



# Agenda for a meeting of the Executive to be held on Tuesday, 6 December 2016 at 10.30 am in Committee Room 1 - City Hall, Bradford

## Members of the Executive – Councillors

<b>LABOUR</b>
Hinchcliffe (Chair)
V Slater
I Khan
Ross-Shaw
Ferriby
Jabar

### Notes:

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
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- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

**From:**

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City Solicitor

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**To:**



## A. PROCEDURAL ITEMS

### 1. DISCLOSURES OF INTEREST

(Members Code of Conduct - Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

*Notes:*

- (1) *Members may remain in the meeting and take part fully in discussion and voting unless the interest is a disclosable pecuniary interest or an interest which the Member feels would call into question their compliance with the wider principles set out in the Code of Conduct. Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (2) *Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (3) *Members are also welcome to disclose interests which are not disclosable pecuniary interests but which they consider should be made in the interest of clarity.*
- (4) *Officers must disclose interests in accordance with Council Standing Order 44.*

### 2. MINUTES

**Recommended –**

**That the minutes of the meetings held on 20 September, 11 October and 8 November 2016 be signed as a correct record (previously circulated).**

(Jill Bell / Yusuf Patel - 01274 434580 434579)



### 3. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Jill Bell / Yusuf Patel - 01274 434580 434579)

### 4. RECOMMENDATIONS TO THE EXECUTIVE

To note any recommendations to the Executive that may be the subject of report to a future meeting. (Schedule to be tabled at the meeting).

(Jill Bell / Yusuf Patel - 01274 434580 434579)

## B. STRATEGIC ITEMS

**LEADER OF COUNCIL & CORPORATE**

*(Councillor Hinchcliffe)*

### 5. PROPOSED FINANCIAL PLAN 2017/18-2020/21

1 - 82

The report of the Director of Finance (**Document “AJ”**) sets out

- initial draft budget and Council Tax proposals for consultation with the public, interested parties, staff and Trade Unions for 2017/18 and 2018/19
- indicative budget plans to 2020/21, to allow the further development of spending proposals to keep the Council effective and financially sustainable.



**Recommended -**

- (1) That Executive, having considered the Council's public sector equality duty as set out in Document "AJ":**
- **Approve for consultation as required with the public, interested parties, staff and trade unions the proposed detailed budget changes for 2017/18 and 2018/19 set out at Appendix C to Document AJ, and any revisions to previous decisions set out in Appendix E and Appendix F to Document AJ**
  - **Approve the proposed non-recurrent spending included in the financial estimates**
  - **Approve for consultation the proposed spending totals for each outcome for 2017/18 and 2018/19, as the basis for a balanced budget**
  - **Approve the proposed use of reserves**
  - **Approve the consultation mechanisms and processes set out in Appendix G to Document "AJ"**
  - **Approve the proposed indicative spending totals for each outcome for 2019/20 and 2020/21 to inform future planning and engagement with stakeholders, the budgets for 2019/20 and 2020/21 to be subject to detailed formal consultation, however, in future budget rounds**
  - **Authorise Strategic Directors to engage with stakeholders to develop draft plans and options for the reforms and changes required to deliver a balanced budget in 2019/20 and 2020/21 as set out in Section 12.**

(Corporate Overview & Scrutiny Committee)

(Stuart McKinnon-Evans - 01274  
432800)





## C. PORTFOLIO ITEMS

### HEALTH & WELLBEING PORTFOLIO & DEPUTY LEADER

*(Councillor Val Slater)*

#### 6. WEST YORKSHIRE LOW EMISSIONS STRATEGY

83 - 160

The report of the Strategic Director of Health and Wellbeing (**Document “AK”**) is to seek adoption of the West Yorkshire Low Emissions Strategy which has been developed by the five West Yorkshire Authorities in conjunction with the West Yorkshire Combined Authority and Public Health England to tackle poor air quality across the region.

**Recommended -**

**That the West Yorkshire Low Emissions Strategy is adopted by the Council.**

(Environment & Waste Management Overview & Scrutiny Committee)

(Ruth Lees – 01274 431349)

#### 7. COMPREHENSIVE HOUSING RENEWAL POLICY

161 -  
222

The report of the Director of Regeneration (**Document “AL”**) presents a progress report on the implementation of the Council’s Comprehensive Housing Renewal Policy and proposals to extend the scope of the Policy to provide an additional form of assistance for residents in order to improve housing conditions within the district.

**Recommended -**

- (1) That the Executive approve Option 1 as set out in Document “AL” for implementation and the appropriate Strategic Directors be authorised to conclude appropriate contractual arrangements for this purpose.**
- (2) That the Comprehensive Housing Renewal Policy set out in Appendix 1 of Document “AL” be approved.**



- (3) **That the appropriate Strategic Director continue to make changes to the Comprehensive Housing Renewal Policy under delegated authority in consultation with the Portfolio Holder with responsibility for Housing.**

(Regeneration & Economy/Health & social Care Overview & Scrutiny Committee)

(Julie Rhodes - 01274 431163)

8. **REGIONALISATION OF ADOPTION SERVICES**

223 -  
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The proposals around the Regionalisation of Adoption were previously presented to the Executive on 19<sup>th</sup> July 2016. The Executive endorsed the proposal that work should begin to develop the establishment of a Regional Adoption Agency and that fuller information regarding this should be presented to the executive in December 2016

The purpose of the report of the Strategic Director of Children's Services (**Document "AM"**) is to inform the Executive on the progress regarding the regionalisation of adoption services and to seek a formal decision regarding the arrangements for the delegation of the adoption service to a Regional Adoption Agency (RAA). The government's adoption reform proposals contained within the Education and Adoption Act 2016 are clear that all local authorities will be part of a RAA or will have delegated their adoption functions to a RAA by 2020.

Bradford has been working in collaboration with other Local Authorities and the Voluntary Adoption Alliance (VAA) throughout the Yorkshire and Humber region to create a new model of service delivery for adoption services in line with the government's agenda. This report provides the up to date position on the plans for Bradford's Adoption Service to transition to the new arrangements and to seek a decision to delegate the adoption service function to a shared service between the 5 West Yorkshire authorities with the appointment of a Joint Committee to oversee the arrangements

**Recommended -**

- (1) **That the Executive to endorse the arrangements for the new Regional Adoption Agency and make the following decisions;**
- (2) **That the Executive formally appoint the Joint Committee with effect from the 10<sup>th</sup> January 2017 and contingent upon all other authorities also agreeing to appoint to the Joint Committee.**



- (3) That the Executive approve the Constitution, Terms of Reference and Procedure Rules of the Joint Committee (Appendix 1a, b and c).**
- (4) That the Executive note that the Leader will appoint a Principal and two Elected Members to the Joint Committee as substitutes.**
- (5) That the Executive note the principles of the partnership agreement as set out in Section {7} and the process for setting the budget as set out in section [3.20] of this report and authorise the Director of Children’s Services to approve the Regional Adoption Agency funding formula and terms and signature of the partnership agreement through their existing delegated powers.**
- (6) That the Executive note that the Joint Committee will delegate responsibility to the Director of Children’s Services of the Lead Agency for the recruitment and assessment of adopters, adoption panels, family finding and adoption support.**
- (7) That the Executive note the transfer of staff via TUPE from Bradford into the employment of Leeds City Council to work within the RAA.**
- (8) That the Executive formally agree that Leeds City Council hosts the West Yorkshire Adoption Agency that is a shared service and that the name of the Agency is One Adoption West Yorkshire.**
- (9) That the Executive note the creation of an organisational unit within Leeds City Council for the West Yorkshire Adoption Agency. The lead officer for this will be the Director of Children’s Services for Leeds and the unit will sit within Children’s Services.**
- (10) That the Executive note that this report discusses further work required regarding non agency adoption and support for special guardians and therefore seeks agreement from the Executive that the Director of Children’s Services can make further arrangements for extending the breadth of the**



delegation to this aspect of the function following agreement by the management board and Joint Committee as the project develops and

- (11) That the Executive authorises the Director of Children's Services to progress with the other local authorities in order to implement the Regional Adoption Agency.

(Children's Services Overview & Scrutiny)

(Jim Hopkinson - 01274  
432904)

**EDUCATION, EMPLOYMENT & SKILLS  
PORTFOLIO**

*(Councillor I Khan)*

9. **UPDATE ON PUPIL PLACE PLANNING ACROSS THE DISTRICT AND REQUEST TO ALLOCATE BASIC NEED FUNDING TO SEVERAL SCHOOL EXPANSION SCHEMES** 249 - 260

The report of the Strategic Director of Children's Services (**Document "AN"**) asks the Executive to:

- Note the need for additional school places across the District.
- Support the expansion of Immanuel College's and Ilkley Grammar Schools by the allocation of Basic Need funding to allow the Council expand the schools.

**Recommended -**

**To approve the allocation of Basic Need and S106 Funding to the expansion of Immanuel College and Ilkley Grammar School.**

(Children's Services Overview & Scrutiny Committee)

(Judith Kirk - 01274 431078)



## REGENERATION, PLANNING & TRANSPORT PORTFOLIO

*(Councillor Ross-Shaw)*

### 10. KEIGHLEY TOWN CENTRE TRAFFIC MANAGEMENT MEASURES

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At its meeting on 8 March 2016 the Executive approved a strategy for short, medium and long term improvements to assist traffic flow around Keighley Town Centre and complement regeneration opportunities of key development sites.

The report of the Strategic Director of Regeneration (**Document "AO"**) updates Executive on progress and the current position of the project and seeks the delegation of decisions needed to progress and implement the works to the strategic director of regeneration.

#### **Recommended –**

- (1) That the Strategic Director of Regeneration, in consultation with the Portfolio Holder (Regeneration, Planning and Transport), be given delegated authority pursuant to Article 14.20 of the Constitution to:**
  - (a) progress and approve the detailed design of the short, medium and long term schemes and undertake appropriate consultation including with the relevant Area Committees;**
  - (b) undertake negotiations with landowners to secure by private treaty the timely acquisition and internal appropriation of land required for the implementation of the scheme;**
  - (c) undertake negotiations with leaseholders of Council owned land affected by the scheme with a view to securing surrender of any extant leases;**
  - (d) as may be required, secure the procurement of specialist external services having regard to the Council's Contract Standing Orders and EU procurement legislation in order to advise the Council on matters relating to the delivery of the proposals;**
  - (e) advertise any necessary legal orders required to facilitate the delivery of the strategy and to make any necessary applications to seek planning permission. Any objections to be referred to the Keighley Area Committee;**



(f) **approve the implementation of the works.**

(Environment & Waste Management Overview & Scrutiny Committee)

(Richard Gelder - 01274 437603)

11. **BRADFORD DISTRICT LOCAL FLOOD RISK MANAGEMENT STRATEGY**

269 -  
404

The report of the Strategic Director of Regeneration (**Document “AP”**) seeks Members to adopt the Local Flood Risk Management Strategy (LFRMS). As Lead Local Flood Authority (LLFA), the City of Bradford Metropolitan District Council is required under Section 9 of the Flood and Water Management Act (FWMA) 2010, to develop, maintain, apply and monitor a strategy for local flood risk management – a “Local Flood Risk Management Strategy” (LFRMS). The strategy must detail the risk management authorities and the functions that they can exercise within the Bradford Lead Local Flood Authority area, assess local flood risk, the objectives for managing that risk and measures proposed to implement those objectives.

The FWMA requires the LFRMS to demonstrate how it contributes to the achievement of wider environmental objectives. To fulfil our legislative requirements a Strategic Environmental Assessment (SEA) of the LFRMS was commissioned. The Draft SEA states that there are no negative environmental effects identified from the LFRMS objectives and that many of the proposed LFRMS objectives have the potential for both direct and indirect environmental benefits.

The LFRMS (attached as Appendix 1) is an all-encompassing or umbrella document for the implementation of the FWMA, which sets out how the LLFA intend to fulfil the requirements of the FWMA and who (within the council) will be responsible for the different areas. It will therefore act as a tool to deliver the benefits of well managed and hence reduced flood risk to people, properties and the wider environment of Bradford District.

**Recommended –**

**Executive is recommended that the Local Flood Risk Management Strategy (LFRMS) be adopted, and that delegated authority is given to the Strategic Director for Regeneration to amend the LFRMS as a result of the consultation on the Strategic Environmental Assessment (SEA), and following consultation with the Portfolio Holder for Regeneration, Planning and Transport.**

(Environment & Waste Management Overview & Scrutiny Committee)

(Chris Eaton - 01274 432483)



## Report of the Director of Finance to the meeting of Executive to be held on 6 December 2016

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**AJ**

### Subject:

Proposed Financial Plan 2017/18-2020/21

### Summary

This report sets out

- initial draft budget and Council Tax proposals for consultation with the public, interested parties, staff and Trade Unions for 2017/18 and 2018/19
- indicative budget plans to 2020/21, to allow the further development of spending proposals to keep the Council effective and financially sustainable.

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Stuart McKinnon-Evans  
Director of Finance

**Portfolio:**

**Leader of Council**

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**Overview & Scrutiny Area:**

**Corporate**



## **1. SUMMARY**

This report sets out

- initial draft budget and Council Tax proposals for consultation with the public, interested parties, staff and Trade Unions for 2017/18 and 2018/19
- indicative budget plans to 2020/21, to allow the further development of spending proposals to keep the Council effective and financially sustainable

## **2. MAIN MESSAGES**

This report makes proposals about the Council's revenue and capital spending plans from 2017/18 to 2020/21. For the first time, the Council is publishing a financial plan which shows how the estimated revenue budget deficit over 4 years will be closed.

The plan is the financial component of the Council Plan 2016 - 2020, and aligns resources with priorities.

It reflects the purposes, priorities and ambitions set out in the Council Plan. The proposals seek to reconcile the contradictions between: citizens' expectations and requirements for services and the Council's ambitions to do the right things for the District; statutory and other obligations; and the money available.

The plan is borne out of an extensive process of outcome-led planning, which focussed on the level of investment the Council intends to make in the activities and services which are most effective in delivering the Council's priorities.

The report makes detailed proposals, for consultation, about spending in 2017/18 and 2018/19.

For 2019/20 and 2020/21, it indicates the level of affordable spending on Council priorities, and signals the need for continuing engagement with stakeholders in developing plans and proposals for those years.

## **3. ALIGNING RESOURCES TO PRIORITIES**

The Council's investment plans are focussed on people, places and delivering progress and not Council departments. The proposals are aligned to the priority outcomes and activities identified in the Bradford District and Council Plans as the areas where investment, improvements and progress will make the biggest difference to the District's future well being and prosperity.

Those priority outcomes are summarised at Figure 1.



## Figure 1 – The Council’s Priority Outcomes



The Council has been talking to people and partners about what matters most and the part they can play in delivering shared priorities. What has emerged is a broad consensus that Bradford, as the youngest city in the UK, should offer all our young people the chance to access good education, skills and employment and to realise their potential. The Council’s overriding determination to work with others to ensure this is the case cuts, across our proposals for every priority outcome.

## **4. MAKING OUR INVESTMENT CHOICES**

- 4.1 The Council has to look ever more closely at the ways in which it uses resources in order to maximise their impact on priorities. All services have to examine how they can change the way they do things, increase efficiency, work collaboratively with others and develop creative solutions to the District's challenges. Business as usual is not an option and this is reflected in our investment planning which demands significant changes in all aspects of our work.

Making the most effective investments with diminishing resources inevitably means that some areas of activity will no longer be viable in their current form. Some will have to be scaled back or cease entirely. Even priority activities will see budget reductions and will have to be run differently.

## **4.2 OUTCOME-LED PLANNING AND BUDGETING PROCESS**

The proposed spending plans are the result of an extensive and iterative process of reviewing and planning across all Council services. The process:

- Identified the most important results (outcomes) that the Council seeks to achieve to deliver its headline priorities
- Reviewed the activities the Council currently undertakes in pursuit of those results, to see which are the most effective, which activities can be reshaped to deliver the same or better results, and which activities can be curtailed
- Identified unavoidable liabilities
- Assessed the deliverability and acceptability of possible changes from the status quo
- Identified the level of resources that can be afforded for each outcome.

The result of this process is the proposed budget – the net expenditure the Council will incur each year.

The Council Plan 2016/20 provides more information about how resources will be prioritised on the things that will have the biggest positive impact on the district and citizens over the next four years.

For reference, Appendix A summarises how Council functions relate to the outcomes.

## **5. CONTEXT FOR THE PROPOSED FINANCIAL PLAN**

- 5.1 The proposals have been developed in a very challenging financial environment. Budgets continue to shrink as the Government reduces its financial support to local authorities. Yet demand for services, particularly for social care, is increasing each year and costs keep rising.

The Council retains hugely important responsibilities relating to the care of vulnerable children and adults. Meeting the cost of these responsibilities inevitably limits the resources available for investment in other services and activities. Decisions have to be made about **Page 14** invest resources to make the biggest

difference to our priority outcomes.

Over the last six years the Council has budgeted for more than £250m in savings and increased Council tax. This proposed plan shows that further savings of £81.6m will be required, after taking account of taxation increases, the net effect of changes in specific grants, and the consequences of inflationary and demographic pressures on the costs of services.

## 5.2 **Medium Term Financial Outlook**

The proposed spending represents a balanced financial plan over 4 years, closing the revenue budget gap identified in the Medium Term Financial Strategy (MTFS). The MTFS estimates:

- the changes in funding relating to taxation, specific grants, and locally paid fees and charges
- the impact on the current (“baseline”) budget of inflation, demographic demand for services, past budget decisions, government policy changes, and service-specific factors
- the resultant revenue account deficit that needs to be closed by budget decisions.

The assumptions in the Medium Term Financial Strategy approved by Council on October 18 2016 have been refreshed to reflect the latest intelligence on inflation, the demographic impact on the demand for adult social care services and for Looked After Children.

Further commentary on the financial context is provided at Appendix B.

## 5.3 **Government Fiscal Policy and Autumn Statement**

The Chancellor’s Autumn Statement confirmed that he will leave unchanged for now the fundamental government departmental spending plans set in the 2015 Spending Review. He announced an increase the National Living Wage, which is consistent with our proposed financial plan. He also announced investment in transport and digital infrastructure which may, once details are unveiled, increase capital spending in the District.

## 5.4 **Key Challenges and Ambitions**

As the balance of funding for local services shifts from Government to the Council, improving quality of life and sustaining local services will increasingly rely on our collective ability to reduce dependency on high cost care services and expensive interventions, to collaborate across organisational boundaries, and to generate inclusive economic growth in which everyone can share. In these ways we can maximise the resources for other services and infrastructure.

In particular, we have to capitalise on our youth, energy and vitality by making sure that our young people are connected to economic opportunities. Bradford’s future

well-being and prosperity depends on success in providing our young people with access to good education, skills and jobs so they can be productive citizens.

## **5.5 Managing the Costs of Care**

The costs of both adults and children's social care are increasing as a result of rising prices but also growth in the numbers of older and younger people and people who have disabilities. The proposed financial plan assumes that by 2020/21 demographic changes add £14.6m to annual costs, in the absence of mitigating action.

To reduce the escalating costs of adult care services we have to work with individuals, families and partners to shift resources and emphasis from high cost models of care to helping people to stay well throughout their lives and intervening earlier when people have problems. The proposed plan is to ensure that the care people receive is appropriate to their needs, by promoting ways of helping them to remain independent. More people will be supported to live in extra care housing rather than institutions like residential and nursing homes.

Health and care services need both acute services and those that keep people out of hospital and improve quality of life. Effective working with health services to create an integrated system that supports peoples' health, well-being and care across the District will be critical to designing services that work more effectively.

Public health spending has been comprehensively reviewed. The proposals signal a shift in investment from traditional clinical models of delivery to the prevention of illness and support for well-being, particularly in the early years of life which is the key to reducing future demand and sustaining good lifelong outcomes.

Bradford compares well to similar cities in terms of the proportions of children who enter care but the overall numbers are rising as a result of an increasing population. The re-direction of some public health funding into early support for children and families will allow us to invest in the future of our children through the development of a comprehensive and District wide early help system, aimed at reducing the numbers of children who enter the care system, improving their quality of life and ultimately their life chances.

Other measures that we are proposing to implement include increasing our capacity to care for children within the District, assessing fostering fees against the benchmarks of comparable authorities, and securing Government funding to support innovation around looked after children and disabled children with complex care needs.

## **5.6 Supporting Our Children and Young People**

Realising the full potential of all our children and young people means providing appropriate support at all stages of their development and our proposals prioritise our available resources to that end from the earliest stages of life. The plans will ensure that the Council both meets its mandatory duties and supports and empowers parents, provides quality information and advice, and targets the most

vulnerable and disadvantaged so that all our children can start school in good health and ready to learn.

While schools themselves are leading the school improvement agenda, the Council will make sufficient resources available to ensure that all children have a school place and that the learning needs of vulnerable children are met. Strong relationships with education leaders will enable us to influence collaboration between schools. An estimated £570m of funds flow to the District's schools through the Dedicated Schools Grant (DSG) and related grants. Of this, some £420m is within the scope of the Council's accountable resources, with the remaining £150m going to academies – this proportion will change if more schools convert to academies. The Council will advocate for children and promote the development of all schools as community facilities. Council investment will also enable us to promote actively the Education Covenant that sets out the things that everyone can and should do to improve educational achievement.

The Council will maintain a youth service targeted at those individuals and groups where it can make the most difference and this will be integrated into a wider range of support for young people including youth offending, and early help services promoting healthy lifestyles and choices. The Council's direct contributions will complement the wide ranging work with young people that is undertaken by the voluntary and community sector.

We will continue to collaborate with schools and business to deliver employment focussed skills and education meeting the needs of our employers.

Resource constraints and our legal and moral obligations means that the primary focus for the delivery of services has to be on those children, young people and families who are most vulnerable and at risk and in greatest need of support. Overall, the Council's role will be prioritised to early years and post 16 activity with targeting of inequalities and the most vulnerable and those furthest from the labour market. We will continue to advocate and influence on behalf of all our children, ensuring support is there when it is needed.

Our commitment to keep investing in the well-being of children and young people, which requires interventions to reduce poverty, target children in their early years of life, improve education, support economic opportunity and develop productive and active citizens, means that larger budget reductions have had to be proposed for other areas of activity than might otherwise have been the case.

## **5.7 An Inclusive Economy**

Bradford has a globally connected £9.2 billion economy sitting at the heart of the northern economy and characterised by an entrepreneurial spirit, a significant manufacturing sector and a cultural offer with international appeal. It has latent potential which Council leadership and investment can unlock, working with businesses and communities.

If the economy is to work for everyone, we need to secure investment in the development of people as well as physical infrastructure. Our priorities include developing a skilled and flexible workforce, supporting business start-ups and

attracting investment, expanding digital and transport infrastructure including lobbying hard for a high speed rail stop and promoting the District to potential investors, visitors and workers. However, investment in the early years of life and in helping people to keep themselves well and active should also play an important part in delivering inclusive growth.

Bradford faces complex challenges but it is also home to significant assets including a rapidly growing, highly entrepreneurial and globally connected economy with high levels of exports, a strong manufacturing sector and a burgeoning and innovative digital industry. Further and higher education is strong and the University has advanced rapidly in recent years. We have a vibrant cultural offer with a visitor economy worth £550m a year.

## **5.8 Taking Account of All our Resources**

Working together with individuals, families, communities and each other, our public services, voluntary and community sector and businesses can achieve far more than any single organisation working alone. So, we must harness all the District's resources in pursuit of our shared objectives.

Our greatest success stories are down to the people and organisations working closely together and pooling resources in pursuit of shared goals; Born in Bradford, our multi-agency programme to reduce infant mortality; Better Start Bradford working with families and young people, the development of a digital health enterprise zone; Get Bradford Working; Industrial Centres of Excellence; securing additional resources for school places, city centre regeneration, bringing the national museum of Rugby League to Bradford – all these are fine examples of what can be achieved through collaboration.

The voluntary and community sector has been adversely affected by reductions in public spending yet it continues to represent a significant resource. We will carry on working closely with our not-for-profit partners, supporting them where appropriate to transition to new arrangements, and making the best use of their expertise in our own reforms.

The Council has looked to ensure that our proposals recognise all of the District's resources and assets wherever they are, for example, our schools, health services, the Police, parish councils and community groups. The aim is that our activities and investments across the District complement and support each other, that work is not duplicated and that, where possible, if the Council has to reduce or cease activity then it does so in the knowledge that there continues to be some level of capacity across the District albeit reduced.

Some of the changes proposed will depend on support from communities and businesses in order to succeed. More of us will need to be actively involved in helping to run local facilities, playing our part in improving education and keeping communities safe and clean, recycling recoverable materials, properly looking after our health or in working to provide apprenticeships, jobs and skills and to attract investment.

## 5.9 **Leading, Influencing and Negotiating**

The Council's ability to lead, influence and negotiate across all types of relationships, both within the District and looking outwards, is going to assume increasing importance in delivering improvements in quality of life and in attracting investment to generate the inclusive and sustainable economic growth that the District needs.

The activity of other organisations will often have greater direct impact on local outcomes than that of the Council but we will not abdicate responsibility for those outcomes or simply sit back and watch events unfold. Public opinion tells us that local people value the Council's role as the District's democratically accountable leader and advocate, holding others to account while supporting them to succeed.

We will use our unique position to influence, support and work collaboratively with communities, businesses and public services. Together we will work to promote the District to external partners, investors and the talented people that we want to live and work here as an attractive place where ambition, fairness and opportunity are valued, culture celebrated and effort and enterprise rewarded.

We will use our role as a local commissioner of services and consumer of goods to secure social value delivering wide social, economic and environmental benefits to the District.

The Council will deliver strong and vocal leadership, promoting the District's interests and what it offers to regional and national economies to ensure that it gets the resources, opportunities and investment in social and physical infrastructure it requires to prosper and be in greater control of its own destiny. We will position Bradford at the heart of the northern economy and the inclusive growth agenda, making collaboration with others work in the District's interests.

Accordingly, the proposals allow the Council to retain an effective, democratically accountable leadership supported by right-sized functions developing the right policies, commissioning the right services, and influencing others to achieve shared ambitions.

## 6. **PROPOSED SPENDING LEVELS FOR 2017/18 TO 2020/21**

### 6.1 **Revenue Spending**

This budget sets out proposed and indicative spending plans from 2017/18 to 2020/21.

For 2017/18 and 2018/19, the proposed total spending level by outcomes, and the associated detailed proposed changes from current spending, are recommended for formal consultation, in order that Council in February 2017 can set a firm budget for 2 years.

For 2019/20 and 2020/21, indicative planning totals of the budget for each overarching outcome are shown, together with a commentary on the principal changes and reforms that the Executive are advised could be necessary to ensure

a balanced financial plan to 2020/21 (see Section 12). These potential reforms are not proposed to be subject to formal consultation in this budget round. However, we wish to begin, and in some cases continue, discussion with stakeholders to develop options in preparation for setting detailed budgets in future budget rounds.

This approach enables the Council to have a rolling 2 year firm budget and a rolling 4 year indicative spending plan.

Proposed and indicative gross and net revenue pending by outcome in each year is summarised in Tables 1a and 1b.

**Table 1a – Planned Gross Spending by Outcome**

	Current	Proposed for		Indicative for Further	
	Gross	Consultation		Development	
	2016/17	2017/18	2018/19	2019/20	2020/21
	£m	£m	£m	£m	£m
Better health better lives	449.2	438.5	435.0	435.1	431.5
A great start and good schools for all our children	507.6	506.9	506.4	503.0	500.3
Better skills, more jobs and a growing economy	96.3	93.2	91.3	89.9	88.7
Decent homes that people can afford to live in	3.5	3.5	3.5	3.6	3.7
Safe, clean and active communities	63.9	62.2	61.8	61.5	61.2
A well-run Council	92.8	88.3	86.9	86.8	85.1
Non service, fixed and unallocated	52.3	68.0	63.8	61.6	59.0
<b>Total</b>	<b>1,265.6</b>	<b>1,260.6</b>	<b>1,248.7</b>	<b>1,241.5</b>	<b>1,229.5</b>

**Table 1b – Planned Net Spending by Outcome**

	Current Net	Proposed for		Indicative for Further	
	Budget	Consultation		Development	
	2016/17	2017/18	2018/19	2019/20	2020/21
	£m	£m	£m	£m	£m
Better health better lives	179.1	167.1	155.4	148.5	145.0
A great start and good schools for all our children	20.4	19.7	19.1	15.7	12.9
Better skills, more jobs and a growing economy	47.3	44.0	42.0	40.5	39.1
Decent homes that people can afford to live in	2.9	3.0	3.0	3.0	3.1
Safe, clean and active communities	40.7	38.9	38.5	38.2	37.8
A well-run Council	59.8	55.2	53.8	53.6	51.9
Non service, fixed and unallocated	27.9	49.2	51.2	51.6	48.9
<b>Total</b>	<b>378.1</b>	<b>377.1</b>	<b>363.0</b>	<b>351.1</b>	<b>338.7</b>

Further details on how the proposed and indicative spending plans lead to a balanced revenue budget are shown in Table 2 below.



**Table 2: Summary Medium Term Financial Position 2017/18 – 2020/21**

**CUMULATIVE FOUR YEAR FORECAST**

	<b>2017-18 Forecast £'000</b>	<b>2018-19 Forecast £'000</b>	<b>2019-20 Forecast £'000</b>	<b>2020-21 Forecast £'000</b>
<b>NET EXPENDITURE</b>				
2016/17 Base Budget	378,045	378,045	378,045	378,045
Reversal of non recurring investment	(1,478)	(2,643)	(2,643)	(2,643)
Full Year effect of recurring pressures	1,200	1,200	1,200	1,200
<b>Sub total</b>	<b>377,767</b>	<b>376,602</b>	<b>376,602</b>	<b>376,602</b>
<b>FUNDING CHANGES (as per Table 7)</b>	<b>1,350</b>	<b>832</b>	<b>(2,210)</b>	<b>(2,094)</b>
<b>INFLATION</b>	<b>15,997</b>	<b>25,479</b>	<b>36,172</b>	<b>49,506</b>
<b>Basic Net Expenditure Requirement</b>	<b>395,114</b>	<b>402,913</b>	<b>410,564</b>	<b>424,014</b>
Demographic Pressure in Adults	2,934	5,927	8,979	12,094
Adult Social Care costs funded by existing BCF	4,189	4,189	4,189	4,189
Children's demographic pressure	625	1,250	1,875	2,500
Apprenticeship levy	1,000	1,000	1,000	1,000
One off pressures	1,005	0	0	0
Transitional funding	(745)	(980)	(980)	(980)
Public Health reduction in expenditure due to grant cut	(1,085)	(2,201)	(3,288)	(3,288)
Termination costs	8,842	4,500	4,500	4,500
Transformation Fund	2,500	2,500		
2016/17 Budget decisions	(24,263)	(24,263)	(24,263)	(24,263)
Amended 2016/17 Budget Decisions	5,653	5,653	5,653	5,653
Replacement 2016/17 budget decisions for consultation/amendment	(4,615)	(5,055)	(5,055)	(5,055)
New Budget proposals for 2017/18 and 2018/19 for consultation	(13,990)	(32,382)	(32,382)	(32,382)
Indicative savings required for 2019/20 and 2020/21 to achieve a balanced budget	0	0	(19,706)	(49,271)
<b>Net Expenditure Requirement</b>	<b>377,164</b>	<b>363,051</b>	<b>351,086</b>	<b>338,711</b>
<b>RESOURCES</b>				
Localised Business Rates	(72,097)	(76,238)	(77,763)	(79,318)
Top Up Business Rate Grant	(58,162)	(59,877)	(61,791)	(63,645)
Revenue Support Grant	(62,849)	(48,539)	(34,054)	0
Use of Reserves	(16,790)	(3,486)	5,422	(4,500)
Council Tax Income	(167,266)	(174,911)	(182,900)	(191,248)
<b>Total Resources</b>	<b>(377,164)</b>	<b>(363,051)</b>	<b>(351,086)</b>	<b>(338,711)</b>
<b>Budget Shortfall</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Memorandum</b>				
Council tax base	134,255	135,005	135,755	136,505
Council Tax Band D (proposed 3.99% increase †)	£1245.88	£1,295.59	£1,347.28	£1,401.03

† includes 2% social care precept

## 6.2 Capital Spending

The Council's existing Capital Investment Plan totals £264m over 4 years, including items brought forward in the existing plan and investment requirements which have emerged during 2016/17. The plan is revised on a quarterly basis, to reflect rescheduling of expenditure and new expenditure funded by the receipt of capital grants.

For the purpose of this budget consultation round, additional items are proposed as indicated in Table 3 below, totalling £11/10/10/10m.

**Table 3 – Capital Investment Plan 2017-2021**

### SUMMARY - CAPITAL INVESTMENT PLAN 2017-2021

	2017-18 £'000s	2018-19 £'000s	2019-20 £'000s	2020-21 £'000s
<b>Service</b>				
Adult & Community Services	14,951	3,914	1,313	0
Childrens Services	26,820	16,460	1,045	0
Environment & Sports	25,205	6,919	16,726	3,000
Estates & Property Services	1,893	0	0	0
Economic & Development Services	34,573	10,129	6,942	0
Planning, Highways & Transport	10,529	43,814	0	0
Reserves & Contingencies				
General Contingency	2,000	2,000	2,000	2,000
Wyke Manor Sports Facility	493	0	0	0
Essential Maintenance	2,000	2,000	2,000	2,000
Bradford City Centre Townscape Heritage	2,750	0	0	0
Depot Strategy	0	3,000	0	0
Bereavement Strategy	0	17,000	0	0
<b>Previously Approved Total</b>	<b>121,214</b>	<b>105,236</b>	<b>30,026</b>	<b>7,000</b>
<b>New Items</b>				
Strategic Acquisition - Investment Property	10,000	10,000	10,000	10,000
School Meals Central Production Unit	750	0	0	0
Canal Road Land Assembly	0	450	0	0
Customer Services Strategy	250	0	0	0
<b>Proposed Revised Total</b>	<b>132,214</b>	<b>115,686</b>	<b>40,026</b>	<b>17,000</b>

## 7. PROPOSED CHANGES FROM CURRENT BUDGETS AND SERVICE LEVELS

The proposed budget signals changes from the baseline budget and from current service levels. The total changes are shown in Table 4.

**Table 4 – Changes to current budget by outcome (cumulative basis)**

	2017/18	2018/19	2019/20	2020/21
	£'000	£'000	£'000	£'000
Better health, better lives	11,028	22,191	32,479	47,458
A great start and good schools for all our children	458	1,077	4,918	8,215
Better skills, more jobs and a growing economy	1,775	4,197	6,714	9,480
Decent homes that people can afford to live in	32	76	76	76
Safe, clean and active communities	100	1,490	2,863	4,707
A well-run Council	597	3,351	5,038	8,986
Non service, fixed and unallocated	0	0	0	2,731
<b>Total *</b>	<b>13,990</b>	<b>32,382</b>	<b>52,088</b>	<b>81,653</b>

*\*Please note totals may not add up due to rounding*

The detailed proposed changes for each service affected for 2017/18 and 2018/19 are itemised at Appendix C. These proposed changes are the subject of formal consultation in this budget round.

Decisions made by Budget Council in February 2016 which affect 2017/18 totalled £24.3m (Appendix D).

It is proposed that five of these decisions, totalling £5.65m in savings, will be amended and replaced by new and amended proposals. Appendix E details those which require new consultation. Appendix F details amended proposals which do not require consultation as they reflect just a reduction in the original savings target.

## 8. NON-RECURRENT SPENDING

The proposed budget includes non-recurrent spending on

- Implementing change: £5m in total has been included to support implementation. This fund will be used to support the delivery of those changes which are more complex, higher risk, and where additional, temporary resource is required
- Restructuring costs, principally to meet potential employee and contract termination costs. The proposed budget includes £22.3m.

## 9. USE OF RESERVES

The balanced plan is achieved partly through the use of existing reserves. Proposed movements in reserves are summarised in Table 5.

**Table 5 – Proposed Use of Reserves**

	2017/18 £'000	2018/19 £'000	2019/20 £'000	2020/21 £'000	Total
Use of Reserves per Table 2	(16,790)	(3,486)	5,422	(4,500)	(19,354)
Pre agreed use of reserves	(355)	(120)	(120)		(595)
Redundancy costs	(8,842)			(4,500)	(13,342)
Transformation costs	(2,500)	(2,500)			(5,000)
To close budget gap	(5,093)	(866)			(5,959)
Forecast replenishment of reserves			5,542		5,542
	(16,790)	(3,486)	5,422	(4,500)	(19,354)
Pre agreed use of reserves					
Transitional Fund	(235)				(235)
Financial Services Vat reserve	(120)	(120)	(120)		(360)
	(355)	(120)	(120)		(595)
Proposed redirection of earmarked reserves	Redundancy	Transformation	To close Gap	Reserves replenished	Total
Managed severance reserve	(4,093)				(4,093)
Repairs and renewals reserve	(3,449)	(1,511)	(2,610)		(7,570)
Waste collection and disposal reserve			(2,026)		(2,026)
Transformation programme		(124)			(124)
Care Act reserve	(1,300)	(1,700)	(1,323)		(4,323)
Culture company		(100)			(100)
Art Fund		(12)			(12)
Customer services strategy reserve		(750)			(750)
Facilities Management service improvement reserve		(515)			(515)
Business support centre reserve		(72)			(72)
District elections reserve		(216)			(216)
2020/21 redundancy funded through surplus in 2019/20	(4,500)				(4,500)
Replenishment of reserves in 2019/20				5,542	5,542
	(13,342)	(5,000)	(5,959)	5,542	(18,759)

## 10. TAXATION

The proposals assume Council Tax will rise by 3.99% annually, comprising a 2% annual increase to fund social care costs, and 1.99% increase in the basic Council Tax.

The increases equate to additional funding each year of c £6.7m each year.

## **11. IMPACT ON EMPLOYMENT LEVELS**

The new budget proposals for 2017/18 and 2018/19 will reduce staffing levels. Current estimates are that 118 full-time equivalent posts in 2017/18 and a further 107 in 2018/19 will be removed as a result. These figures are additional to the 139 FTE post reductions set out in last year's budget proposals, and subsequently amended during consultation to 191.

## **12. THE NEED FOR CONTINUING REFORM IN 2019/20 and 2020/21**

The indicative financial plan for 2019/20 and 2020/21 shows net spending continuing to reduce necessitating further savings in 2019/20 of £19.7m rising to £49.0m in 2020/21 on top of those proposals included for consultation. Although no proposals are being presented for formal consultation, the conclusions of the outcome-based planning process are that further changes and reforms will be required to enable the Council to remain financially sustainable.

Some of these changes will flow from the continuation or extension of the specific proposals for 2017/18 and 2018/19. Other suggested changes are not presaged by the detailed budget. In due course they will require development for the purposes of consultation. Below, in the interests of transparency, we set out the functions and activities that will need to be reviewed.

### **12.1 Great Start Goods Schools**

In the next two years, education services provided by the Council will be reshaped as consequence of reductions in the Dedicated Schools and Education Services Grants. Beyond that, it is likely that further changes will be required to ensure available funds are targeted at the most effective school improvement activities. We will continue to engage with our stakeholders on these reforms which are fundamentally changing the role of the local authority.

The longer term intention for early years is to review our delivery of early help services for children and young people, and to develop a coherent pathway. This review will look at a range of services including those within the Council - for example, School Nursing and Health visiting, Early Help including Family Centres, and Early Years including Children's Centres. We will be working with partners to also look at how services not directly delivered by the Council can fit within this offer. This is the right direction from a pedagogical and pragmatic perspective. We will collaborate with stakeholders to develop options, so that, subject to consultation, the remodelled services will be ready for commissioning by 2019. The next phase of development for the functions carried out by Children's Centres will be part of the combined services (following the end of the current arrangements in July 2019).

### **12.2 Better Health Better Lives**

The Council currently commissions welfare advice services, and will review their scope and size before 2020/21. Diminishing overall funds will require a re-think with our partner organisations to strike the right balance between building capacity for people to support themselves and meeting individuals' direct needs. In addition,

we will keep under review the level of public health-grant funded expenditure on other services including health checks and dementia services, within the context of related NHS funding.

As part of the wider redesign of adult services and health services, under the concept of integrated accountable health and care services, we intend to review, for 2019/20, the out of hospital care programme, including how temporary accommodation is provided to people who are homeless on discharge from hospital.

### **12.3 Safe Clean and Active Communities**

Although there are no additional changes to the Youth Service for the next 2 years, our planning concludes there is a need to move to a more integrated area-based approach to prevention and early intervention for young people. This approach will be designed in conjunction with Youth Offending and Families First services, and applies youth work methodology and skills to a wide “Early Help” offer across the District.

### **12.4 Better Jobs, More Skills and a Growing Economy**

We need to establish a sustainable future for our museums and galleries. Our planning indicates that the Council will not be able to afford its current level of spending on these attractions. We wish to engage with potential partners to consider how additional sources of funding can be secured, or how alternative operating arrangements can be put in place.

The Council needs to establish a sustainable future for our library service. Our planning indicates that the Council will not be able to afford its current level of spending on its library service. We will wish to engage with potential partners to consider how additional sources of funding can be secured, or how alternative operating arrangements can be put in place, including the extension of the community managed libraries and the hybrid models of library management.

### **12.5 Using Resources Wisely**

By 2020/21 the Council, through its digital strategy, will be using more automated, self-serve, app-based and on-line services for the public. In addition, we will need an ambitious cost-reduction plan for the Council’s technology services, which will also reflect the move to a smaller organisation over time. To this end we will engage with staff and customers about continuing to digitise our services, at the same time as reducing overall technology and other costs.

We will continue to monitor the consequences of Brexit for current EU funding streams, and take every opportunity to influence and make the most of successor arrangements.

### **13. ONGOING BUDGET ENGAGEMENT AND CONSULTATION**

The Council has duties to consult on the budget proposals for 2017/18 and 2018/19. The consultation is to understand people's views, which can be conscientiously taken into account in finalising the budget in February. It is also an opportunity to increase public understanding of the scale of the financial challenge and why difficult decisions need to be made.

The consultation commences on publication of this report. Pro-active consultation activity will commence following this Executive meeting on 6 December 2016. This activity will then continue until 12 February 2017, the day before papers for the Executive meeting on 21 February are published.

Consultation will take place through discussion at events (some facilitated by partner organisations), on-line, via social media, and by direct mailing, as well as specific consultation where appropriate.

Further detail on the consultation approach is provided at Appendix G.

### **14. RISK MANAGEMENT**

The principal risks to the proposals are:

- 2016/17 financial performance may show that there are structural recurrent deficits in the baseline budget, which will need to be dealt with before the final budget is set in February, particularly in relation to social care. At the mid-year, the risk of a £6m overspend was reported. The proposed budget assumes that this risk will be fully mitigated
- The Local Government Settlement (expected in late December) may imbalance the financial plan, either through changing the actual forecast flow of specific grants, or by requiring revisions to the assumptions underpinning the forecasts. The Council has agreed a 4 year deal with DCLG over the level of RSG, which partly eliminates the risk
- Economic signals are that inflation may begin to rise. It is not expected that public sector pay will rise further than forecasts, but suppliers and households could be affected, which diminishes their real-terms resources
- Consultation outcomes may mean that specific proposals cannot be delivered or need recasting.

### **15. LEGAL APPRAISAL**

15.1 The Council must comply with all legal requirements and local agreements to consult on proposals to change or withdraw services before the Council is asked to make any final decisions.

15.2 The legal requirements for a proper consultation exercise are as follows –

- Consultation must be at a point when proposals are at a formative stage.

- Sufficient reasons for the proposals must be given to allow intelligent consideration and response
- Adequate time must be given for a response
- The product of the consultation must be conscientiously taken into account before the decision is made.

15.3 Section 149 of the Equality Act 2010 (the public sector equality duty) provides that:

- (1) A public authority must, in the exercise of its functions, have due regard to the need to -
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
  
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
  
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –
  - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
  - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
  
- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
  
- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to –
  - (a) tackle prejudice, and
  - (b) promote understanding.
  
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
  
- (7) The relevant protected characteristics are -



age;  
disability;  
gender reassignment;  
pregnancy and maternity;  
race;  
religion or belief;  
sex;  
sexual orientation.

Officers have prepared equality impact assessments on the proposals to assist elected members in having regard to this duty.

- 15.4 Section 3(1) Local Government Act 1999 imposes a duty on local authorities to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. Section 3(2) requires local authorities to consult representatives of
- persons liable to pay any tax in respect of the authority
  - persons liable to pay non-domestic rates
  - persons who use or who are likely to use services provided by the authority,
  - persons appearing to the authority to have an interest in any area within which the authority carries out functions

for the purpose of deciding how to fulfil the duty imposed by Section 3(1).

- 15.5 Pursuant to Section 188 Trade Union and Labour Relations (Consolidation) Act 1992 (TULRCA 1992) the Council as employer is required to consult the recognised Trade Unions where there is a proposal to dismiss by reason of redundancy (which includes voluntary redundancy) 20 or more employees at an establishment within a period of 90 days or less. If 100 or more employees are at risk of dismissal by reason of redundancy at any one establishment within a period of 90 days or less the consultation must begin at least 45 days before the first of the dismissals takes effect.

- 15.6 Where a proposal gives rise to a transfer under the Transfer of Undertakings (Protection of Employment) Regulations 2006, trade union consultation will be carried out in accordance with those Regulations.

## **16. OTHER IMPLICATIONS**

### **16.1 EQUALITY AND DIVERSITY**

Each proposal is subject to an initial Equality Impact Assessment, which will be developed through the consultation period.

The consultation provides the opportunity for the Council better to understand:

- the consequences for individuals with protected characteristics affected by changes, particularly related to proposals relating to social care
- any cumulative impact on groups with protected characteristics.

## 16.2 TRADE UNION

In accordance with the requirements of Section 188 Trade Union and Labour Relations (Consolidation Act) 1992, consultation with the Trade Unions will commence on 28<sup>th</sup> November 2016.

The new proposals provided to the Trade Unions highlight the areas where staff could be at risk of redundancy and show that the proposed likely full time equivalent (FTE) reductions in a number of areas is calculated to be 118 FTEs reductions for 2017/18 and 107 in 2018/19. This is in addition to the proposed 139 FTEs reductions for 2017/18 about which the Council commenced consultations with the Trade Unions on 23<sup>rd</sup> November 2015 (and which number was subsequently amended during consultation to 191). Where a proposal gives rise to a transfer under the Transfer of Undertakings (Protection of Employment) Regulations 2006, trade union consultation will be carried out in accordance with those regulations.

Senior Management will be explaining the proposals in more detail to the Trade Unions at the Trade Union meetings scheduled to take place from the 7<sup>th</sup> December 2016.

Equality impact assessments (EQIA) are being prepared on all proposals that have a staffing implication, these will be available as part of the consultation process. All information from individual EQIAs will feed into an overall Corporate EQIA.

Staff will also be briefed on the proposals.

## 16.3 VOLUNTARY AND COMMUNITY SECTOR (VCS)

Given the scope of VCS involvement in the delivery of services, the scale of Council spending with the sector and the size of Government spending cuts, it is inevitable that VCS organisations will be affected by cuts to Council budgets. Work is underway to deliver some of last year's savings proposals which affect VCS organisations as we look ahead to these new proposals.

Some of the initial proposals will require VCS service providers to work differently and, as with all providers of public services, will prompt them further to innovate and prioritise within the resources the Council can afford.

Initial impact assessments suggest that some VCS organisations may only be affected by one proposal but this may be sufficient to affect their viability. A small number may be affected by more than one; and for others it may be the cumulative impact of funding squeezes.

We recognise that some organisations will need to seek alternative funding and that some may consider collaborating or even merging with others to share common costs. We will continue to spend a significant amount of its resources with VCS organisations. The Executive recognises that a vibrant and thriving VCS will be critical if we are going to make progress on the District's priorities with much less public money, and commits to maintaining a constructive, collaborative relationship with the VCS.

## 16.4 WARD IMPLICATIONS

In general terms, where the proposed cuts affect services to the public, the impact will typically be felt across all wards. Some proposals could potentially have a more direct local impact on individual organisations and/or communities. It is expected that the consultation process will allow an analysis of local impacts to inform final decisions.

## 17. CONCLUSIONS

The proposals align resources with priorities. They support economic growth, maintain key universal services, help to manage expensive future demand and support children and young people in their early years, through school and into their participation in the economy. They provide for effective, democratically accountable leadership that helps to influence and shape the District's future.

Despite the financial challenges we will continue to deliver beyond the statutory minimum where possible, and in so doing we will ultimately reduce the cost of people requiring statutory provision.

The proposals demand transformations in the ways that the Council and others work, without which we will be unable to achieve our objectives.

The scope and scale of Council services will change. Services will be delivered from fewer buildings with less face to face contact with the public and more digital and online provision. Some services may be provided through different models of delivery for example, leisure or cultural trusts, others will be dependent on the efforts of volunteers to sustain them and others will cease. Resources will increasingly be targeted at the most vulnerable and disadvantaged. The relationship between public services and citizens will shift to emphasise a shared responsibility for achieving outcomes.

The Council and health services will need to manage demand for care by investing in support to keep people well and independent and the transformation of the health and social care system will be vital if other services are to be sustained.

All this will demand lots of change over a relatively short space of time and resources will need to be allocated to ensure that there is sufficient capacity to deliver that change successfully.

Mature and well developed partnerships have demonstrated that they can deliver and innovate across a range of disparate disciplines and cross-cutting issues.

Taken together, the District's whole resources represent a significant and impressive asset base. If we can all pull together to galvanise our full potential, sharing resources, ideas and responsibility, we can achieve our shared ambitions for Bradford District.

## 18. RECOMMENDATIONS

18.1 It is recommended that Executive, having considered the Council's public sector equality duty as set out above:

- Approve for consultation as required with the public, interested parties, staff and trade unions the proposed detailed budget changes for 2017/18 and 2018/19 set out at Appendix C, and any revisions to previous decisions set out in Appendix E and Appendix F.
- Approve the proposed non-recurrent spending included in the financial estimates
- Approve for consultation the proposed spending totals for each outcome for 2017/18 and 2018/19, as the basis for a balanced budget
- Approve the proposed use of reserves
- Approve the consultation mechanisms and processes set out in Appendix G
- Approve the proposed indicative spending totals for each outcome for 2019/20 and 2020/21 to inform future planning and engagement with stakeholders, the budgets for 2019/20 and 2020/21 to be subject to detailed formal consultation, however, in future budget rounds
- Authorise Strategic Directors to engage with stakeholders to develop draft plans and options for the reforms and changes required to deliver a balanced budget in 2019/20 and 2020/21 as set out in Section 12.

## 19. APPENDICES

19.1 **Appendix A:** How Council Services Relate to Outcomes

**Appendix B:** Commentary on Financial Context

**Appendix C:** New Draft Savings Proposals Open for Consultation until Full Council on 23 February 2017

**Appendix D:** Schedule of Decisions of Budget Council February 2016 for information, not subject to consultation

**Appendix E** New Draft Savings Proposals Open for Consultation until Full Council on 23 February 2017 to Compensate for Unachievable 2016/17 and 2017/18 Savings Agreed by Full Council on 25 February 2016

**Appendix F** Changes to Previously Agreed 2017/18 Budget Savings Not for Consultation

**Appendix G:** Consultation Approach

## 20. BACKGROUND DOCUMENTS

- Council Plan 2016-2020, adopted by Council October 18 2016
- Medium Term Financial Strategy, adopted by Council October 18 2016
- Mid Year Financial Position Statement and Performance Report for 2016/17, approved by Executive November 9 2016

## **Appendix A: How Council Services Relate to Outcomes**

Council services have been categorised into the outcomes as follows.

### **Better health, better lives**

- Sports Facilities
- Adult social care
- Children's specialist services
- Benefits payments
- Public Health

### **A great start and good schools for all our children**

- Educational Achievement services
- Early Childhood services

### **Better skills, more jobs and a growing economy**

- Skills for work
- Planning
- Transport
- Highways
- Economic Development
- Culture

### **Decent homes that people can afford to live in**

- Housing development
- Housing strategy and operations

### **Safe, clean and active communities**

- Waste collection and disposal
- Neighbourhood services
- Parks and woodlands
- Youth service
- Customer services

### **A well-run Council**

- Democratic functions
- Support services: Finance, human resources, information and communication technology, property costs, legal services, commercial and procurement, tax collection, debt management

### **Non service, fixed and other costs not allocated to individual outcomes**

- Capital financing
- Specific grant funding not attributable to a service
- Other costs not attributable to a specific outcome.

## **Appendix B: Commentary on Financial Context**

### ***Funding and Other Income***

The Council's medium term funding outlook is dominated by the decline, ultimately to zero by 2020/21, of the general Revenue Support Grant from central government.

At that point, all Council services are funded by: local sources of taxation (Council Tax and Business Rates); a large range of fees, charges and contributions from local individuals and organisations; and specific grants from Government.

#### *Taxation*

Council Tax continues to increase, both from growth in the number of properties, and from proposed 1.99% tax rises annually. An additional 2% is proposed to be added to Council Tax specifically to fund adult social care. Without it, adult social care spending would have to be reduced further.

Business Rate growth remains fragile. Actual tax yields in the last two years have been below plan, principally due to revaluations and appeals over which the Council has no control. The plan assumes Business Rates growth of around 2% per year through the multiplier (indexation) mechanism.

Compared with other Councils, Bradford's Council and Business Rate Tax yield is weak. If we divide the total tax yield by the population, the value of the tax base per capita is lower than in other places. This reflects household composition, the fact that Bradford has one of the lowest Council Tax rates in the country, and the relatively low growth in the value of the business rate tax base. This is an important aspect of the financial position because a large proportion of Council spending is driven by the needs of individuals. As the cost of services driven by individual needs rises, as a result of demographic changes and supply-chain inflation, a weak per-capita tax base does not keep pace with this increase. Unless individualised costs can be contained, funding is squeezed for the universal services such as waste collection, highways infrastructure, and culture and leisure services which are important for households and the District as a whole.

Bradford remains dependent on the top-up grant paid via central government's mechanism which redistributes collected business rates from areas with lower needs to areas with higher needs. In 2017/18, the Top Up is £58m, rising to an estimated £63m by 2020/21. The business rate system is being reformed by Government, likely in 2020 – but whether Bradford will be better or worse off cannot be predicted. In addition, the Government's 2017 business rate revaluation will affect the balance between retained business rates and the top-up: this is not reflected in the estimates but it expected to have a neutral overall effect.

#### *Specific Grants*

The largest single specific grant is the Dedicated Schools Grant (DSG) which the Council distributes directly to schools (£419m for non-academy schools in 2016/17). Some of the DSG is, with the agreement of schools, used to pay for services provided by the Council. For 2017/18 and beyond, this amount is reduced, reflecting

a change in the role of the Council, and a “sector-led” model under which more of the total resource available is controlled directly by schools.

The Council receives funding through the Better Care Fund (BCF), used to pay for a range of health and social care initiatives (not all spending on social care is channelled through the BCF). Over the next 4 years, the Better Care Fund will grow £1.5/9.8/17.2/17.2m to 2020/21. All this growth will be directed to the adult social care budget.

The grant for Public Health is estimated at £43/42/41/41m to 2020/21. This budget proposes a redirection of the grant away from current purposes, towards the wider determinants of health provided by the mainstream operations of adult social care and children’s services.

Other specific grants to be used for their designated purposes are shown in Table 6.

**Table 6 – Estimated specific grants**

	Estimated Grant				
	2016/17 £'000	2017/18 £'000	2018/19 £'000	2019/20 £'000	2020/21 £'000
Housing Benefit	178,434	178,434	178,434	178,434	178,434
Public Health	44,015	42,930	41,814	40,727	40,727
Building Schools for the Future PFI grant	27,301	27,301	27,301	27,301	27,301
Improved Better Care Fund	0	1,566	9,880	17,156	17,156
New Homes Bonus	11,154	9,073	6,354	6,139	6,242
Returned New Homes Bonus	0	2,045	0	0	0
Education Services Grant	6,350	1,682	500	500	500
S31 business grants	6,102	6,110	6,245	6,279	6,367
Housing Benefit and Council Tax administration	3,125	2,825	2,525	2,225	1,975
Other grants	17,135	21,231	21,144	21,085	21,028
<b>Sub total</b>	<b>293,616</b>	<b>293,197</b>	<b>294,197</b>	<b>299,846</b>	<b>299,730</b>
	Estimated Schools Grant <sup>1</sup>				
	2016/17 £'000	2017/18 £'000	2018/19 £'000	2019/20 £'000	2020/21 £'000
Dedicated Schools Grant	378,487	377,556	377,074	374,467	374,467
Pupil premium	26,225	26,225	26,225	26,225	26,225
6 <sup>th</sup> Form Funding	14,783	14,783	14,783	14,783	14,783
<b>Sub total</b>	<b>419,495</b>	<b>418,564</b>	<b>418,082</b>	<b>415,475</b>	<b>415,475</b>
<b>Total Specific grants</b>	<b>713,111</b>	<b>711,761</b>	<b>712,279</b>	<b>715,321</b>	<b>715,205</b>
<b>Estimated cumulative movement on specific grants reduction/(increase) shown in Table 2</b>		<b>1,350</b>	<b>832</b>	<b>(2,210)</b>	<b>(2,094)</b>

<sup>1</sup> Schools grants will reduce as schools convert to academy status. As these monies are passported through to schools and offset by the grant. No forecast reduction in schools grants have been factored in. The total Dedicated Schools Grant, Pupil Premium and 6<sup>th</sup> Form Funding for all schools including academies is estimated at £572m for 2017/18. Academy-related funding is out of scope for the purposes of these budget proposals.

### Other Local Income

Individuals and businesses pay a wide range of fees, charges and contributions towards the cost of services. Amounting to c £140m in 2016/17 they include, for

example, school meals, contributions to the cost of personal care, parking charges, planning fees, sports centre visits, theatres tickets, burial fees, and many others. The Council seeks to maximise these sources of income while ensuring that prices satisfy regulatory requirements. These contributions have the financial effect of reducing the level of general subsidy required from taxation. In many cases, the Council competes with other suppliers. This proposed budget assumes that aggregate income from these sources will rise typically by 0.5%. It also proposes to generate income from investment property.

### ***Expenditure***

With aggregate funding decreasing, the key financial management challenge is to reduce the net cost of services.

The characteristics of the costs base are such that, at its simplest, if the Council wants to pursue all its aims and remain financially viable, it must:

- contain the historical increase in the costs of social care, ensuring that services are the most appropriate for individual needs, whilst dealing with the pressure on costs arising from population growth and an ageing society. This budget is predicated on the assumption that gross nominal spending on adult social remains broadly steady, despite such pressures, and despite the added inflationary effect of the National Living Wage
- recognise that demographic growth will also likely add to the number and cost of Looked After Children
- meets its historical liabilities, principally relating to debt servicing and pensions
- Having set aside sufficient budget for social care, within the constraints of what can be afforded:
  - Support the needs of pre-school and school age children to achieve in life and learning
  - Invest in physical and electronic infrastructure, transport, skills and business growth to support the economy
  - provide universal services, leisure and cultural services which keep communities safe, clean and active
  - enable the provision of decent and affordable homes
  - maintain an effective and accountable democratic and leadership function which allows the Council to influence and deliver results in partnership with others
  - minimise the cost of overheads whilst maintaining effective governance and control.

The proposed budget seeks to balance those requirements.

More analysis of the Council's cost base is included in the Council's Medium Term Financial Strategy.



## APPENDIX C - DETAILED BUDGET CHANGES PROPOSED FOR 2017/18 - 2018/19 & SUBJECT TO CONSULTATION

### Better Health, Better Lives

<b>Total Savings Proposed - £22.1m</b>	<b>2017-18</b>	<b>2018-19</b>
	<b>£11.0m</b>	<b>£11.1m</b>

#### Health and Wellbeing - Public Health

##### Ref - 4PH2 Public Health - Substance Misuse

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £10.9m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£1,169,000</b>	<b>£1,634,000</b>	<b>£2,803,000</b>	<b>26%</b>

The Substance Misuse service provides a number of recovery-focussed services in the prevention, reduction and treatment of drug and alcohol misuse and its associated harms for individuals, families and communities. The service is currently provided for 4500 individuals in various locations across the district.

The budget for substance misuse services will be reduced through a combination of redesign and re-commissioning of services and services ceasing.

- The Substance Misuse Recovery Service is the new integrated drug and alcohol service currently out to tender, through which individuals receive a continuum of preventive measures, treatment interventions and recovery options. The review of the service will achieve savings in 2017-18 of £1.088m and £1.076m in 2018-19.
- The Substance Misuse Dual Diagnosis Service provides a specialist Dual Diagnosis from premises in both Bradford and Keighley, delivered by a team of specialist health care professionals. Over 4 years, patients will be gradually transferred to, and managed by, mainstream NHS Mental Health services and/or substance misuse services. This service will reduce in 2018-19 resulting in a saving of £487,000.
- The Supervised Medication Programme is delivered by 130 pharmacies across the district. The programme ensures that individuals in drug treatment are supervised in consumption of substitution medication within pharmacies and a reduction in demand for this service will lead to an annual saving of £56,000 in 2017-18 and £6,000 in 2018-19.
- Inpatient Detoxification services are provided by a number of contracted organisations on an approved provider basis outside of the district and provide detoxification in a residential setting. There is little evidence of continued abstinence following discharge, and detoxification can be delivered within the community under the new recovery service and therefore by 2018-19 this service will reduce resulting in an annual saving of £35,000.

- The Needle Exchange programme offers an open-access service to any drug injector because every person engaged in this activity is at risk of contracting a life-threatening blood-borne virus, particularly HIV, Hepatitis B and Hepatitis C. The service is being reviewed to identify cost effectiveness and ensure geographical coverage of service. It is anticipated that a new delivery model and this redesign will lead to an annual saving of £25,000 in 2017-18 and £30,000 in 2018-19.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Impact assessments have identified that this range of proposals could have impacts on a wide range of service users across the range of protected characteristics.

### **Mitigation**

Any new contracts will continue to have the same equality requirements of the Provider under the Equality Act 2010 as the current tender. The new service specification being commissioned requires that the service is provided through various types of provision and that the service is integrated throughout providing continuity for service users. Services will be more community based with access points in multiple sites in non-substance misuse specific services making it easier for all sections of society to access them.

**See EIA 4PH2**

### **Ref - 4PH3 Public Health - Sexual Health**

#### **Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.7m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£70,500</b>	<b>£25,000</b>	<b>£95,500</b>	<b>2%</b>

The Sexual Health service provides open access to Bradford residents to all forms of Contraception, Sexually Transmitted Infection testing and treatment, information and support, allowing easy access to services by giving them the choice of either an appointment or access to drop-in clinics across the district.

The budget for the service will be reduced through a combination of redesign and review of services, and other services ceasing.

'Prism' is a service in which a Health Development Worker works with young people, delivering information, advice, support and referral (where appropriate) through 1-1, 'Drop In' and Group Interventions. The proposal is that this service will cease from 31 March 2017 resulting in an annual budget reduction of £55,500.

Step2 is a service which supports the delivery of a Sex and Relationship Education (SRE) programme in schools. The SRE programme is delivered in 9 upper schools within the district and is co delivered by a teacher, Step2 or School Nurse in the class room and discusses sexual exploitation, sexuality, and abusive relationships, as well as a range of

other topics giving young people information around local services and where they can access support. The proposal is that this service will cease from 31 March 2017 resulting in an annual budget reduction of £15,000.

Emergency Hormonal Contraception (EHC) is made available in Pharmacies, free-of-charge, to those aged 25 and under. Pharmacists also provide condoms and chlamydia screening giving advice on contraception and sexual health and signposting to Sexual and Reproductive Health Service (SRHS) for further support. The proposal is that this service will cease from 31 March 2018 resulting in an annual budget reduction of £25,000.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Some of the services are designed specifically for parts of the population who share a protected characteristic. Therefore services are provided disproportionately to those parts of the population and the impact will reflect this.

The financial implications of this reduction in budget will be applied across the whole of the contract and therefore will impact upon all potential users of the services.

### **Mitigation**

The SRHS that is commissioned is part of a wider Sexual Health economy with GPs providing oral contraception and STI testing which is commissioned by NHSE from GP practices as part of their core service offer.

Bradford residents would still be able to access SHRS (oral contraceptives and STI screening) within their community through their GP practice and Long Acting Reversible Contraceptives (coils and implants) and STI testing and treatment, through the SHRS that would stay situated centrally within the city centre making it accessible to all.

**See EIA 4PH3**

### **Ref - 4PH4 Public Health - Tobacco**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.8m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£2,000</b>	<b>£59,200</b>	<b>£61,200</b>	<b>8%</b>

The tobacco service provides and commissions services to reduce smoking prevalence across the district and prevent the uptake of smoking by young people. The budget for the service will be reduced through a combination of the redesign and review of services which will see some currently commissioned services ceasing and a reduction in the number of people accessing services.

Dental Practices across Bradford District are currently commissioned to provide a practice-based stop smoking service. As part of the redesign of stop smoking services, dental practices will not continue to be commissioned to provide this service and therefore will cease in April 2017 resulting in an annual budget reduction of £2,000.

Stop smoking medication is available on prescription to smokers, through the Bradford district stop smoking service. This will be limited to geographical areas identified as having higher smoking prevalence and priority groups e.g. pregnant smokers, patients with a long term condition etc. This redesign will lead to an annual saving of £44,000.

The Midwifery-based stop smoking service provides a specialist stop smoking midwife to provide and coordinate training, implement and monitor interventions to reduce smoking and promote smoke free homes throughout pregnancy. This service will cease in January 2019 resulting in a budget reduction in 2018/19 of £15,200.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

#### **Mitigation**

N/A

**See EIA 4PH4**

#### **Ref - 4PH5 Public Health - Homestart, Worksafe and Injury Minimisation Programme**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£190,000</b>	<b>£55,000</b>	<b>£245,000</b>	<b>100%</b>

The services commissioned are for children, young people and their families with a focus on accident prevention, and support for vulnerable parents and children age 0-5 years. The proposal is to phase out the services detailed below over two years, with a view to some activities being mainstreamed into the wider transformation plan for children and young people and families in the District.

- **Homestart**

Homestart is a national charity with independent schemes in local communities which recruit and train volunteers to help families with young children by visiting them in their homes. The proposed plan is to end the current grant agreement with Homestart in 2016/17. The service would therefore cease resulting in an annual saving of £155,000.

- **Injury Minimisation Programme (IMPs)**

The Programme is aimed at all year 6 children in all Primary schools and aims to reduce injuries and empower young people to take personal responsibility for managing their own risk. It is proposed that the service will cease in 2016-17, giving the required 6 months notice from April 2017 (therefore terminating at the end of September 2017), resulting in an annual saving of £70,000, (£35,000 in each of the two years).

- **Worksafe**

This Voluntary and Community Sector (VCS) service provides training, advice and information about a range of safety issues to selected primary schools and to children with special needs. It is proposed that this continues for one year and stops in year 2018/19. This service will cease resulting in an annual saving of £20,000.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Impact assessments have identified that this range of proposals could have impacts on a wide range of service users across the range of protected characteristics particularly age, disability, race and low income families. There will be impact on key public health outcomes which are likely to widen inequalities in some of our vulnerable groups as these services are delivered across the areas that have already been identified as a strategic priority within the District's Health Inequalities Action Plan.

**Mitigation**

Some activities may be mainstreamed into the wider transformation plan for children and young people and families in the District going forward but there will be some that will not be mitigated against.

In order to manage any negative affects we will use a phased approach so that we can identify any potential risks in the first year.

Some risk may be mitigated with funding from other areas within the District through Better Start and Big lottery in Keighley so the negative consequences are not as high as would be expected if the service was completely decommissioned.

**See EIA 4PH5**

**Ref - 4PH6 Public Health - Physical Activity, Food and Nutrition**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.0m**

2017-18	2018-19	Total	% of current base
£1,000,000	£0	£1,000,000	51%

The Health Improvement Team currently provides grants to 24 VCS organisations which deliver a range of interventions including activities such as 'cook & eat' programmes, physical activity sessions for inactive adults and children, food growing activities and breastfeeding support.

These grant agreements come to an end on 31 March 2017 and it is proposed that they will not be extended which will result in an annual saving of £1m.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Services are currently commissioned from a variety of BME organisations and groups based in low income areas to ensure positive outcomes for all parts of the community. The race equality impact is judged to be high, because of the high BME take up of VCS services.

**Mitigation**

The Health Improvement Team will support providers/organisations and service users proactively with advice and sign-posting as opportunities are identified.

See EIA 4PH6

**Ref - 4PH7 Public Health - Small Grants (Wider Determinants)**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.1m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£101,000</b>	<b>£0</b>	<b>£101,000</b>	<b>100%</b>

The Public Health Department funds VCS organisations through the small grants scheme to deliver a range of interventions addressing broader public health outcomes including sexual health, smoking cessation, cancer awareness, teenage pregnancy and healthy lifestyles interventions.

These grant agreements come to an end on 31 March 2017 and it is proposed that they will not be extended which will result in an annual saving of £101,000.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

N/A

See EIA 4PH7

**Ref - 4PH8 Public Health - Warm Homes Healthy People Programme**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.08m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£25,000</b>	<b>£40,000</b>	<b>£65,000</b>	<b>76%</b>

The Warm Homes Healthy People (WHHP) is a short-term, winter activity based programme which supports those most in need of Winter Warmth services in Bradford and Airedale area. Services offered include food parcels and hampers; cook and eat sessions; big lunches; provision of practical needs such as coats; hats; duvets and emergency heating appliances; small fuel poverty remedies (radiator foils, draft excluders etc), energy efficiency

assessments; fuel debt relief; top-ups for prepaid fuel meters and community activity such as snow clearance, befriending schemes etc.

The proposal is to reduce this service, resulting in an annual saving of £65,000.

(Note: This proposal is 'exclusive' of £30,000 currently received from City and District Clinical Commissioning Groups (CCG's) via the local resilience fund).

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Currently the proposal offers support to a range of vulnerable householders, many of whom share particular protected characteristics. Removing the programme's main funding reduces the breadth of service offered and may disadvantage some people.

### **Mitigation**

The current budget includes £30,000 received from City and District's CCG's Resilience fund. This may continue to be available beyond the time when funding via Health and Well-being ends. Should the CCG contribution continue it would not be able to support a WHHP programme the size it is now; tighter more specific client targeting would be required.

In 2016/17 support to develop a new approach to funding was granted to the partners, this has allowed the creation of a crowd funding website which plans to raise £25k this year. It is planned to build on this in 2017/18 with the hope that core services such as fuel poverty and food poverty work streams can be maintained.

Additionally there are existing partners such as Ground Works/ Family Action and others who fund raise for services independently and join in the programme each winter. It is hoped this can be continued.

**See EIA 4PH8**

### **Ref - 4PH9 Public Health - Back office CCG funding transfer**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.5m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£499,000</b>	<b>£499,000</b>	<b>100%</b>

The funding is a budget adjustment, transferring funding to Bradford Clinical Commissioning Group's (CCG's); the funding is then paid to provider Bradford District Care Foundation Trust (BDCFT) as part of existing contracts held between CCGs and BDCFT. The funding was, prior to 2016-17, part of a contract between Public Health and BDCFT. Specific services are not described as part of this funding agreement and known only to CCGs. It is proposed that services are redesigned as part of an accountable care system/organisation development involving health, social care and other providers, resulting in an annual budget reduction of £499,000.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4PH10 Public Health - Staffing and operational cost reductions****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£300,000</b>	<b>£350,000</b>	<b>£650,000</b>	<b>19%</b>

The Public Health staff team comprises of the Public Health management team, analysts and commissioning/business unit staff who are responsible for supporting and directing strategic needs assessment for the district and commissioning services directly to meet identified need in responsible areas. In addition, the department employs operational staff to deliver some public health services, specifically sexual health, stop smoking and health improvement (physical activity, anti-obesity).

It is proposed that the Public Health staff team is reduced in line with Public Health redirecting its investment profile towards reducing demand and maintaining health and well-being.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4PH11 Public Health - Environmental Health Restructure****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£35,000</b>	<b>£40,000</b>	<b>£75,000</b>	<b>8%</b>

It is proposed to undertake a management restructure within the Environmental Health Service as part of wider changes in the Department of Health and Wellbeing.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A



**Mitigation**

N/A

**Environment and Sport****Ref - 4E11 Environment and Sport - Sport and Physical Activity Service****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£150,000</b>	<b>£150,000</b>	<b>6%</b>

Swimming pools, sports centres, swimming development, sports development and outdoor adventure activities form the basis of this service. A number of changes are proposed. In the first instance the service will investigate through an options appraisal all methods of future operational service delivery and this will include the potential for a 'not for profit' trust model to be established as part of the potential savings required in 2018-19.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

N/A

**See EIA 4E11****Health and Wellbeing – Adult and Community Services****Ref - 4A1 Adult and Community Services - Overall Demand Management Strategy****Total 2016-17 Budget for Service Area £108.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£8,000,000</b>	<b>£8,000,000</b>	<b>£16,000,000</b>	<b>15%</b>

The latest statistics from Projecting Older People Population Information (POPPI) and Projecting Adult Needs and Service Information (PANSI) projects a 2% yearly increase in the number of service users up to 2030.

The challenge is to change the culture in Adult Social Care and with the NHS to move from a dependency model to one that promotes independence and resilience (a strength based model, with a focus on what people can do, and positive risk-management so people can

live their lives to the full).

The Sustainability and Transformation Plan includes development of an Accountable Care System. The aim of this will be to use our investment to improve the health and wellbeing of people in the Bradford District. We will do this by targeting our collective resources to maximise independence and resilience, regardless of age, disability or condition and protecting and safeguarding the most vulnerable in our communities.

The challenge in Adult Social Care is to deliver services to growing numbers of both young and older people, whilst at the same time discharging our statutory duties.

We will where possible support people to be safe and independent at home and so reduce the need for some people to go into residential/nursing Care. We will do this by working with our NHS and community and voluntary services partners to promote independence through strength based assessments, a greater focus on prevention/early intervention and using enabling technologies. This approach will be underpinned by an integrated workforce development plan which will focus on the Home First Model:

1. Reducing the number of people coming into care through an enhanced preventative focused (early intervention) approach, which will aim to minimise the need for long term support by addressing underlying needs at the earliest stage possible, and reduce the need for some people to go into hospital or a care facility.
2. Changing the culture across the care system: moving to a strength (asset) based model that will require an open dialogue with the people, their families and carers to draw on these resources to maximise independence; and ensuring that people get the right level and type of support i.e. not too little and not too much.
3. Speeding up integration with Health to ensure we can establish a whole systems approach across the Health and Social Care sector and secure efficiencies and economies e.g. Integration of complex care teams with partners within NHS and Voluntary and Community sector, so that service users receive the right care at the time in the right place, and so that support from Health and Social Care is seamless. Ensure all service users are reviewed on a regular basis in line with the guidance set out in the Care Act, so that the appropriate package of care is delivered subject to the individual's needs.
4. Moving away from expensive traditional forms of support through targeted care and enhanced reviews of care needs. This could include options such as extra care or improved home care services and only using residential or nursing care when people really need it.
5. Redesigning our approach to enablement to reduce costs and maintain independence of people e.g. more investment in home care. We will do our utmost to support people to regain skills and confidence to stay independent including use of technology.
6. Reviewing the financial needs of people to ensure that they are provided with the appropriate level of funding to meet their care need. When we assess people we will ensure that they get the right support from either health or social care funders.
7. Continuing the implementation of personalisation including the use of ISF's (Individual Service Fund). ISFs are a third party agreement that will ensure that people can have choice and control without the worries of looking after the money.

Our approach builds on our local experience and research undertaken by national bodies which has demonstrated that significant amounts can be saved through effective demand management across the support system. The key underlying principle will be to ensure we deliver services in the short term, while using this time to develop the provider market to take on service delivery in the medium and long term.

These proposals are designed to enable the costs of the services to be contained within the proposed available resources, despite the predicted rise in demand of approximately 2% annually, and inflationary increases in costs affecting Adult Services. This proposal reflects our conclusion that we need to make changes to the way we deliver services in order to avoid annually £8m of costs that would otherwise be incurred. This level of saving is required even after the use of additional income from the Better Care Fund, and from the Social Care precept equivalent to 2% of Council Tax. This is a challenging, yet achievable goal.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Older people and people with Mental Health & Learning Disabilities will predominantly be affected by this proposal but the focus will be on personalised services for people so the impact on protected characteristics will be mitigated at individual level.

As part of the Strategy to reduce residential and nursing places it is intended that more extra care schemes are developed, which will help to improve people's lives and reduce expenditure across all groups.

As the proposal is developed, the detail of impacts will be further assessed to ensure any potential implications on protected characteristics are minimised.

### **Mitigation**

Our approach will seek to focus on people's strengths and enabling people to manage properly understood, proportionate and positive risks in living their lives.

We will undertake individual assessments and carry out extensive engagement with service users, carers and advocates to ensure seamless transitions for any service users affected. This will enable us to meet our duty under the Care Act 2014 and mitigate against any disproportionate negative impact on any person with a protective characteristic.

By offering other options for people in terms of housing and care support, people will have the opportunity to access appropriate services that meet their assessed needs and be in a position to maintain their independence and to continue to have a positive contribution and be inclusive in their local community. This will ensure where possible people with particular characteristics are not disproportionately affected. We will further review the potential impact on protected characteristics as part of the development of the delivery programme.

**See EIA 4A1**

## Children's Services - Children's Social Care

### Ref - 4C4 Child Protection management restructure

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £7.0m**

2017-18	2018-19	Total	% of current base
£240,000	£240,000	£480,000	7%

This activity area includes the work of the fourteen teams who work in front line Child Protection in the District, the specialist services management team, and the interpreting budget for children in the care system. The proposal is to undertake a review in year 1 to align the Child Protection teams with a revised approach to delivering early help to children and families that includes a range of services to be delivered at a locality level. Currently there are fourteen team leaders in the child protection teams. The proposal is that the number of teams is reduced by four to ten, potentially resulting in a reduction in the number of team managers. This process will be started in year 1 but full savings will not be realised until year 2 due to the requirements for review and consultation.

In addition the proposal is to review the overall staffing & non staffing budgets and identify further saving in years 1 and 2 of 2% in each year.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

#### **Mitigation**

N/A

### Ref - 4C5 Service Wide - Further management savings

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £57m**

2017-18	2018-19	Total	% of current base
£85,000	£85,000	£170,000	0.3%

Across Children's Social Care, the role of team managers is to oversee cases and support social workers to put in place good plans for children. They are responsible for an outcome area within specialist services.

This proposal is that a review is undertaken of the management structure within children's social care, reducing it by two service manager posts and one team manager in addition to team manager reductions identified in other service areas.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4C6      Early Help - Review management structure and commissioned services****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.7m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£80,000</b>	<b>£120,000</b>	<b>£200,000</b>	<b>4%</b>

Within the scope of this activity is early help for children and families commissioned from the VCS, Youth Offending Team, crime prevention and the family centres, families first and other early help services offered through children's centres, and for disabled children and young people

The targeted early help portfolio includes a range of statutory, early intervention and prevention services. These seek to help vulnerable families to help themselves, become more resilient and take action early in the life of a problem for children of all ages. Funding comes from a number of sources including the council, Youth Justice Board and Troubled Families Programme.

This proposal is to undertake a review of the management structure resulting in the reduction of 1 Team Manager, and a review of the external commissioning budget to achieve a reduction of 15% in year 2. In addition there will an overall review of the service to achieve a 1% budget reduction.

**Equality impact on the Equality Duty protected characteristics & low income groups**

This service works with a higher percentage of children and families from disadvantaged households and any reduction in service may result in a disproportionate affect on low income groups needing this support.

**Mitigation**

The review will ensure that resource is most effectively targeted at areas of need, with careful mapping of service needs and outcomes. This process will be done alongside the VCS to ensure that impact is mitigated where possible. Where possible, resources will be reduced in back office and management functions.

**See EIA 4C6**

**Ref - 4C7      Looked After Team**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.9m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£19,000</b>	<b>£19,000</b>	<b>£38,000</b>	<b>2%</b>

Within the scope of this activity is the Looked After Children's team, young peoples advocacy and the Children in Care Council

This proposal is to undertake a review of overall staffing & non staffing budget and save 1% each year from within the service.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4C8      Fostering and Adoption management restructure**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £17.9m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£50,000</b>	<b>£50,000</b>	<b>0%</b>

Within the scope of this activity is the staffing of fostering service; buildings; marketing; fostering fees; foster care assessments and panels; family and friends carer assessments and allowances; fostering fees and allowances; crisis and carer support costs.

The change proposed is to review the team manager structure of the service to remove one post in year 2 making a saving of £50,000. This will be achieved through a review of workload and rationalising the current four teams into three.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4C9 Disabled Children Team**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £5.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£250,000</b>	<b>£34,000</b>	<b>£284,000</b>	<b>5%</b>

Within the scope of this activity is the Children's Complex Health and Disabilities team staffing, placement support, inclusion intensive support, Children and Adolescent Mental Health Service (CAMHS), under 18 drugs and alcohol, short breaks, family intervention, trusted adult, shared care and contract carers.

The Children with Disabilities Service is made up of two elements.

- 3 Residential Units; Clockhouse, Wedgewood and Valley View
- 3 Statutory Social Work Teams.

This proposal is to build on the review already underway with CAMHS to ensure a service that meets the needs of children moving forward and is delivered within a reduced budget saving £250,000. In addition the proposal is to review the overall staffing & non staffing budget and save £34,000 in Year 2.

**Equality impact on the Equality Duty protected characteristics & low income groups**

This service works with disabled children who have are a group with a protected characteristic. Reduction in this service impacts on this specific group of young people.

**Mitigation**

A review of the CAMHS service with a financial appraisal will ensure that through achieving better value for money, direct service reductions are minimised. The review will ensure that resource is most effectively targeted at areas of need, with careful mapping of service needs and outcomes. Where possible resources will be reduced in back office and management functions. This change impacts on disabled children, but reductions are in place across the full service and have not targeted this group disproportionately.

**See EIA 4C9**

**Ref - 4C10 Child Protection Review Team**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£24,000</b>	<b>£24,000</b>	<b>2%</b>

The services in scope are the Independent Reviewing Officer and Child Protection Chairs, and the LADO (Local Authority Statutory Officer). These services are all statutory.

This proposal is to undertake a review of all staffing & non staffing budgets and achieve a saving of 2% of budget in Year 2. Areas that will be looked at include vacancy management and use of software to reduce administrative requirements.

The review will prioritise non staff spending for reduction but there may be a requirement for staff reductions.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4C11 Leaving Care**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.5m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£68,000</b>	<b>£34,000</b>	<b>£102,000</b>	<b>3%</b>

Within the scope of this activity is the staffing of the service, university support, Southwark judgement costs, semi independent placements and stepping stone support.

This proposal is to review overall staffing & non staffing budgets to achieve a saving of 2% in Year 1 & a further 1% in Year 2. Areas that will be looked at include vacancy management, improved procurement arrangements on items bought for young people, a review of agreements with providers of purchased services and closer monitoring of grants paid to young people to ensure that this is in line with the agreed policy.

The review will prioritise non staff spending for reduction but there may be a requirement for staff reductions.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A



Ref - 4C13    Drugs and Alcohol Team

**Note - This relates to funding linked to a Public Health Inter Departmental Agreement and should be seen as a loss of funding to the Service**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£50,000</b>	<b>£50,000</b>	<b>£100,000</b>	<b>29%</b>

The Alcohol and Drugs Team is a specialist service tasked to address substance misuse as it affects children, young people and young adults who are parents.

This proposal includes a review of the work of the team and all of the other services that support young people with alcohol and drug issues to achieve a saving of £50,000 in year 1 and a further £50,000 in year 2.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**NB - Public Health England announced further cuts in Public Health grant of £1.085m in 2017/18 and a further £1.116m in 2018/19, total reduction over the two years of £2.201m. These reductions in grant will be met by some of the reductions in Public Health services shown above.**

**The total for Better Health, Better Lives savings proposals are reduced by this figure.**

## Great Start, Good Schools

Total Savings Proposed - £1.1m	2017-18	2018-19
	£0.5m	£0.6m

### Children's Services

#### Ref - 4C1 Children's Services - Education Services

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.8m**

2017-18	2018-19	Total	% of current base
£0	£0	£0	0%

**NB - the proposal below relates to reductions in grant funding and not Council Base Budgets.**

The services within scope of this budget relate to services in Education, Employment and Skills including school improvement, Behaviour Support, Diversity and Cohesion, Educational Psychologists, School Governance, SEN core services for statutory duties and Trade Union Facility time.

Funding is provided through Dedicated Schools Grant (DSG), Education Support Grant (ESG) and High Needs Funding.

A significant proportion of the funding for these services is provided through the Dedicated School Grant (DSG) including high proportions of funding for the School Improvement team (including Governors and the data team) £1.3m, Behaviour and Attendance £426,400, Fischer Family Trust school licenses £33,500, Trade Union Facility time £415,800, EEMA £94,000.

From 2017 part of the DSG element will be removed from the Council and passed directly to schools with what remains to be removed in March 2018.

The total amount of DSG funding used to pay for the current services is £2.4m. This is therefore the sum which is at risk for the current services provided. Future decisions by the Bradford Schools Forum, as well as the Government's prescriptions about how funding can and will be used, will affect the scale of this risk.

While the resources will stay in the wider education system – and therefore be available to support the Council's wider ambitions for children - the shift from Council to schools will impact on the services the Council provides and the staff who provide them. High Needs Funding may be affected by proposed changes to the National Funding Formula for schools.

Plans are being formulated whereby a more targeted service will be provided for areas such as school improvement. However the majority of available funding will be utilised to tackle the education safeguarding agenda.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

The equality assessment carried out indicates that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share

protected characteristics.

Essential statutory services will be maintained by the LA. Part of the proposal is the recognition of the significant expertise that exists in schools. This expertise will increasingly be available to those schools through school-to-school support. In many cases the available capacity, expertise and level of resource available in schools can lead to heightened services for pupils and training for staff.

### **Mitigation**

Resources will transfer into the schools system and the Council will work together with school leaders to ensure that schools are able to access the support that they need to drive improvement.

**See EIA 4C1 & 4C2**

### **Ref - 4C2 Children's Services - Early Years**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £9.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£0</b>	<b>£0</b>	<b>0%</b>

**NB - the proposal below relates to reductions in grant funding and not Council Base Budgets.**

The services within scope of this budget reduction relate to early years services in Education, Employment and Skills. Outcomes for children have been improving for early years in recent years with the highest results so far being achieved in 2016. Funding is provided through Dedicated Schools Grant (DSG), Education Support Grant (ESG) and High Needs Funding.

A significant proportion of the funding for these services is provided through the DSG including a large proportion of funding for the Play Team (£220,000), Family Information Service (£234,000), Pre School Language Development (£44,600), Early Years team (£155,400).

The DSG element of early years is removed from the Council in part in March 2017 and the remaining in March 2018. This without any other funding cuts amounts to a budget decrease of £654,000 by March 2018.

The Council will have to work with others to review all its early years' provision. Plans are being formulated to develop a coherent and targeted suite of early years' services including early help, family centres and early years' services including Children's Centres.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

The equality assessment carried out indicates that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics. However, as the plans are being formulated to develop a coherent

and targeted suite of early years and early help services, the equality impacts will be reviewed and the impact assessment updated.

**Mitigation**

The Council will work together with other public sector leaders to ensure that the District retains a wide ranging early years offer, with the Council's own resources primarily targeted at those in greatest need.

**See EIA 4C1 & 4C2**

**Ref - 4C12 Children's Services - Early Years School Readiness**

***Note - This relates to funding linked to a Public Health Inter Departmental Agreement and should be seen as a loss of funding to the Service***

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£60,000</b>	<b>£0</b>	<b>£60,000</b>	<b>15%</b>

This project funds a range of small VCS providers to undertake community based activity to help prepare children for school.

The budget proposal is to review this funding opportunity from 2017-18 and to make a reduction in the grants offered, ensuring that projects funded in the future meet the criteria of ensuring school readiness in line with the Council priority.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicates that this proposal is unlikely to have any detrimental impact and so there is no disproportionate impact on any group that shared protected characteristics.

**Mitigation**

N/A

## Health and Wellbeing - Public Health

### Ref - 4PH1 Public Health - Services for Children 0-19

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £14.4m**

2017-18	2018-19	Total	% of current base
£827,000	£1,390,000	£2,217,000	15.4%

**NB - This proposal is split between the outcomes for Better Health, Better Lives and Great Start, Good Schools for accounting purposes but merged to describe the proposal**

The services within the Scope of this Budget Reduction proposal relate to Public Health Services commissioned for children aged 0-19 and their families, and cover:

- **Health Visiting (HV):** a universal service for all children age 0-5 years, including the targeted Family Nurse Partnership (FNP) service for young mothers (under 20 years of age) in more deprived areas;
- **School Nursing (SN):** a universal service for 5-19 year olds;
- **Oral Health (OH):** a programme to improve children's oral health across the district;

The proposal is to reduce the overall Public Health budget for 0-19 years from £14.4m to £12.2m by 2018-19. The reduction will be phased over two years and identified through service based efficiency savings.

#### **Health Visiting and School Nursing Services:**

The service will be subject to 5% savings during 2017-18 and 10% during 2018-19 which will be realised by a review of current service delivery and staffing structures, primarily identifying savings through management and back office savings, and vacancy control.

#### **Oral Health:**

The Programme will be subject to a £50,000 (7%) reduction in 2017-18 and £100,000 (17%) in 2018-19 which the provider will be required to find through management and back office savings, stopping all training (including midwifery) and campaigns, and the Healthy Teeth Award and Health Promotion Practice Award.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

Any reduction in Public Health investment carries with it a risk that the children and young people will experience deterioration in health and wellbeing within the district.

The reduction in service will impact on quality and access as all training and resources will be withdrawn and providers will not access up to date training which could impact on partnership working both externally and internally, which in return will result in lack of awareness amongst their clients groups which are mainly the protected groups such as mothers/parents, babies and early year's children services.

#### **Mitigation**

Using a phased approach will help to plan and prepare any risks which can then be

managed through the transformation process for a more integrated model for children and young people and the service will continue to provide statutory services.

**See EIA 4PH1**

## Better Skills, More Good Jobs and a Growing Economy

<b>Total Savings Proposed - £4.2m</b>	<b>2017-18</b>	<b>2018-19</b>
	<b>£1.8m</b>	<b>£2.4m</b>

### Environment and Sport

**Ref - 4E7 Environment and Sport - Remodel of Visitor Information & frontline service**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£50,000</b>	<b>£50,000</b>	<b>16%</b>

A review of tourism and visitor economy services is currently taking place and will reduce the number and/or size of Visitor Information Centres across the district. The service will move to a more digital basis promoting the district to target audiences, with the potential for VIC information points as a co-located provision in buildings which are available and financially sustainable.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

The potential closure of VICs could have a disproportionate impact on older customers unable to access information electronically.

#### **Mitigation**

Alternative options are being explored including seasonal visitor information centres in destinations such as Saltaire, Haworth and Ilkley with support from local groups.

**See EIA 4E7**

**Ref - 4E8 Environment and Sport - Events and Festivals**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.8m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£150,000</b>	<b>£150,000</b>	<b>18%</b>

There will be a review of the programme and an investment approach in future years in order to develop a more sustainable and balanced events programme between community, regional and national events, increased income streams and greater emphasis on partnership events across the key providers in the City, benefiting the wider economy that supports the event and visitor economy.

This budget also supports grants to voluntary arts and culture bodies and the City of Film work. Direct funding to this initiative will be removed through a more commercial approach to the work and there will be a review of the funding to external arts and cultural organisations. We will seek to ensure that we minimise the impact of the District's ability to leverage external arts and culture funding.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

N/A

**See EIA 4E8**

**Ref - 4E9 Environment and Sport - Libraries**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£100,000</b>	<b>£100,000</b>	<b>3%</b>

There are currently 30 libraries and in the future there will be a reduction in the number of libraries directly provided. The service will investigate the potential for the libraries to be included in an alternative delivery model which could include a 'not for profit' trust model.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

N/A

**See EIA 4E9**

**Ref - 4E10 Environment and Sport - Theatres and Community Halls**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£130,000</b>	<b>£130,000</b>	<b>32%</b>

Currently there is a feasibility study looking at the potential for a trust type model to be adopted in the Theatre and Halls Service. No decision has yet been made pending the



outcome of this study.

In regard to community centres/halls it is proposed that they will be transferred as part of a community asset transfer. If this is not successful, they will then be reviewed and may form part of future proposals.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

N/A

**See EIA 4E10**

**Ref - 4E12 Environment and Sport - Ministry of Food**

***Note - This relates to funding linked to a Public Health Inter Departmental Agreement and should be seen as a loss of funding to the Service***

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.1m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£96,000</b>	<b>£96,000</b>	<b>100%</b>

The Ministry of Food (MOF) teaches people how to cook and eat and to improve their long-term health and wellbeing and is a practical hands-on community based cooking programme that teaches people of all ages how to cook from scratch.

The service will no longer be able to offer cookery groups for parents with children, students and young adults, young families, disabled people, VCS organisations, community groups, and the general public.

In addition, the service will no longer be able to offer an outreach service across the district which includes cookery demonstrations, presentations and general information around health and well-being by teaching cooking skills.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Whilst the Ministry of Food is a discretionary service provided by the Council, its closure will by definition have a disproportionate effect upon those people who share a protected characteristic. Those attracted to the services provided by the Ministry of Food tend to be those from disadvantaged communities where behaviour change is required to reduce obesity through education and teaching cooking skills.

### **Mitigation**

The Health Improvement Team will support providers/organisations proactively with advice and sign-posting as opportunities are identified.

**See EIA 4E12**

### **Children's Services**

#### **Ref - 4C3 Children's Services - A prepared and Skilled Workforce**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£150,000</b>	<b>£150,000</b>	<b>£300,000</b>	<b>15%</b>

The proposed savings will be made by reducing the Connexions Contract by £150,000 per annum in 2017-18 and 2018-19.

This and other savings proposals set out below will see an overall reduction of £2.3 million on 2016-17 budget (including reserve funding) in Education Employment and Skills. Furthermore, there will be a £1.2million reduction in projected income for Skills for Work during the period by 2018 as the Work and Work Choice Programme ends from April 2017 that will have to be factored into the savings required.

Key elements of the proposals are:

- To restructure Skills for Work and reduce staff in line with a reduction in income with the finishing of the government's Work and Work Choice programmes from April 2017.
- To reduce the Connexions Contract by £150,000 per annum in 2017-18 and 2018-19.
- At the end of the current Connexion Contract in August 2019 re-design the activity and bring the service in-house at a reduced cost.
- Explore the feasibility of establishing a regional young person tracking data centre with other West Yorkshire local authorities to make savings.
- To make Skills House funded from base budget from April 2020
- Cease funding the Employment Opportunity Fund (EOF) from April 2017.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

This proposal in regard to the Connexions Service contract will have a negative impact on people who share a protected characteristic. This service directly supports young people who are NEET, the cohort being comprised of young people with complex and multiple needs related to the protected characteristics and long-term low-income unemployed adults.

### **Mitigation**

To mitigate the potential disproportionate impact of the Connexions Service proposal, there will be a re-design of the Connexions type activity to provide a minimum statutory service with a greater reliance on the Bradford Pathways approach that will be underpinned with more effective information, advice and guidance framework. Greater linkages and working

with other front line staff working with young people will also be explored. It is not feasible to fully mitigate the impact of the proposals given proposed funding levels.

**See EIA 4C3**

### **Regeneration Services**

#### **Ref - 4R1      Regeneration Services - Industrial Services Group Operational Savings**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.04m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£43,300</b>	<b>£43,300</b>	<b>100%</b>

Industrial Services Group (ISG) is a trading service currently running at a cost to the Council. The proposal is to reduce the staffing structure to suit the present workloads starting with bringing the service back into line with the base budget. Further changes and reductions will be made to bring the service back to a nil operating budget.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

#### **Mitigation**

N/A

#### **Ref - 4R2      Regeneration Services - West Yorkshire Combined Authority (WYCA) Transport Levy**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £24.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£750,000</b>	<b>£750,000</b>	<b>£1,500,000</b>	<b>6%</b>

This proposals relates to the £24m contribution from Bradford paid to West Yorkshire Metro for transport operations. The contribution is raised as a levy, based on population size, across all 5 West Yorkshire Councils. Bradford's contribution includes a £1.4m Transport Fund for investment in transport infrastructure projects.

West Yorkshire Local Authority colleagues have requested that the WYCA consider a minimum 3% reduction (£750,000 for Bradford) in the 2016/17 levy and then a further percentage reduction per year to achieve a £750,000 saving each year.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

This proposal could have an adversely disproportionate impact on both the young (under

18's) and elderly sectors of the community as the funding which is being reduced is specifically used to fund schemes/programmes which are delivered for these groups.

### **Mitigation**

The negative impacts would need to be considered within the wider West Yorkshire context in consultation with WYCA with whom the ultimate decisions on which aspects of their budgets to reduce would rest.

Some aspects of expenditure of the Transport Levy are protected by national regulation and hence are likely to remain largely unaffected by any reductions as a consequence of this proposal. It is therefore anticipated that those elements of expenditure which are discretionary are likely to bear the majority of any agreed levy reduction.

**See EIA 4R2**

### **Ref - 4R3      Regeneration Services - Commercialise Highway Delivery Unit function**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£223,000</b>	<b>£223,000</b>	<b>£446,000</b>	<b>18%</b>

This proposal is to increase the range of services provided by the Council's Highway Delivery Unit through increasing involvement in existing capital works programmes (other than highway maintenance) and delivery of services which are externally funded (e.g. installation of residential dropped crossings or services under the New Roads and Street Works Act).

### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

### **Mitigation**

N/A

### **Ref - 4R4      Regeneration Services - Centralisation of Urban Traffic Control including reduced maintenance of street lighting asset**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.5m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£119,000</b>	<b>£246,000</b>	<b>£365,000</b>	<b>77%</b>

This proposal is based around the current West Yorkshire Combined Authority programme to establish a West Yorkshire UTMC (Urban Traffic Management & Control) service combining all traffic signal staff from all West Yorkshire districts with a presence from bus operators, emergency services & WYCA in a central location.

It should be noted that as this project is not within the direct control of the Council. Delays in implementation may adversely impact the delivery of savings within the proposed timeframe.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4R5      Regeneration Services - Increase charges within Planning, Transportation and Highways Services**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.6m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£30,000</b>	<b>£30,000</b>	<b>£60,000</b>	<b>11%</b>

The scope of this proposal is to increase discretionary charges within the Planning, Transportation & Highways Services together with introducing new charges for aspects of the services functions which bring it in line with neighbouring authorities. Specific proposals within Transportation & Highways include:

- Increasing charges associated with Section 38 and Section 278 Agreements including raising the minimum amount of charge payable including to £2,000 per agreement with a standard charge of 9% of the bond amount for technical inspection and validation.
- Introducing a new annual charge for café licence applications, inspections and approvals of £500 per permit.
- Introducing a minimum charge for events on the highway to cover staff costs associated with their planning and co-ordination except where such events are street parties.
- Introducing a charge to permit the temporary installation of developer signs on street lighting columns inclusive of their manufacture and removal at the end of a prescribed period.

Proposals within Planning include:

- Increasing pre-application advice service charges above the standard rate of inflation.
- Introducing a charge for dealing with high hedge complaints.
- Introduction of a charge for the street naming and numbering services with appropriate exception for street names associated with injured/killed military service personnel.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

The introduction of fees and charges in relation to dealing with high hedge complaints may lead to disproportionate impacts on the low paid sectors of the community and senior citizens. Currently, receipt and investigation of complaints in relation to high hedges are processed by the Council on a free of charge basis.

Introduction of a minimum charge for co-ordination and marshalling of events on the highway could adversely affect those community interest groups/areas of protected characteristics who wish to arrange an event on the highway. The impact of this proposal may lead to a number of events no longer taking place along traditional routes given the costs associated with the administration and approval of traffic management.

#### **Mitigation**

Discounts for various types of organisations in relation to charges for events on the highway could be introduced to help minimise the impact of this aspect of the proposal. It should be noted that this proposal will not affect the holding of a street party which will remain free of charge as per national guidance.

The mechanism for charging for dealing with high hedge complaints may similarly introduce a discount for members of the community over a certain age making a complaint.

**See EIA 4R5**

### **Ref - 4R6      Regeneration Services - Options related to discretionary budgets for highway maintenance works including minor drainage improvements, pavement repairs and footpath and snicket maintenance.**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.7m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£128,000</b>	<b>(£6,400)</b>	<b>£121,600</b>	<b>18%</b>

The above savings profile assumes adoption of the level of service defined below whereby a direct budget reduction of £128,000 would be implemented in the 2017-18 financial year.

The Council currently allocates an annual budget of £50,000 per parliamentary constituency to allow minor scale maintenance works such as drainage repairs and improvements, pavement and pedestrian area maintenance, footpath maintenance and urban snicket maintenance.

The proposal would see a reduction of the current service level provision meaning each parliamentary constituency would receive circa £25,000 for minor maintenance repairs. Under this proposal works would continue to be prioritised on drainage maintenance, unclassified road maintenance, issues with a "life and death" consequence with very minimal levels of funding for footpath work per constituency and no funding to undertake snicket maintenance.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Whilst the cost of the works delivered through the local area maintenance budgets may be relatively small, the impact of non-action could have a disproportionate impact on the lives of the districts citizens. Some footpaths and snickets are currently impassable due to lack of maintenance which is a consequence of the current reduced budget allocation.

#### **Mitigation**

As the scope of the impact arising from this proposal could be wide ranging and dependent upon the nature of any specific maintenance requirements, it is not possible to propose measures to fully mitigate or eliminate the disproportionate impacts.

However, the nature of the prioritisation framework (which is still to be developed), which would be used to assess the priority for action of any requests, could incorporate appropriate consideration of the characteristic of the person needing action (e.g. include age and/or disability criteria).

**See EIA 4R6**

**Ref - 4R7      Regeneration Services - Reduction in Highways Services operational budgets associated with operational accommodation, transport gateway and subway maintenance.**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£64,000</b>	<b>£31,600</b>	<b>£95,600</b>	<b>43%</b>

#### **Transport Gateway and Subway Maintenance**

This proposal would reduce maintenance activities on gateway corridors to Bradford city centre together with maintenance of current subways and underpasses in the city centre. The Council currently allocates an annual budget of £127,000 to fund minor scale maintenance works.

#### **HDU Depot Reduction**

This proposal is to reduce the operational bases used by both the Highways Delivery Unit (DLO), Traffic & Road Safety (North) and Highway Maintenance (North) teams through relocation of existing staff, plant and materials from Stockbridge depot to other operational bases to realise budget savings equivalent to the annual maintenance and running costs of the Stockbridge facility charged to the service.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

Failure to undertake any maintenance of gateways and subways will very rapidly lead to these assets deteriorating and potentially becoming impassable.

Winter maintenance operations would be significantly impacted by the reduction in DLO operational bases meaning longer times being necessary to grit the routes in the district,

potentially meaning that areas in the north of the district may be untreated in periods of inclement weather.

This could therefore impact on some of the protected characteristics.

### **Mitigation**

Any loss of a subway/underpass facility could be offset through the introduction of a crossing. Research has shown that these types of crossing are more attractive to pedestrian users than subways as they are generally perceived as reducing the fear of attack/crime for pedestrian users. However, such facilities on major corridors are problematic as they need to cross six lanes of traffic and therefore their design can lead to increased delays for general traffic and increased frustration for drivers.

The impact of the closure of the depot at Stocksbridge and the consequent impact on winter maintenance operations will need to be carefully considered within the context of winter gritting routes and treatment programmes. Consideration of more pro-active treatment regimes for areas in the north of the district will need to be developed in order to ensure that problems associated with reactive maintenance are mitigated.

**See EIA 4R7**

**Ref - 4R8      Regeneration Services - Increase fine income by increasing enforcement of contraventions by statutory undertakers of the Yorkshire Common Permit Scheme (YCPS) on highways.**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding    £n/a**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£30,000</b>	<b>£70,000</b>	<b>£100,000</b>	<b>n/a</b>

The Council has a statutory duty under the Traffic Management Act 2004 to coordinate road works to ensure traffic moves efficiently around its network. In recognition of this duty the Council sought powers from the Secretary of State to introduce a Permit Scheme on key transport corridors in the District. This scheme provides income both from the applications for permits to carry out works on the highway and from the statutory powers to fine utility companies that breach the scheme.

The income from permit applications is used to cover the staff costs of operating the scheme. The Council must review its fee income every year to ensure that surpluses are not accruing and similarly that costs are not exceeding income. Where either of these conditions occur it must adjust its fee charges every third year to reflect operational realities (either increasing or decreasing charges accordingly).

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

### **Mitigation**

N/A



**Ref - 4R9      Regeneration Services - Reduce Area Committee support by Highways and stop processing/charge for all requests for service delivery for non-casualty led projects.**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£124,000</b>	<b>£124,000</b>	<b>40%</b>

Introduce an alternative Governance structure for consideration of all highway related matters rather than the current Area Committee structure thereby reducing the officer numbers required to effectively service five committees. In addition, this proposal recommends that elements of non-casualty led works and requests for service delivery are either stopped or charged for at cost rates.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Any replacement decision making body would need to appropriately consider the views and opinions of the protected characteristics and demonstrate appropriate consideration/ due regard to the Equality Act duties. The exact form of this decision making body is yet to be determined and hence the impact of this proposal cannot fully be explored at this time.

The introduction of an administrative charge to cover the additional processing necessary for checking the validity of a disabled persons parking permit (DPPP) would produce a disproportionate negative impact on this protected characteristic.

Provision of some of the other proposed highway services (e.g. vehicular dropped crossings and keep clear markings) may similarly have a disproportionate impact on those sectors of the community where the ability to pay for services will be an issue (e.g. elderly residents or those residents on low income).

**Mitigation**

Decisions taken through the new body would need to ensure that appropriate consideration is given to the Equalities Act on all matters progressed. Therefore any decision recording process must ensure that an appropriate record of the regard given to Equalities matters on the decision matter is retained.

**See EIA 4R9**

**Ref - 4R10      Regeneration Services - Payment Reductions - Capital Team**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.8m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£50,000</b>	<b>£50,000</b>	<b>£100,000</b>	<b>5%</b>

£50,000 will be taken from the budget in 2017-18 to reduce it to £1.8m by a combination of savings due to salary savings and a reduction in facilities management and other charges.

In 2018-19 the final payment of £50,000 will have been made by the Council for the temporary classrooms at Ryecroft Primary School and this money can be released as a saving.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4R11 Regeneration Services - Introduction of limited lighting hours / switch off of street lighting on non-principal road network**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.4m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£50,000</b>	<b>£60,000</b>	<b>£110,000</b>	<b>8%</b>

This proposal is to arrange for the introduction of limited lighting hours or switch off of street lighting on non-principal road network to save energy costs. Typical non-lit hours could be from 12am-5am (or longer on lesser populated/used areas of the non-principal network). Proposals for groups of streets to be included in any switch off zone would need to be developed in accordance with appropriate standards including assessment of road traffic collision data, criminal activity and infrastructure condition/type etc.

A small capital investment in appropriate lighting management equipment/software would initially be required for any sections of non-principal network selected for limited lighting hours but this initial cost would be rapidly recovered as energy costs are fully saved during non-lit hours.

**Equality impact on the Equality Duty protected characteristics & low income groups**

Introduction of this proposal in additional areas of the district will have a disproportionately negative impact on some protected characteristics.

Fear of crime amongst the elderly will increase where back streets and residential roads are unlit during the early hours of the morning and it is from this characteristic group that the greatest impact is anticipated.

Similarly fear of crime on unlit streets could adversely impact the protected characteristic groups of disability, race, religion/belief and sex who may all experience increased levels of concern about the proposal.

### **Mitigation**

The Council has developed a set of criteria which are used to select streets where limited lighting hours are introduced. These criteria assess road safety statistics, criminal activity records, infrastructure condition and involve consultation with the local community on any proposals being prepared.

Any streets which are considered appropriate to be included in the programme of limited lighting operation will be fully appraised using this model before a decision is taken on whether or not to implement the limited lighting hours infrastructure is taken. Those streets with high criminal activity and/or poor road safety records will not be included in the project beyond their initial assessment.

To avoid any undue distress to local residents only those streets which “pass” the desktop assessment will be consulted upon with the local community.

**See EIA 4R11**

### **Ref - 4R12    Regeneration Services - Increasing the profitability of the FM service for schools**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding (£0.7m)**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£30,000</b>	<b>£35,000</b>	<b>£65,000</b>	<b>(9%)</b>

This proposal is to increase the trading surplus of School Catering & Cleaning by up to 10% through increased sales and price reviews while being mindful of the need to maintain value for money and retain the existing client base. Additionally, work is on-going to assess the option of these services being provided via various alternative delivery models.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

### **Mitigation**

N/A

### **Ref - 4R13    Regeneration Services - Businesses starting-up, growing and investing - Economic Development Service**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£150,500</b>	<b>£0</b>	<b>£150,500</b>	<b>7%</b>

Proposal is as below;

- £70,000 to be removed from the £320,000 City Park Sinking Fund, further reducing the maintenance fund for major works to £250,000.
- Reduce match funding of £72,500 for European Strategic Investment Fund programmes and projects.
- Remove support for the Bfunded community funding information website saving £8,000. Financial and officer support will cease in 2018 and a transfer to Third Sector partners is under negotiation.

Remaining work areas will be refocused to meet new priorities around Inclusive Growth and increasing our business rates income.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

Equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

#### **Mitigation**

N/A

**See EIA 4R13**

**Ref - 4R20 Regeneration - Sustrans promotes young people travelling to school actively and/or sustainably**

***Note - This relates to funding linked to a Public Health Inter Departmental Agreement and should be seen as a loss of funding to the Service***

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.056m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£28,000</b>	<b>£28,000</b>	<b>50%</b>

This budget saving proposal is phased over two financial years commencing in 2018-19 to allow for discussions with schools involved in supporting the programme. The first change in 2017-18 would be to no longer accept new schools onto the programme with existing schools provision being phased out over the following years of this budget proposal.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

The nature of the Active School Travel programme is such that its cessation would effectively adversely affect the young children and adolescents which the programme targets through removal of the opportunities afforded under the programme to embed health lifestyle choices.

Similarly, as children with a sedentary lifestyle are predominantly found in areas of deprivation and low incomes, the cessation of this programme would likewise have an impact on this protected characteristic.

### **Mitigation**

Working with schools it may be possible to introduce aspects of the programme into the school curriculum, however given the demands on pupil contact time created by the national curriculum this may not be a significant mitigation proposition.

**See EIA 4R20**

### **Ref - 4R21    Regeneration - Road Safety Training programme in Schools**

***Note - This relates to funding linked to a Public Health Inter Departmental Agreement and should be seen as a loss of funding to the Service***

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£62,500</b>	<b>£62,500</b>	<b>24%</b>

The Road Safety Team operates on a district-wide basis. Staff and financial resources are allocated to education, training and publicity programmes based on priorities identified for greatest impact on casualty reduction. This reduction would result in a net reduction of staff resources available for this type of work.

This proposal would reduce the funding for the team, effectively reducing the exposure of road safety training and support to local children of both pre- and school age.

### **Equality impact on the Equality Duty protected characteristics & low income groups**

This proposal will adversely affect the younger sections of society, or those from wards with a particular road safety problem (which tend to be predominantly low income inner city wards) who will not be able to access the same level of training and awareness activities as are currently provided by the Road Safety Team.

### **Mitigation**

Nominal charges for provision of training programmes could be introduced, however these have historically been seen as barriers to ensuring take up of the training provided and therefore may have a counter effect to that anticipated.

Programmes of training interventions may need to be targeted to Key Wards in each year due to reduced resources. This would ensure that those wards with an identified road safety issue receive some training but may mean that some areas of the district similarly are not offered any training in future.

Alternative funding sources for the provision of this service could be explored within West Yorkshire to offset the reduction in funding.

**See EIA 4R21**

## Decent homes that people can afford to live in

Total Savings Proposed - £0.076m	2017-18 £0.03m	2018-19 £0.04m
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### Regeneration Services

**Ref - 4R18    Regeneration - Housing - Homelessness Private Rented Housing Development Officer**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.9m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£32,000</b>	<b>£0</b>	<b>£32,000</b>	<b>2%</b>

Delete the vacant post of private rented housing development officer.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

#### **Mitigation**

N/A

**Ref - 4R19    Regeneration - Housing - Increase income generation from agency fees**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£44,000</b>	<b>£44,000</b>	<b>4%</b>

To increase fee income for the Housing Operations service from agency fees by £44,000

The increase in fee income is achievable due to the current levels of demand and delivery of Disabled Facilities Grants (DFGs). The Housing service which administers DFG's offers an agency service to procure and manage works on the clients' behalf. In 2015-16 87% of clients chose to use the agency service and the number of referrals for DFG continues to increase year on year. In 2015-16 Housing received 603 new referrals for DFG compared to 357 in 2013-14 and 489 in 2014-15.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

#### **Mitigation**

N/A

## Safe, Clean and Active Communities

Total Savings Proposed - £1.5m	2017-18 £0.1m	2018-19 £1.4m
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### Environment and Sport

#### Ref - 4E1 Environment and Sport - Parks and Bereavement

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.35m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£160,000</b>	<b>£160,000</b>	<b>7%</b>

Parks, Recreation Grounds and Woodlands are to be offered as community asset transfer initiatives.

Tree work & Wood Management services will rationalise the management structure & reduce work to trees & woodlands.

In relation to sports pitches & bowling greens the Council will withdraw from the direct management and maintenance of sports pitches and bowling greens and explore the potential of increasing charges.

The Council will use the consultation period to discuss with the groups affected, the options available.

Bereavement Service - Raise prices 3% above inflation in financial year 2018-19.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

With regard to bereavement service proposals, any increase in charges, particularly at a rate above inflation, will by definition have a disproportionate effect upon those on low incomes for a service that cannot be viewed as discretionary.

Given that cremation charges are currently lower than burial charges, particularly should a new grave be required, any percentage price rise will generate a higher cash increase in the cost of burials than that of cremations. This could represent a disproportionate effect for those religious and faith communities that favour burial.

The implementation of a flat rate cash increase to both cremations and burials would however have increased the cremation charge to a level disproportionate to that of the burial charge in terms of comparator values of neighbouring Councils.

#### **Mitigation**

The most deprived/low income communities receive support for the cost of funerals from the Council through Adult Services.

The proposed above inflation increase in charges for funerals will result in local service users continuing to pay less than the average within West Yorkshire for all services.



It is intended to introduce a reduced rate for the walling of graves to coffin height which will mitigate the effect of the increases for those faith groups that adopt such a requirement.

**See EIA 4E1**

**Ref - 4E2 Environment and Sport - Waste Collection and Disposal Services**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £21.6m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£50,000</b>	<b>£807,000</b>	<b>£857,000</b>	<b>4%</b>

Budget proposals have already been approved for the introduction of Alternate Weekly Collection (AWC) of residual waste, which will also see the introduction of fully co-mingled recycling via a Mechanical Recycling Facility which has been installed at Bowling Back Lane Household Waste and Recycling Centre. This will enable residents to re-cycle all types of plastics and therefore further reduce waste into the residual bin which will support residents with this change to AWC and encourage greater recycling. The year 2 savings (2018-19) will include the remaining full year effect of the year 1 planned reduction in rounds and a further reduction of 3 rounds with associated restructuring of Waste Services.

The Council is currently part way through a procurement process to award a contract for the disposal of its residual waste following the approval of the "Municipal Waste Minimisation & Management Strategy" by Executive in January 2015. The procurement of new waste treatment arrangements are due to be finalised by October 2017.

**Equality impact on the Equality Duty protected characteristics & low income groups**

The proposal is likely to have no or a low impact on everyone so it is considered that there is no disproportionate impact on any group who share protected characteristics. It is however recognised that a move to alternate weekly collection could result in the residual waste bin being heavier to move around.

**Mitigation**

It is recognised that the elderly and disabled could be impacted upon by a heavier bin where there are mobility or accessibility issues. The Council already provides assisted bin lifts for residents in such circumstances. If this service is required, residents can call the Council Contact Centre and a home visit will be arranged to see how the Council can help.

**See EIA 4E2**

**Ref - 4E3 Environment and Sport - Trade Waste**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding (£0.5m)**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£50,000</b>	<b>£0</b>	<b>£50,000</b>	<b>(9%)</b>

The Council operates a Trade Waste Collection Service to local businesses. It currently has approximately 3000 customers collecting 19,500 tonnes of residual waste and 800 tonnes of recycling. Process improvements have been identified which will release cashable savings from a revision of the existing charging policy and a move to cashless payment systems. In addition the service actively seeks out new business to generate additional revenue. Our customers are predominantly small to medium size businesses which in the future could be supported by the domestic waste collection service. This would then reduce trade waste service costs and make the service more competitive.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4E4 Environment and Sport - Customer Services**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.1m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£50,000</b>	<b>£50,000</b>	<b>2%</b>

A continuation of the Customer Services Strategy seeking to redirect face to face contact towards self service and telephone services will see a continuing decline in contact resulting in staffing efficiencies.

Automated services will increase with fewer options for people to speak to a customer services advisor. More people will be expected to 'self serve' using on line services. Automation will be used to take requests for services where appropriate.

**Equality impact on the Equality Duty protected characteristics & low income groups**

The Council recognises that any move toward increasing dependency on digital/online access to Services or information may potentially have a detrimental impact on residents who do not have English as a first language or who don't/can't access IT. Making services available electronically could impact on those unable to access due to ability or lack of available technology. Those with a preference or requirement to deal with a person may feel anxious and vulnerable.

The majority of current face-to-face customer service and an increasing proportion of telephony work is with low wage/low income groups, including people with disabilities, and older people although there has been a significant increase in enquiries from customers from Eastern Europe who have language barriers.

Customer service teams carry out some home visits to customers who are unable to access Council services in other ways.

However, in the context of the number of enquiries handled by the Council each year, the relative numbers of people adversely impacted by the proposed change is small.

**Mitigation**

To mitigate the potentially disproportionate impact the Council remains committed to the Five Principles of Producing Better Information for Disabled People, and will also continue to make sure the Council website is accessible.

Greater self service access will provide the majority of citizens with a more efficient service; thereby freeing up the limited resources to focus on those who need the additional support. By minimising avoidable face-to-face and telephone contact with the council, officer time can be better directed to those customers who require it.

**See EIA 4E4**

**Ref - 4E5 Environment and Sport - Street Cleansing and Public Conveniences**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.5m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£336,300</b>	<b>£336,300</b>	<b>7%</b>

There are currently 25 Ward based clean teams and 17 mechanical sweepers. This proposal would see a reduction in the number of ward based clean teams and mechanical sweepers (precise number to be determined during consultation period) and the removal of funding for all public toilets (except City Park).

The service would continue to employ any new starters working to a standard 30 hour working week, mitigating the impact through increased use of technology.

Potential income from a City and Town Centre environmental enforcement contract may generate Fixed Penalty Notice income to offset the loss of the one street cleansing team.

**Equality impact on the Equality Duty protected characteristics & low income groups**

The proposal has the potential to have a low impact on predominantly inner city highly densely populated areas. The people who live in these areas are in the main white people on low incomes and communities from BME backgrounds.

In terms of closure of the toilets there is likely to be a disproportionate impact on older people, pregnant women, parents requiring access to baby changing facilities, young

children, transgender community, disabled people, particularly those with complex needs, and people who, because of their physical condition, may need to visit the toilet more regularly.

**Mitigation**

Increased waste awareness and anti litter/education campaigns in affected areas and the new robust enforcement model for targeting those people that drop litter, will mitigate the impact the street cleansing proposals.

In the case of public toilets work will take place to ascertain whether Parish/Town Councils, community or other voluntary groups could take over the running of those blocks proposed for closure. Consideration will also be given to whether local businesses, cafes, restaurants etc. would allow people to use their facilities.

**See EIA 4E5**

**Ref - 4E6      Environment and Sport - Cessation of the Pest Control Service**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.036m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£36,200</b>	<b>£36,200</b>	<b>100%</b>

The Council will stop providing a Pest Control Service. The provision of a pest control treatment service is not a statutory service and it is currently running at a loss. Due to the availability within the private sector for a similar product at a similar cost it is proposed to stop delivery of this service.

The Council's prices for pest control treatments are similar to the private sector. Therefore the financial impact on residents would be minimal.

**Equality impact on the Equality Duty protected characteristics & low income groups**

This proposal could have an adverse impact on people on low incomes as it removes the facility to pay for treatments in instalments although the equality assessment carried out indicated that this proposal is likely to have no or a low impact on everyone, and so there is no disproportionate impact on any group who share protected characteristics

**Mitigation**

The most common request for treatment is to deal with rats and mice and there is at least one company in Bradford which is able to provide the service cheaper than the Council.

**See EIA 4E6**

## A Well-Run Council

<b>Total Savings Proposed - £3.3m</b>	<b>2017-18</b>	<b>2018-19</b>
	<b>£0.6m</b>	<b>£2.7m</b>

### Financial Services

#### Ref - 4F1 Financial Services - Restructure

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £2.8m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£32,000</b>	<b>£130,000</b>	<b>£162,000</b>	<b>6%</b>

The size of the Financial Services function will continue to gradually reduce, reflecting reduced emphasis on retrospective reporting, more self-service by budget managers, and targeting staffing resources at highest risk, most complex issues. We will also consider if transactional functions across the Department will be more efficient and sustainable if we bring them together. This will be achieved through further restructuring.

#### **Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

#### **Mitigation**

N/A

#### Ref - 4F2 Financial Services - Manage insurance risks and claims

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £6.0m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£200,000</b>	<b>£300,000</b>	<b>£500,000</b>	<b>8%</b>

The proposal aims to reduce the total cost of insurance, including premiums paid to the Council's insurer, the cost of maintaining an internal insurance fund for self-insured risks and the cost of meeting claims.

The scope will include:

- Reassessing the level of self-insurance
- Exploring with the Council's insurers the options for reducing premiums
- Working with Departments to take action to reduce claimable risks
- Maximising the benefit of the impact of Ministry of Justice reforms of the legal costs allowable in claims
- Selling on insurance cover to schools to generate marginal income

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4F3 Revenues and Benefits - Rationalisation of the cash management function**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £0.3m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£160,000</b>	<b>£160,000</b>	<b>49%</b>

Reduce significantly the amount of cash used by and within the organisation and reduce the cost of cash management functions through the increased digitalisation of customer payment options.

We will also consider if transactional functions across the Department of Finance will be more efficient and sustainable by bringing them together.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4F4 Financial Services - Contribution to West Yorkshire Joint Committees**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.2m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£75,000</b>	<b>£35,000</b>	<b>£110,000</b>	<b>9%</b>

West Yorkshire Joint Services is a shared services organisation led by a Joint Committee from the five District Councils. It carries out specialist collective functions. The proposal is to cap Bradford's contribution to joint committees at £1.1m, which will require concerted action with other Councils.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4S1 Information Technology Services****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £12.5m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£500,000</b>	<b>£500,000</b>	<b>4%</b>

The proposal is comprised of two main components:

- Re-sizing of IT Services to reflect the broader organisational changes affecting the Council. The assumption is that there will be a significant reduction in the number of Council supported desktop/laptop devices over time. This will enable IT Services to reduce costs associated with device support, licenses and infrastructure.
- Fit for purpose IT application architecture - This component will involve switching technology solutions where better value can be achieved and rationalising the number of existing IT applications to simplify the technology in use.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Human Resources****Ref - 4H1 Human Resources - Restructure****Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.6m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£204,000</b>	<b>£204,000</b>	<b>4%</b>

The proposal is to reduce transactional HR support, to reduce volume of service specific training, to return 'non HR' activities such as Coroners office, Finance and Mail Distribution and Archive to more appropriate Corporate Service functions.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4H2 Human Resources - Terms & Conditions**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £1.65m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£400,000</b>	<b>£400,000</b>	<b>24%</b>

Removal of non contractual overtime payments and removal of essential car allowance lump sum payments.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Legal and Democratic Services**

**Ref - 4L1 Legal and Democratic Services**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £5.7m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£20,000</b>	<b>£55,000</b>	<b>£75,000</b>	<b>1%</b>

To reflect the reduced size and scope of the Council, reductions to Civic, Legal and Committee Services, including Overview and Scrutiny, are proposed. It is not possible to describe the precise changes until the Council decides what it requires from these services in the future.

The Civic profile of the Council is proposed to diminish, including no longer having a Deputy Lord Mayor. As the Council reduces in size and scope there will be an impact on the number and frequency of Committee meetings, including Overview and Scrutiny. As reductions are agreed some reductions in staffing will need to be considered.



**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Office of the Chief Executive**

**Ref - 4X1 Office of the Chief Executive - Restructure**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.6m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£479,000</b>	<b>£479,000</b>	<b>13%</b>

In February 2016 Council agreed a saving of £541,000 in 2017-18 from a “review and restructure of Chief Executive’s Office, Public Affairs and Communications (PAC) and Policy Programmes and Change (PPC).” Further cuts of £479,000 are proposed for 2018-19.

This proposal suggests a radical restructure of the Office of Chief Executive to improve the coherence and integration of core corporate functions, so they can support and improve the Council’s leadership of the District. The authority will need to continue to change in order to have the agility, skills and capacity to influence, negotiate, communicate and collaborate with communities and partners to deliver the district’s priorities.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Regeneration Services**

**Ref - 4R14 Regeneration - Asset Management - Manage the Operational and Investment Estate**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £n/a**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£270,000</b>	<b>£240,000</b>	<b>£510,000</b>	<b>n/a</b>

The proposal foresees changes in the management of:

- the Council's operational and investment estate;
- Delivery of the capital receipts programme
- Community Asset Transfers and Assets of Community Value
- One Public Estate Programme

This aims to make the best use of the Council's and public sector partners' estate working with the Voluntary and Community Sector.

We will also seek investment in non-operational property to generate surplus income. The proposal targets £260,000 gross cost reductions and £250,000 additional surplus income. Overall it is proposed to increase surplus income to £1million p.a. by 2020.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4R15 Regeneration - Facilities Management Operational cost reductions**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.5m**

2017-18	2018-19	Total	% of current base
£0	£100,000	£100,000	2%

Allowing for the planned release of Future House and Jacobs Well and further estate rationalisation reflecting the continued contraction of the organisation. Operational estate costs including cleaning, will fall.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4R16 Regeneration - Facilities Management - Operational Savings**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £3.2m**

2017-18	2018-19	Total	% of current base
£0	£100,000	£100,000	3%

Planned reductions in Facilities Management will take the current net budget down from £3.9m to £3.8m. A further reduction in future years is likely but would be dependent on the Council's estate shrinking further.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

**Ref - 4R17      Regeneration – Facilities Management - Manage New Energy Projects & Corporate Utility consumption**

**Total 2016-17 Net Budget for Service Area after pre-agreed savings & removal of transitional funding £4.6m**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>	<b>% of current base</b>
<b>£0</b>	<b>£50,000</b>	<b>£50,000</b>	<b>1%</b>

Sharper procurement and control of utilities to all Council buildings, managing carbon taxes and statutory annual carbon emissions reporting, and the current energy efficiency capital programme will all deliver savings.

The energy industry is forecasting 35% energy price inflation by 2020, due to increased non-commodity price increases, grid/network costs etc. It is anticipated that there will be a commensurate reduction in the size of the estate during this period, allowing offsetting savings.

**Equality impact on the Equality Duty protected characteristics & low income groups**

N/A

**Mitigation**

N/A

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**APPENDIX D – SCHEDULE OF DECISIONS OF BUDGET COUNCIL FEBRUARY 2016  
FOR INFORMATION & NOT SUBJECT TO CONSULTATION**

NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
<b>Adults and Community Services</b>			
3A1	Integration and Transition	<p><b>Changes to the Contributions Policy for Adult Social Care</b>                      People who are able to reasonably afford it will pay more towards the cost of their non-residential care. Bradford's current policy is generous compared to other authorities and treats people with more income more favourably. No service user would pay more than they can reasonably be expected to afford. A significant number of service users out of a total of 3,500 would see an increase of between 2p and £116 per week. People with higher levels of income or savings would be most affected.</p>	611
3A2	Operational Services	<p><b>Changes to Home Care Services</b>                      Savings will be made by changing the way in which home care services are monitored and delivered and by fully implementing existing policy relating to care plans for people recovering from hospitalisation and accidents:  <b>Electronic Monitoring</b> – using technology to monitor and agree care provided by contractors will enable the Council to save money by paying for care that is actually delivered, rather than simply planned in advance and providing it with more control over changes to individual care packages and the length of time those changes stay in place.  <b>Reducing staff costs by Providing More Equipment in the Home</b>, Sometimes people's care needs can mean that they need more than one person to provide their care. Investing in equipment such as hoists can reduce the need for more than one carer and cut costs. The proposal includes accessing funding through the Health Service Capital Equipment Fund.  <b>Changes to Welfare Visits</b> Some people receive 15 minute home calls to check on their welfare. The proposed changes mean that instead of someone calling at their home the checks would be done over the phone.</p>	1,500
3A3	Integration and Transition	<p><b>Changes to Supported Living for People With Learning Disabilities: Using Technology to Promote Independence and Reduce Contact Time With Staff.</b>                      Supported living covers different services that help people with learning disabilities to be enabled to live as independently as possible. The Council currently spends over £7.9m on these services and the proposal would save money by requiring contractors to reduce costs by using new technology to promote greater independence and reduce the need for one to one contact with staff. Some people will see their hours of contact time reduce but all individual needs will be reviewed.</p>	500

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
3A4	Integration and Transition	<p><b>Review and De-Commission Financial and Welfare Advice Services</b> The review will be undertaken in conjunction with the Council's Public Health Department which also commissions advice services. The proposal would reduce the overall funding available to providers of advice, reduce face to face contact by providing digital alternatives, eliminate the least effective advice sessions and target provision where there is greatest need.</p>	700
3A5	Departmental	<p><b>Restructure Adults and Community Services and Reduce Staff by 80</b> Savings would be made by undertaking a fundamental re-structure of the whole of Adults and Community Services including options for the delivery of Social Work and Occupational Therapy assessment and support functions. There could however be an impact on frontline services, for example in delayed transfers from hospitals to care and longer waiting times for people to have their needs assessed.</p>	2,000
3A6	Operational Services	<p><b>Changes to Learning Disability Day Care Services and Procurement</b> The budget for Learning Disability Services is £8.8m including a £7m contract that is due to be re-tendered in 2016-17 providing the opportunity to deliver savings.  The overall numbers of hours and days of day care provided will reduce and this will affect some individuals and families directly. Everyone will have their needs reviewed before any changes are made to individual arrangements.</p>	1,000
3A7	Integration and Transition	<p><b>Changes to Housing Related Support : De-commission and Re-configure Services</b> The Council commissions services to provide housing related support to a range of people including homeless people, ex offenders, people with mental health issues etc. The Council is not required to provide these services by law however a £4m saving has already been agreed for this area in 2016-17. The proposal would reduce that by a further £1m – the overall budget would reduce by 50% compared to today. Existing services will be changed to make sure that people in the greatest need are given priority. There is currently no assessment process.</p>	1,000
3A8	Operational Services	<p><b>Continue to Review Learning Disabilities Travel Support</b></p>	360

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
	<p><b>This saving is a budgetary consequence of a decision previously consulted on and is therefore not open for further consultation</b></p>	<p>These savings will be made by continuing with the Council's agreed policy on travel support to people with learning disabilities which is to regularly review people's travel needs and to explore different travel arrangements</p>	
3A9	<p>Operational Services</p> <p><b>This saving is a budgetary consequence of a decision previously consulted on and is therefore not open for further consultation</b></p>	<p><b>Closure of Whetley Hill Day Care Centre With Serviced to be Provided Elsewhere</b>            Closure of Whetley Hill Day Care centre has been agreed with users and families who have worked with the Council to find a solution. The building will close but people will access services at Thompson Court and Norman Lodge.</p>	170
3A10	<p>Operational Services</p>	<p><b>Changes to Contracts for Residential and Nursing Care for People With Learning Disabilities to Promote Independence and the Use of Technology</b>            New contracts will enable the re-negotiation of high cost placements with service providers and require them to maximise the use of technology and telemedicine to support people with learning disabilities in the community which will reduce the numbers of care hours including nursing care required. The development of additional extra care housing will also reduce reliance on residential and nursing placements</p>	1,000
3A11	<p>Operational Services</p>	<p><b>Reduce the Number of Long Term Placements of Older People in the Independent Sector</b>            Although the Council will work to reduce the numbers of older people needing long term residential or nursing care some will still require that level of care. The Council proposes to reduce costs by changing spare beds in Council homes into long term beds reducing the numbers that we need to purchase from the independent sector</p>	200
3A12	<p>Operational Services</p>	<p><b>Mental Health – Review of charging arrangements for people with Mental Health issues</b>            Page 81            Some people with Mental Health needs don't</p>	250

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		contribute financially towards their social care because of their status under the Mental Health Act. The proposal will review their status and anticipates more income from people with Mental Health needs through payments towards their care and as a consequence bring them into line with other clients for example older people and people with disabilities.	
3A13	Operational Services	<p><b>Reduce Long Term Placements of Older People into Nursing and Residential Care</b></p> <p>By supporting more people to live in their own homes or in extra care supported housing, the Council can reduce what it spends on long term residential and nursing care. The Council will achieve reductions in the numbers of older people needing long term residential and nursing care by using technology to help them stay independent and working closely with health services to plan and deliver services</p>	1,000
<b>Total Adults and Community Services</b>			<b>10,291</b>
<b>Children's services</b>			
3C1	Special Education Needs (SEN) Services	<p><b>Restructure the Special Needs and Educational Disability (SEND) Core Service</b></p> <p>The SEND Core Service carries out various statutory duties including coordination of assessments for children with SEND, monitoring children's progress and planning to ensure there is enough SEND provision. The proposal will make savings by re-structuring the services to reduce management costs while maintaining statutory functions.</p>	0
3C2	Special Education Needs (SEN) Services	Re-commission the SEND Teaching Services. Development of SEND Centres of Excellence based in schools. Dedicated Schools Grant funded so no revenue saving. Has been added due to S188 and Corporate Services Recharges	0
3C3	Behaviour and Attendance	<p><b>Restructure the Educational Social Work (ESWS) and Behaviour Support (BSS) Services</b></p> <p>The proposed re-structures will bring BSS and ESWS together with the New Arrivals and Travellers Children's Service and Looked After Children to create a "Virtual School" for Vulnerable children which provides additional support and complements</p>	0



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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		the children's mainstream education; Management costs will be reduced and because the services often work with the same children there will be opportunities to eliminate duplication and maximise the impact of resources.	
3C4	Diversity and Cohesion Service	<p><b>Restructure the Diversity &amp; Cohesion Service</b> The Diversity and Cohesion service has a number of functions including supporting supplementary schools, delivering the Government's PREVENT anti-radicalisation agenda and support to the Standing Advisory Council on Religious Education (SACRE). The re-structure will reduce management and align New Communities and Travellers Services with the "Virtual School" (see 3C3) for vulnerable children in order to reduce costs while using Government grants to cover budget reductions and maintain essential aspects of the Service's work.</p>	0
3C5	Bradford Achievement Service	<p><b>Move Delivery of School Improvement to Schools</b> The District is moving to a "School led" approach to driving school improvement. As a result the Council will no longer perform some of the functions it does now and this will mean that there will be a decrease in the number of Council teams required. Funding for School improvement will continue to be made available directly to schools via the Dedicated School Grant.</p>	150
3C6	Employment and Skills	<p><b>Reviewing Work with Young People Who are Not in Employment Education or Training</b> The proposal is made up of different elements:</p> <ul style="list-style-type: none"> <li>• <b>Connexions.</b> Connexions supports young people on a range of issues including accessing education, training, skills and employment choices. The proposal would reduce the Connexions contract by £450,000 (30%) reducing the Council's capacity to support this work and increasing the risk of growing numbers of young people Not in Employment Education or Training.</li> <li>• <b>De-commissioning the Employment and Skills element of the Community Fund</b> to save £250,000. This will impact on a number of Voluntary Sector providers and will further reduce the delivery of employment and skills opportunities in the District.</li> <li>• <b>Service re-structure</b> – A review of the service structure to save £26,000</li> </ul>	243
	Specialist	Investment for Early Help Service	0

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<b>NEW REF</b>	<b>Service Area or function</b>	<b>Proposal for Change</b>	<b>2017/18 £'000 Impact</b>
	Services and Children's Centres		
3C7	Specialist Services and Children's Centres	<b>Looked After Children - bring children cared for outside of Bradford back into the District.</b> Having more of our children with complex needs living locally will reduce costs associated with the provision of care outside the District which is generally more expensive. This will be achieved by strengthening our local provision and the movement of young people from residential care to highly skilled foster care.	624
3C8	Specialist Services and Children's Centres	<b>Looked After Children - Reduce the Numbers of Looked After Children by 75 Over 2 Years.</b> The numbers of children in Council care will be reduced by improving its Early Help offer to children and families and the fostering and residential care we provide for children once they need to be looked after by the Local Authority. Earlier and more effective action to address issues affecting families and children along with the use of "Signs of Safety", an approach designed to reduce risks by working in partnership with families, is expected to reduce the numbers of children in care by 75 over two years.	1,630
3C9	Specialist Services and Children's Centres	<b>Staff Savings in Children's Specialist Services</b> Bradford's Early Help offer will be improved to develop a clearer focus on outcomes, eliminate duplication and promote integrated working between services. This will contribute to reducing the numbers of looked after children, reduced contacts with children's social care, reduced child protection plans and reductions in associated staffing costs.	1,080
3C10	Youth Offending Team	<b>Youth Offending Team - Stop Delivering Pre-Court Crime Prevention Work</b> "Community Resolutions" helps to divert young people from the criminal justice system by directly communicating with and making amends to people they have subjected to low level crime. There is no statutory duty for the Council to provide this service and the proposal is to end its delivery.	77
<b>Total Children's Services</b>			<b>3,804</b>
<b>Regeneration</b>			
3R1	Economic Development	<b>Review the Business, Investment and Enterprise team.</b> Changes at the regional Combined Authority to develop strategic inward investment will result in changes in delivery locally. This will reduce the capacity of the service to support business and	61

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		attract investment to the District.	
3R2	Economic Development	<p><b>Replace City Park Maintenance Fund with a Reserve</b> Maintenance works for City Park are currently funded from the Council's ongoing revenue budget. The proposals will replace this funding with a reserve of over £500k which would be sufficient to cover the life time replacement costs for major works.</p>	0
3R3	Economic Development	<p><b>Replace Budget for the City Centre Growth Zone Rates Rebate Team with a Reserve</b> The costs of managing contracts for business rate rebates in the City Centre Growth Zone are currently paid for from the Council's ongoing revenue budget. This proposal would replace that funding by using money set aside to fund the Growth Zone's Rates Rebate programme for the duration of the programme to March 2020. The proposal would reduce the money available to support City Centre businesses but because of various other business rates initiatives fewer businesses will qualify to receive a rates rebate than was originally anticipated so the impact will be minimised.</p>	0
3R4	Economic Development	<p><b>Reduce European Strategic Investment Fund (ESIF) and Replace with a Reserve</b> The ESIF is used to provide match funding for bids for funds from the European Union, this match funding typically helps to secure an additional 50% from the EU. Reducing the fund will reduce the capacity to respond to Leeds City Region requests to deliver EU funded programmes. Leeds City Region is currently calling for an EU funded enterprise support programme under the proposal. This and other similar calls would be funded through reserves.</p>	0
3R5	Climate, Housing & Property	<p><b>Continue to reduce the Council's Administrative Estate</b> The Council will continue to reduce the number of buildings it operates from in the City Centre, closing Jacobs Well and moving staff to Britannia House. Some capital investment will be required to deliver the proposal</p>	150
3R6	Climate, Housing & Property	<p><b>Remove or Reduce Rental Subsidies Provided to Tenants of "Community Facilities"</b> Tenants of "community facilities" e.g. sports and recreational facilities are granted rental subsidies from the Council based on their ability to pay. The total value of subsidies is £300,000. The proposal</p>	150

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FOR INFORMATION & NOT SUBJECT TO CONSULTATION**

NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		<p>would either remove all subsidies or revise the policy to reduce the overall level of subsidy by assessing the tenant's contribution to District wide priorities, their management of the property and the extent to which facilities are made available to the wider community.</p> <p><i>Following public consultation the savings targets for rent subsidies for tenants of community facilities and community organisations be revised downwards by £150K pending the outcome of a comprehensive review of subsidy and support that will also cover rates rebates, community centre core costs and residual community development funding.</i></p>	
3R7	Climate, Housing & Property	<p><b>Changes to the delivery of capital schemes.</b> Changes to the Education Client Services and Architectural Services teams</p>	17
3R8	Climate, Housing & Property	<p><b>Reduce Building Maintenance Budgets</b> The maintenance budget has already reduced by £700,000 in the last four years and the proposal would make a further £1m reduction which would affect the ability to carry out programmes of planned maintenance work.</p>	650
3R9	Climate, Housing & Property	<p><b>Restructure Environment &amp; Climate Change Service</b> The team works to reduce energy consumption and expenditure, reduce carbon emissions and promote a reduction in fuel poverty and improve Public Health outcomes. The proposed re-structure will align functions to other areas of activity such as buildings and estates management and reduce management costs. There will be a reduction in strategic capacity and the delivery of carbon reduction work however this reflects a changing policy context in which there is greater difficulty in delivering schools carbon reduction projects which form a significant part of the work.</p>	186
3R10	Climate, Housing & Property	<p><b>Increase Trading Surplus in Catering Services by Ceasing Loss Making Operations</b> The proposal would review and change services at loss making venues which include sports centres, swimming pools and City Hall.</p>	0
3R11	Climate, Housing & Property	<p><b>Reduce Office Cleaning to 3 Days a Week</b> The proposal would reduce levels of cleaning and increase reliance on employees to keep their work areas clean and tidy.</p>	200

**APPENDIX D – SCHEDULE OF DECISIONS OF BUDGET COUNCIL FEBRUARY 2016  
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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
3R12	Climate, Housing & Property	<p><b>Property Programme – Continue to Rationalise the Council Estate</b> The continuation of the Property Programme will continue to deliver savings including the closure of Future House, reductions in managed print spend and savings on cleaning and utilities bills.</p>	650
3R13	Planning Transportation & Highways	<p><b>CCTV Services</b> The proposal would seek to generate income through exploring the commercial opportunities for example services to education, other authorities and the private sector.</p>	100
3R14	Planning Transportation & Highways	<p><b>Street Lighting – Partial Night Switch Off</b> Switching selected street lights off between midnight and 5am will reduce energy costs. Other authorities have adopted this approach. Determining the specific areas subject to the proposals will need surveying, research and consultation to be undertaken. There would be no switch off proposed in areas where;</p> <ul style="list-style-type: none"> <li>• There is a record of traffic collisions during switch off times</li> <li>• There is high crime during switch off times</li> <li>• There are Roundabouts, complex junctions etc</li> <li>• There is CCTV coverage</li> <li>• There are pedestrian crossings</li> <li>• There is 24 hour use e.g. Hospitals</li> <li>• There is sheltered accommodation and housing for vulnerable people</li> </ul> <p>Some initial investment would be required to make the technical changes necessary to deliver ongoing savings. Public consultation may also be required in some areas. Additional switch offs could potentially reduce costs by another 20%.</p>	100
3R15	Planning Transportation & Highways	<p><b>Reduce Winter Gritting Routes</b> The Council currently affords priority status for gritting to 62% of the local road network - 712 miles. The proposals would reduce this to 42% by 2017-18 with just the main arterial routes and spinal link roads being afforded priority status</p>	40
3R16	Planning Transportation & Highways	<p><b>Restructure Development Services</b> Development Services deliver planning and building control services. The proposal reduces staffing levels but by restructuring in the light of changing requirements and already agreed procedures, no detrimental effect on planning is anticipated. Building control is moving to a joint arrangement with Kirklees and possibly also Wakefield Councils which should see it maintain and capture market share</p>	0

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
3R17	Planning Transportation & Highways	<p><b>New Charges for Permits for Car Parking, Skips and Scaffolding; Charges for Dropped kerb applications and events on the highway co-ordination</b></p> <p>The proposal introduces new charges for residents car parking permits and for skips and scaffolding on the highways.</p> <p>Applications for dropped kerbs will incur a charge as will staff time involved in co-ordinating events and parades. Licence fees will be introduced for cranes and cherry pickers.</p>	67
3R18	Planning Transportation & Highways	<p><b>Re-Structure Planning Transport &amp; Highways and Transfer Some Functions to the West Yorkshire Combined Authority</b></p> <p>The proposal will change administrative support, merge Transport Development and Highways Asset management in to one Team and seek to centralise some functions to the West Yorkshire Combined Authority – these are Highways Design, Traffic control, Highways Structures, Transport Planning and Highways Development Control.</p> <p>Transfer of functions would remove the Council's ability to deliver its own strategic highway improvements without having to use consultants.</p> <p>Review the provision of highways inclusion and mobility advice which could reduce effectiveness and impact in this area of work.</p>	125
<b>Total Regeneration</b>			<b>2,496</b>
<b>Environment and Sport</b>			
3E1	Waste - Waste Minimisation	<p><b>Waste Minimisation – Support and Encourage Recycling; Provide One General Waste Bin and End the Collection of Side Waste</b></p> <p>The Council has agreed a Domestic Waste and Recycling Policy that will increase recycling and reduce domestic waste and its associated disposal costs. The current and ongoing costs of disposal of domestic waste are not affordable.</p> <p>Education, information and raising awareness will support increased recycling and a scheme providing community incentives to recycle will be introduced in places where households have little space for separate recycling bins. The Council will work with householders to eliminate the need to leave out side waste and will only collect one general waste bin from each household; households above a certain</p>	200

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		size can apply for a larger bin.	
3E2	Waste - Green Waste	<p><b>Introduce Charges for Green Waste Collection</b> The Council currently subsidises the collection of green waste in some parts of the District, mainly serving households with larger gardens through its brown bin system. The proposals will introduce a charge of £35p.a. per household for collection of green waste for which householders will receive a specified number of collections a year in turn. Charging for green waste collection is increasingly common among local authorities and will remove the unfairness of the free service only being offered to households in certain parts of the District.</p> <p><i>Following consideration of feedback from the consultation process the proposal is now to reduce the proposed charge of £40p.a down to £35p.a. In addition there will be an early bird discount offered in 2016/17 for early take up of the offer reducing the £35p.a. charge to £28p.a..</i></p>	310
3E3	Waste - Trade Waste	<p><b>Trade Waste – revise charging and payment and improve efficiency</b> Increasing trade waste charges will generate additional income while a move to cashless payment systems will improve efficiency and reduce costs to the Council. “Pay as you go” arrangements will eliminate building up bad debt and other operational efficiencies will contribute to the overall savings.</p>	200
3E4	Waste - Waste Collection	<p><b>Alternate week Waste Collections</b> The proposal will mean alternate weekly collections of household waste and recycling. The current and ongoing costs of disposal of domestic waste are not affordable. The proposal will reduce the total number of collections per year for each household but maintain weekly visits.</p>	1,000
3E5	<p>Sport - Play service</p> <p><b>This saving is a budgetary consequence of a decision previously consulted on and is therefore not open for further consultation</b></p>	<p><b>Merge and Restructure Play Service</b> It has already been agreed that the Council's Community Play and Activity Service should merge with the Early year's Childhood team and this will deliver an ongoing saving.</p>	0

**APPENDIX D – SCHEDULE OF DECISIONS OF BUDGET COUNCIL FEBRUARY 2016  
FOR INFORMATION & NOT SUBJECT TO CONSULTATION**

<b>NEW REF</b>	<b>Service Area or function</b>	<b>Proposal for Change</b>	<b>2017/18 £'000 Impact</b>
3E6	Sport - School Swimming	<b>Increase Charges for School Swimming by £5 per Pupil</b> The increased charges for Key Stage 2 School Swimming lessons will bring the Council into line with other providers of KS2 school swimming. Over 135 schools across the District currently buy our KS2 swimming.	30
3E7	Sport - Sports Centres	<b>Withdraw from Nab Wood Sports Centre</b> A new school is due to be built at Nab Wood and the proposal is to withdraw Council provision from the sports centre in advance of the building work rather than awaiting its commencement.	0
3E8	Sport - Sports Centres	<b>New agreement with Pulse fitness at Thornton Recreation Centre</b> The Council has an agreement with Pulse Fitness to share income from Thornton Recreation Centre. This ends in January 2016 providing the opportunity to increase the Council's income through a new agreement.	45
3E9	Sport - Sports Centres	<b>Sports Facilities – New Online Booking and Membership System</b> A new online booking system is being installed in sports facilities which will reduce the need for reception staff cover in certain facilities.	50
3E10	Sport - Sports Centres	<b>Sports Development - additional income from holiday courses and year round</b> The Sports Development Service will adopt an increasingly commercial approach to delivering courses and activities like multi-sports camps, dance camps, aquatics courses and outdoor programmes. Fees and charges will be brought further into line with market prices.	35
3E11	Sport and Culture Management	<b>Re-structure Sports &amp; Culture Management &amp; Staffing</b> A reduction in sports and culture activity presents the opportunity to further reduce management and staffing costs.	100
3E12	Parks - Events	<b>Removing subsidised Support for Bingley Music Live and Sports and Parks Events</b> The proposal would lead to a loss of experience and capacity however there is the potential for Bingley Music Live to move to a private operator and for parks and sports events to be run by local communities or other alternative approaches.	50
3E13	Parks	<b>Transfer ownership of playing pitches and facilities to Page 90, Parish Councils and</b>	80



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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		<p><b>community organisations.</b> Some sports pitch management and maintenance including changing facilities would transfer to clubs, parishes and community groups to operate as community assets. This may require the consolidation of multiple clubs onto to a single site to reduce the current dependency on pitches used only by one team and to provide more cost effective opportunities for club or community management. Club or community management will increase the potential for access to sponsorship, fund raising activity and grant funding.</p>	
3E14	Parks	<p><b>Parking Charges at Some Parks and Woodlands</b> Parking charges will be introduced at specific parks and woodlands e.g. St Ives, Lister Park, Ilkley Lido, Cliffe Castle</p>	40
3E15	Parks	<p><b>Find external funding for Christmas Trees or cease provision</b> The Council currently buys, installs and removes 9 Christmas trees at city and town centres and key facilities. The proposal is to identify alternative funding for these activities through sponsorship.</p>	10
3E16	Bereavement	<p><b>Increase Bereavement Services charges above inflation.</b> The increases will bring the Council's charges broadly into line with other West Yorkshire authorities in particular Bradford Council's charges for graves are relatively low. The proposed increase would be an average of 5% above inflation in each of the next two years.</p>	110
3E17	Culture - Libraries	<p><b>Libraries - Operational Efficiencies Including Review of Opening Hours and Reductions to the Materials Fund</b> The proposal would reduce the materials fund and spending on casual staff resulting in reductions in resources for library materials across the District and risks of temporary library closures due to a lack of casual staff cover. <i>Following consideration of feedback from the consultation process this proposal has been withdrawn</i></p>	0
3E18	Culture - Libraries	<p><b>Libraries - Increase the Numbers of Libraries Managed by Local Communities</b> A number of branch libraries are already being successfully run by local community groups and volunteers. This proposal would seek to extend community management across the rest of the library network, with the exception of Bradford Central Library, Shipley, Keighley, Bingley, Ilkley, Eccleshill and Thringmorton which would remain</p>	100

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NEW REF	Service Area or function	Proposal for Change	2017/18 £'000 Impact
		<p>under direct Council management</p> <p>If a community managed solution cannot be found then the Council would look to close them.</p> <p><i>Following consideration of feedback from the consultation process this proposed cut has been reduced by £105K. Along with the withdrawal of proposal 3E17 this will provide the resources to:</i></p> <p><i>Extend the proposed network of fully staffed libraries to ten based on the principle that there should be two in each constituency. This policy means that Wibsey, Wyke and Laisterdyke libraries will continue to be fully staffed.</i></p> <p><i>Deliver a hybrid model of staff and volunteer support at Baildon Library so that all libraries open 45 hours or more would have some staffing complement,</i></p> <p><i>Deliver a hybrid model of staff and volunteer support at Clayton Library on the basis that the City Centre library serves a much wider area than just Bradford West.</i></p> <p><i>The revised proposal will also introduce charges for reservations (free for over 60's and under 16s) and donation boxes.</i></p>	
3E19	Culture - Museums	<p><b>Museums – restructure of the Service</b></p> <p>The proposal is to restructure the service to provide a smaller staff team retaining the capacity to deliver service objectives, eliminate duplication and promote more joint working. There would be some reduction in the funding available to deliver exhibition design.</p>	80
3E20	Culture - Theatres	<p><b>Theatres – Reduce Box Office staffing: Increase Income in Community Halls; Review Contemporary Dance Programme and Increase Income</b></p> <p>Increasing the transactions that are carried out online will reduce the numbers of telephone staff required. Contemporary Dance events will be significantly reduced. Investment may be needed to drive income generation.</p>	75
3E21	Culture - Markets	<p><b>Markets – Operational Review</b></p> <p>To undertake an operational review of markets introducing operational efficiencies. Plus introduce a small business initiative scheme.</p>	77
3E22	Culture - Tourism	<p><b>Review of Tourism Budget</b></p> <p>Over £120,000 of the current budget for tourism is short-term transitional funding to underpin services</p>	50

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		<p>while a review of its future configuration is carried out. The review will have to deliver savings equivalent to that funding and this proposal requires an extra £69,000 to be saved.</p> <p>Savings can be made in 2016-17 by reducing opening hours or closing Visitor Information Centres. Balancing the budget beyond 2016-17 would require the closure of more or all Visitor Information Centres. The impact of any potential closures could be reduced through the development of online and digital alternatives.</p>	
3E23	Safer and Stronger Communities	<p><b>Remove Council Funding for Police Community Support Officers</b></p> <p>The Council will remove its financial contribution to Police Community Support Officers (PCSO's) over two years and work with West Yorkshire Police to develop a new approach to neighbourhood policing within the context of reduced funding. The Council currently part funds 120 PCSO's who are employed by the Police and provide a visible uniformed presence. To reduce the negative impact of this proposal the Council and Police will work together to promote and increase the numbers of Special Constables and to move to multi-disciplinary local neighbourhood teams that work together and focus on preventing harm to vulnerable people. The Council would retain its Wardens Service.</p>	385
3E24	Safer and Stronger Communities	<p><b>Community Development – Reduce Devolved Area Committee Budgets</b></p> <p>Several organisations in different parts of the District are commissioned by the Council to deliver community development. The proposal would mean that funding would reduce by a significant amount after current arrangements end.</p>	300
3E25	Neighbourhood Services	<p><b>Parking – Introduce New and Increased Charges</b></p> <p>Proposals include changes in Bradford City Centre as follows:</p> <p>Off street evening charges – introduce £1.00 charge.  Off street Sunday charges – flat rate of £1.00  On Street daily charges – extend from 8am to 6pm (currently 10am to 4.30pm)  On street Sunday charges – extend pay and display on-street to cover Sundays.</p> <p>Other proposals:  Implement already agreed tariffs  Remove free parking at Westgate 2pm - 4pm  Pay and Display around Bingley Arts Centre &amp; Railway Road and HWafe View Car Parks, Ilkley  New on street areas of pay and display</p>	319

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<b>NEW REF</b>	<b>Service Area or function</b>	<b>Proposal for Change</b>	<b>2017/18 £'000 Impact</b>
		Remove initial free parking at car parks Amend and extend charges at some other car parks Parking would continue to be cheaper than neighbouring authorities.	
3E26	Neighbourhood Services	<b>Street Cleaning – Changing Working arrangements for new staff; using technology to improve efficiency.</b> As staff retire or leave the service all new staff will work to a 30 hour week, the use of technology to plan routes and more litter bins requiring less frequent emptying will ensure that this is at no detrimental impact to service delivery.	50
3E27	Neighbourhood Services	<b>Youth Provision</b> The proposal will re-design the Youth Service to deliver cost reductions while promoting the active involvement of communities in delivering a District wide “youth offer”.  <i>Due to feedback from the consultation process two Youth Service Information Officer posts will be retained and the cut for 2017/18 has been reduced by £70k</i>	360
3E28	Customer Services	<b>Increase the numbers of calls and transactions that are automated</b> The numbers of calls and transactions processed by automated means will be increased reducing the need for staff involvement.	50
<b>Total Environment &amp; Sport</b>			<b>4,106</b>
<b>Finance</b>			
3F1	Commissioning and Procurement	<b>Restructure Commissioning and Procurement</b> The proposal will further reduce management costs and create a new Commercial and Procurement service allowing greater sharing of knowledge and more focussed activity.	35
3F2	Financial Services	<b>Improved efficiency in financial reporting</b> Better use of technology, standard processes for financial reporting and more budget holders carrying out routine financial activities will deliver savings.	70
3S1	IT	<b>IT Savings</b> The end of the Council’s ICT contract will, by enabling full Council control over IT, deliver significant savings and more effective procurement.	1,306
3F3	Revenues and Benefits	<b>Increase the amount charged for issuing a summons to people who do not pay their Council tax or business rates.</b>	0

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<b>NEW REF</b>	<b>Service Area or function</b>	<b>Proposal for Change</b>	<b>2017/18 £'000 Impact</b>
		The charges would only apply to people summonsed after receiving reminders and taking no action. The charges would increase from £40 to £50 for Council tax and £40 to £60 for business rates.	
3F4	Revenues and Benefits	<b>Reduce Expenditure on Support for Business Rates</b> Remove discretionary rate relief that is provided to a range of not for profit organisations	190
3F5	Revenues and Benefits	<b>Reduce Expenditure on Support for Council Tax &amp; Discretionary Housing Payments</b> The Council provides various exemptions and reductions for Council tax and business rates. This proposal will <ul style="list-style-type: none"> <li>Remove the 1 month exemption the owners of empty buildings enjoy on paying Council tax – they will pay from the day a property becomes empty.</li> <li>Reduce the Council contribution to Discretionary Housing Payments</li> </ul>	0
3F6	Revenues and Benefits	<b>Reduce staffing and overtime in revenues and benefits.</b> Automation, improved productivity and changes to staff roles will allow savings to be made without adverse impact on the performance of services or increase in workloads.	244
<b>Total Finance</b>			<b>1,845</b>
<b>Chief Executive</b>			
3X1	Core Office and Political Group Offices; Public Affairs and Communication; Policy Programmes and Change	<b>Review and restructure Chief Executive's Office, Public Affairs and Communications and Policy Programmes and Change.</b> This proposal will result in a full review of the functions sitting within the Chief Executive's department with a view to achieve savings through staffing, trading services/generating income and reductions to operational budgets	541
<b>Total Chief Executive</b>			<b>541</b>
<b>Human Resources</b>			
3H1	Human Resources (HR)	<b>Restructure HR Department.</b> The proposal will result in a significantly streamlined service and will involve: <ul style="list-style-type: none"> <li>Reduction of staffing on workforce</li> </ul>	880

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<b>NEW REF</b>	<b>Service Area or function</b>	<b>Proposal for Change</b>	<b>2017/18 £'000 Impact</b>
		development <ul style="list-style-type: none"> <li>• Staff reductions in workforce development, corporate HR and business support.</li> <li>• Combining specialist teams</li> <li>• Reducing member Development.</li> <li>• Removing vacant posts</li> </ul>	
<b>Total Human Resources</b>			<b>880</b>
<b>Legal and Democratic</b>			
3L1	Legal Services	<b>Staffing Reductions – Legal and democratic Services.</b> Staff reductions would mean some types of legal service/representation work from Legal Services no longer being available and/or severely limited. There may be opportunities to share services with other authorities. There will be implications for Council Departments seeking support from Legal Services	300
<b>Total Legal and Democratic</b>			<b>300</b>
<b>Non-Service Costs</b>			
3N1	Capital Financing costs	The proposal is to save £2m with a reduction in the Minimum Revenue Provision, the annual amount of revenue set aside to repay borrowing incurred to fund the capital programme. The proposal changes the profile of payments over future years. Accounting rules require the Council to make a prudent provision to repay its debts. The proposal is prudent in that it ensures the full repayment of borrowing over a 50 year period with an even charge in each year.	<b>0</b>
<b>Total Non-Service Costs</b>			<b>0</b>
<b>Total Draft Proposals open for Consultation excluding Council Tax</b>			<b>24,263</b>

## APPENDIX E- SCHEDULE OF AMENDMENTS TO PREVIOUS BUDGET DECISIONS & SUBJECT TO CONSULTATION

### Children's Services

**Ref - 3C8 Reducing cost of high cost placements & reducing numbers of Looked After Children £1,630,000 in 2017-18**

#### Alternative compensatory proposals

**Ref - 4C14 Reducing Agency Spending in Children's Social Care Services**

2017-18	2018-19	Total
£1,025,000	£36,000	£1,061,000

This replacement proposal is to reduce spending on agency social workers and agency staff in Residential Homes. There will always be instances where staff turnover and unplanned change means that to be safe, the Service will need to employ agency staff at short notice. This project will deliver an overall reduction in the spending on agency staff of £1million. This will be achieved through a number of strands which will start with a review of caseload numbers in social work, which is already underway.

**Ref - 4C15 Front Door Customer Contact to Children's Social Care Services**

2017-18	2018-19	Total
£0	£46,000	£46,000

This project will achieve savings at the first point of contact for social care through a review of the current arrangements. A review will identify clearer pathways from the first contact through to assessment and staffing efficiencies will be achieved following this.

The project will review all access points to Children's Services and look to integrate them into one single point of contact.

**Ref - 4C16 Administrative Support restructure**

2017-18	2018-19	Total
£100,000	£0	£100,000

The proposal is to review the administrative structure within Children's Specialist Services to identify potential for some rationalisation of the supervision and management structure.

NB - The pre-agreed savings for Children's services that are no longer achievable are not fully matched by compensatory savings. As a result additional funding has been included in the proposed future base budget.

## Environment & Sport

### Ref - 3E25 Parking Services Income Generation £319,000 in 2017-18

#### Alternative compensatory proposal

### Ref - 4E13 Parking Services Income Generation

2017-18	2018-19	Total
£222,000	£108,000	£330,000

This proposal sets out the adjustments to this year's budget decision in respect of income generation from amendments to on- and off-street parking orders, taking into account schemes which have not been implemented or where income estimates will not be achieved due to changes in shopping habits in the city centre since the introduction of The Broadway.

This replacement proposal is to;

- Remove Christmas parking concessions from next year
- Little Germany
  - amend the tariffs in the Little Germany area of the city centre in line with charges in the rest of the city centre. Remove the half hour charge and increase to 70p per hour in accordance with the rest of the city centre.
  - Extend the charging hours to bring them in line with the opening hours of The Broadway. Extend charging hours until 8pm during the week
  - Introduce charging hours on Saturdays between 8:00 - 20.00 and Sundays 11:00 - 17:00 with a rate of £1 for a maximum of a 4 hour stay.
- Other Car Parks
  - introduce an evening charge at South Hawksworth Car Park in line with car parks in Bradford City Centre. Valid Monday to Sunday 18:00 - Midnight. £1 flat rate charge
  - Remove staff parking at Shipley and Bingley pools in line with staff parking schemes at the Council - staff could purchase contracts through salary sacrifice
  - Introduce evening and Sunday charges at main car parks in Bingley
  - Increase charges for waiver permits from £5 to £10 (or £15 if purchased on the day)



## Adult & Community Services

**Ref - 3A5 Staffing efficiencies £2,000,000 in 2017-18**

**Alternative compensatory proposal**

**Ref - 4A2 Adult Services Demand Management**

<b>2017-18</b>	<b>2018-19</b>	<b>Total</b>
<b>£2,000,000</b>	<b>£0</b>	<b>£2,000,000</b>

The Department has reviewed its plan to reduce its front line staffing spend by £2m in 2017-18, and this replacement proposal is to address the required saving through the following approach as part of its delivery of the overall demand management strategy:

- Further reduction in high cost packages
- Further reduction in Supported Living contracts/ packages
- Various reductions in travel and fees

A combination of the above savings will achieve a net budget reduction of £2m during 2017-18 and will promote positive risk taking, enablement and independence and will maximise the use of assistive technology which reduces the number of care hours required to support individuals.

**See also proposal 4A1 in Appendix C for more detail on the proposed actions in 2017-18.**

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## APPENDIX F- SCHEDULE OF AMENDMENTS TO PREVIOUS BUDGET DECISIONS & NOT SUBJECT TO CONSULTATION

### Children's Services

#### Ref - 3C7 Reducing cost of high cost placements £624,000 in 2017-18

Change to agreed budget saving

#### Ref - 3C7 Out of Area Placements

2017-18	2018-19	Total
£500,000	£250,000	£750,000

This work will deliver on the previously agreed change programme in relation to Looked After Children out of area placements, and is also linked to the existing plan to redesign beds in our in-house residential homes for young people with complex needs.

It also includes a review of current voids in internal respite beds for young people with complex needs. This review will develop a market rate price for these beds which will be offered to neighbouring authorities when they are not being used for Bradford young people.

#### Ref - 3C9 Early Help staffing efficiencies £1,080,000 in 2017-18

Change to agreed budget saving

2017-18	2018-19	Total
£767,500	£0	£767,500

This project seeks to make changes relating to early help linked to the delivery of the Journey to Excellence programme key areas of the service including.

- A review of contracts for commissioned services with the aim of producing a new Early Help Commissioning Strategy that meets current need and look to identify 10% savings within the overall programme.
- Moving a number of staff from Family Centres to a dedicated contact team based within social work.
- Restructure of staffing in Early Help Hubs including Community Resource Workers
- A review of the management structure including seniors and team managers
- A reduction in the costs for emergency admissions into high cost placements through the effective delivery of a rapid response service.

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## **APPENDIX G: Consultation Approach**

In the past, the Council has shared the budget proposals with consultees, and then attended and/or run various meetings, events and focus groups to seek their views.

Following feedback, this year will see greater focus on explaining the intent of the budget proposals, rather than just creating forums for drawing in viewpoints.

The budget consultation taking place between November 2016 and February 2017 is intended to encourage consultees to provide their views via the online questionnaire, or equivalent paper format.

Consultation activities will be set up to provide more information on the intent of the proposals, allowing consultees to themselves provide more meaningful feedback.

With this in mind the following activities are being set up for this year's consultation.

1. Information on the budget proposals on the Bradford Council web site to support the consultation.
2. Online questionnaire asking people to outline any concerns and also any suggestions for improvements/alternatives for whichever proposals they wish to comment on.
3. Freepost address for the public to write in to, to share their views.
4. Meetings scheduled with community of interest groups centred on the protected characteristics as set out in the Equality Act (e.g. the Equity Partnership and the Women's Forum) and with low income groups.
5. Meetings with the Voluntary and Community Sector through the Bradford District Assembly (e.g. BDA Steering Group, Equality Forum).
6. Support for groups wishing to arrange their own consultation.
7. Direct mailings to key stakeholders and groups which may be affected by the budget proposals to encourage engagement in the consultation and responses via the online questionnaire. This would include Town and Parish Councils, the business community, and Members of Parliament.
8. Use social media (Twitter and Facebook) and the Council's app to promote the consultation.
9. Specific consultation with commissioned organisations and grant-holders, and statutory consultation with service users and other interested parties. In addition it is necessary to undertake specific consultation with service users or other interested parties where a proposal would have a significant effect on persons with particular protected characteristics.

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# Report of the Strategic Director of Health and Wellbeing to the meeting of the Executive to be held on December 6<sup>th</sup> 2016.

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**AK**

**Subject: West Yorkshire Low Emissions Strategy**

**This report is to seek adoption of the West Yorkshire Low Emissions Strategy which has been developed by the five West Yorkshire Authorities in conjunction with the West Yorkshire Combined Authority and Public Health England to tackle poor air quality across the region.**

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## 1. SUMMARY

This report is to seek adoption of the West Yorkshire Low Emissions Strategy (WYLES) which has been developed by the five West Yorkshire Authorities in conjunction with the West Yorkshire Combined Authority and Public Health England to tackle poor air quality across the region.

## 2. BACKGROUND

- 2.1 The City of Bradford District Council (The Council), along with other West Yorkshire authorities has been identified by Defra as having the second worst air quality in the country.
- 2.2 In summer 2011 Bradford Environmental Health Services successfully made a bid to Defra for a grant allocation to develop a Low Emission Strategy for the Bradford District. Funds were also obtained to carry out a feasibility study for a Low Emission Zone within the District. The Bradford Low Emissions Strategy was formally adopted on November 5<sup>th</sup> 2013 and the results of the Low Emissions Zone feasibility Study were presented to the Health and Wellbeing board in November 2014 and Executive in March 2015.
- 2.3 Information produced by the Committee on Medical Effects on Air Pollution (COMEAP) indicates that nationally there are over 40,000 early deaths attributable to poor air quality per year. The Low Emission Zone Feasibility Study for Bradford findings were that 222 early deaths in Bradford were attributed to air pollution annually. The study demonstrated how reducing emissions from vehicles could reduce the impact of air pollution; for example the use of newer buses and petrol cars instead of diesel reduced the numbers of early deaths, heart attacks, low birth weight babies and children developing asthma in Bradford markedly. The Executive resolved that Bradford should progress this work by revisiting the Bradford LES and within the review of the strategy a full understanding of the impacts, benefits and issues around practical implementation of a Low Emission Zone should be explored.
- 2.4 Recognising that the issues affecting poor air quality are cross boundary Bradford Council lead on a bid to Defra to secure funding to develop a Low Emissions Strategy for the West Yorkshire region. The bid was successful and a grant of £150k was awarded. The strategy has been developed in conjunction with officers from the five West Yorkshire Authorities, the West Yorkshire Combined Authority and Public Health England. During the development of the Strategy stakeholders from relevant areas including Transport Planning, Land Use Planning, Local Authority Procurement and Fleet Management services and the Leeds Enterprise Partnership have been involved and their input has shaped the WYLES as it was developed.





- 2.5 The WYLES covers a range of initiatives to tackle transport emissions in the short to medium term and sets out how air quality improvements will be sustained over the long term, balancing this with the ambitions for economic and housing growth for the region and the consequent risk of worsening air quality from increased traffic. It is notable that for Bradford, the WYLES in the main reaffirms policies adopted already in the Bradford Low Emission Strategy, and aligns the other authorities in West Yorkshire with Bradfords positive policy stance on improving air quality.
- 2.6 Working together at a West Yorkshire level has provided common purpose, confirmed strategic intent and delivered economies of scale when delivering specific projects, seeking joint-funding bids and developing other regional and local policies, plans and strategies such as the emerging West Yorkshire Transport Strategy 2016 to 2036. Adopting the WYLES will show a commitment to improving air quality, meeting legal obligations and protecting public health now and for future generations. The WYLES is attached at appendix 1.
- 2.7 Public consultation was carried out on the first draft of the WYLES using an on-line survey. As well as being open to the public, special interest groups and other stakeholders were invited to provide feedback via the survey. A total of 190 responses were received during the six week consultation period. A strong message from public consultation was for the WYLES to be more ambitious including using more regulatory controls, such as Low Emissions Zones (now referred to as Clean Air Zones) to control emissions from the most polluting vehicles.
- 2.8 In December 2015 Government announced that Leeds would be one of five cities which would have a mandated Clean Air Zone (CAZ) imposed in order to improve air quality to meet legal limits. A recent High Court case (2<sup>nd</sup> November 2016) ruled that Government had failed to take the required action to improve air quality and that the plans made in December 2015 were woefully inadequate and based on over optimistic modelling (which not take into account the findings of the recent VW scandal amongst other things). The UK Government has announced it will not appeal the decision. It is likely this will lead to additional action, including more CAZ in further cities. There is an additional 23 cities which are likely to require CAZ, it is understood that Bradford is likely to be one of them.

### **3. OTHER CONSIDERATIONS**

### **4. FINANCIAL & RESOURCE APPRAISAL**

- 4.1 The development of West Yorkshire Low Emissions Strategy (WYLES) has been funded via grants from Defra. The West Yorkshire group of authorities will work together and independently on specific projects to tackle poor air quality which will be funded through external sources or utilising existing resources.



4.2 The Localism Bill introduced the power for central Government to pass on to Local Authorities any fines imposed by the EU on government for an infraction of certain European Environmental Standards. These fines can only be passed on where the Local Authorities has “demonstrably caused or contributed” to the infraction. Any such fine would be passed on through the legislative process set out in the bill which requires a notice to be served upon the Local Authority in question. These fines can be very large with an annual figure of £300 million or approximately £1 million/day being estimated in relation to air quality. The main area which gives rise for concern with respect to the passing on of fines is that of air quality. The UK is currently in breach of the EU standards for nitrogen dioxide in 40 out of the 43 zones selected for assessment (of which the West Yorkshire zone 4 is one). The work which has been outlined within this report would place Bradford Council favourably for being able to show that they have not “demonstrably caused or contributed” to the infraction and as such the massive fines should not be passed onto the authority. Brexit will potentially change this situation but at the present time this is the situation..

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

The implementation of the low emission strategy will mitigate against the risk of fines from the European Union. It will do this by showing we have not demonstrably caused or contributed to a breach of certain European Environmental Standards

## **6. LEGAL APPRAISAL**

The adoption of WYLES will have legal implications, specifically in the area of domestic environmental law and EU environmental law and regulation.

Failure to adopt WYLES will also have legal implications in the area of environmental law and regulation. It would potentially undermine any defence the Council may have to EU imposed environmental fines being passed on from central government under the powers of the Localism Act.

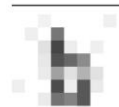
There may in addition be procurement implications and legal implications for countywide and local transport strategies.

There may also be legal implications of the joint working arrangements with other public bodies.

Legal Services will be available to provide support and guidance for the plan’s implementation.

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**



Previous work carried out as part of the LEZ feasibility study included within it a Health Impact Assessment which also looked at the relationship between pollution levels and deprivation. This found that a significant correlation exists between high pollution levels and areas with deprived populations within the District, it therefore demonstrated that an improvement in air quality will go some way to reducing health inequalities in the District..

## **7.2 SUSTAINABILITY IMPLICATIONS**

The WYLES supports modal shift and a move to more walking and cycling. This, and increased use of public transport, offers a more sustainable approach. The Guidance developed as part of the WYLES, to be used as part of the Development Control process, seeks to ensure that all new developments do not have a negative impact on air quality and support the introduction of infrastructure to assist in the move towards a low emissions future.

## **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

It's recognised that measures to improve air quality, for example switching modes from car to rail journeys or moving to electric vehicles will enable a reduction in GHGs. However the push for greater fuel efficiency and improved emissions standards alone, will not be sufficient to tackle climate change if fuel savings result in increased mileage on our roads. It is recommended that policies to reduce overall vehicle mileage are prioritised and aligned with health and wellbeing objectives.

## **7.4 COMMUNITY SAFETY IMPLICATIONS**

There are no community safety implications arising out of the adoption of the WYLES

## **7.5 HUMAN RIGHTS ACT**

There are no human rights issues arising out of the adoption of the WYLES

## **7.6 TRADE UNION**

There are no trade union issues arising out of the adoption of the WYLES.

## **7.7 WARD IMPLICATIONS**

The WYLES applies across the District, there are no specific ward implications..

## **8. NOT FOR PUBLICATION DOCUMENTS**

None.

## **9. OPTIONS**

**Option 1:** To adopt the West Yorkshire Low Emissions Strategy 2016 to 2021 as the Council's strategic approach, together with our partners, to improve air quality in the Bradford district and across West Yorkshire. This option will confirm the Council's



commitment to working with partners to tackle air quality in order to meet legal obligations and protect public health.

**Option 2:** Not to adopt the West Yorkshire Low Emissions Strategy 2016 to 2021 as the Council's strategy for improving air quality. Not having a Strategy could put the local authority at risk of failing to meet legal obligations in relation to air quality and could result in an adverse impact in the health of residents in, and visitors to, the District.

## **10. RECOMMENDATIONS**

That the West Yorkshire Low Emissions Strategy is adopted by the Council

## **11. APPENDICES**

Appendix 1 The Draft West Yorkshire Low Emissions Strategy.

## **12. BACKGROUND DOCUMENTS**

- Bradford Air Quality Strategy
- Bradford Low Emissions Strategy.
- Bradford Low Emissions Zone Feasibility Study





# West Yorkshire Low Emissions Strategy 2016 to 2021



City of Bradford MDC

[www.bradford.gov.uk](http://www.bradford.gov.uk)

Calderdale  
Council

Kirklees  
COUNCIL

Leeds  
CITY COUNCIL

wakefieldcouncil  
working for you

WEST YORKSHIRE  
COMBINED AUTHORITY

*Delivering Cleaner  
Air for All in  
West Yorkshire.*

*DRAFT - (Date of approval to  
be inserted)*

## About the West Yorkshire Low Emissions Strategy

The West Yorkshire Low Emissions Strategy (WYLES) has been developed through collaboration between the West Yorkshire local authorities (Bradford MDC, Calderdale MBC, Kirklees MDC, Leeds CC and Wakefield MDC); West Yorkshire Combined Authority (WYCA) and Public Health England (PHE), with each organisation having an input and contributing to the content of the Strategy.

Funded by the Department for the Environment and Rural Affairs (DEFRA) the WYLES project has been managed by Bradford MBC, with technical support provided by Low Emissions Strategies Ltd. and Public Health England and specific acknowledgements are given for their contribution into the development of this Strategy.

This Low Emissions Strategy outlines what the key challenges are in relation to air quality within West Yorkshire and how, together, we can deliver cleaner air for all to create a healthier place for people to live, work and visit.

After considering the evidence which supports the need to improve air quality this Strategy then considers air quality in the context of other key regional plans and strategies and how we can use these to **Create a Low Emissions Future**, including consideration of the region's economic and transport plans, changes in energy production and use, land-use planning, supporting walking and cycling and finally how local authorities can lead by example.

The Strategy then moves on to its main focus: **Tackling Transport Emissions** as pollution from transport causes most local air quality problems. All transport modes are considered as each has a part to play, to a greater or lesser extent, in delivering the necessary improvements to air quality.

The key aims and objectives are set out early within the Strategy document and will act as a reference point to monitor progress towards achieving cleaner air for all. Finally, the delivery and funding arrangements are considered and set out how, together with our partners, we will make the best use of existing funding and access new funding streams and co-ordinate activity across West Yorkshire to make air quality better now and for future generations.

## Consultation

Public consultation on the draft WYLES was undertaken during November and December 2015 via an on-line survey. The key messages taken from the consultation, together with direct feedback from other key stakeholders were:

- A more ambitious Strategy which has more “teeth” to improve air quality using Low Emission Zones / Clean Air Zones.
- A more focussed Strategy, with fewer, but more targeted objectives that will deliver the greatest benefits to air quality.
- Tackling emissions from the most polluting vehicles in towns and cities: buses, lorries and taxis.
- Better public transport and greater support for walking and cycling, not just reducing emissions.
- Linking in with other initiatives, such as green infrastructure, energy efficiency and carbon reduction to improve air quality.

This feedback has been used to help shape the final version of the WYLES together with other key developments such as the refresh of the Leeds City Region Strategic Economic Plan 2016 to 2036; the development of the West Yorkshire Transport Strategy 2016 to 2036 and the Government's Plan<sup>1</sup> for improving air quality in the UK which was published in December 2015. One other key development since the public consultation has been the UK referendum result to leave the European Union in July 2016. It is far too early to say how this decision will affect air quality policy at a national level, but as far as this Low Emissions Strategy is concerned, the fundamental principle of protecting health through improved air quality remains un-changed and therefore, whether operating outside or within a wider European framework, should not alter our strategic aims and objectives.

<sup>1</sup> <https://www.gov.uk/government/collections/air-quality-plan-for-improving-air-quality-in-uk-2015>

## Our Key Messages:

*Health effects associated with exposure to air pollution are significant; more deaths are caused by air pollution than preventable liver or respiratory disease. In West Yorkshire, 5.1% of all deaths (1 in 20 deaths) are caused by exposure to particulate air pollution with up to 6% in some local authority areas. (2013).*

*Improvements in air quality over recent decades have reduced the number of sudden air quality events; e.g. the London 'Smogs'. Nowadays the health risks from air pollution are less visible as they build up over a period of time. The high use of cars and motor vehicles means that air pollution sources are more numerous and widespread with peaks in air pollution occurring at rush hour times. Motor vehicles are now the most significant contributor to poor air quality in West Yorkshire and around the country.*

### West Yorkshire Low Emissions Strategy 2016 to 2021

*Air quality shouldn't be considered in isolation as an issue that can be purely addressed by reducing emissions through technical fixes (newer engines) and restrictive practices (low emission zones), it needs to also be seen as an opportunity to encourage people to change their behaviour and become more active. 20% of people in West Yorkshire are physically inactive so decreasing vehicle use, particularly for short journeys, both reduces air pollution and allows us to incorporate physical activity into our normal daily routine.*

*Creating a place where people feel that public transport and active travel are the best and easy choice and where the remaining vehicles emit less pollution will improve our health, our cities and our environment and make West Yorkshire a better place to live and invest, thus creating "good growth" for the region.*



## Foreword

*West Yorkshire has a rich industrial heritage, which has evolved and adapted over the decades resulting in one of the fastest growing economies in the UK. We are also blessed with beautiful countryside and majestic open spaces for both residents and visitors to enjoy. There is much to be proud of and levels of air pollution have much improved over the decades, but we expect even better air quality now and for future generations.*

*The challenges are not insignificant. Reducing emissions from road traffic, particularly from older diesel vehicles in towns and city centres, is our greatest priority, but we need to recognise that increased traffic can also be associated with the need for more housing and more jobs for the region. We are confident that collectively we can achieve “good growth”, i.e. more and better homes and jobs and a vibrant economy, while at the same time reducing emissions and improving air quality.*

*The energy market is also changing, with a move from large central power stations, to more localised heat and power generation and the use of renewable fuels and technology in order to meet carbon reduction targets and tackle climate change. Energy production closer to where people live and work can deliver significant environmental benefits, but we recognise that this can also introduce localised pollution and has the potential to negatively impact on air quality. We will ensure that in responding to the changing energy market, air quality will be preserved and protected.*

*There is no “silver bullet” to protecting and improving air quality, which requires action at international, national, local and individual level and on a range of areas including transport, housing and economic development and changing behaviour. The West Yorkshire Low Emissions Strategy recognises our collective responsibility and sets out what we can achieve in our respective roles on behalf of the public which we serve to make sure that air quality in West Yorkshire continues to improve for a cleaner and healthier place to live, work and visit.*



*Name, designation and signature of representative + photo.*



*Name, designation and signature of representative + photo.*



*Name, designation and signature of representative + photo.*



*Name, designation and signature of representative + photo.*



*Name, designation and signature of representative + photo.*



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### List of Abbreviations

## 1. Executive Summary

The West Yorkshire Low Emissions Strategy demonstrates the commitment of the West Yorkshire local authorities, together with West Yorkshire Combined Authority and other key stakeholders to work together to improve air quality for the benefit of all in the region. This Strategy sets out the overall vision, aims and objectives which the WYLES intends to deliver over the next five years. This Strategy document has four main sections:

- Evidence for Change
- Creating a Low Emission Future
- Tackling Transport Emissions
- Delivery and Funding of the WYLES

### 1.1. Evidence for Change

Most of West Yorkshire benefits from very good air quality and, overall, air quality has improved relative to air pollution levels experienced by previous generations. However, traffic in our urban centres and on busy roads result in levels of air pollution which have a significant impact on the health of the population, with those having underlying health conditions being most at risk. There are two pollutants of greatest concern: nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>n</sub>), which have an adverse impact on health and are mainly caused by emissions from traffic, particularly exhaust emissions from older diesel vehicles.

Unlike the smoke and smog problems of the past, nitrogen dioxide and particulate matter emissions are invisible, leading to a perception that the air is “clean”. However, fine particulate matter is inhaled deep into the respiratory tract and, in the case of very fine particles and nitrogen dioxide may transfer into the blood stream. A range of health problems are attributed to exposure to high levels of nitrogen dioxide and particulate matter, the most obvious being respiratory conditions, asthma and cardio-vascular disease, but evidence is now also showing an association with cancer, strokes, low birth-weight babies and even childhood development. These health conditions impact both on quality of life and life expectancy. The Public Health Outcomes Indicator<sup>2</sup> for air pollution points to the equivalent of one in twenty deaths in West Yorkshire each year being attributable to poor air quality, which equates to approximately 1,000 deaths annually and poor air quality has been estimated to cost £16 billion to the UK economy.

Nitrogen dioxide and particulate matter, together with other air pollutants, have been set an upper air quality limit value that the general population should not be exposed to and are legally binding through EU and UK law. The urban areas of West Yorkshire have been identified as having some of highest levels of nitrogen dioxide concentrations in the UK, with only London showing higher levels at a regional level. Current projections indicate that concentrations of nitrogen dioxide will not fall below the limit values in some parts of West

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<sup>2</sup> [Public Health Outcomes Framework, 3.1 fraction of Mortality attributable to particulate air pollution, Public Health England](#)

Yorkshire until 2025 at the earliest unless urgent action is taken to reduce pollution in our towns and city centres and particularly the emissions coming from the most polluting vehicles: older diesel cars, vans, buses and lorries.

Continued failure to meet the limit values will put the UK Government at risk of legal action being taken against it under European law, with the further risk of any fine imposed on the UK Government being passed down to local authorities if their action, or in-action, has contributed to the limit value being exceeded. In April 2015 the Supreme Court ordered the UK Government (Secretary of State for the Environment, Food and Rural Affairs) to produce a revised Plan setting out how it intended to meet the Air Quality Limit values in the shortest possible time and submit this to the European Commission by the end of 2015. This Plan was duly produced and introduced a number of measures intended to meet the air quality limit value for nitrogen dioxide. Perhaps the most significant aspect the Plan is the intention to require Clean Air Zones (CAZ) to be implemented within a number of cities in the UK where the air quality limits were not predicted to be achieved by 2020, including an area within the Leeds district. The CAZ is a means of regulating vehicles entering the Zone unless minimum emission standards are met, and for charges to be levied against vehicle owners that don't meet the minimum emission standard. This form of vehicle control is similar to Low Emission Zones which already operate in some parts of the UK, but follow a standardised national framework. Clean Air Zones are discussed in further detail within Section 6 of this Strategy: Tackling Transport Emissions.

It is too early to say how the UK referendum decision to leave the European Union will impact on the legal position with regard to the EU Air Quality Directive and the possibility of legal action outlined above, however, we recognise the underlying importance of reducing emissions to improve and protect public health and therefore we will continue with the ambitions and objectives of this Low Emissions Strategy irrespective of our relationship within the European Union.

## **1.2. Creating a Low Emission Future**

This section recognises that reducing emissions and improving air quality does not sit in isolation from wider economic, social and environmental activity within the region and considers how the WYLES objectives fit, or may be at risk, from these other policy considerations and considers how we can ensure that air quality continues to improve as our economy and society develops in the future.

The Leeds City Region Strategic Economic Plan 2016 to 2036 and the draft West Yorkshire Transport Strategy both offer significant opportunities to improve air quality, although it must also be recognised that economic growth, more housing and the potential for more traffic on our roads has the potential to make air quality worse unless this is considered at an early stage and action is taken to mitigate and reduce emissions. The Strategic Economic Plan includes ambitions to reduce carbon emissions and to improve resource efficiency, which can also benefit air quality and the objectives of the WYLES, for example through improved

resource efficiency, improving green infrastructure and further development of alternative fuels and technologies such as hydrogen, hydro-electric, wind and solar power. However, some carbon reduction initiatives have the potential to give rise to adverse impacts on air quality, such as decentralised energy production and the use of biomass fuels and it is therefore important that we recognise these potential conflicts and ensure any unintended consequences are identified and addressed at an early stage

Given that the greatest impact on local air quality arises from road traffic the Draft Transport Strategy for West Yorkshire is extremely important to the delivery of the Low Emissions Strategy objectives. The draft Strategy incorporates many aspects which have the potential to improve air quality, including greater public transport provision, more attractive and safer places where walking and cycling become a natural part of everyday life as well as initiatives to reduce emissions from transport including buses, lorries, taxis and private vehicles.

This section also considers the role of Planning in the development of Local Plans and determining individual planning applications. An important feature of the West Yorkshire Low Emissions Strategy has been the development an Air Quality and Planning Technical Guide which helps to inform developers, planners, consultants and air quality leads on how the air quality impact from developments can be assessed and mitigated against under the principles of sustainability and in accordance with national and local planning policies. The Guide uses the concept of the Damage Costs associated with the any increase in NO<sub>x</sub> and particulate emissions as a result of development proposal, requiring appropriate mitigation which proportionate to the scale and kind of development.

This Low Emissions Strategy inevitably focuses on tackling emissions from transport, but we also recognise that emissions from energy production and use also contribute to overall air pollution. The energy sector is undergoing significant change, with a commitment to reduce the use of fossil fuels to help tackle CO<sub>2</sub> emission reduction targets and tackle climate change. Although these changes are positive for the environment, we are also mindful of potential unintended adverse consequences for air quality which could arise from decentralising heat and power production, for example through Combined Heat and Power (CHP) plant, and Short Term Operating Reserve (STOR) generators which bring emission sources closer to where people live and work and also the use of alternative fuels such as biomass, wood-burning and energy from waste facilities. When considering new energy generating facilities, the potential impact on air quality will be considered through feasibility studies, planning and other regulatory controls.

When considering how we shape the future to reduce emissions and improve air quality we must consider the roles which cycling and walking have to play: the ultimate forms of low-emission transport, which also deliver significant additional health benefits. We have seen significant increases in the number of people cycling and steady growth in the number of people walking as part of their travel and leisure activity. Cycling and Walking is set to continue to play a significant role and feature strongly within the West Yorkshire Transport Strategy, with particular emphasis on creating places not dominated by cars, but which are

pedestrian and cyclist-friendly; developing transport hubs to better integrate cycling and walking as part of multi-modal travel arrangements; building on City Connect and Cycle Superhighway projects to develop cycling and walking infrastructure and maximises opportunities from the Government's Cycling and Walking Investment Strategy to help bring further investment in cycling and walking into the region. Because active travel is so important, a separate Walking and Cycling Plan will be developed to support the West Yorkshire Transport Strategy and this will complement our ambition to create a low emission future.

Finally, in this section we look at our own role and leading by example to reduce emissions from the vehicle fleets operated by local authorities; how we can support and encourage the people we employ to reduce their own impact on air quality by considering how they travel and using low-emission alternatives; and how we can encourage the suppliers of goods and service to reduce their emissions from our procurement policies.

### 1.3. Tackling Transport Emissions

In some parts of West Yorkshire, like many urban areas in the UK and other developed countries across the world, road traffic is having a significant impact on air quality. Factors such as the growth of diesel passenger cars and vehicle technology not achieving anticipated emission reductions has led to air pollution (NO<sub>2</sub> in particular) remaining unacceptably high in some areas. This Strategy seeks to reduce emissions from all sectors of road transport, although buses, lorries, taxis and other diesel vehicles operating within towns and cities will be the focus of our attention in order to achieve air quality improvements as quickly as possible.

This section looks at each of the main vehicle categories in turn, including passenger cars, buses, trains, freight transport, taxis and our own fleet vehicles, and considers what local authorities are able to do as part of a West Yorkshire Vehicle Emissions Plan (WYVeP) through regulatory means, infrastructure development, our influencing role and other support to achieve a reduction in transport emissions than would otherwise occur without such intervention.

A very important feature of the WYVeP will be the mandatory introduction of the Leeds Clean Air Zone, which will regulate access of certain categories of vehicle to an area of Leeds dependant on the emission standard of the vehicle: targeting buses, coaches, taxis, HGVs and vans. In addition to the mandatory Leeds CAZ, we will consider whether Clean Air Zones will be necessary to reduce transport emissions in other parts of the region if air quality is found not to be improving through the implementation of the WYLES.

**Passenger Cars** account for 78% of the 9.8 billion miles driven on West Yorkshire roads each year and they are a significant contributor to overall emissions which impact on air quality. In real-world driving conditions it has been shown that diesel cars can produce 22 times more particulate emissions and four times more NO<sub>x</sub> emissions than petrol cars and this, together

with a rapid growth in the number of diesel cars on our roads compared to a decade ago is one of the main reasons why air quality targets have not been achieved across the UK. This Low Emission Strategy will focus on reducing emissions from cars, by making it easier for people to switch to ultra-low emission alternatives, such as plug-in electric, hybrid and hydrogen fuel-cell power-trains and developing the necessary infrastructure to support this change. Although this is our main focus, this will also be supported by our wider strategic ambition to reduce the dominance of cars in our towns and cities and to create places which are more pedestrian and cyclist friendly and increasing public transport integration for example with increased park & ride / park & rail schemes.

**Buses** provide a valuable public transport option and are part of the solution to air quality problems. However, buses, which are a type of heavy goods vehicle and predominantly run on diesel fuel, give rise to relatively high NO<sub>x</sub> and particulate emissions. It is also common for buses to be kept in operation for many years and therefore turn-over to newer buses which have more stringent emission standards can be relatively slow. These factors, together with the recognition that buses also operate in our towns and cities where air quality needs to improve the most, means that reducing emissions from a relatively small number of buses will yield the most significant air quality improvements and is therefore a key priority for the delivery of the Low Emissions Strategy.

We are developing a Bus Strategy and supporting the bus industry through a Bus18 project which will accelerate a reduction in bus emissions through investment in new buses, fitting pollution abatement technology where appropriate, introducing the Eco Stars fleet recognition scheme and supporting alternative fuels and technologies including biomethane, electric and hybrid variants. These supportive measures, together with the introduction of a Clean Air Zone in Leeds and elsewhere if needed, will accelerate the reduction in bus emissions than would occur without such intervention.

**Trains**, particularly those driven by diesel engines, can contribute to the overall air pollution, however their contribution is relatively insignificant in the region when compared to other transport modes such as buses, lorries, vans and (diesel) cars, particularly when considered in relation to the emissions per passenger carried. Trains are therefore considered within this Strategy principally as a means of helping to resolve air quality in towns and cities: the more people who are able to move away from cars, even if for part of their journey, will have a positive contribution to air quality. The draft West Yorkshire Transport Strategy 2016 to 2036 will consider in further detail the significant role that trains will have in meeting our future transport needs and improving connectivity and capacity on local, regional and national rail network, including integration with HS2, further electrification of the rail network and better integration to facilitate multi-modal travel increased car-parking capacity and electric vehicle charging at railway stations and improving facilities to support cyclists to create door-to-door connectivity.

**Freight** and commercial operations are a significant contributor to the West Yorkshire economy, taking advantage of the excellent links to the strategic highway to deliver goods



and services nationally and internationally as well as within the region. Consequently, the number of HGVs on the West Yorkshire road network contribute significantly to local and regional air pollution. The Leeds Clean Air Zone will mean that lorries and vans will need to meet newer (Euro VI/6) emission standards where the CAZ applies, which will accelerate a reduction in emissions, but as well as a regulatory approach, this Low Emission Strategy will also support the commercial sector to reduce emissions from their fleet operations, for example by providing advice and training through the ECO Stars fleet recognition scheme, and supporting trials and infrastructure for low emission alternatives including compressed natural gas (CNG), liquefied natural gas (LNG), hybrid, electric and hydrogen fuel options.

**Taxis** (hackney carriage and private hire vehicles) are predominantly diesel cars or vans, with the majority of journeys being within town and city centres and therefore contribute to local air pollution issues. Taxis, like buses, lorries and vans, will be included in the class of vehicles that will need to meet minimum Euro standards as part of the Leeds Clean Air Zone. The West Yorkshire local authorities will also be using their influence when licensing hackney carriages and private hire vehicles and contracting taxi transport services to improve vehicle emission standards. These measures will accelerate a reduction in emissions coming from taxis, but the role taxis play as part of the integrated transport network, particularly for people with limited mobility, is also important and therefore we will continue to support the role of taxis at transport hubs and encourage the uptake of ultra-low emission vehicle options and the provision of dedicated electric vehicle charging infrastructure and allowing access to bus lanes where appropriate.

**Public Sector Fleet vehicles** also contribute to local air pollution problems and it is important that we play our part and also lead by example by doing all we can to reduce emissions from the fleet vehicles which we operate. All fleet managers in local authorities are signed up to the Eco Stars fleet recognition scheme and will reduce emissions from fleets through a combination of upgrading fleets to the latest Euro VI emission standard and integrating the use of alternative fuels and technologies, such as CNG / LNG, hydrogen fuel cell and electric vehicles where we can.

#### **1.4 Funding and Delivery of the West Yorkshire Low Emissions Strategy**

Accelerating the reduction in emissions and creating a low emission future will require funding. This will be provided through a number of avenues including maximising opportunities that arise from existing funding streams, such as Growth Deal funding used to deliver objectives of the Strategic Economic Plan and the West Yorkshire Transport Fund used to deliver the West Yorkshire Transport Strategy. New developments will also fund initiatives to reduce emissions, such as improved cycling and walking provision and electric vehicle charging infrastructure either directly as part of a development proposal, or indirectly through contributions from Section 106 Planning Obligations or Community Infrastructure Levy (CIL) arrangements. We will also work together to apply for new funding from grant schemes, such as those administered by the Department for Transport, and seek

opportunities for private and public sector investment, for example in new low emission infrastructure such as alternative fuels and technologies.

Delivery of the WYLES will be overseen by the West Yorkshire Transport & Health Board, which has representation from Public Health England, West Yorkshire Combined Authority and West Yorkshire district Environmental Health professionals and will in turn report on progress through the governance arrangements of the West Yorkshire Combined Authority. Progress in achieving the WYLES objectives will be monitored and reported through each local authority and made available to the public and the WYLES will also be used to inform each local authority's Annual Status Report and development of Air Quality Action Plans as part of their local air quality management duty.

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## 2. Vision, Aims and Objectives of the WYLES

### Vision

*Delivering Cleaner Air for all in West Yorkshire.*

### Aims

In working towards achieving the above vision the West Yorkshire local authorities together with West Yorkshire Combined Authority will use this Strategy as a framework to achieve the following aims:

**Aim 1:** Accelerate improvements in air quality, above that which would occur without intervention, to achieve air quality limit values set out in law in all parts of West Yorkshire by 2020 at the latest.

**Aim 2:** Working within the wider economic, social and environmental context for West Yorkshire to create a Low Emissions Future that will maximise opportunities to improve air quality, minimise risks of worsening air quality and create healthier places to live, work and visit.

**Aim 3:** Immediate focus on tackling transport emissions, targeting interventions that will deliver the most significant air quality improvements in the areas of greatest concern.

## Objectives

The West Yorkshire local authorities (WYLA) and West Yorkshire Combined Authority (WYCA) will work together to achieve the above aims and will commit to the following strategic objectives:

Ref:	Objective:
001	A Clean Air Zone will be introduced within the Leeds district, and elsewhere where necessary, to control emissions from the most polluting vehicles.
002	We will work with West Yorkshire bus operators to accelerate investment in newer buses, emission abatement technology and alternative fuels and technologies to reduce emissions through the implementation of the West Yorkshire Bus Strategy and Bus 18 Project.
003	We will accelerate the uptake of plug-in electric cars and vans through improved electric vehicle charging infrastructure and the implementation of an Electric Vehicle Strategy.
004	We will introduce the Eco Stars fleet recognition scheme to support businesses, bus operators and public sector fleet managers to reduce emissions from their fleet operations.
005	We will work with our partners to develop infrastructure to support alternative fuels and technology for transport including: natural gas, bio-methane, LNG and hydrogen.
006	We will support the taxi industry to help the transition to low emission vehicles including demonstrating economic benefits; supporting funding bids and considering policy incentives to promote the uptake of ultra-low emission taxis.
007	We will use the West Yorkshire Transport Strategy and Leeds City Region Strategic Economic Plan to help deliver the WYLES objectives, including improved cycling and walking provision; better public transport; low emission energy production and use, and sustainable infrastructure to deliver "Good Growth".
008	We will use the <i>West Yorkshire Air Quality and Planning Technical Guide</i> to deliver sustainable developments and deliver air quality improvements.
009	We will use our influence to promote low emission transport through the use of the <i>West Yorkshire Low Emission Procurement Guide</i> in the procurement of vehicles, goods and services and lead by example to reduce emissions from our own fleet operations.
010	We will continue to raise awareness of the impact of poor air quality with the public, policy makers and partners to improve air quality through changing behaviour, influencing policy, access funding and working together to deliver the objectives of this low emissions strategy.

### 3. Introduction

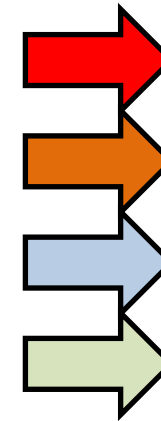
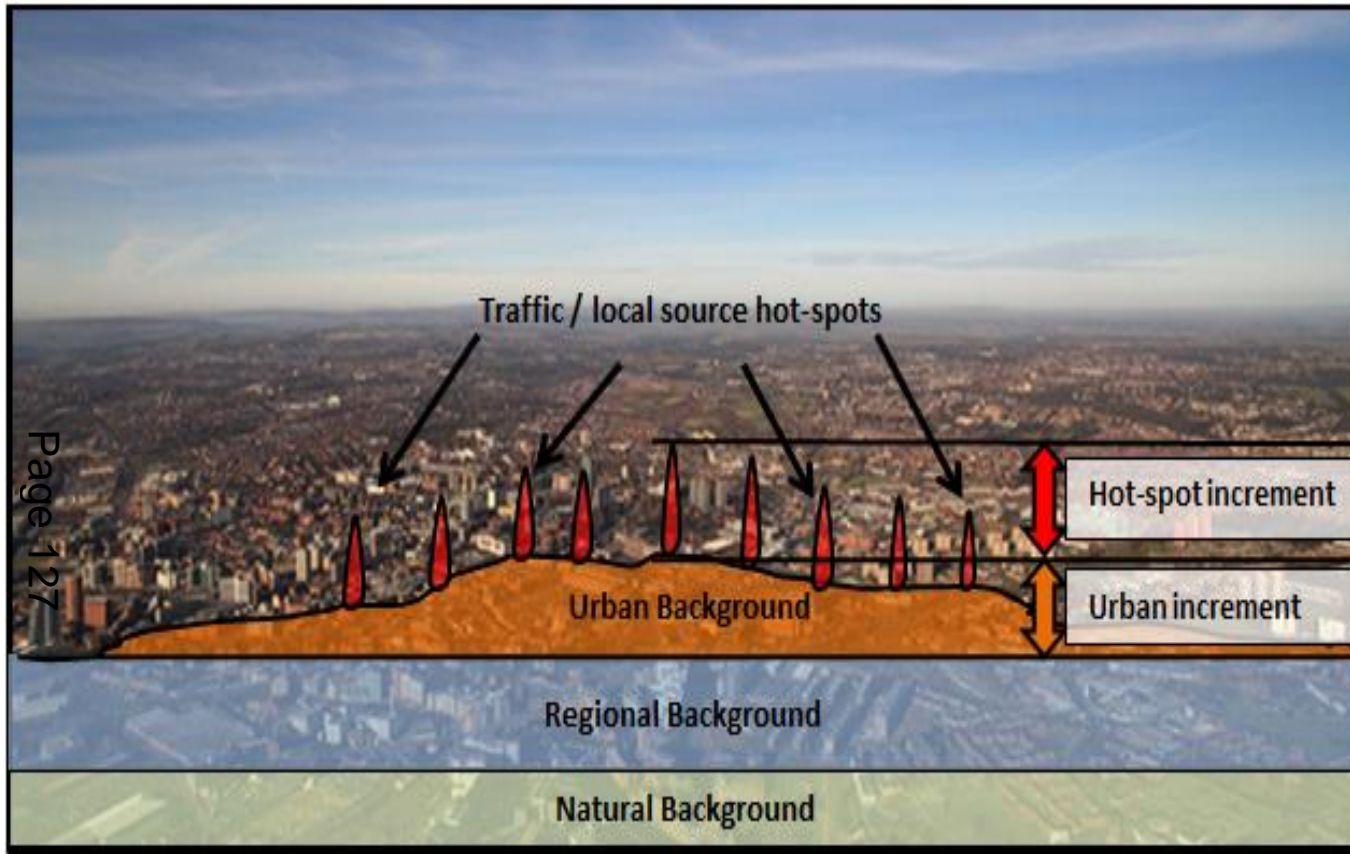
Breathing clean air, which does not adversely affect health, should be a basic requirement of any society. Air quality has improved significantly over recent decades from the days when smogs and smoke could be seen coming from chimneys in the region. Where visible smoke emissions, mainly from domestic and industrial combustion processes, were once the major cause of concern, today we face different, but no less significant challenges to our air quality although now the emissions are largely unseen and mainly come from the traffic on our roads.

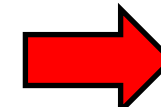
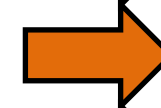
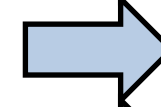
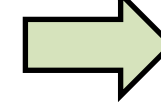
The “quality” of air describes its composition, i.e. the mixture of gases and fine particles in a given volume of air (usually one cubic metre (m<sup>3</sup>)). These gases and particles are made up from the millions of chemical, biological and physical reactions and processes that occur on a daily basis, including those resulting from human activities that we have all become used to in today’s world, such as driving a car, using public transport, generating heat and power, construction, agriculture, manufacturing and transport of goods and services. Emissions from these activities, together with the emissions from natural processes, add to the overall composition of the air we breathe.

Levels of air pollution are affected by a number of factors including the amount of primary pollution produced at source and how this is then dispersed in the atmosphere. However, the effect or impact that air pollution has depends on the level of exposure, (how much and for how long), and the susceptibility of the person (or other organism) to the particular pollutant or pollution mix.

Air pollution at a particular location is made up from a number of different pollution sources, both near and far, but generally the closer a person is to a pollution source and for a longer period of time the more likely they are to be exposed to “poor” air quality. Figure 1 illustrates how air quality becomes a problem due to “layers” of pollution building up from different sources. In rural or semi-rural areas the levels of pollution may mainly come from distant sources and therefore air quality is likely to be very good. In urban areas the amount of pollution from traffic and other sources can add to general background levels and can result in an elevated “urban background” so that the population living in that area is exposed to “poor” air quality. In other cases, although urban background levels may be below threshold levels which impact on health, localised pollution sources, for example a busy road or combustion plant can elevate the level of air pollution close to that source resulting in a local “hot-spot” of poor air quality and only the population in the “hot-spot” area will be affected.

Figure 1 - How air pollution builds up in urban areas (illustrative only).



<b>Pollution from:</b>	
	Vehicles on individual roads / junctions and local sources such as industry or construction activity.
	General urban traffic and contribution from heat / power combustion processes.
	Wider strategic road network, power stations, major industry, agriculture etc.
	Natural processes: storms, volcanoes, lightning, sea-salt, animal and plants etc.

The World Health Organisation has considered over thirty different pollutants that contribute to air pollution and recommended guideline values to help inform policy development for the protection of public health. The most common pollutants, and the ones which are considered to be a priority in terms of protecting public health, together with the WHO short-term and long-term guideline values are listed in Table 1 below.

<b>Table 1: Air Quality Guideline Values (WHO)<sup>3</sup></b>		
<b>WHO Guideline Values</b>		
<b>Pollutant</b>	<b>Short Term Exposure</b>	<b>Long Term Exposure (annual mean)</b>
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	200 µgm <sup>-3</sup> (24hr)	40 µgm <sup>-3</sup>
<b>Particulate Matter (PM)</b>	<b>PM<sub>10</sub></b>	50 µgm <sup>-3</sup> (24hr)
	<b>PM<sub>2.5</sub></b>	25 µgm <sup>-3</sup> (24hr)
<b>Sulphur Dioxide (SO<sub>2</sub>)</b>	20 µgm <sup>-3</sup> (24hr) 500 µgm <sup>-3</sup> (10 min)	Not Required <sup>4</sup>
<b>Ozone (O<sub>3</sub>)</b>	100 µgm <sup>-3</sup> (24hr)	

Air pollution is monitored in the UK through a combination of measurement of pollutant concentrations at different locations and using computer modelling based on calculated emissions from various pollution sources. The results of this monitoring can be viewed on DEFRA's ambient air quality interactive map<sup>5</sup>, which provides data on background and roadside levels of air pollution. In addition, local authorities also monitor air quality at a local level, so overall we have a good understanding of the pollutants which are of concern and the sources of pollution which needs to be addressed.

Of the pollutants listed in Table 1, the Guideline Values for Sulphur Dioxide is consistently being met within West Yorkshire, largely as a result of a reduction in the use and content of sulphur containing fuels, such as coal, and the introduction of Smoke Control areas by local authorities. Ozone is not a primary source of pollution, but is produced through a photo-chemical reaction in the atmosphere with other pollutants, and therefore Ozone pollution is greatly affected by the amount and intensity of sunlight and the prevalence of other pollutants, such as Nitrogen Dioxide and Volatile Organic Compounds (VOCs). Ground-level Ozone is not exceeding the WHO guideline values within West Yorkshire, but there is a concern that levels may increase over time due the effect of climate change and the changing concentrations of other primary pollutants. Action to reduce primary pollutants,

<sup>3</sup> [Air Quality Guidelines - Global Update 2005, World Health Organisation](#)

<sup>4</sup> The short-term exposure value is considered sufficient for the protection of health.

<sup>5</sup> <https://uk-air.defra.gov.uk/data/gis-mapping>

such as Nitrogen Dioxide, and limit greenhouse gases, such as Carbon Dioxide, will also have a beneficial effect in limiting Ozone production and therefore this Strategy, although not specifically aimed at Ozone, will also seek to achieve outcomes which will have a positive benefit on ground-level Ozone levels.

Levels of both Nitrogen Dioxide and Particulate Matter are exceeding WHO Guideline values in some urban areas of West Yorkshire. Both pollutants are largely associated with combustion processes, including internal combustion engine (ICE) vehicles (particularly those using diesel fuel), and the generation of heat and power using fossil fuels. Poor air quality occurs in areas where a large number of these combustion processes occur in close proximity to where people live and work – i.e. in urban areas and near to busy roads.

Everyone in West Yorkshire has a role to play in improving air quality, including individuals, businesses, public sector organisations and local and national Government. However, the West Yorkshire local authorities together with West Yorkshire Combined Authority (WYCA) recognise their collective role in shaping the region's economic, social and environmental future through their administrative and political decision-making powers and the allocation and use of public money. This Low Emissions Strategy provides a strategic framework to help shape regional and local strategies, policies and plans and demonstrate their commitment to ensure the people of West Yorkshire can continue to enjoy cleaner air over the next five years and for future generations.

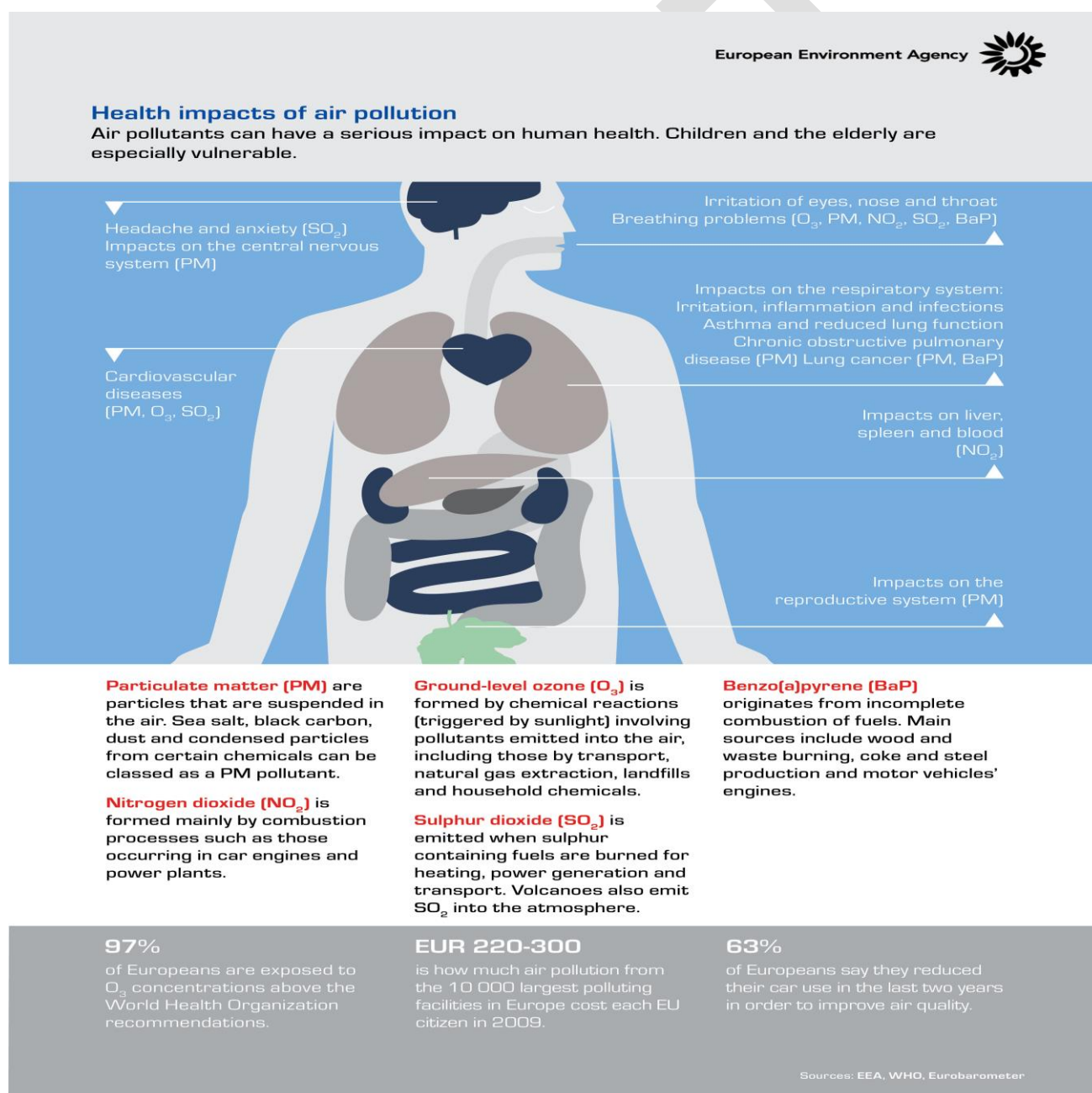


## 4. Evidence for Change

### 4.1. Health Impact

The adverse health effects from short and long-term exposure to air pollution range from premature deaths caused by heart and lung disease to worsening of respiratory symptoms (i.e. asthma, chronic obstructive pulmonary disease (COPD, commonly known as chronic bronchitis), which lead to a reduced quality of life and increased health care costs. There is also evidence linking air pollution with lung and bladder cancer<sup>6</sup>, low birth weight babies<sup>7</sup> and subsequent neurodevelopment problems in children<sup>8</sup>. The main health effects associated with air pollution are illustrated Figure 2 below:

**Figure 2: Main health effects of air pollution (European Environment Agency)**



<sup>6</sup> Diesel Engine Exhaust Carcinogenic, International Agency for Research on Cancer, WHO, 12 June 2012

<sup>7</sup> Ambient air pollution and low birthweight: a European cohort study (ESCAPE), The Lancet v1, No9 p695 - 704, Nov 2013

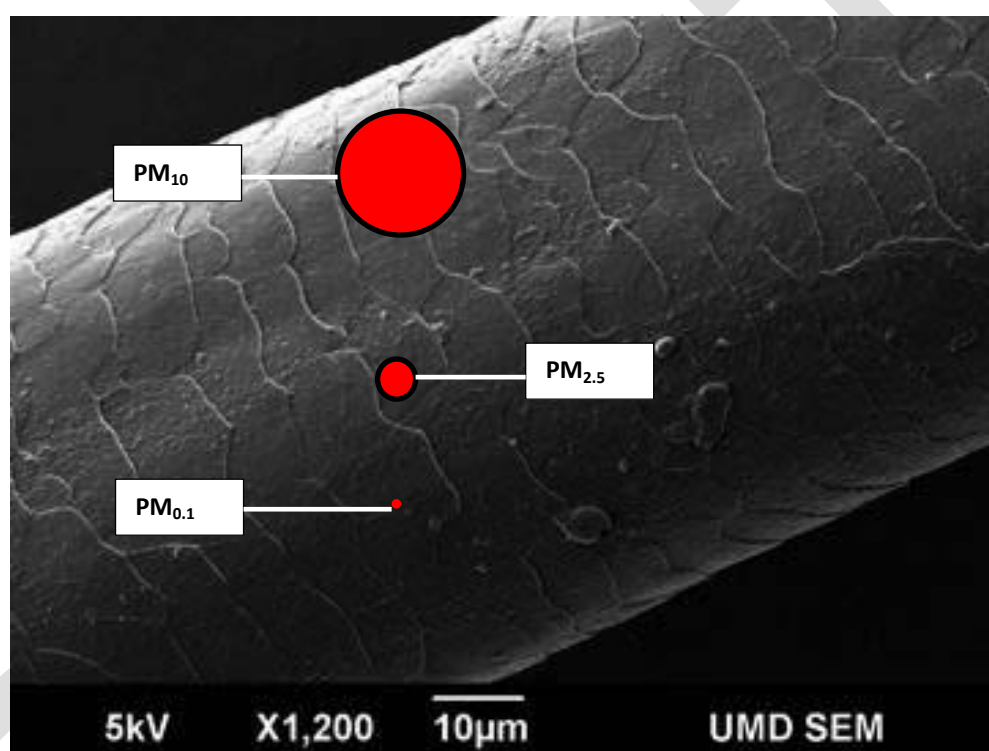
<sup>8</sup> <http://bmjopen.bmj.com/content/6/6/e010004.full>



The two main pollutants of concern in urban areas of West Yorkshire are Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>n</sub>). The Committee on the Medical Effects of Air Pollutants (COMEAP), a panel of independent experts, provide advice on the associated health risk from various air pollutants based on the best available evidence. In 2015 COMEAP reported<sup>9</sup> that the evidence linking exposure to NO<sub>2</sub> concentrations and adverse health effects such as asthma, respiratory conditions and increased cardiovascular risk has strengthened significantly over recent years and DEFRA estimate that this has an effect on mortality equivalent to 23,500 deaths annually in the UK<sup>10</sup>.

Particulate matter is the generic term used to categorise air pollution caused by very small particles which arise from a range of sources and are categorised by the particle size (Figure 3).

**Figure 3: Particle size relative to human hair.**



PM<sub>10</sub> – coarse particles (smaller than 10 microns / 0.01mm)

PM<sub>2.5</sub> – fine particles (smaller than 2.5 microns / 0.0025mm)

PM<sub>0.1</sub> – ultra-fine particles (smaller than 0.1 microns / 0.0001mm)

The small particle size means that that these pollutants are inhaled deep into the lung tissue and ultra-fine particles can pass into the bloodstream and circulate around the body and may lodge in tissue causing a disruption of function. Although much remains to be understood about the toxicity of different particle sizes, chemical composition and particle structure, COMEAP reports<sup>11</sup> a clear causal link between exposure to fine particulates and adverse impacts on health, estimated to have an effect on mortality equivalent to 29,000 deaths, 340,000 life-years lost across the UK.

<sup>9</sup> [Statement on the Evidence for the Effects of Nitrogen Dioxide on Health, COMEAP \(March 2015\)](#)

<sup>10</sup> [Improving air quality in the UK, Tackling nitrogen dioxide in our towns and cities, UK overview document, December 2015](#)

<sup>11</sup> [Statement on the Evidence for Differential Health Effects of particulate Matter According to Source or Components, COMEAP \(March 2015\)](#)

Using Public Health England (PHE) methodology<sup>12</sup> for assessing the health impact from particulate air pollution it is possible to understand the impact on mortality levels at a West Yorkshire Level (for PM<sub>2.5</sub> fine particulate air pollution) (see Table 2). The figures show that an equivalent of one in twenty deaths in West Yorkshire can be attributed to exposure to fine particulate matter alone, which, when also taking into account the effect of other air pollutants, is likely to underestimate of the true impact on health and mortality.

	<b>% Mortality</b>	<b>Equivalent number of deaths per year</b>
<b>West Yorkshire (total)</b>	<b>5.0%</b>	<b>992</b>
Bradford	4.7%	213
Calderdale	4.5%	86
Kirklees	4.8%	173
Leeds	5.0%	329
Wakefield	6.0%	189

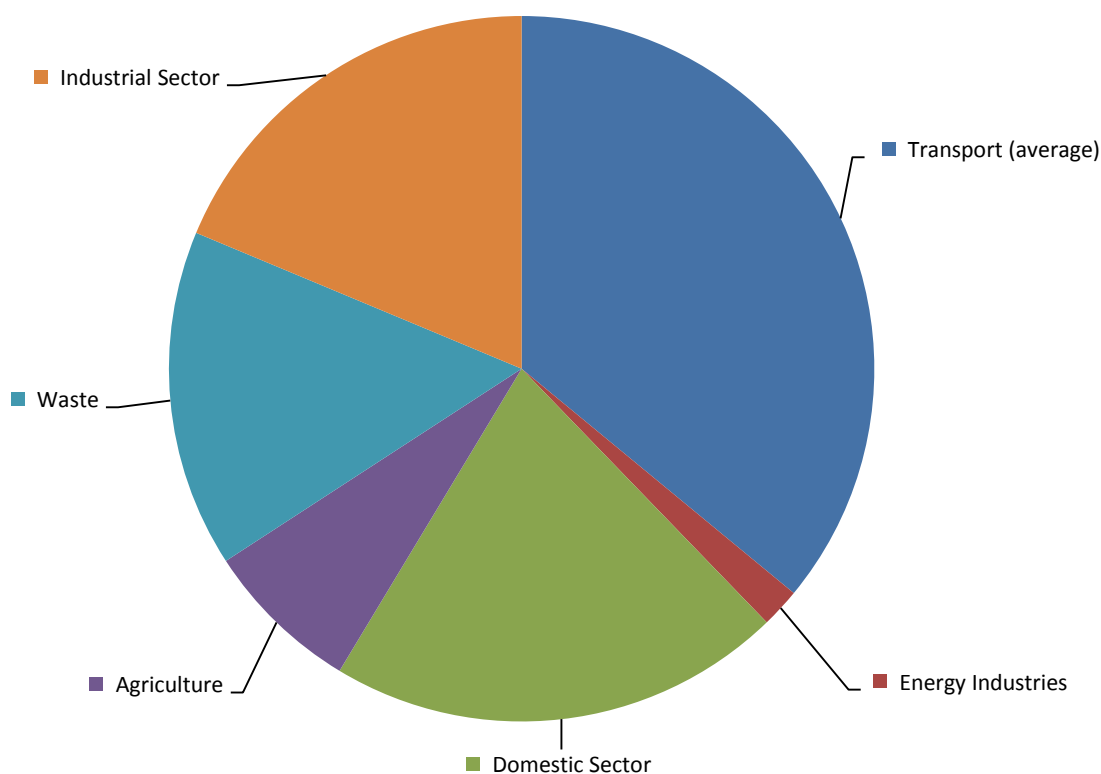
Premature death is the ultimate health impact associated with air pollution, but poor air quality particularly affects people with pre-existing respiratory and cardiac problems. It can be seen from Table 2 that the number hospital admissions for asthma, coronary obstructive pulmonary disease (COPD), and heart conditions (in this instance myocardial infarctions), in West Yorkshire are considerably higher than those for England as a whole. If the incidence rates for England were to apply in West Yorkshire there would be 678 fewer asthma admissions, 1,245 fewer for COPD and 463 fewer heart attacks. These figures give an indication of the levels of ill health and the size of the 'high risk' population that will benefit most from improvements in air quality in the region.

	<b>Admissions per 1000 population</b>		<b>Additional admissions in West Yorkshire compared to England overall</b>
	<b>West Yorkshire</b>	<b>England</b>	
<b>Asthma</b>	<b>1.39</b>	<b>1.09</b>	<b>678</b>
<b>COPD</b>	<b>2.63</b>	<b>2.07</b>	<b>1,245</b>
<b>Myocardial Infarction</b>	<b>1.39</b>	<b>1.18</b>	<b>463</b>

<sup>12</sup> [Estimating Local Mortality Burdens Associated with Particulate Air Pollution, Public Health England, 2014](#)

The mortality and morbidity effects of exposure to poor air quality can be translated into an economic cost to society. It is estimated that air pollution imposes a cost of £16 billion<sup>13</sup> per year in the UK. HM Treasury together with DEFRA have developed guidance<sup>14</sup> on how to quantify the economic impact that policies, plans and projects have on air quality. The guidance uses annual “damage costs” to quantify the impact of different pollutants from different sectors (Figure 4).

**Figure 4: Relative Air Quality Damage Costs (PM and NOx) by Sector**



Transport accounts for the most significant economic impact on air quality with an average “cost” of £44,430 and £25,252 per tonne of emissions for particulate matter (PM) and Oxides of Nitrogen (NOx) respectively. This impact is even greater in urban areas, for example in urban conurbations, such as large parts of West Yorkshire, the damage cost associated with transport rises to £107,965 and £61,365 per tonne for PM and NOx respectively.

The concept of damage costs associated with air quality is used later within this Strategy when considering “good growth” and particularly in relation to new developments and the role of the planning system to contribute to the achievement of sustainable development.

When considering interventions to reduce emissions and improve air quality, it is helpful to understand and compare the relative impact of different interventions. Leeds and Bradford Councils used this approach to help understand the health impact of introducing transport

<sup>13</sup> <https://www.gov.uk/guidance/air-quality-economic-analysis>

<sup>14</sup> [Valuing impacts on air quality: Supplementary Green Book guidance, HM Treasury and DEFRA, May 2013](#)

initiatives to reduce emissions as part of a Low Emission Zone (LEZ) feasibility study<sup>15</sup>. Table 4a summarises the estimated health benefit, in terms of actual health events being averted, if various transport initiatives were introduced. A further parameter used by health professionals to compare alternative health interventions is Quality Adjusted Life Years (QALY) which assigns a cost (or saving) to NHS and Personal Social Services (NHS / PSS) for each life year that is lost (or saved) as result of a particular health intervention.

The QALY framework was applied to the estimated health benefits arising from the LEZ study in a report<sup>16</sup> carried out by the University of York, Centre for Health Economics and concluded that the QALY methodology should be applied when assessing interventions to improve air quality. A summary of the NHS / PSS benefits associated with the transport interventions considered as part of the LEZ study are summarised in Table 4b below.

**Table 4a: Health Impact (Benefit) Associated with transport interventions modelled as part of a Leeds and Bradford Low Emissions Zone Feasibility Study.**

Transport Intervention:		pre Euro IV buses and HGVs to Euro VI by 2016	pre Euro V buses to Euro VI by 2021	Ratio of Petrol : Diesel cars to year 2000 levels (50:50 to 80:20)	10% reduction in car journeys by 2021
Health Event	Pollutant	Number of Cases Averted per year	Number of Cases Averted per year	Number of Cases Averted per year	Number of Cases Averted per year
All-cause mortality	PM <sub>2.5</sub>	15	18	18	19
Cardio-pulmonary deaths	PM <sub>2.5</sub>	8	11	10	10
Coronary events (Bradford only)	PM <sub>2.5</sub>	24	45	45	45
Low birthweight babies (at term)	PM <sub>2.5</sub>	12	14	14	15
Low birthweight babies (at term)	NO <sub>2</sub>	19	38	45	37
Pre-term birth	PM <sub>2.5</sub>	3	4	4	4
Cases of childhood asthma*	NO <sub>2</sub>	254	506	596	494

**Table 4b: Estimated Cost Saving to NHS / PSS using QALY methodology.**

Annual Saving	£3.9m	£5.5m	£5.5m	£5.7m
One-off Saving*	£4.3m	£8.6m	£10.1m	£8.4m

\*One-off effect due to reduced prevalence of asthma – i.e. incidents no longer recur year on year.

This approach provides useful indicator of the magnitude of the impact which poor air quality has on health and the associated costs in providing NHS and Personal Social Services and also the benefits which targeted interventions, such as those considered as part of the LEZ feasibility study for Leeds and Bradford, can have on the wider population.

<sup>15</sup> [Bradford Low Emission Zone Feasibility Study, Bradford Council Environmental Health Service, November 2014](#)

<sup>16</sup> [A pharmacoeconomic approach to assessing the costs and benefits of air quality interventions that improve health: a case study, Lomas et al, BMJ Open, April 2016](#)

## 4.2. Legal Context

**Note:**

This Strategy was drafted prior to the UK referendum on membership of, and subsequent decision to leave the European Union and therefore this Section should be read within this in mind. It is too early to say how this decision will impact on the legal position with regard to the EU Air Quality Directive and domestic law and the possibility of legal action outlined below, however, we recognise the underlying importance of reducing emissions to improve and protect public health and therefore we will continue with the ambitions and objectives of this Low Emissions Strategy irrespective of our relationship within the European Union.

Although improving public health is the main driver for this Strategy, there is also a legal requirement through European and domestic law to improve air quality. Air Quality Directive 2008/50/EC<sup>17</sup> sets out the obligations for Member States in terms of assessing ambient air quality and ensuring limit values for certain pollutants are not exceeded by a given target date. These legal requirements have been transposed into domestic law<sup>18</sup>. The limit values and target dates to be achieved for the two key pollutants of Nitrogen Dioxide and Particulate Matter are set out in Table 4.

**Table 4: Air Quality Directive 2008/50/EC - Limit Values and Target Dates for compliance for Nitrogen Dioxide and Particulate Matter**

		Limit Value (annual mean)	Target Date
Nitrogen Dioxide		40µgm <sup>-3</sup>	1 <sup>st</sup> January 2010
PM <sub>10</sub>		40µgm <sup>-3</sup>	1 <sup>st</sup> January 2005
PM <sub>2.5</sub>	Stage 1	25µgm <sup>-3</sup>	1 <sup>st</sup> January 2015
	Stage 2	20µgm <sup>-3</sup>	1 <sup>st</sup> January 2020

It is worth noting that the limit values set out in the Air Quality Directive are influenced by the WHO Air Quality Guideline Values (Table 1), but they are not the same, this is particularly the case for the limit values for long term exposure to particulate matter, which are higher than the WHO Guideline values. A review<sup>19</sup> of the evidence on which the air quality guidelines are based has shown that exposure to levels of particulate air pollution even below 10µgm<sup>-3</sup> can have adverse health effects and demonstrate that **there is no safe threshold of exposure to fine particulate matter**. In recognition of this the Directive further requires Member States to achieve an exposure reduction target for PM<sub>2.5</sub>, which for the UK means achieving an average exposure target of 11µgm<sup>-3</sup> by 2020. The Directive is therefore set in a legal and policy context to achieve improvements in air quality, but compliance with the Directive itself is not an assurance that air pollution will be at a level which will still not have any adverse health impact.

Each year DEFRA report on air pollution in the UK and compliance with the Air Quality Directive. These reports provide information of background (at 1km<sup>2</sup>) and roadside air pollution levels. For reporting purposes the UK is divided into 43 zones, one of which is the West Yorkshire Urban Zone.

<sup>17</sup> [DIRECTIVE 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe, \(21 May 2008\)](#)

<sup>18</sup> [Air Quality Standards Regulations 2010](#)

<sup>19</sup> [REVIHAAP Project: Technical Report, World Health Organisation \(2013\)](#)

The latest DEFRA report<sup>20</sup> indicates that in 2014 the limit value for PM<sub>10</sub> and PM<sub>2.5</sub> was being met across the West Yorkshire Urban Area. More detailed consideration using DEFRA's Ambient Air Quality Interactive Map<sup>21</sup> shows significant parts of urban West Yorkshire and particularly areas near to busy motorways and major roads are exceeding WHO guideline values and the 2020 exposure target for PM<sub>2.5</sub> of 11µg m<sup>-3</sup>. Therefore, although levels of fine particulate matter are currently compliant with Air Quality Directive limit values, there is a continuing need to reduce particulate emissions even further in order to sustain compliance with the Directive and to further protect public health.

The current challenge for the West Yorkshire area in terms of compliance with the Air Quality Directive is achieving the limit value for nitrogen dioxide. DEFRA's annual report<sup>16</sup> shows that levels nitrogen dioxide in parts of West Yorkshire, along with other major conurbations in the UK, were exceeding the EU limit value in 2014 and therefore continuing to breach the target compliance date of 2010.

The European Commission has commenced infraction proceedings against the UK Government for failing to meet the limit value for nitrogen dioxide and has indicated that it would like [the UK Government] ***“to achieve full compliance with existing air quality standards by 2020 at the latest”***. The implication being that continued failure to meet the limit value beyond 2020, could result in further legal action and possible infraction fines against the UK Government. It is also recognised that all public authorities have a role to play in improving air quality and DEFRA has written to all local authorities seeking their co-operation in achieving compliance with the air quality limit values, adding: ***“we feel we ought to remind you of the discretionary powers in Part 2 of the Localism Act under which the Government could require responsible authorities to pay all or part of an infraction fine”***.

In April 2015, in a case brought by Client Earth<sup>22</sup>, the Supreme Court ruled that the UK Government must submit new Air Quality Plans to the European Commission by the 31<sup>st</sup> December 2015 on how it intends to achieve compliance with the limit value for nitrogen dioxide in the shortest possible time. In December 2015 DEFRA duly published its Air Quality Plan for Nitrogen Dioxide in UK (2015)<sup>23</sup>, including an overview document and specific plans for each zone, including the West Yorkshire Zone Plan<sup>24</sup>. These Plans include an assessment of compliance with the limit value for nitrogen dioxide for each zone for the baseline year of 2013 and projection for compliance by 2020 and 2025 if no new measures, other than those already proposed, were to be implemented. The West Yorkshire Urban Zone, is one of eight in the UK where the annual mean limit value for nitrogen dioxide is predicted not to be achieved by 2020 unless additional measures as outlined in the Plan are implemented, which include the mandatory introduction of a Clean Air Zone (CAZ) within Leeds to control emissions from buses, coaches, taxis, HGVs and light goods vehicles (LGVs) together with additional measures such as traffic management, promoting alternative travel options and the use of alternative, low emission fuels and technology.

<sup>20</sup> [Air pollution in the UK 2015, DEFRA \(September 2015\)](#)

<sup>21</sup> <https://uk-air.defra.gov.uk/data/gis-mapping>

<sup>22</sup> [R \(on the application of ClientEarth\) \(Appellant\) v Secretary of State for the Environment, Food and Rural Affairs \(Respondent\) \[2015\] UKSC 28, 29 April 2015](#)

<sup>23</sup> [Air Quality Plan for Nitrogen Dioxide in UK, DEFRA \(2015\)](#)

<sup>24</sup> [Air Quality Plan for the achievement of the EU air quality limit value for nitrogen dioxide \(NO2\) in West Yorkshire Urban Area \(UK0004\), DEFRA, December 2015](#)

In addition to the specific challenges faced in meeting the air quality limit values and the introduction of a Clean Air Zone within Leeds, other parts of West Yorkshire also need to achieve improvements in air quality and DEFRA's Air Quality Plan makes it clear that, as a minimum, ***all local authorities currently exceeding the air quality limit values should put in place a low emission strategy setting out a range of commitments and actions to tackle air pollution and achieve compliance as soon as possible.*** This Clean Air Strategy fulfils the collective ambitions and commitments to achieve the necessary improvements in air quality in West Yorkshire.

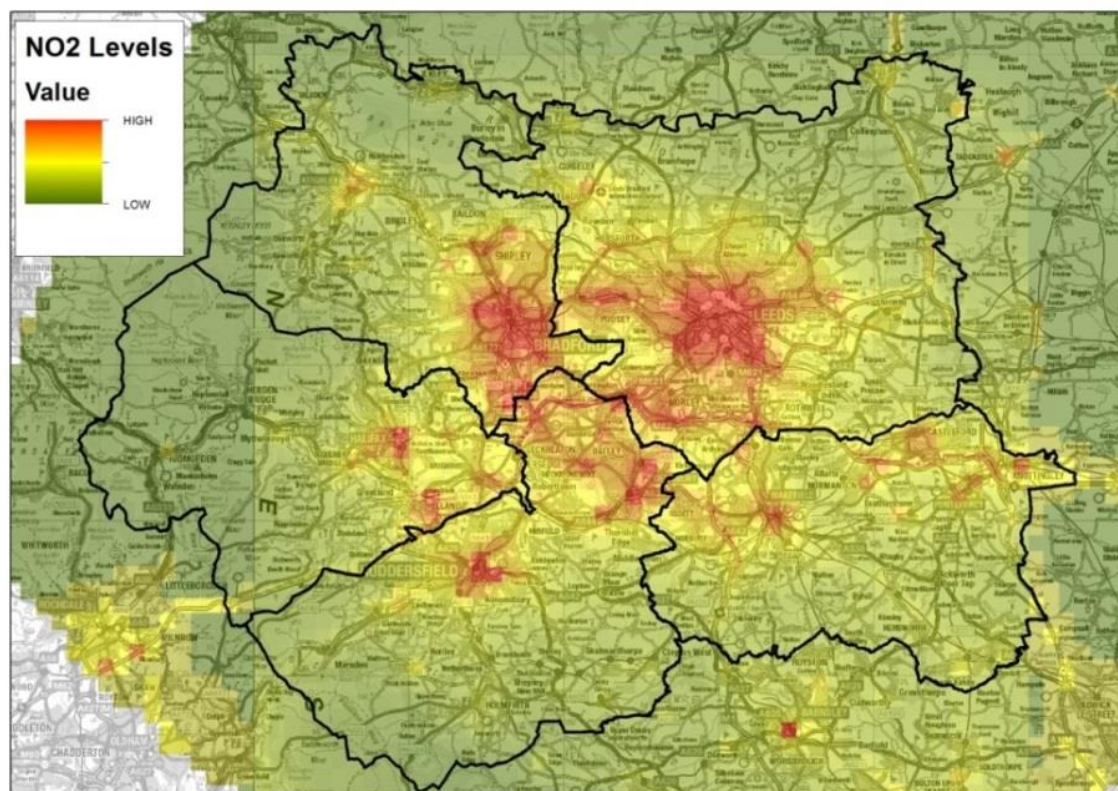
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### 4.3. Air Quality in West Yorkshire

Air quality in West Yorkshire varies and is largely dependent on geographical location and proximity to the sources of air pollution. Figure 4 shows the modelled concentrations of nitrogen dioxide in West Yorkshire.

**Figure 4: Modelled levels of nitrogen dioxide (NO<sub>2</sub>) in the West Yorkshire area.**

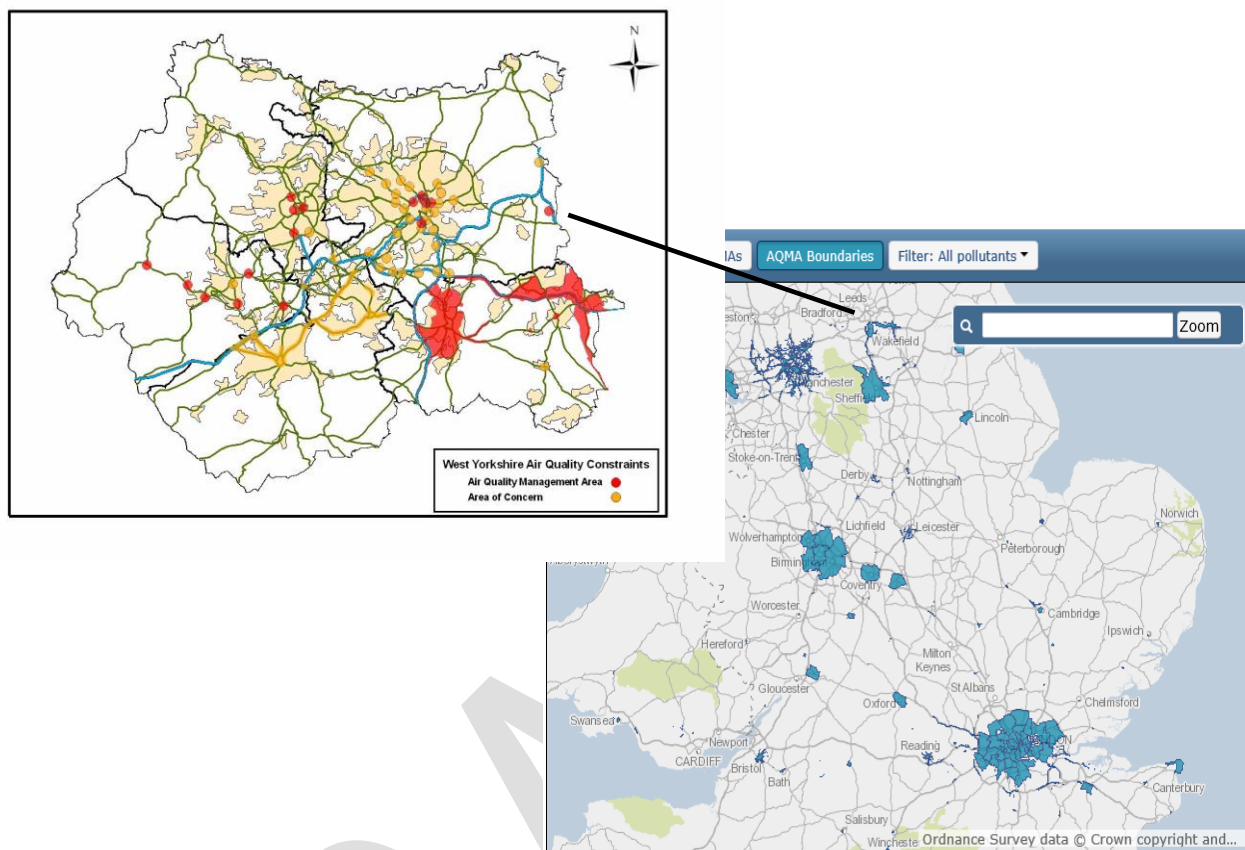


Local authorities are required to review and assess air quality in their administrative areas and declare air quality management areas (AQMAs) if they find that air quality is exceeding objective levels<sup>25</sup>. Twenty-nine AQMAs have been declared in the West Yorkshire area: 28 because of NO<sub>2</sub> concentrations and one because of particulate (PM<sub>10</sub>) concentrations (Figure 5). All the AQMAs in the region have been declared because of pollution arising from road traffic.

These monitoring and modelling results tell us that air quality is poorest in urban areas and near to busy roads and is caused by emissions from road traffic.

<sup>25</sup> [National Air Quality Objectives and Limit Values, DEFRA](#)



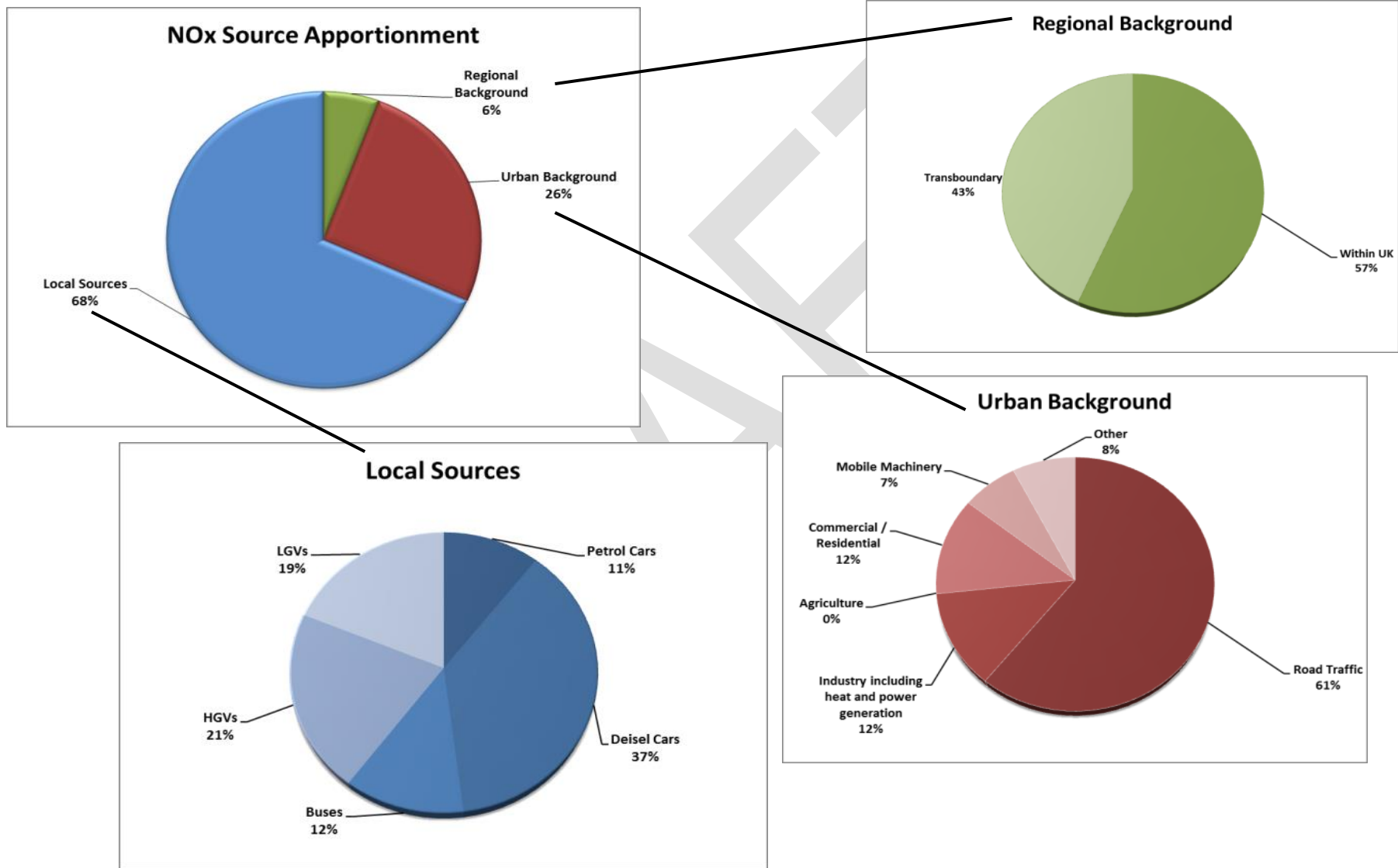
**Figure 5: Air Quality Management Areas Declared by Local Authorities**

The West Yorkshire Plan for reducing Nitrogen Dioxide in West Yorkshire<sup>26</sup>, published by DEFRA in December 2015, identified that areas of the West Yorkshire agglomeration are currently exceeding the air quality objective levels at roadside locations and that air pollution levels in some areas is not predicted to fall below the legal limits before 2020 unless targeted action (through the introduction of Clean Air Zones) is taken to reduce emissions from transport.

Figure 6 shows the sources of air pollution at the location identified within the West Yorkshire Plan as having the highest concentration of nitrogen dioxide air pollution. Although the specific source apportionment of air pollution will vary from place to place the sources identified are quite typical of the transport-related air pollution in other parts of the region and emphasise the need for this Strategy to focus on reducing transport emissions.

<sup>26</sup> [Air Quality Plan for Reducing Nitrogen Dioxide in West Yorkshire Urban Area UK0004, DEFRA, December 2015](#)

Figure 6: Modelled Concentrations of NO<sub>x</sub> ( $\mu\text{g m}^{-3}$ ) on the A58 within the West Yorkshire Urban Zone by Source<sup>27</sup>



<sup>27</sup> [Air Quality Plan for the achievement of the EU air quality limit value for nitrogen dioxide \(NO<sub>2</sub>\) in West Yorkshire Urban Area \(UK0004\), DEFRA, December 2015](#)

## 5. Creating a Low Emission Future

### 5.1. Links with other Strategies, Policies and Plans

This Low Emissions Strategy should be used to help inform and influence other relevant strategies, policies and plans both at a regional and local level and Figure 7 illustrates how the WYLES links with other policy areas and key stakeholders. It is also important to ensure that this Strategy is informed by, and is consistent with, the wider strategic priorities for the region. Notable regional strategies are the Leeds City Region Strategic Economic Plan 2016 - 2036<sup>28</sup> and the developing West Yorkshire Transport Strategy 2016 – 2036<sup>29</sup>, which set out the over-arching plans for the economy and transport over the next 20 years. As well as these regional strategies each local authority has implemented or is in the process of implementing local development plans, which set out each local authority's plans and policies for the allocation of land for employment, housing and other uses.

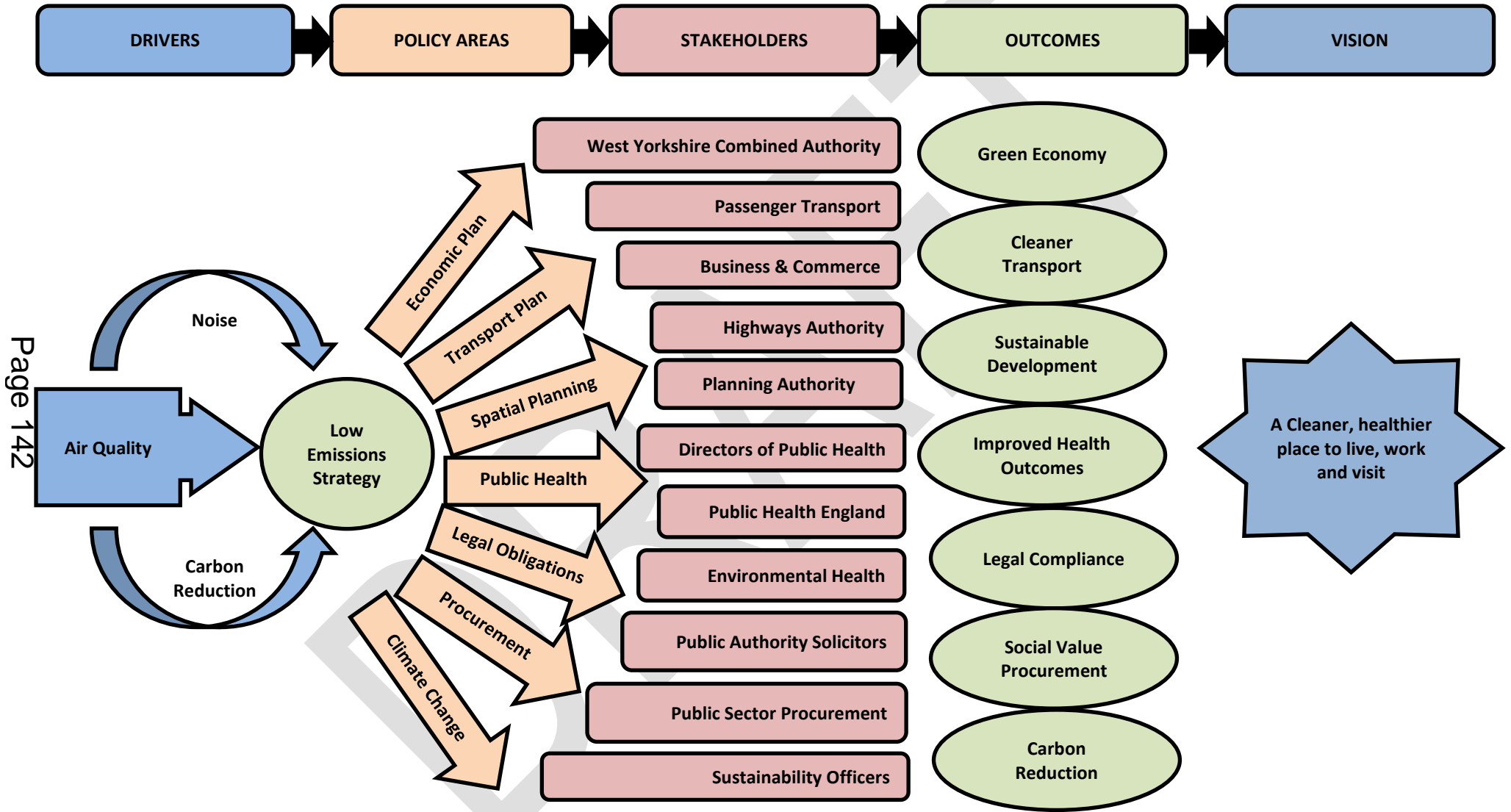
These Strategies and Plans will result in additional jobs and housing for the region, which has the potential to create more air pollution, particularly from transport, and it is therefore important to consider how regional and local growth will impact on air quality now and in the future and how we take the opportunities which arise from this growth to improve the environment and places where we live and work. These Strategies and Plans and how they link with this Low Emissions Strategy are considered in further detail below.

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<sup>28</sup> [Leeds City Region Strategic Economic Plan 2016 - 2036, Leeds Enterprise Partnership, May 2016](#)

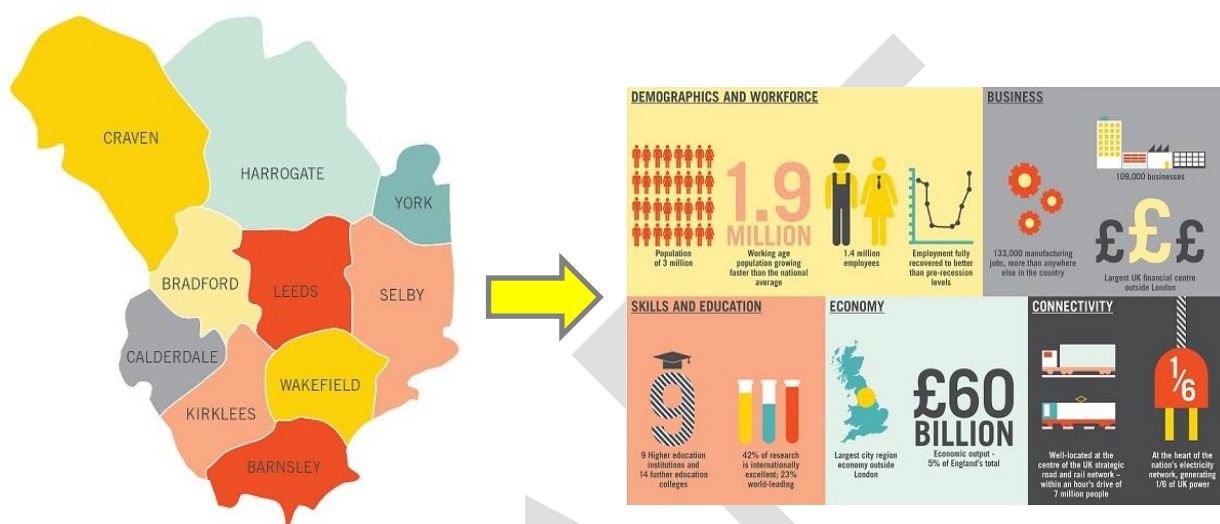
<sup>29</sup> [Single Transport Plan, West Yorkshire Combined Authority](#)

Figure 7: West Yorkshire Low Emission Strategy and links to other key Policy Areas



### 5.2. Leeds City Region Strategic Economic Plan 2016 – 2036

The Leeds City Region has the biggest economy outside London and the Leeds Enterprise Partnership (LEP), together with other partners, are working to improve the economic prosperity of the region. In May 2016 the LEP updated its Strategic Economic Plan (SEP) for the region with an overall ambition of delivering upwards of 35,000 jobs and an additional £3.7 billion of annual economic output by 2036.



Central to the SEP is the concept of “Good Growth”, to support and grow businesses that deliver good jobs, higher wages, better standards of living and improvements to the environment and places where people live and work. The SEP priorities include Clean Energy and Environmental Resilience (Priority 3), and although principally aimed at reducing CO<sub>2</sub> emissions and adapting to climate change, it sets out the principle that the environment is a key priority while growing the economy. In delivery economic growth, the SEP therefore creates potential risks to air quality, but also has the potential to deliver air quality improvements which complement this Low Emissions Strategy. The key opportunities and risks from the SEP are highlighted in Table 5 below.

The Strategic Economic Plan therefore provides significant opportunity and potential access to funding to improve air quality and help deliver the objectives of this Low Emissions Strategy. Priority 3: Clean Energy and Environmental Resilience provides some of the most significant opportunities to contribute to the objectives of this Strategy through the development. We will work with our partners to maximise the opportunities presented by the SEP, and also raise awareness of the potential risks to air quality and ensure these are fully considered and impacts are mitigated.

	<b>Opportunities</b>	<b>Risks</b>
<b>Priority 1: Growing Businesses</b>	<ul style="list-style-type: none"> <li>• <i>Investment in Low Carbon and Environmental industries.</i></li> <li>• <i>Improved Digital Capacity: reducing reliance on travel and transport.</i></li> <li>• <i>Embedding resource efficiency to support business productivity.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Generation of more traffic on our roads.</i></li> <li>• <i>More businesses using more energy and creating more emissions.</i></li> </ul>
<b>Priority 2: Skilled People, Better Jobs</b>	<ul style="list-style-type: none"> <li>• <i>Skilled workforce in low Carbon, resource efficiency and environmental industries.</i></li> <li>• <i>Higher paid jobs: more likely to invest in cleaner vehicle technology.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>More people travelling to work, education or training.</i></li> </ul>
<b>Priority 3: Clean Energy and Environmental Resilience</b>	<ul style="list-style-type: none"> <li>• <i>Reduction in Carbon-based fuels and development of low emission fuels and technology (e.g. Hydrogen, hydro-electric, wind, solar etc).</i></li> <li>• <i>More resource efficient businesses.</i></li> <li>• <i>More and better use of trees and green space (Green Infrastructure) to promote active travel and help improve air quality.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Decentralised energy production: localised power and heat generation may cause localised air quality problems.</i></li> <li>• <i>Biomass fuels: risk of higher particulate and NOx emissions.</i></li> </ul>
<b>Priority 4: Infrastructure for Growth</b>	<ul style="list-style-type: none"> <li>• <i>Improved Public Transport, more capacity and better connectivity.</i></li> <li>• <i>Reduced congestion.</i></li> <li>• <i>Removal of traffic from town and city centres.</i></li> <li>• <i>Investment in Walking and Cycling infrastructure.</i></li> <li>• <i>Infrastructure to support alternative, low emission transport: e.g. electric / hydrogen / gas vehicles</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Greater capacity on roads generating more emissions from vehicles.</i></li> <li>• <i>Moving air quality problems away from city centres to residential areas.</i></li> </ul>

### 5.3. West Yorkshire Transport Strategy 2016 – 2036 (Draft)

An efficient and effective transport system is of vital importance for connecting people to the places they need to be and to support businesses and the local economy, but at the same time we know that transport contributes most to local air quality problems. Our plans and investment strategies for transport now and in the future are key to ensuring air quality improves and the objectives of this Low Emissions Strategy are met.

The impact transport has on the environment is recognised in the current West Yorkshire Local Transport Plan 2011 to 2026<sup>30</sup> (LTP), with a particular commitment to progressing to a low Carbon, sustainable transport system. However, emissions from transport which contribute to poor air quality (NOx and PM) have not fallen in the way that was predicted when the current Transport Plan was drafted, largely due to the growth of diesel cars and the failure of Euro standards to achieve the expected reduction in exhaust emissions in real-world driving conditions. Reducing CO<sub>2</sub> emissions continues to be an important feature of transport policy, but it is recognised that more action in the short to medium term is required to also reduce transport emissions which cause air quality problems at a local level.

West Yorkshire Combined Authority (WYCA) is developing a new Transport Strategy<sup>31</sup>, which will replace the current LTP and support the economic ambitions outlined in the Strategic Economic Plan, running alongside the same twenty-year time-frame.

Although yet to be finalised, the Transport Strategy is likely to have a number of core themes to improve the transport network and making a positive contribution to the places where we live and work. The importance of improving air quality and delivering benefits to health and the environment will feature strongly, cutting across all the core themes of the Strategy and linking closely with this Low Emissions Strategy.

The draft Transport Strategy offers many opportunities to make a positive contribution to air quality and, although to a far lesser extent, also presents some risks to improving air quality which are highlighted in Table 6.

<b>Table 6: Draft West Yorkshire Transport Strategy 2016 to 2036 - Opportunities and Risks to Air Quality</b>		
	<b>Opportunities</b>	<b>Risks</b>
<b>Theme 1: Road Network</b>	<ul style="list-style-type: none"> <li>• <i>Reducing congestion.</i></li> <li>• <i>Support for multi-modal travel, including park and ride, park and rail and cycling facilities.</i></li> <li>• <i>Managing vehicle use in town and city centres.</i></li> <li>• <i>Support for ultra-low emission vehicles – e.g. electric charging network.</i></li> <li>• <i>Support for alternative fuels in the freight sector – e.g. CNG / LNG and biofuels.</i></li> <li>• <i>Better walking and cycling routes.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Greater capacity on roads, leading to more vehicles and more emissions.</i></li> </ul>
<b>Theme 2: Places to Live and Work</b>	<ul style="list-style-type: none"> <li>• <i>People-friendly town and city centres, encouraging walking and cycling and reducing dominance of cars.</i></li> <li>• <i>Better rail and bus transport hubs to encourage greater public transport use.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>None</i></li> </ul>

<sup>30</sup> [My Journey, West Yorkshire Local Transport Plan 2011 to 2026](#)

<sup>31</sup> <http://www.westyorks-ca.gov.uk/stp-survey/>



	<ul style="list-style-type: none"> <li>• <i>Enhancing community settings to create safer, healthier and more attractive places to live and work.</i></li> </ul>	
<b>Theme 3: One System Public Transport</b>	<ul style="list-style-type: none"> <li>• <i>Improved connectivity and capacity of local, regional and national rail network, including HS2.</i></li> <li>• <i>Electrification of trans-Pennine railway routes.</i></li> <li>• <i>A new Bus Strategy<sup>32</sup> to improve bus services and increase bus use.</i></li> <li>• <i>Reducing emissions from buses to directly benefit air quality.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Investment by commercial bus and train operators to improve bus fleets, rolling stock and infrastructure.</i></li> </ul>
<b>Theme 4: Smart Futures</b>	<ul style="list-style-type: none"> <li>• <i>Using the latest technology to improve traffic management.</i></li> <li>• <i>Smart Card to support multi-modal travel.</i></li> <li>• <i>Better information to support public transport.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Measures to reduce congestion may not translate to reduced emissions.</i></li> </ul>
<b>Theme 5: Asset Management</b>	<ul style="list-style-type: none"> <li>• <i>Improved condition of highway infrastructure to reduce congestion, and support cycling and walking.</i></li> <li>• <i>Incorporation of green infrastructure to highway improvement schemes.</i></li> <li>• <i>Improved energy efficiency and resource efficiency.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Better roads could create more vehicle use and reinforce car dominance.</i></li> </ul>
<b>Cross-cutting Theme: Environment, Health &amp; Wellbeing and Inclusion</b>	<ul style="list-style-type: none"> <li>• <i>Adoption of the West Yorkshire Low Emissions Strategy.</i></li> <li>• <i>Implementation of Leeds Clean Air Zone</i></li> <li>• <i>Electric vehicle recharging infrastructure.</i></li> <li>• <i>Moving to near zero bus emissions.</i></li> <li>• <i>Green infrastructure to enhance the environment and promote active travel options.</i></li> <li>• <i>Investment in cycling infrastructure.</i></li> <li>• <i>Safer roads which are pedestrian and cyclist friendly.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>None</i></li> </ul>

The Transport Strategy and the funding which flows from its implementation through successive delivery plans will form one of the primary means by which the objectives of this Low Emissions Strategy are delivered. The West Yorkshire local authorities, together with West Yorkshire Combined Authority and the various partners and stakeholders will continue to work together to implement the complimentary objectives of this Low Emissions Strategy and the West Yorkshire Transport Strategy.

<sup>32</sup> [Bus Strategy, West Yorkshire Combined Authority](#)



#### 5.4. Local Development Plans and Development Management

Local Council planning departments consider how land in their districts should be developed for housing, employment and other uses and determines the policies that should be applied when considering individual development proposals. Sustainability is at the heart of planning policy, whereby environmental, social and economic factors are considered when developing Local Plans and when determining individual planning applications. National Planning Policy Framework (NPPF)<sup>33</sup> (Figure 8) recognises the importance of air quality and sustainable transport when deciding where new development is needed and when determining individual planning applications.

**Figure 8: Extracts from National Planning Policy Framework (NPPF)**

##### National Planning Policy Framework – Para 35:

*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies;*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
- *consider the needs of people with disabilities by all modes of transport.*

##### National Planning Policy Framework – Para 124:

*“Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with local air quality action plans”.*

National Planning Practice Guidance (NPPG)<sup>34</sup> provides further detailed guidance and states Local Plans should:

- Consider the potential cumulative impact on air quality from developments.
- Consider the impact of point-sources of air pollution, for example industrial emissions.
- Where air quality may be unacceptable, identifying measures for offsetting the impact including supporting measures in an air quality action plan or **low emissions strategy**.

<sup>33</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>34</sup> <http://planningguidance.planningportal.gov.uk/>

West Yorkshire planning authorities use the Health Impact Assessment<sup>35</sup> methodology to assess the impact of certain major developments and each has local planning policies which ensure air quality and other environmental considerations are taken into account when taking planning decisions.

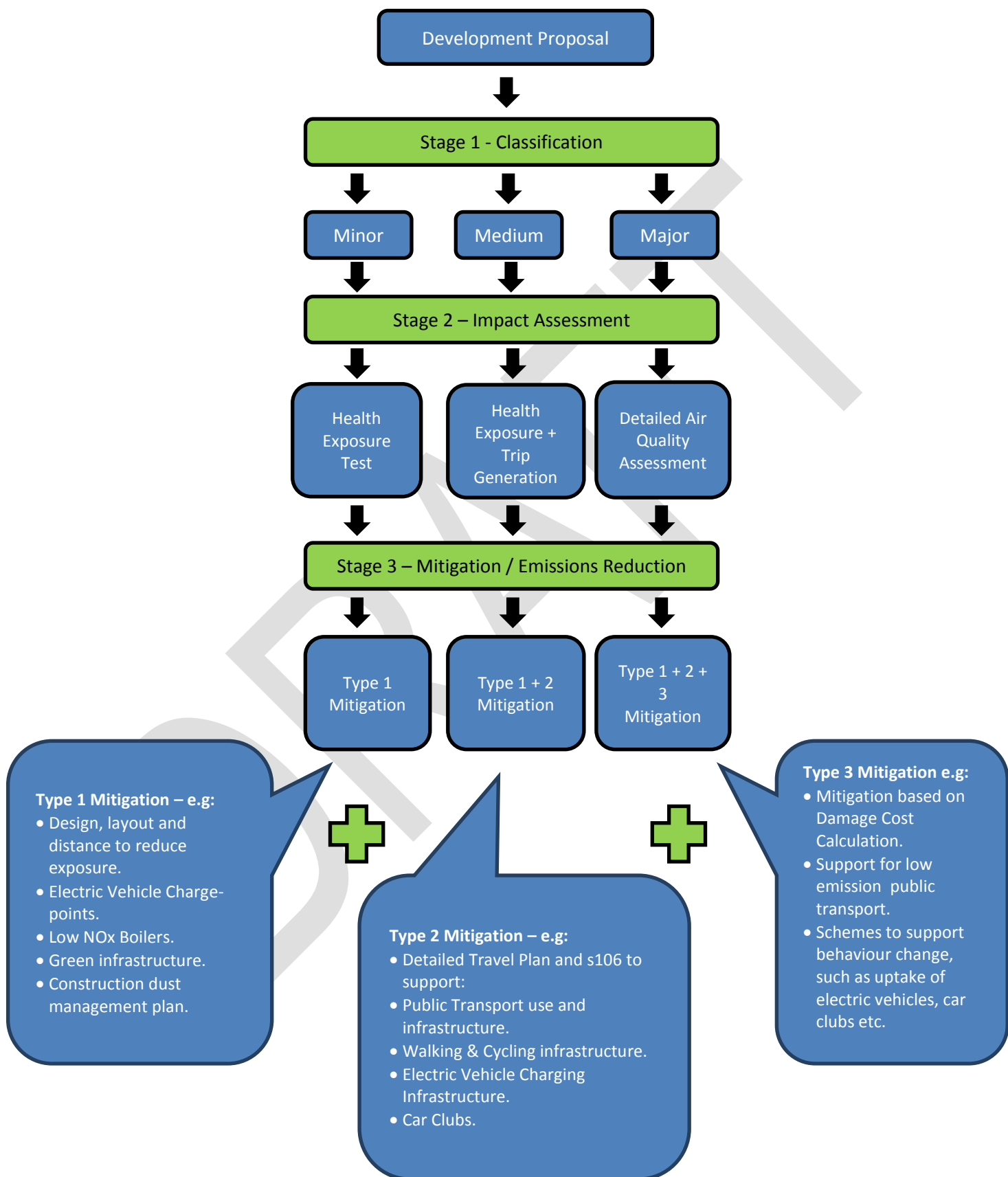
One key strand of the WYLES has been the development of an ***Air Quality & Planning Technical Guide*** to assist developers, consultants, air quality officers and planning authorities to ensure that the principles of sustainable development, with particular reference to air quality, are satisfied when making planning decisions. The Guide, which is a key supporting document of this Low Emissions Strategy, will be used by the West Yorkshire local authorities to help assess the air quality impact of developments and ensure mitigation measures are incorporated into development proposals. The Guide provides a three stage process (Figure 9) which leads the developer through a step-by-step pathway to understand what is required to mitigate the impact that a development would otherwise have on air quality. The concept of Damage Costs associated with Particulate and NO<sub>x</sub> emissions from the development (see Section 4.1 above) are used to help inform the scale and kind of mitigation required and that this is proportionate to the impact on air quality.

Because poor air quality is mainly associated with emissions from road traffic, the Planning Guide necessarily leans towards reducing emissions from transport through the promotion and support for public transport, cycling and walking and low emission vehicles, however the guide can equally be used to consider emissions from developments which impact on air quality in ways other than increased traffic, such as emissions from industrial processes, energy and heat production, construction and minerals extraction. Non-transport mitigation options, such as low NO<sub>x</sub> boilers, emission abatement technology, green infrastructure and dust management plans are examples of how emissions from non-transport sources could be reduced or controlled.

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<sup>35</sup> [Health Impact Assessment, Wakefield Council](#)

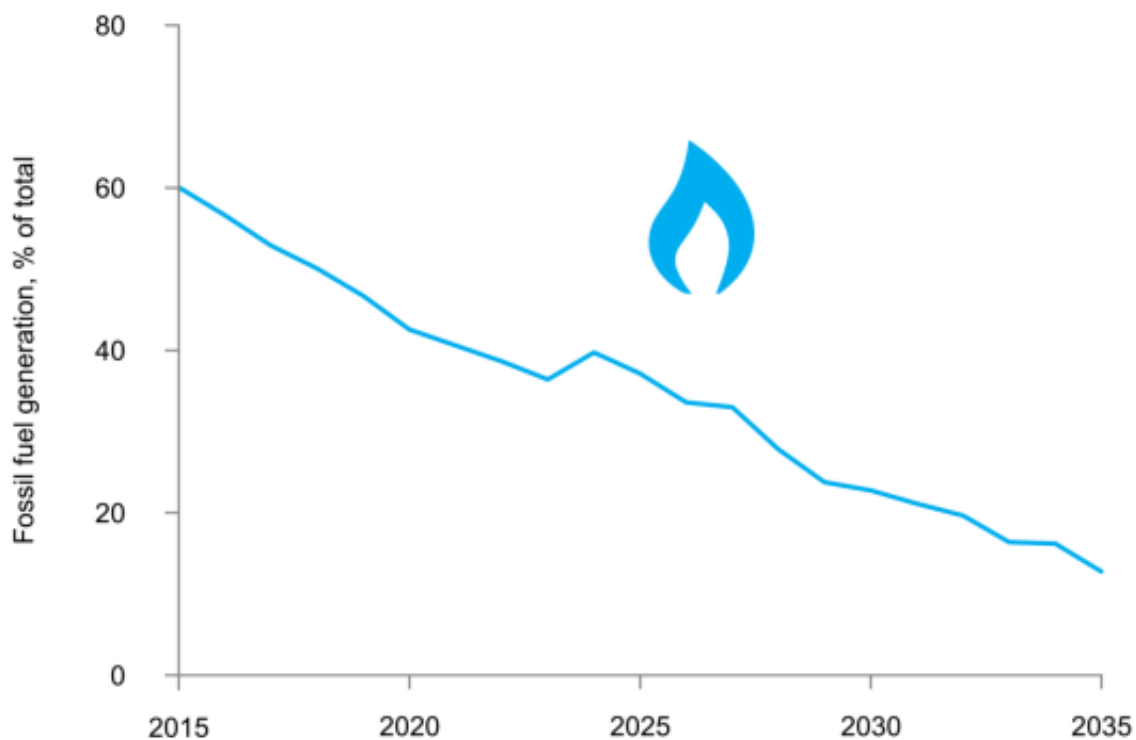
Figure 9: Air Quality & Planning Technical Guide – How it Works.



## 5.5. Emissions from Energy Production and Use

We use electricity and heating in our everyday lives, although most of us are largely unaware of the type of fuel or technology used to generate the electricity or the resulting emissions to the environment. The way in which electricity and heat used in homes and businesses has changed considerably and is set to continue on this journey as Government policy and the need to address climate change concerns drives low-Carbon alternatives. It is predicted that electricity generated from fossil fuels will fall from 60% in 2015 to just 13% by 2035<sup>36</sup> (Figure 10), with greater reliance on nuclear and renewable energy sources. All coal-fired power stations are set to close by 2025, and major power stations in the region such as Ferrybridge C, Eggborough and Drax have either already moved or are planning to move to alternative fuels, such as energy from waste or biomass, although there is likely to be continued investment in gas-fired power generation.

**Figure 10: Projected fall in electricity production from fossil fuels 2015 to 2035<sup>36</sup>.**



In terms of air quality, emissions from large power stations contribute mainly to regional or trans-boundary pollution and are therefore not directly associated with localised hot-spots which cause air quality problems in our town and city centres and near to busy roads. The WYLES focus is therefore to reduce emissions from transport sources, however, we are also aware that the change in energy markets and energy policy can have a knock-effect on local air quality, which we must be mindful of and be prepared for. There are two emerging issues that have the greatest potential to have an adverse impact on air quality: decentralised heat and

<sup>36</sup> [Updated Energy and Emissions Projections 2015, DECC, February 2016](#)

energy production (i.e. combustion processes to generate heat or power near to where people live and work rather than from a regional power-generating station), and the use of some alternative fuels such as biomass, waste and wood-burning, which can give rise to higher particulate and NO<sub>x</sub> emissions when compared to other fuels such as natural gas. The combination of local heat / power generation using a fuel such as biomass, has the greatest potential to adversely impact on local air quality.

In almost all cases the installation of a localised heat or power generating facility, such as a Combined Heat and Power plant (CHP), District Heating Scheme or Short Term Operating Reserve (STOR) facility will require planning permission and the impact of emissions will be fully considered as a part of any planning application process as outlined above. In some cases, such as with some District Heating and CHP Schemes, local authorities themselves will be instrumental in pursuing such developments as part of the wider drive to be more energy efficient, reduce CO<sub>2</sub> emissions and tackle fuel poverty. Where local authorities are directly involved in such schemes we will ensure that the full impacts on air quality are considered at the earliest opportunity as part of any feasibility study.

There has been a recent increase in the number of planning applications for STOR facilities, often multiple diesel generators that can be switched on at short notice under contract with the National Grid to meet a short-term demand for energy. These facilities are a significant concern in terms of air quality, particularly if located near to where people live or work, because particulate and NO<sub>x</sub> emissions can be very high over a short period of time. These facilities also tend to fall outside of other regulatory control such as the need to have an Environmental Permit which applies for larger combustion plant. We believe that these combustion facilities should be subject to the same regulatory control of emissions as other larger combustion processes and will seek to influence and support Government to introduce regulation in this regard. In the meantime, planning applications for STOR facilities will be closely scrutinised as part of the planning application process to ensure air quality concerns are adequately addressed.

In addition to considering emissions from new combustion facilities at the planning application stage, local authorities also have a further regulatory role in relation to controlling emissions and considering chimney heights under Clean Air Act<sup>37</sup>, Environmental Permitting Regulations<sup>38</sup> and statutory nuisance control<sup>39</sup>. Local authorities already widely use these powers to control emissions from domestic, commercial and industrial combustion processes and activities. Local authorities will continue to use these powers to control and contribute to improving local air quality.

In terms of the evolving energy sector it is also worth a note on how hydraulic fracturing (“fracking”) technology in the extraction of shale gas could impact on air quality. There are currently limited studies on the fracking process within the UK although some research<sup>40</sup> suggests that the process does produce emissions such as methane, VOCs, particulates and

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<sup>37</sup> [Clean Air Act 1993](#)

<sup>38</sup> [Environmental Permitting \(England and Wales\) Regulations 2010](#)

<sup>39</sup> [Environmental Protection Act 1990](#)

<sup>40</sup> [A Public Health Assessment of Shale Gas in England, Medact, 2016](#)

oxides of nitrogen which would adversely impact air quality. Areas within West Yorkshire have been identified<sup>41</sup> as having potential shale gas reserves and it would be necessary for any subsequent planning application for exploration or extraction to be fully considered, including any potential impact on air quality, by the relevant minerals planning authority.

As outlined in section 5.1 above, a key feature of the Leeds City Region Strategic Economic Plan 2016 to 2036 is investment in renewable energy, energy efficiency and tackling fuel poverty. Some specific areas which have the potential to support this low emissions strategy are:

- H-21 Project looking into the possibility of using existing gas pipeline infrastructure to transport hydrogen as a fuel to be used in homes, businesses and potential transport fuel resulting in zero emissions at point of use.
- Developing alternative transport fuels and technologies including CNG / LNG, bio-methane, hydrogen and electric vehicle charging infrastructure.
- Incorporating Green Infrastructure (trees and other vegetation) as an integral part of infrastructure projects.
- Improved energy efficiency in businesses.
- Home energy improvements to reduce fuel poverty.

In developing these themes the Leeds Enterprise Partnership will help address air quality and contribute to the objectives of this Low Emissions Strategy.

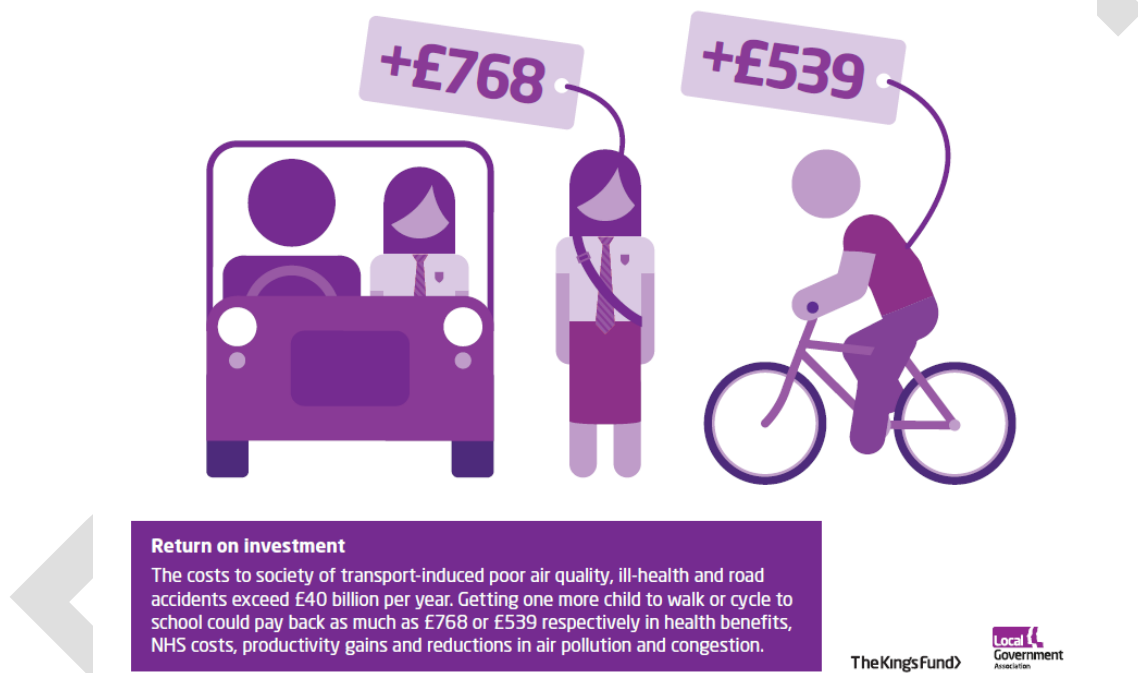
### 5.6. Active Travel: Walking & Cycling

Active travel is cheap, inclusive and accessible, but is also the ultimate “low emission vehicle”. Choosing to walk or cycle instead of getting in the car will not only reduce air pollutants and help with traffic congestion it will also:

- Improve health and well-being for the individual - Inactivity has a health effect comparable in scale to that of air quality. Eliminating inactivity in the UK would cut mortality rates by 7.5%<sup>42</sup>.
- Promote a vibrant local economy.
- Benefit community cohesion.

Figure 11 below shows the economic benefits each year of getting just one child to walk or cycle to school<sup>43</sup>.

**Figure 11 – Illustration of the health benefits from walking and cycling.**



The Government is currently drafting a Cycling and Walking Investment Strategy (CWIS)<sup>44</sup> which outlines a transformational vision with the aim that **“cycling and walking is the natural choice for shorter journeys, or as part of longer journeys”**. The draft CWIS identifies three priority areas (Figure 12):

- Better Safety
- Better Mobility
- Better Streets

<sup>42</sup> [http://www.panorama.am/en/current\\_topics/2015/01/15/inactivity-deaths/](http://www.panorama.am/en/current_topics/2015/01/15/inactivity-deaths/)

<sup>43</sup> Kings Fund infographic 2014

<sup>44</sup> [Draft Cycling and Walking Investment Strategy, Department for Transport, March 2016](#)

**Figure 12: Extract from Department for Transport draft Cycling and Walking Investment Strategy, March 2016**

**By 2040 our ambition is to deliver:**

**BETTER SAFETY**

*“A safe and reliable way to travel for short journeys”*

- streets where cyclists and walkers feel they belong, and are safe
- reduced community severance
- safer traffic speeds, with 20mph limits where appropriate
- cycle training opportunities for all children

**BETTER MOBILITY**

*“More people cycling and walking – easy, normal and enjoyable”*

- cycling facilities that are recognised by business as in the top ten globally
- urban areas that are considered as amongst the most walkable globally
- dense networks of routes around public transport hubs and town centres, with safe paths along busy roads
- better links to schools and workplaces
- technological innovations which promote walking and cycling
- behaviour change interventions

**BETTER STREETS**

*“Civilised places where people come first”*

- places designed for people, with walking and cycling put first
- improved public realm
- planning for walking and cycling
- community based activities
- a wider green network of walkways, cycleways and open spaces that lets people actively incorporate nature into their daily lives

The Government’s ambition with respect to cycling and walking will help build on the success of the Tour de France *Grand Depart* in 2014 and Tour de Yorkshire in 2015 and the resulting growth of cycling in the region and closely aligns key objectives within the draft West Yorkshire Transport Strategy, including:

- Removing dominance of the car in towns and cities and creating places which are safe and attractive to walk and cycle.
- Building on the City Connect<sup>45</sup> initiative and investment programmes such as the £60m in the Leeds – Bradford Cycle Superhighway.

<sup>45</sup> <http://cyclecityconnect.co.uk/>



- Making it easier for walking and cycling to be an integrated part of longer journeys without having to drive with improvements to transport hubs.
- Introducing traffic calming, pedestrian-friendly initiatives to encourage walking so that this becomes a natural part of everyday journeys to school, work and leisure activities.

We can all make a positive contribution to improve air quality and deliver significant personal health benefits by walking or cycling more as part of our regular travel arrangements. The importance of active travel extends beyond delivering air quality improvements and will be subject to a separate and more detailed ***Cycling and Walking Plan*** to be developed in conjunction with other key stakeholders as a supporting document to the West Yorkshire Transport Strategy to help shape our investment and support for walking and cycling for the future.

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## 5.7. Leading by Example

In order to create change it is important that key organisations, including local authorities and other public sectors organisations and socially responsible companies lead by example. Local Authorities in West Yorkshire operate over 3,000 fleet vehicles and are significant employers in the region, generating many thousands of business miles each year and are responsible for spending public money when procurement of goods and services. These represent significant opportunities for influencing change, both within local authority organisations and beyond, including employees and the many private, public and voluntary sector organisations who engage with local authorities on a daily basis.

### 5.7.1. Local Authority Fleet

Although many factors need to be taken into account when deciding what type of vehicle is most suitable for a particular job it is a legal requirement<sup>46</sup> that public bodies must consider the energy and environmental impact that a vehicle will have during the length of its operational life, which include taking into account emissions which impact on air quality. Initial purchase costs for low emission vehicles and associated infrastructure can be expensive relative to conventional vehicles and fuels, however over the life of a vehicle, because running costs are typically much lower for low emission vehicles than conventional equivalents, the whole-life costs can be lower and therefore represent good value to the tax-payer. The Department for Transport has produced guidance<sup>47</sup> on what authorities need to do in order to comply with the Regulations and, as part the WYLES, this Guidance has been used to develop a **West Yorkshire Low Emission Procurement Guide** to assist fleet managers to purchase or lease vehicles having regard to the environmental impacts for the whole life of the vehicle. This Guidance is available as a supporting document to the WYLES.

West Yorkshire local authorities already run a number of electric and electric-hybrid vehicles, but will continue to review their fleets and use the West Yorkshire Low Emission Procurement Guide to determine whether more fleet vehicles should be replaced with low emission and ultra-low emission alternatives.

### 5.7.2. Local Authority Employees

A large number of public sector employees work and live in the region and therefore this presents an opportunity for local authorities and other public sector organisations to support employees to consider their own travel arrangements, whether as part of their commute to and from work, on work activity or in their personal lives, including

- Workplace Travel Plans to encourage the use of public transport and cycling.
- Flexible working arrangements, including home-working and mobile working to reduce the need to travel to workplaces.

<sup>46</sup> The Cleaner Road Transport Vehicles Regulations 2011

<sup>47</sup> <https://www.gov.uk/government/publications/guidelines-for-the-directive-on-the-promotion-of-clean-and-energy-efficient-road-transport-vehicles-2009-33-ec>

- Pool cars to reduce reliance on individual car ownership and use.
- Salary Sacrifice schemes for cycling equipment.
- Car leasing and salary sacrifice for ultra-low emissions vehicles.
- Workplace electric charging points to support EV car use.

### 5.7.3. Local Authority Spending

The purchasing power of the public sector is significant across West Yorkshire, which is an opportunity to influence the providers of goods and services to ensure the vehicles used by the providers emit the lowest possible emissions

Public Sector organisations must follow strict procurement rules, but included within those rules is a duty<sup>48</sup> to consider “social value” as part of the procurement process. This means that when procuring goods and services authorities must take into account social and environmental considerations and can set criteria when awarding contracts and procuring service how these may be improved. The principles of social value have been incorporated into the **West Yorkshire Low Emission Procurement Guide** which provides a scoring matrix which may be used when evaluating tender applications and awarding contracts giving greater weight to those contractors and providers with better environmental credentials, such as low emission transport, the use of ultra-low emission vehicles and membership of an environmental recognition scheme such as Eco Stars.

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<sup>48</sup> The Public Services (Social Value) Act 2012

## 6. Tackling Transport Emissions

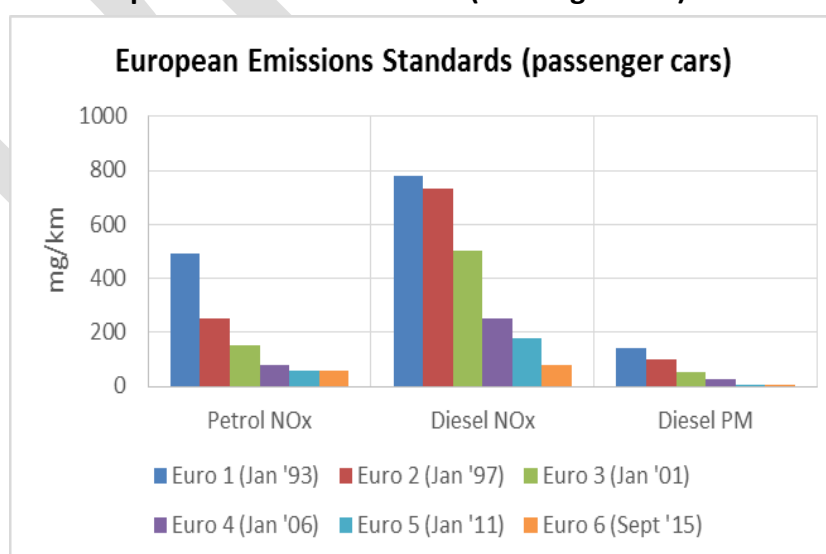
This section sets out the key focus of the West Yorkshire Low Emissions Strategy to reduce emissions from transport over the next five years. After a short introduction into vehicle emissions, each of the main transport modes are considered in turn as part of a **West Yorkshire Vehicle Emissions Plan (WYVeP)**. The WYVeP includes low and ultra-low emission vehicle specific measures that are being developed and implemented in West Yorkshire to accelerate the uptake of cleaner vehicles, including the provision of infrastructure in support of the Leeds City Region Strategic Economic Plan and West Yorkshire Transport Strategy outlined above.

### 6.1. Vehicle Emissions

We normally associate vehicles that either meet or go beyond the latest European Emission Standard (Euro Standard – see section 6.2) as achieving the low emission vehicle status. However, some vehicle emissions are far higher under real-world driving conditions than in official tests and this needs to be recognised when promoting emission standards. The Government defines a low emission bus as meeting Euro VI<sup>49</sup> emission standards while reducing CO<sub>2</sub> emissions by 15% compared with Euro V buses. The Government defines light duty vehicles (cars and LGVs) as ultra-low emission if they emit less than 75 g/km of CO<sub>2</sub>, irrespective of the Euro Standard.

In order for manufactures to sell vehicles within EU Member States they must limit exhaust emissions to a level dictated by the latest Euro Standard, assessed during a standardised test cycle – see Figure 13. It can be seen that diesel cars emit significantly more NOx per vehicle than petrol cars. Emissions projections assume the Standards will not be met and there are plans to amend the Euro 6 regulations to use real world testing in the vehicle approval process with the introduction of Euro 6c in 2017 (ICCT 2014)<sup>50</sup>.

**Figure 13 – European Emission Standards (Passenger Cars)**

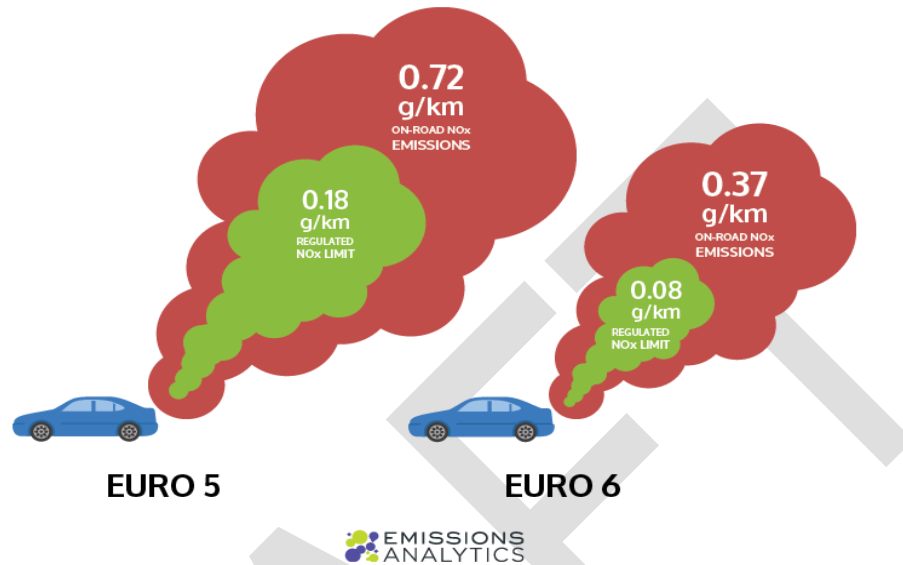


<sup>49</sup> European Emission Standards use normal numbering for light duty vehicles and Roman numerals for heavy duty vehicles

<sup>50</sup> <http://www.theicct.org/real-world-exhaust-emissions-model-for-cars>

Euro 6 and 5 diesel cars have had compliance issues especially with the NOx requirements. Figure 14 illustrates the difference between the test cycle emissions of Euro 5 and 6 diesel cars and their respective real world emissions.

**Figure 14 – Real-world NOx Emissions from Diesel Cars compared with Regulated limits.**



The European Emission Standards for heavy duty vehicles (buses and lorries) are more stringent for Euro VI vehicles compared with previous standards – see Figure 15. Evidence suggests that Euro VI vehicles are demonstrating significant improvements under real world driving conditions.

**Figure 15 – European Emission Standards for Heavy Duty Engines**

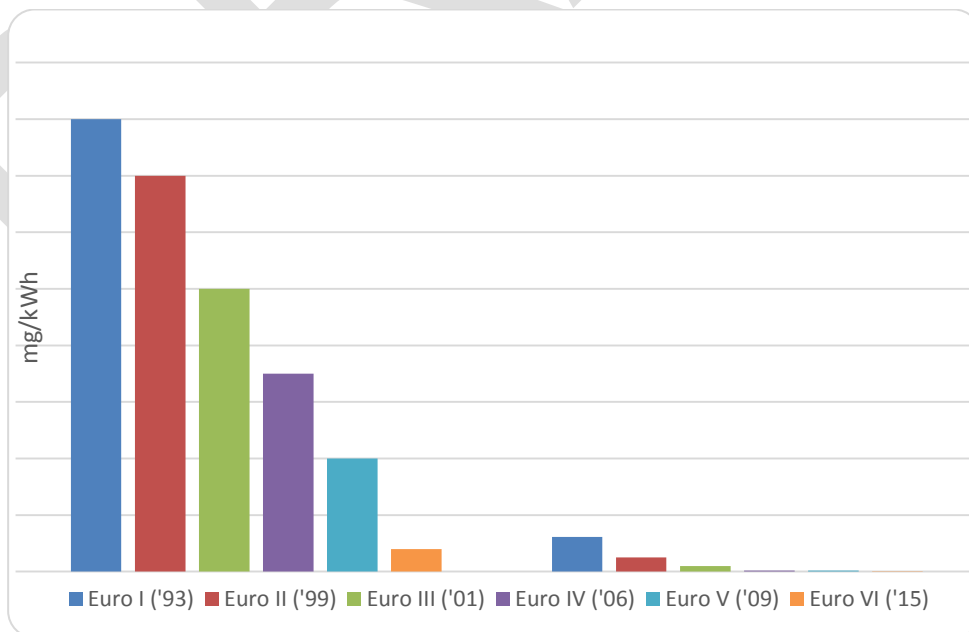
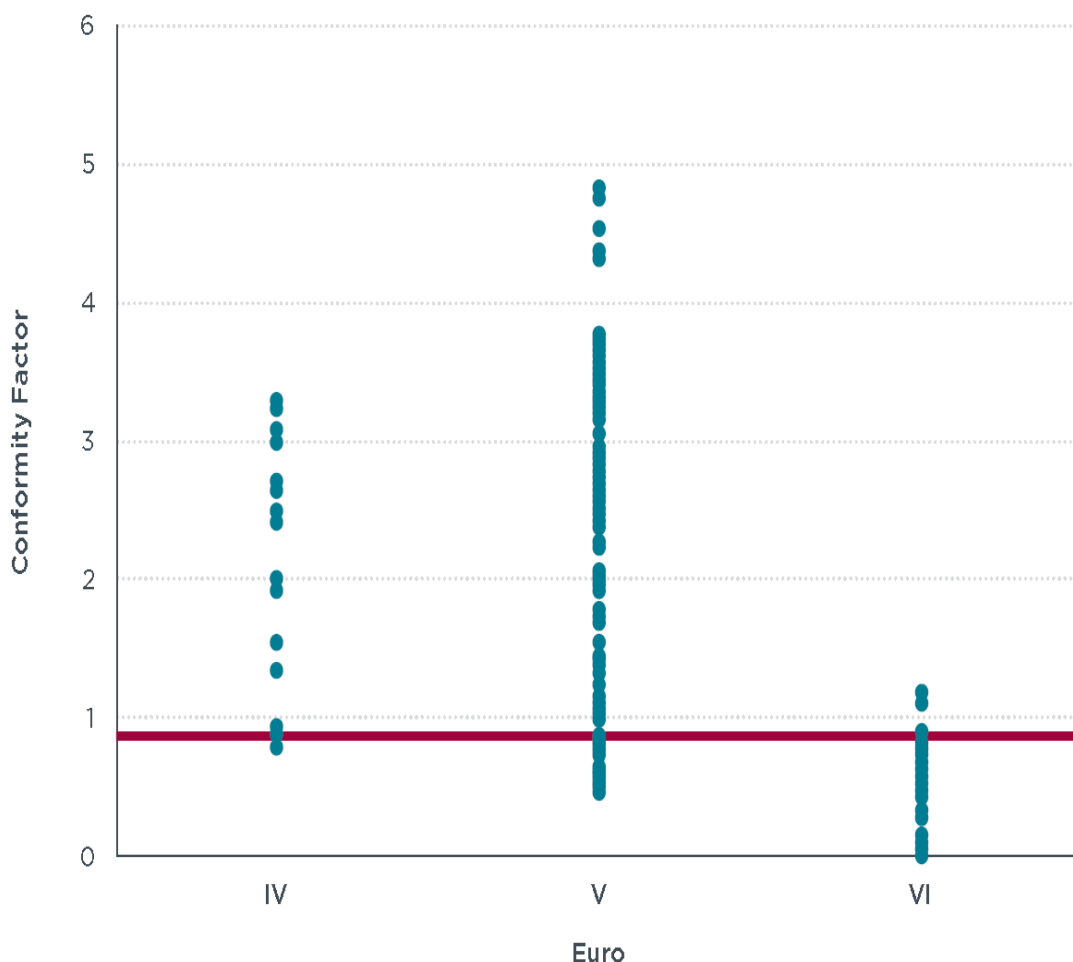


Figure 16 shows the results of conformity tests carried out <sup>51</sup> on heavy duty vehicles with different Euro Standards, including buses and trucks. Each dot represents a real world test. The ‘conformity factor’ is the ratio of the result to the standard limit, so a value of ‘2’ means the vehicle was emitting twice the amount of NOx compared with its Euro standard, and any value under ‘1’ would mean it was cleaner than the Euro standard.

**Figure 16 – Performance of heavy duty engines against Euro Standards (ICCT 2015)**



<sup>51</sup> “Briefing: Comparison of real-world off-cycle NOx emissions compared to Euro IV, V, and VI”, March 2015, www.theicct.org

## 6.2. West Yorkshire Vehicle Emission Plan (WYVeP)

The West Yorkshire Transport Strategy 2016 – 2036 (draft)<sup>52</sup> provides a strong commitment to improving air quality and health and reducing harmful road transport emissions, including greenhouse gases and noise.

Key WYTS emission policies include:

- *We will adopt and implement the West Yorkshire Low Emission Strategy (WYLES) - and we will look to the WYLES to provide targets for reducing harmful emissions, and in line with the WYLES we will seek to achieve these targets through the appropriate use of technology and encouraging people to switch from their cars to low emission forms of transport for some journeys*
- *Leeds will introduce a Clean Air Zone which will set emission standards for certain types of vehicles permitted to enter the zone, becoming one of the first cities in the country to do so. Leeds may also be required to take additional local action, the extent and details are to be determined but the Leeds Clean Air Zone and additional actions are intended to achieve compliance with the required standards in the shortest timescales possible and by 2020 at the latest. Wider and consistent roll-out of stronger emissions controls will be considered where necessary across West Yorkshire.*
- *We will make significant progress in the electrification of cars, freight and public transport vehicles, by accelerating delivery of recharging infrastructure for electric vehicles and providing facilities for other alternative fuelled vehicles.*
- *We will play our part in creating a low emission future with public authorities leading by example – our District Councils operate over 3,000 fleet vehicles and employ over 30,000 people across West Yorkshire, providing the potential to influence the uptake of low emission vehicles in business operations and in the wider population.*
- *We will implement our draft West Yorkshire Bus Strategy proposals for moving to a clean bus fleet with near to zero emissions.*

The Transport Strategy outlined above will be informed by this Low Emissions Strategy and the following sections outline vehicle specific measures that will be developed and implemented under a framework called the **West Yorkshire Vehicle Emissions Plan (WYVeP)**. The key features of the WYVeP are outlined in Figure 17 below. While many of the measures covered by the WYVeP have already been, or in the process of being developed and implemented, the Plan provides an overarching structure identifying best practice vehicle emission reduction measures that are appropriate to the challenges we face. The WYVeP outlines roles and responsibilities, delivery mechanisms

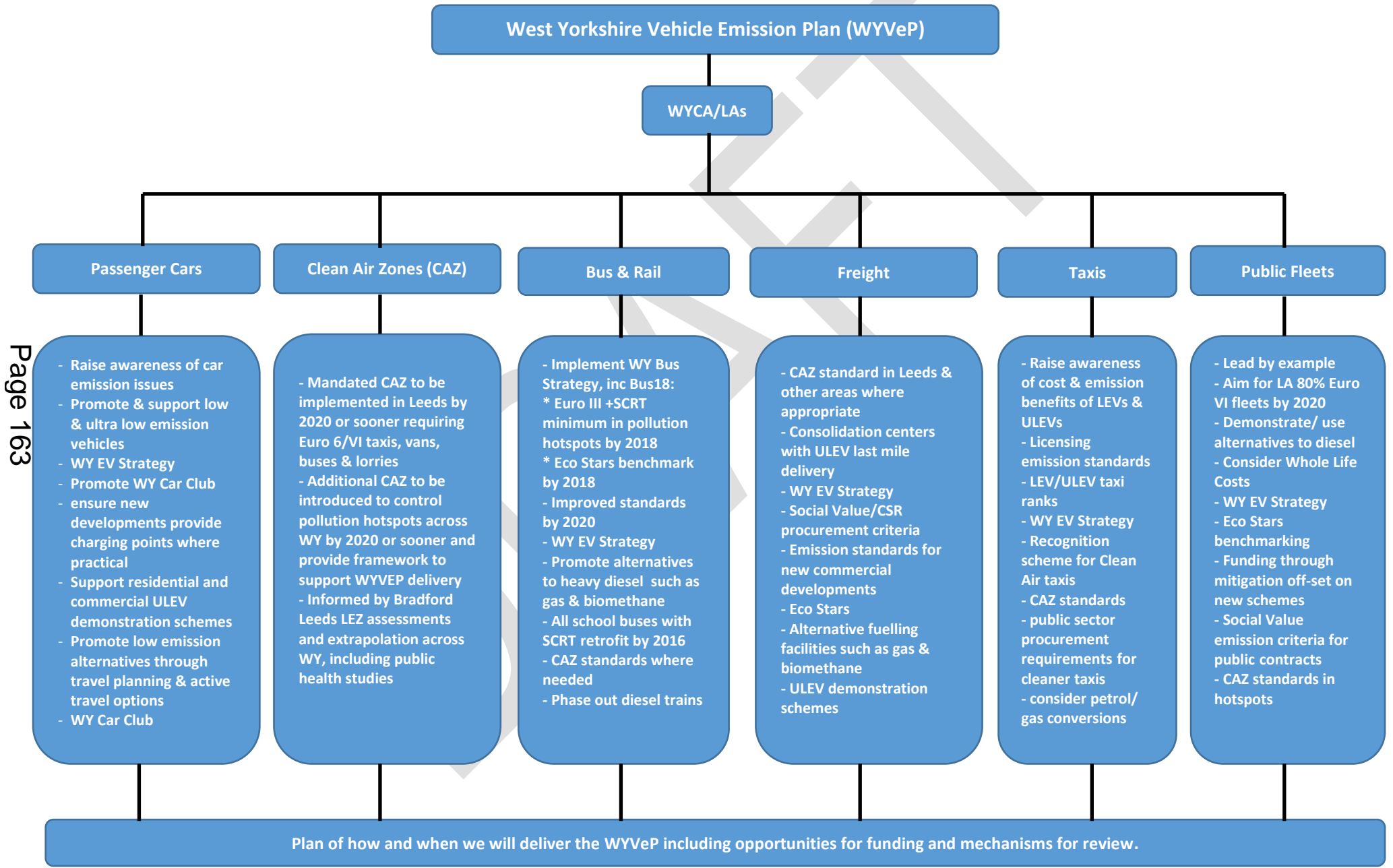
<sup>52</sup> <http://www.westyorks-ca.gov.uk/transport/>

& opportunities for funding, timescales, engagement and processes for monitoring and review. The Plan will continue to be informed by robust and ongoing research.

DRAFT



Figure 17 – West Yorkshire Vehicle Emission Plan (WYVeP)



### 6.3. Passenger Cars

The rise in the number of diesel cars on our roads has been a significant factor in why air quality continues to be a cause for concern. In addition to the many areas of work to promote alternative travel modes, such as public transport, walking and cycling a key feature of the WYVeP will be to encourage and support people to switch to low emission vehicles, including the following initiatives:

- **Raise awareness of car emission issues & benefits of alternative fueled cars.**
- **Promote & support low & ultra-low emission vehicles.**
- **Implement West Yorkshire Electric Vehicle Strategy.**
- **Promote West Yorkshire Car Club.**
- **Ensure new developments provide EV charging points where practical.**
- **Support residential and commercial ULEV demonstration schemes.**
- **Promote low emission alternatives through travel planning & active travel options.**
- **Park & Ride / Park & Rail to integrate active travel and ultra-low emission car use as part wider journey planning.**

One of the key reasons that air quality has not improved in line with expectations is the significant increase in diesel car use in the UK. In 2000, around 20% of cars sold were diesel compared with around 60% today<sup>53</sup>. Diesel cars have been promoted as environmentally friendly with generally lower vehicle excise duty (VED)<sup>54</sup>, however, not only are Euro Standards for diesel cars less stringent than for petrol cars but they are now known to emit far more NOx under real world driving conditions than their Euro Standard limit. Further action is needed by Government to look at the incentives provided for diesel cars and their suitability for use in urban areas needs to be questioned.

The WYVeP seeks to raise awareness about the relative emissions of cars and also the total cost of ownership (TCO) of standard technologies compared with alternative fuelled models. Our research<sup>55</sup>, shows that over a 3 year period, including depreciation, electric and hybrid models are likely to cost the motorist less to own.

The WYVeP will support the take up of ultra-low emission vehicles (ULEVs) with the implementation of the **West Yorkshire Electric Vehicle Strategy** (Section 6.4). Plug-in vehicle registrations in West Yorkshire are showing significant growth, albeit from a low base. Figure 18 shows plug-in vehicle registrations by local authority between 2012 and

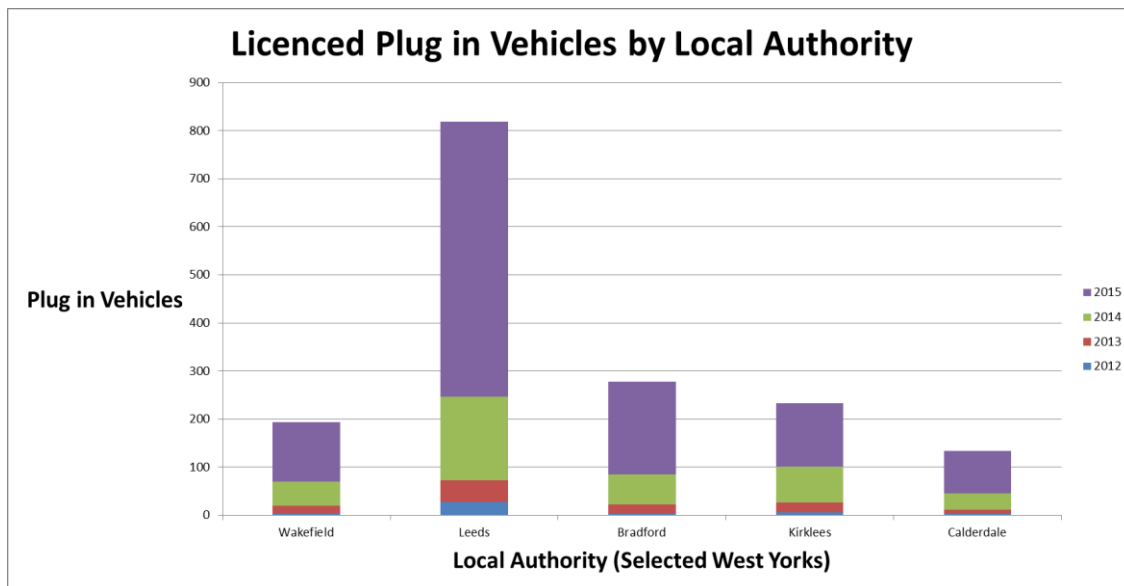
<sup>53</sup> [www.smmmt.co.uk](http://www.smmmt.co.uk)

<sup>54</sup> <https://www.gov.uk/government/publications/vehicle-excise-duty>

<sup>55</sup> Bradford LES update 2016

2015. Data for 2016 indicates that this growth trend is continuing<sup>56</sup>. The number of plug-in model available is increasing<sup>57</sup> while costs are reducing.

**Figure 18 – OLEV Plug-in Car Grants 2012-2015**



In line with our Air Quality and Planning Technical Guide outlined in Section 5.4 above we will work with developers to provide practical charging solutions and support plug-in vehicle demonstration schemes on new residential and commercial developments.

The Government has pledged that almost all new car and light goods vehicle sales will be zero emission by 2050<sup>58</sup> and will continue to provide a grant of up to £4,500 towards the purchase of ultra-low emission cars, including plug-in vehicles<sup>59</sup> and also provide support for rolling out the charging infrastructure needed to enable take-up<sup>60</sup>.

We will continue to support and expand the **West Yorkshire and York Car Club**<sup>61</sup> and seek to expand on the 8 electric vehicles already available through the Club, increasing the opportunities for users to experience battery technology.



<sup>56</sup> DfT Vehicle Statistics

<sup>57</sup> <https://www.goultralow.com/>

<sup>58</sup> <https://www.gov.uk/government/news/uk-government-pledges-bold-ambition-for-electric-cars>

<sup>59</sup> <https://www.gov.uk/plug-in-car-van-grants>

<sup>60</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/515932/electric-vehicle-homecharge-scheme-guidance-for-customers-2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/515932/electric-vehicle-homecharge-scheme-guidance-for-customers-2015.pdf)

<sup>61</sup> <https://www.enterpriseclub.co.uk/locations/north-east-england/leeds/>

#### 6.4. West Yorkshire Electric Vehicle Strategy

In order to promote and support the take-up of ultra-low emission plug-in vehicles, including cars, taxis and commercial vehicles, we will develop and implement a West Yorkshire wide Electric Vehicle Strategy with the following objectives:

- Support home and workplace charging as the primary charging location utilising the local planning process, business support and private sector investment.
- Creation of a strategic West Yorkshire wide public charge point network that ensures electric car users reach their destination through a simplistic access, usage and payment model.
- Ensure charging opportunities are equitable for residents with and without private driveways.
- Work with developers to support plug-in vehicle demonstration opportunities on new residential and commercial schemes.
- Tackle the perceived and actual barriers to EV ownership through targeted marketing, promotion and information.
- Work with the Leeds City Region Local Enterprise Partnership to help businesses achieve resource efficiency savings and to attract investment in ULEV technology and infrastructure.
- Deliver an exemplary public sector ULEV operation – demonstrating to employees, business and the wider community the benefits and savings of ULEV vehicles and related air quality improvements.
- Seek opportunities for small-scale renewable energy generation to power ULEVs and two-way energy delivery from ULEVs to power homes when appropriate, reducing domestic bills and energy demands on the national grid.
- Support the freight industry to invest in ULEV vehicles, especially in relation to last-mile delivery operations and help with infrastructure installation where possible.



## 6.5. Clean Air Zones (CAZ)

Clean Air Zones will play an important feature of delivering the objectives of this Low Emissions Strategy and allow for a targeted approach to control emissions from certain types of vehicles in specific areas of concern. The key features of how Clean Air Zones will be implemented in West Yorkshire are:

- **Mandated Clean Air Zone in Leeds by 2020 or sooner.**
- **Additional Clean Air Zones in other parts of West Yorkshire by 2020 or sooner where evidence supports the need for implementation.**

Government has set out its plans to improve the UK's air quality, reducing health impacts, and fulfilling its legal obligations<sup>62</sup>. The DEFRA Air Quality Plans sets out an approach for meeting these goals by implementing a programme of Clean Air Zones and that five cities outside London, comprising Birmingham, Derby, Leeds, Nottingham and Southampton will be legally required to introduce Clean Air Zones (CAZ) in the shortest possible time and by 2020 at the latest. DEFRA has identified classes of vehicles that need to be included in the CAZ as set out in Table 7. Leeds will be required to implement a Class C CAZ meaning the types of vehicle falling into Class C will be required to meet a Euro VI Standard for buses, coaches and HGVs and a Euro 6 (diesel) or Euro 4 (petrol) Standard for taxis and LGVs as indicated in Table 8. The DEFRA Plans state that non-compliant vehicles will be required to pay a charge to enter the CAZ, although certain exemptions may be granted for emergency vehicles.

**Table 7 - Clean Air Zone Vehicle Classification**

Clean Air Zone Class	Vehicles included
<b>A</b>	Buses, coaches and taxis (including private hire)
<b>B</b>	Buses, coaches, taxis and heavy goods vehicles (HGVs)
<b>C</b>	<i>Buses, coaches, taxis, HGVs and light goods vehicles (LGVs)</i>
<b>D</b>	Buses, coaches, taxis, HGVs, LGVs and cars

**Table 8 - Clean Air Zone emission standards for vehicle types in Leeds (CAZ Class C)**

Vehicle type	NOx emissions limit
Bus/coaches	Euro VI
HGV	Euro VI
LGVs	Euro 6 (diesel) Euro 4 (petrol)
Taxis	Euro 6 (diesel) Euro 4 (petrol)

<sup>62</sup> <https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emission>

DEFRA will consult with Leeds City Council during 2016 on the approaches by which CAZ duties will be imposed and will make funding available to undertake a more detailed scoping study and implement the CAZ. The area identified for the Leeds CAZ will be the Outer Ring Road area, however, a scoping study will be undertaken prior to formal Clean Air Zone implementation to ensure issues such as traffic and vehicle displacement can be effectively addressed. This will avoid creating new problem areas and can take account of expected growth in and around the key locations. It should be noted that while the DEFRA Plans appear prescriptive, they also state that the final class of the mandated CAZ to be implemented and the area that it should cover will be based on the scoping study findings.

DEFRA are in the process of developing a National Clean Air Zone Framework and any local authority may consider implementing a CAZ by 2020 or sooner where air quality, caused by road transport emissions, is an issue. It is envisaged that 'voluntary' CAZ will retain more flexibility in the types of vehicles included and the emission standards they are required to meet. Additionally, the CAZ framework may be used to include wider measures to support the uptake of ultra-low emission vehicles.

To ensure that there is a clear and consistent approach to implementing and enforcing CAZ in West Yorkshire, the WYCA, in partnership with the district authorities will develop and adopt agreed shared policies and actions for Clean Air Zones in specific and suitable locations.

## 6.6. Buses and Trains

The key features of the WYVeP to reduce emissions from buses and trains are:

### Buses

- **Implement the West Yorkshire Bus Strategy, including Bus18 Project.**
- **Buses to meet minimum Euro III + SCRT abatement technology in pollution hotspots by 2018.**
- **Leeds CAZ and other CAZ areas where necessary to control bus emissions standards.**
- **Eco Stars benchmark by 2018.**
- **Improved bus emissions standards by 2020.**
- **Links with the West Yorkshire Electric Vehicle Strategy to promote electric and hybrid bus technology.**
- **Promote alternatives to diesel such as gas & biomethane.**
- **All Metro school buses retrofitted with SCRT abatement technology by 2016.**
- **Improved Park & Ride Facilities with EV charging infrastructure.**

### Trains

- **Phase out older diesel trains and expand electrification of the West Yorkshire rail network.**
- **Increased capacity on the rail network.**
- **Increased Park & Rail provision.**
- **EV Charging points at railway stations.**

#### 6.6.1. Buses

We recognise the vital role that public transport plays in our everyday lives and buses and trains provide efficient transport modes and an alternative to private vehicle use and potential for reducing congestion. We also understand that older buses and trains can cause significant emissions. Bus emissions in Bradford were found to be responsible for around 40% of NOx emissions in the Inner Ring Road area<sup>63</sup>. Table 10 shows the bus emission profile of West Yorkshire buses in 2015.

Figures 20 and 21 show the relative emissions of buses by Euro Standard travelling at urban speeds. It can be seen that Euro V buses tend to emit more NOx than Euro IV buses due to the ineffective operation of their NOx catalysts at low speeds when the exhaust temperature is insufficient. This can be addressed by retro-fitting thermal management technology.

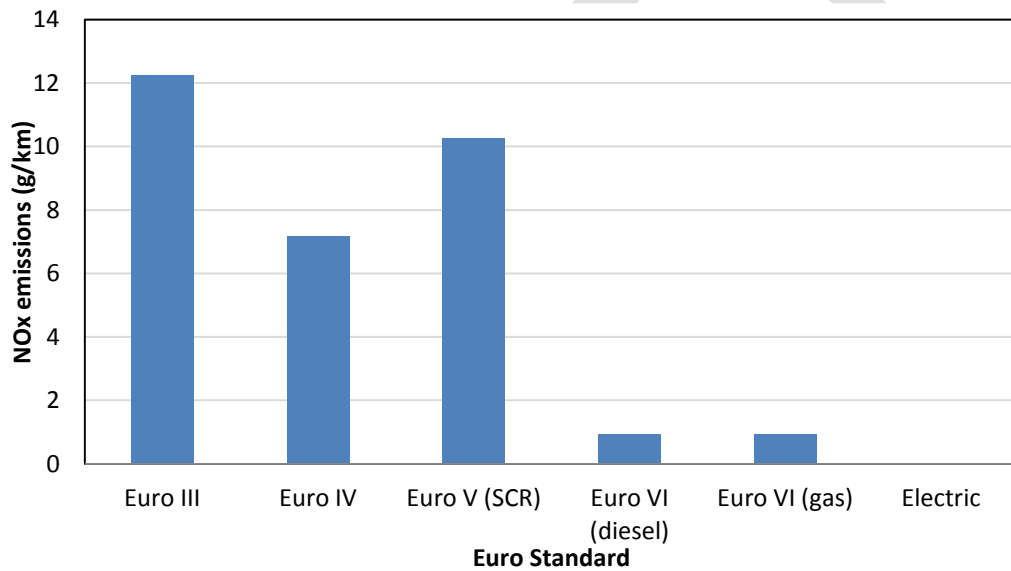
Figure 22 illustrates the greenhouse gas emissions of diesel and alternative fueled buses.

<sup>63</sup> Bradford Leeds LEZ Feasibility Study 2014/15

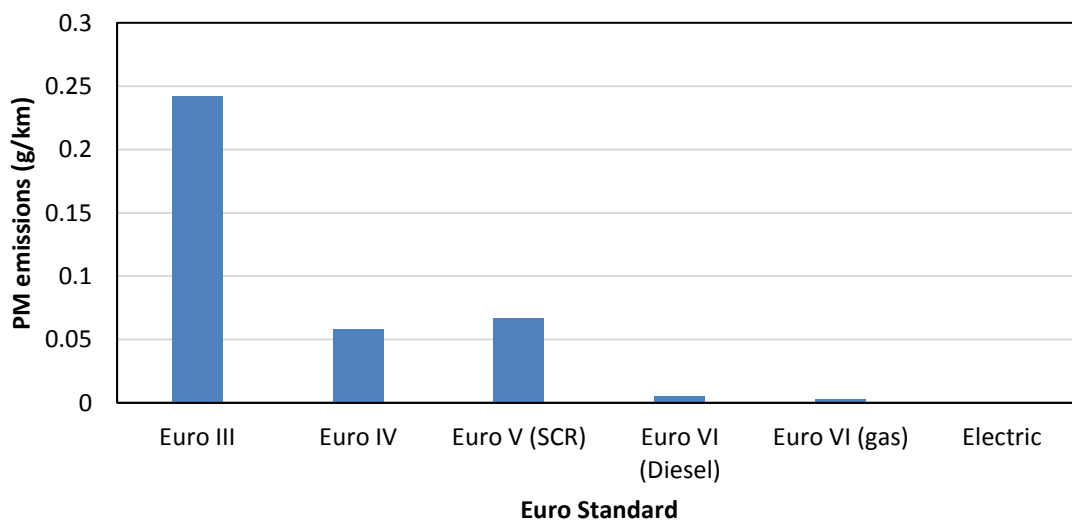
**Table 10 – West Yorkshire Bus Fleet by Euro Standard (2015)**

Euro Standard	% Emissions in West Yorkshire
Euro I	1.2
Euro II	25.3
Euro III	20.8
Euro IV	27.3
Euro V	24.4
Euro VI or equivalent <sup>64</sup>	1.0

**Figure 19 – NOx emissions of buses by Euro Standard and fuel type (at 18 km/hr)**



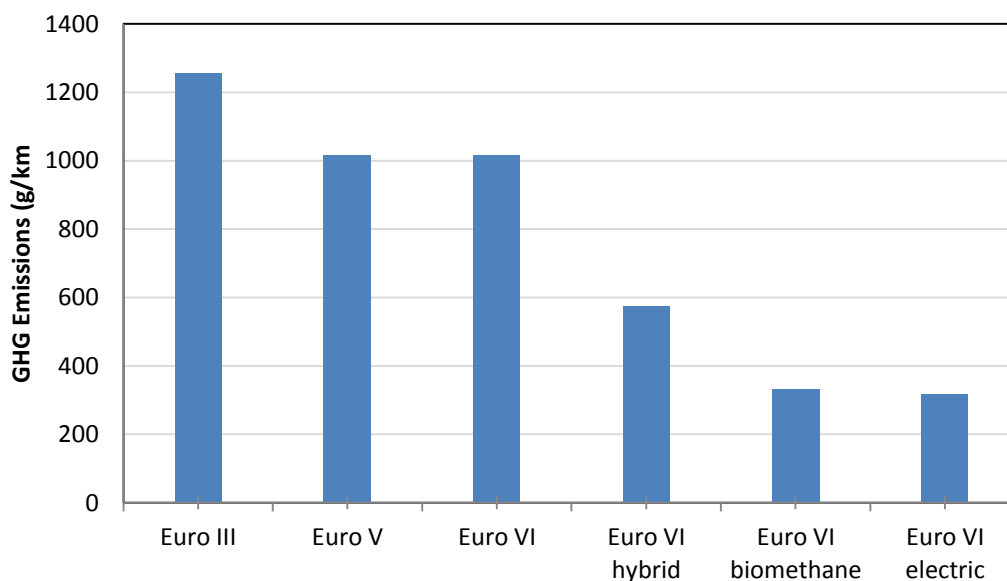
**Figure 20 – PM emissions of buses by Euro Standard and fuel type (at 18km/hr)**



<sup>64</sup> Includes hybrid buses



**Figure 21 – Green House Gas (Well to Wheel) emissions of buses by Euro Standard and fuel type**



There has been considerable activity in West Yorkshire to improve bus emissions, including:

- “Yellow” school buses go green by fitting NOx and Particulate abatement technology to reduce exhaust emissions – resulting in older buses now achieving EEV<sup>65</sup> emission standards and protecting the health of children. The West Yorkshire school bus fleet is now one of the cleanest in the country<sup>66</sup>.
- Arriva has introduced 12 hybrid buses and FirstGroup introduced 22 hybrid buses in the region, with further hybrid buses being introduced in Bradford and Calderdale.
- Bradford Council has worked with FirstGroup and Transdev to fit NOx and Particulate exhaust abatement technology on 25 buses operating on urban routes resulting in at least 90% of buses going to the Bradford interchange being Euro IV or better by 2016<sup>15</sup>.
- Leeds City Council has secured Government funding to introduce 10 low emission buses on park & ride sites.

As part of the West Yorkshire Transport Strategy we will develop and implement a **West Yorkshire Bus Strategy**, including the following environmental policies:

- A bus fleet that has a positive impact on health and environment, with consistent year-on-year emission improvements.
- To meet the legal health standards for air quality by ensuring older buses are modernised or replaced through investment to reduce local emissions.
- All vehicles new to West Yorkshire would be required to meet at least the latest environmental standard as a minimum.

<sup>65</sup> Environmentally Enhanced Vehicle

<sup>66</sup> Based on PEMS testing in Bradford and Leicester on Euro III retrofitted buses a NOx emission improvement of 70% to 96% may be expected. Particulate matter reductions of 40% to 60% were also reported

- New vehicle technologies which move towards near to zero vehicle emissions will also be encouraged.
- Support to establish and comply with Clean Air Zones across West Yorkshire.
- Raising public awareness around bus emission standards.

The Bus Strategy includes the **Bus 18** project aimed at providing a step change in bus services by 2018, including the following initiatives to reduce emissions:

- Commercial bus services operating in pollution hotspots across West Yorkshire will be required to retrofit all pre-Euro IV buses with NOx and Particulate abatement equipment by 2018.
- Bus operators will introduce benchmarking, including emission performance, through the Eco Stars scheme by 2018.

Further emission improvements will be required by 2020 or sooner when CAZ standards will be introduced in Leeds and in other locations where needed.

While we will continue to work with bus operators to progressively reduce harmful emissions from buses we will also seek to promote the greenhouse gas benefits of moving away from diesel to alternatively fuelled buses such as bio-methane and electric technologies.

We will build on the experience of other towns and cities in supporting diesel alternatives. Biomethane buses have been successfully rolled out in Sunderland, Darlington, Reading, Beccles, Runcorn and Bristol and both Bristol and Nottingham, 2 of the 4 Ultra Low Emission Cities in the UK have plans for significant growth in bio-methane buses. Cities such as London, Nottingham, Milton Keynes and Coventry have successfully introduced electric buses. While the capital cost of these buses is higher than standard diesel buses, there can be significant fuel and maintenance savings that can provide overall savings to operators. The benefits of both these technologies are highlighted below:

### **Biomethane Buses**

- Runs on compressed gas, tanks on roof.
- Spark ignition engine
- Very high GHG savings
- No range limitation
- Filling station required, economies of scale favour larger projects
- Significant operational savings



### Electric Buses

- All electric operation
- Zero tailpipe emissions
- Limited range – more suited to urban routes
- Operational savings
- Choice of infrastructure – overnight charging to inductive and/or rapid charging (more expensive)



### 6.6.2. Trains

Diesel trains emit high levels of particulates and NO<sub>x</sub>, however, when considered on the basis of pollution per passenger per kilometre travelled, emissions are much less than other forms of transport including diesel cars and buses. Trains are therefore part of the solution to reducing transport related emissions. This is not to say that trains do not produce emissions, such as NO<sub>x</sub>, particulates, CO<sub>2</sub> and noise, with emissions from trains being most significant at train stations in urban locations such as Leeds and Bradford train stations. Therefore, any action to reduce emissions from trains will benefit air quality and the quality of our environment.

The impact of trains on local air quality varies according to the type of rail vehicle in use. Older trains emit more pollution so renewing train fleets will help reduce emissions. Electric vehicles impose minimal impact on local air quality compared to diesel trains and therefore the most effective way to ensure that trains do not contribute to local air quality problems and reduce passenger exposure is to support calls for electrification of the regional rail network. Electric trains are also able to have more seats than a diesel equivalent, increasing much needed capacity on the railway network.



The procurement and deployment of rail rolling stock is generally determined at a national level as part of the rail franchising process. As with bus operations, WYCA is the lead organisation at a regional level which engages with train operating companies and Network Rail. Acting through Rail North, WYCA is seeking to influence decisions regarding rail rolling stock and to advance the process of replacing older, more polluting trains with newer, cleaner rolling stock.

Whilst electric trains operate between Leeds and Wakefield, and connect Leeds and Bradford with Shipley, Keighley, Skipton and Ilkley, the remainder of the West Yorkshire rail

network is operated by diesel trains. Many of the diesel rail vehicles in use in West Yorkshire are over 30 years old and do not benefit from modern engine technologies. Incremental improvements in emissions can therefore be obtained by replacing older diesel vehicles with electric trains or cleaner, newer diesels.

Electrification of the trans-Pennine rail route between York, Leeds, Huddersfield and Manchester planned for 2019/20 will replace diesel vehicles with electric providing a commensurate benefit to air quality. Further electrification is subject to funding however the Leeds – Harrogate and Leeds, Bradford, Halifax lines are high in the regional priority for electrification in the early 2020s<sup>67</sup>.

In addition to the plan to electrify more of the rail network, plans to replace older diesel trains are included in the revised Northern and trans-Pennine rail franchises which will start in 2016. These plans involve the replacement of the older “Pacer” trains with brand new diesel vehicles with improved emission control. It is anticipated that the new rolling stock will be in service from 2019 onwards.

In addition to the work to rolling stock and increased electrification of routes, improvements will also be undertaken to integrate the use of trains as part of wider journey planning, including:

- Increased capacity for Park & Rail.
- EV charging points at railway station car parks.
- Improved cycle facilities.



This modernisation of the regional rail network will improve capacity and will help more journeys to be made by public transport and bring commensurate benefits to air quality.

<sup>67</sup> [https://www.networkrail.co.uk/North\\_West\\_electrification.aspx](https://www.networkrail.co.uk/North_West_electrification.aspx)



## 6.7. Freight

The key features of the WYVeP to reduce emissions from freight are:

- **Clean Air Zone standard in Leeds & other areas where appropriate.**
- **Introduction of Eco Stars Fleet Recognition Scheme**
- **Procurement practice to support low emission fleets.**
- **Minimum Euro emissions standards for new commercial developments.**
- **Alternative fueling facilities such as gas, bio-methane and hydrogen.**
- **Integration with electric vehicle strategy including ULEV demonstration schemes.**
- **Consolidation centres to remove HGVs from towns and cities.**

Freight represents a low proportion of traffic flows at around 8% of traffic in the West Yorkshire region<sup>68</sup>, but produces a disproportionate amount of emissions. Road freight is not just about Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs) such as vans have seen significant growth, rising by 46% between 2000 and 2009.

West Yorkshire is a prime location for the distribution of goods, having an excellent strategic road network from North to South (M1 and A1) and East to West (M62). It is not surprising that many distribution centres and logistics operators are located within the region, with the freight sector contributing about 25% of the region's economy. Road freight is the most used mode for freight movements in West Yorkshire, moving around 1,900 million tonnes of freight in West Yorkshire (2008 data). Motorways account for the majority of freight trips by length of journey, specifically the M1, M621 and M62. Freight can account for up to 16% of traffic flows by mode on the motorway network<sup>69</sup>.

The West Yorkshire Transport Strategy recognises the importance of the freight sector to the West Yorkshire economy and also recognises the disproportionate contribution that road freight has in terms of emissions compared with non-road freight. The WYLES supports the Transport Strategy by promoting actions to reduce emissions from freight and commercial vehicles.

Freight and commercial activity is potentially one of the most difficult for local authorities to directly influence, given that decisions in relation to the procurement of fleet vehicles is entirely a commercial decision. However, commercial organisations are required to report on CO2 emissions through Corporate Social Responsibility (CSR) requirements and are encouraged to reduce their emissions and we will seek to support commercial operators in reducing transport emissions.

Examples of what can be done include:

- Restricting access to older, high emission HGVs and LGV in Leeds and other areas where necessary through the introduction of Clean Air Zones.

<sup>68</sup> West Yorkshire Freight Study 2010

<sup>69</sup> West Yorkshire LTP Freight Strategy 2012

- Seeking opportunities to increase the take-up of alternative fuels and technologies by HGV and LGV operators, for example a recent Gas Infrastructure Feasibility Study commissioned by Wakefield Council found that three strategic LNG/CNG gas refueling stations could be supported at key locations near to the M1 (j41), M62 (j30) and the A1 (Barnsdale Bar) highway networks. Both Leeds and Bradford are looking at plans for gas refueling facilities.
- Promote electric vehicle infrastructure through the WY Electric Vehicle Strategy.
- Promote Sustainable Emission Criteria in public sector and Corporate Social Responsibility (CSR) purchasing decisions.
- Minimising emissions in urban areas from HGVs and LGVs – the so-called “last mile” of deliveries – for example through the use of freight consolidation centres.
- Using the West Yorkshire Air Quality & Planning Technical Guide to ensure new commercial developments incorporate facilities for ultra-low emission vehicles, such as electric charging points and minimum Euro emission standards for fleet vehicles.
- Introduce the Eco Stars fleet emission recognition scheme<sup>70</sup> across West Yorkshire, supporting fleet operators to reduce emissions through upgrading to new vehicle technology, improved driver training and fuel management.
- Working with commercial fleet operators to use whole-life costing during vehicle procurement to promote the economic as well as environmental and health benefits from low emission HGVs and LGVs.
- Encourage more freight to be transported by rail for long-haul journeys.
- Exploring the potential for the regions’ canals and waterways for the transport of goods.



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<sup>70</sup> <http://www.ecostars-uk.com/>

## 6.8. Taxis

The key features of the WYVeP to reduce emissions from taxis are:

- **Clean Air Zone standard in Leeds & other areas where appropriate.**
- **Raise awareness of cost & emission benefits of low emission / electric taxis.**
- **Integration with electric vehicle strategy including ULEV demonstration schemes.**
- **Using taxi licensing to raise emission standards.**
- **Dedicated taxi charge points / ranks for electric / hybrid taxis.**
- **Recognition scheme for clean air taxis**
- **Public sector procurement of transport / taxi services to raise emissions standards.**
- **Support for taxi industry to transfer to low emission alternatives.**

The majority of taxis in West Yorkshire, both Hackney Carriages and private hire vehicles (PHV) are diesel cars, however, there has been a significant rise in the use of petrol hybrid models in the PHV fleet. West Yorkshire was awarded funding by OLEV<sup>71</sup> to undertake an Ultra-Low Emission Taxi feasibility Study through the Energy Savings Trust (EST).

The Study highlighted the need for raising awareness of the emission and cost benefits of ultra-low emission taxis and reinforced the need for taxi licensing authorities to set emission standards as part of licensing requirements. Taxis accessing the Leeds CAZ will be required to meet a Euro 6 diesel or Euro 4 petrol standard by 2020 or sooner.

We will pursue funding opportunities to support taxi drivers and operators to switch to ultra-low emission vehicles through measures in the West Yorkshire Electric Vehicle Strategy, including increased provision of dedicated fast and rapid charging facilities for taxis. We will also investigate the potential for converting petrol taxis to run on liquid petroleum gas (LPG), natural gas or biomethane.

We will investigate the potential to encourage low and ultra-low emission taxi take-up by introducing Clean Air Taxi Ranks and a Clean Air Taxi Recognition Scheme.

We will introduce emission criteria as part of public sector procurement of taxi services.

We will engage with taxi App providers such as UBER to require emission standards.

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<sup>71</sup> Office for Low Emission Vehicles

### 6.9. Public Sector Fleets

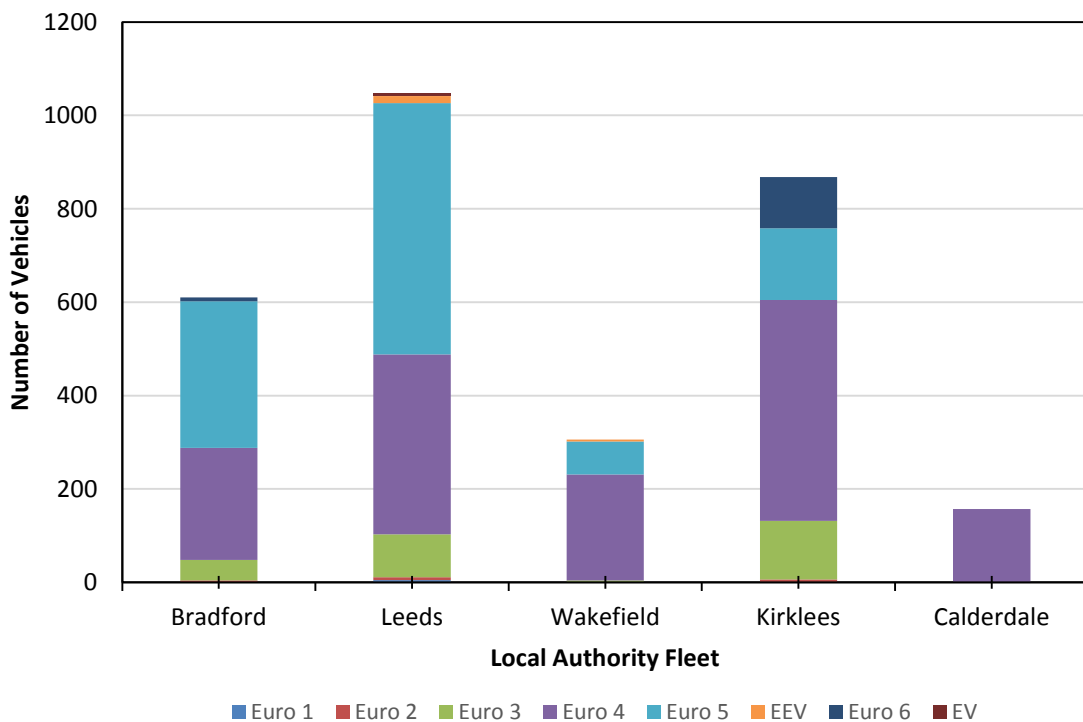
The key features of the WYVeP to reduce emissions from public sector fleet vehicles are:

- **Compliance with Clean Air Zone standards.**
- **Aim for 80% of local authority fleet vehicles to be minimum Euro VI by 2020.**
- **Demonstrate / use alternatives to diesel, such as electric, CNG, bio-methane and hydrogen.**
- **Procurement Guide to consider Whole Life Costs and support low emission alternatives.**
- **Integration with electric vehicle strategy including ULEV demonstration schemes.**
- **Early adoption of the Eco Stars fleet recognition scheme**
- **CAZ standards in hotspots**

Local authority fleet operations are an ideal opportunity to ‘lead by example’ and influence public vehicle purchasing decisions.

West Yorkshire local authorities currently operate approximately 3,000 fleet vehicles of which the overwhelming majority are diesel vehicles of varying Euro Standard (see Figure 22).

**Figure 22 - West Yorkshire Local Authority Fleet – vehicles by Euro Standard<sup>72</sup>**



<sup>72</sup> Note – data for Kirklees is 6 months ahead of the data provided by other councils



The fleet emission profile of purchased vehicles tends to be below that of leased fleet vehicles. Based on fleet replacement programmes it is anticipated that around 80% of local authority fleets will achieve a Euro 6/VI Standard in 2020.

All West Yorkshire Authorities have demonstrated low emission vehicle alternatives and some are beginning to look at more intensive fleet transformation to use cleaner fuels and technologies.

The Cleaner Road Transport Vehicles Regulations 2011 require public sector organisations to consider the energy use and environmental impact of vehicles they buy or lease. A key concept of the Regulations is the consideration of whole-life costs whereby the operational costs over a vehicle life, including pollution damage costs, are taken into account rather than just the purchase price. This helps to redress the issue of low emission vehicles costing more than conventional vehicles, while potentially having lower operating costs that outweigh the purchase increment.

In order to achieve compliance with the above Regulations and to support local authority procurement teams a **West Yorkshire Low Emission Procurement Guide** has been produced as a supporting document to the WYLES.

As part of the WYLES project, a public sector fleet benchmarking exercise was also carried out to identify the barriers and potential opportunities for reducing emissions from local authority fleet operations. Local authorities will continue to share knowledge and seek opportunities to establish best practice by regularly appraising available low emission vehicle alternatives to standard technology, demonstrating suitable low emission vehicles and incorporating whole life cost considerations into procurement processes. This will include:

- Early introduction of the Eco Stars fleet recognition scheme, with a commitment to continuous improvement to raise emission standards.
- Consideration of alternative fuels and technologies including electric, hybrid, CNG, bio-methane and hydrogen vehicles.
- Working with other fleet operators to increase the viability of alternative refuelling infrastructure.
- Linking in with the West Yorkshire Electric Vehicle Strategy to promote EV use within fleet operations.
- Reducing emissions from “grey fleet” vehicle used by local authority staff.

## 7. Funding & Delivery of the West Yorkshire Low Emissions Strategy

The West Yorkshire Low Emissions Strategy will be delivered and funded by making the best possible use of the existing resources that are available and by working across the West Yorkshire area, together with our partners, to tap into new funding streams. Funding to support the WYLES will include:

- West Yorkshire Transport funding.
- Growth Deal funding.
- Public Health funding.
- Development schemes and developer contributions through s106 agreements and Community Infrastructure Levy.
- Grants from Government Departments and other bodies, such as Clean Vehicle Technology Fund; Office for Low Emission Vehicle (OLEV) funding; DfT Cycling and Walking Investment funding etc.
- Joint-working, partnerships with, and investment from other public bodies and private organisations, for example to deliver infrastructure investment.

Delivery of the WYLES will be overseen by the West Yorkshire Transport & Health Board, which has representation from Public Health England, West Yorkshire Combined Authority and West Yorkshire district Environmental Health professionals and will in turn report on progress through the governance arrangements of the West Yorkshire Combined Authority.

The West Yorkshire local authorities will also use this Low Emissions Strategy to help fulfil their obligations to tackle air quality at a local level and develop individual Air Quality Action Plans (AQAP) for Air Quality Management Areas in the region and report on progress through the Annual Status Reports (ASR), which local authorities must provide to central Government and make available to the public.

## List of Abbreviations

ASR	Annual Status Report
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
CAZ	Clean Air Zone
CHP	Combined Heat and Power
CNG	Compressed Natural Gas
COMEAP	Committee on the Medical Effects of Air Pollutants
COPD	Coronary Obstructive Pulmonary Disorder
CSR	Corporate Social Responsibility
CVD	Cardio-vascular Disease
DEFRA	Department for the Environment and Rural Affairs
DfT	Department for Transport
EEV	Enhanced Environmentally friendly Vehicle
EST	Energy Savings Trust
GHG	Greenhouse Gases
ICCT	International Council on Clean Transportation
ICE	Internal Combustion Engine
LAQM	Local Air Quality Management
LEV	Low Emission Vehicle
LEZ	Low Emission Zone
LNG	Liquefied Natural Gas
LPG	Liquefied Petroleum Gas
LTP	Local Transport Plan
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Oxides of Nitrogen (including Nitric Oxide (NO) and Nitrogen Dioxide (NO <sub>2</sub> ))
NPPG	National Planning Policy Guidance
NPPF	National Planning Policy Framework
OLEV	Office for Low Emission Vehicles
PHE	Public Health England
PHV	Private Hire Vehicle
PM <sub>n</sub>	Particulate Matter with a diameter of “n” (usually in microns) including PM <sub>10</sub> , PM <sub>2.5</sub> and PM <sub>0.1</sub> .
QALY	Quality Adjusted Life Year
SCRT	Selective Catalyst Reduction combined with Continuously Regenerating Trap (exhaust emissions abatement technology)
SEP	Leeds City Region Strategic Economic Plan
STOR	Short Term Operating Reserve
TCO	Total Cost of Ownership
ULEV	Ultra Low Emission Vehicle: vehicles which emit very low emissions (usually referred to in g/km Carbon) and used to determine eligibility for plugged in grants: <a href="https://www.gov.uk/plug-in-car-van-grants/overview">https://www.gov.uk/plug-in-car-van-grants/overview</a>
VED	Vehicle Excise Duty
VOCs	Volatile Organic Compounds
WHO	World Health Organisation
WYCA	West Yorkshire Combined Authority
WYVeP	West Yorkshire Vehicle Emissions Plan

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# Report of the Director of Regeneration to the meeting of Executive to be held on December 6<sup>th</sup> 2016.

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**AL**

**Subject:**

**Comprehensive Housing Renewal Policy**

**Summary statement:**

This report presents a progress report on the implementation of the Council's Comprehensive Housing Renewal Policy and proposals to extend the scope of the Policy to provide an additional form of assistance for residents in order to improve housing conditions within the district.

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Director of Regeneration

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**Overview & Scrutiny Area:**

**Regeneration and Economy  
Health and Social Care**



## 1. SUMMARY

This report presents a progress report on the implementation of the Council's Comprehensive Housing Renewal Policy and proposals to extend the scope of the Policy to provide an additional form of assistance for residents in order to improve housing conditions within the district.

## 2. BACKGROUND

- 2.1 The Comprehensive Housing Renewal Policy provides a framework through which the Council and its partners can improve housing conditions within the District. The policy was developed in response to the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO 2002), which required the Council to approve and publish a Housing Renewal Policy in order to continue to provide any housing renewal assistance to the residents of the district.
- 2.2 The Comprehensive Housing Renewal Policy was originally endorsed and adopted at Executive in June 2003 in response to legislative changes introduced through the RRO 2002. A further report and update was considered by the Executive in 2004 but since that date, in line with the decision made by the Executive, amendments to the Policy have been made by the Strategic Director under his delegated authority. The most recent update having been made in August 2014.
- 2.3 The Comprehensive Housing Renewal policy introduces a broad framework which has regard to and is consistent with government policy, new legislation, house condition survey information and corporate and district priorities. It provides the Council with a much greater degree of flexibility than previous policies along with the opportunity to develop and deliver new forms of assistance that are appropriate to local needs.
- 2.4 The main emphasis of the Government guidance that accompanies the RRO 2002 is that it is primarily the responsibility of homeowners to maintain their own homes through use of their own resources. It is recognised however, that some homeowners, particularly the elderly and vulnerable, do not have the necessary resources to keep their homes in good repair and that Local Authorities have an important role in these cases to provide assistance.
- 2.5 The policy ensures that a "safety net" is provided to support the most vulnerable people living in poor housing conditions throughout the District whilst providing advice and support for those owners with the ability to unlock their own private finance to do so. The policy also enables the Council to work with its partners to provide comprehensive support, advice and encouragement to homeowners to enable them to take responsibility for their own homes.
- 2.6 When the policy was initially introduced in 2003 the availability of products to assist homeowners on low incomes to maintain their own homes was limited. This was recognised by the housing officers within the South and West Yorkshire Authorities and a scheme was developed to provide equity release loans for clients. The



loans are provided based on a percentage of the property value equivalent to the value of works undertaken. There are no monthly payments and repayment is only required at the point a property is sold, transferred etc. The amount of grant repaid will depend on the property value at the point of transfer but will always repay the amount invested.

- 2.7 Administered by Sheffield City Council (now on a regional basis) since 2005 the provision of equity share loans known as Home Appreciation Loans (HALs) is now the main form of assistance offered by the Council, although the Council does make provision for a small “last resort” grant of up to £5K for vulnerable homeowners who are unable to access the equity loan but who require urgent works to remove health and safety hazards. This is in line with the statutory guidance provided under the Regulatory Reform Order 2002.
- 2.8 Bradford has been one of the key partners in the development of the regional loan scheme. When the scheme was first developed the partners were successful in obtaining regional funding for the scheme. Through this regional funding Bradford was able to assist 119 homeowners with loan assistance to a total value of £1.3m. As this loan funding is repaid to the region it has continued to fund the Regional Homes and Loans service and has now created a small loans pot that can be used to fund further loans on a regional basis.
- 2.9 The regional funding for loans was unable to meet demand for assistance in Bradford. In view of this the Council has chosen to utilise its own funding to assist vulnerable homeowners to maintain their own homes. In doing so the Council has assisted a further 194 homeowners to a total loan value of £3.6m. Projections estimate that these loans are likely to be repaid on average after 10 - 12 years. As these loans are repaid the funding is being used to fund further loans. Over time this should enable the loan fund to be self-sustaining.
- 2.10 Building on the success of the HAL, Bradford has worked closely with Sheffield to develop an equity share loan to assist empty property owners to bring long term empty properties back into use. This loan, known as an Empty Property Loan (EPL) was developed and introduced in 2011 along with a last resort grant of up to £5K for owners who are unable to access the equity loan but who require assistance to bring their long term empty property back into use. Initially developed for and by Bradford the product is now regionally available for other authorities to use.
- 2.11 In addition to assistance for individual property owners the policy does contain a number of forms of assistance that could facilitate area regeneration. These include Group Repair, Facelift and Living Over the Shops. During the policy’s “lifetime” Bradford has benefited from national and regional funding for housing renewal and has utilised this funding to deliver these forms of assistance on an area basis to achieve regeneration objectives. Unfortunately such funding is no longer available but it is suggested that the forms of assistance are retained within the policy framework so that the Council is able to utilise them should funding opportunities arise. The policy is clear that any of the forms of assistance in the policy will only be made available subject to the availability of financial resources.



- 2.12 As outlined at paragraph 2.8 above, the recycling of repaid loans at a regional level has created a small fund that can be used to provide loans on a regional basis. This has coincided with work that has been taking place at a Leeds City Region (LCR) and regional level relating to energy efficiency. Loans have always been provided to remove health and safety hazards, one of which is excess cold, but officers identified that some clients were unable to access energy programmes designed to help with energy efficiency measures because they were unable to fund their assessed contribution.
- 2.13 In order to address this officers have developed a regional product known as the Energy Repayment Loan (ERL). Administered by the Regional Homes and Loans service hosted at Sheffield City Council, the loan is designed as a small repayment loan to assist these clients with their assessed contribution and so access energy efficiency measures for their homes. This loan will initially be funded from the recycled regional loan fund.
- 2.14 In order to help Bradford residents with the ERL, the product must first be included within the Comprehensive Housing Renewal Policy. Members are therefore asked to approve the inclusion of the ERL in the policy as they approve the updated policy.
- 2.15 In order to utilise products administered by the Regional Homes and Loans service hosted by Sheffield City Council, the Council needs to enter into a contractual arrangement with Sheffield. Such agreements are already in place to enable Bradford to use the HAL and EPL products. A further agreement will need to be established for use of the ERL. This can be authorised by the appropriate Strategic Director under delegated authority.

### **3. OTHER CONSIDERATIONS**

- 3.1 The 2015 Private Sector Stock Condition Survey estimated that 16% of the District's private sector stock contained a Category 1 hazard when assessed using the Housing Health and Safety Rating System (HHSRS), with the most frequently occurring hazards being associated with falls and excess cold.
- 3.2 Analysis of the presence of Category 1 hazards by tenure shows that 14% (19,986) of owner occupied properties and 21% (8,291) of privately rented properties contain such hazards.
- 3.3 For the majority of people within the District owner occupation is the tenure of choice and provides decent housing that satisfies their needs and aspirations. From the Stock Condition survey we know that almost 120,000 homes do not contain a Category 1 hazard.
- 3.4 It is estimated that poor housing conditions are responsible for over 1,774 harmful events that require medical treatment every year. The estimated cost to the NHS of





treating accidents and ill health caused by these hazards is £6.5m per year. If these hazards were mitigated the total annual savings to society are estimated to be £16.3m including £6.1m savings to the NHS.

- 3.5 The Private Sector Stock Condition Survey identified excess cold as one of the most frequently occurring hazards. It also estimated that fuel poverty affects 15% of owner occupiers and 28% of those in the private rented sector, with those considered most at risk being elderly and low income households. This underlines the need for an integrated approach to tackle poor housing conditions and energy efficiency.
- 3.6 A comparison with the results from the previous Stock Condition Survey undertaken in 2007 indicates that there has been an improvement in property conditions but that there are still significant issues with property condition in the private sector and, in particular, the private rented sector.

This improvement is reflective of the various interventions that the Council and its partners have developed and delivered to improve housing conditions in the district. These include:

- The delivery of financial assistance through equity loans. The Council provides equity loans to vulnerable homeowners to remove Category 1 hazards. To date the Council has delivered over £5m of equity loans and has an outstanding loan book of £3.3m. Through the 2015/16 budget process members approved further funding of £1m/year to continue this programme. Bradford was a founding member of the regional equity loan product and is the highest user of the regional loans service.

Bradford has been working as part of a regional team to develop the Energy Repayment Loan (ERL) to enable households in fuel poverty to access energy efficiency schemes where they are unable to otherwise raise their personal contribution.

- Enforcement in the private rented sector – despite a reduction in the size of the team, the service continues to deliver a reactive and targeted proactive service in addition to the mandatory licensing scheme for HMOs . In 2015/16 officers identified over 4000 hazards using the HHSRS and housing conditions were improved in 1330 properties. The service has just completed the delivery of a proactive project to target residential properties located over shops using DCLG funding to tackle rogue landlords. 160 properties were inspected over a 3 month period. These properties were targeted due to the increase risk of the hazard of fire.
- Empty Homes programme – In October 2015 there were 3,944 long term empty properties which is a reduction of 3,358 since 2009/10. The team uses a range of tools from advice, through Empty Property loans through to enforcement using compulsory purchasing powers. The team helped to develop the regional empty property loan that is now in use across the region and continues to work closely



with other partners to access funding streams and bring additional empty properties back into use.

- Major adaptations for disabled people – demand for major adaptations continues to increase. The average referral rate for a disabled facilities grant (DFG) has averaged 55 new cases/month for the last 2 years. Adaptations funded through DFG enable disabled people to continue to live independently in their own homes. Through the 2015/16 budget process members approved further funding to continue to give priority to this programme. This is in addition to a significantly increased government grant via the Better Care Fund.
- Domestic energy efficiency programmes - the Council delivered measures to 74 private sector homes in 2015/16 through schemes using funding from the Green Deal Communities Fund and the Department of Energy & Climate Change and will improve a further 300 homes through the Better Homes Yorkshire and Fuel poverty programmes in 2016/17.

3.7 The importance of having decent homes that people can afford to live in is one of the six key objectives within the Council Plan. The fundamental principles of the Comprehensive Housing Renewal Policy contribute not only to the housing objective within the Council Plan but also more widely as:-

- Good quality housing attracts companies and workers - leading to an economically prosperous district
- Children and young people are better able to benefit from education if they are well housed – leading to a district of excellence in learning
- Good quality housing promotes community safety – leading to a safer place in which to live, work and play
- High quality, affordable, warm homes promote health and well being – leading to a healthy district

3.8 The impact of housing on health is widely acknowledged. In Bradford the Housing Stock Condition survey was a jointly commissioned exercise between Housing and Public Health and the findings will be used to inform future service delivery. The importance of housing conditions to public health is also reflected in the fact that the officers delivering loans within the Housing service are funded through public health.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

4.1 This policy framework has fundamentally reshaped the use of the capital programme for housing renewal, from one based on grants to one where subsidy is used to provide support and encouragement to homeowners and to facilitate, where



appropriate, leveraging in of private finance to improve the condition of the housing stock.

- 4.2 The policy enables the Council to focus its resources on a more proactive, strategic and cost effective basis by effective targeting of resources towards vulnerable groups and to achieve a more sustainable stock.
- 4.3 The policy needs to be both robust and flexible enough to allow the service to deliver its objectives within budgetary constraints as these may vary from year to year.
- 4.4 The development and use of a regional Homes and Loans service has enabled all authorities in the region to benefit from the expertise that has been developed by the service, from the increased value for money obtained through procurements undertaken for the whole region by the service and to avoid the costs of duplication of service. All running costs for the scheme are currently met through the recycled regional loan funding and/or individual costs of loans which are incorporated into the loan amounts given.
- 4.5 Expenditure will be contained within the available budgets allocated to the housing capital schemes each year.

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 In order to protect the Council against any risks associated with the use of loans appropriate contractual arrangements with the Contractor, the other Councils and the beneficiaries of the scheme will be put in place in order to limit the Council's risk. Such contractual arrangements will only be agreed subject to approval by the Council's Legal and Finance departments.
- 5.2 Loans delivered using Bradford's capital funding are administered by Sheffield City Council on Bradford's behalf but capital funding used for the loans remains at Bradford and is subject to the relevant audit processes implemented by the Council.
- 5.3 Loans delivered in Bradford using regional loan funding are administered by Sheffield City Council. All regional funding remains under the control of Sheffield City Council and quarterly reports on loan activity are provided to the Regional Housing group and Leeds City Region meetings. The regional loan fund is subject to the audit procedures implemented at Sheffield City Council.
- 5.4 All loans issued are registered as a legal charge at the Land Registry. This ensures that the Council is notified of any changes to the legal title which may require the loan to be repaid.

## **6. LEGAL APPRAISAL**

- 6.1 The policy has been prepared in line with current legislation and government



guidance as set out below.

- 6.2 Section 111 of the Local Government Act 1972 provides that local authorities can do anything which is calculated to facilitate or which is conducive or incidental to the discharge of its functions.
- 6.3 Section 1 of the Localism Act 2011 provides a 'general power of competence' which includes a power to take steps for the benefit of the authority, its area or person's resident or present in its area.
- 6.4 The above powers provide for making arrangements with other local authorities to provide services on the Council's behalf. Thus in order to enable Sheffield City Council, as host authority for the regional Homes and Loans service, to administer finance for the loan schemes on Bradford's behalf the Council must authorise them to do so. These authorisations are already in place for the existing schemes but will need to be put in place for any new schemes as contemplated under the proposed amended Comprehensive Housing Renewal Policy (see appendix).
- 6.5 The Housing Act 1985 section 239 (The 1985 Act) amongst other things provides powers to local authorities to create Housing Action areas arising from the physical state of housing and social conditions and clearance and demolition orders in relation to unfit housing.
- 6.6 The Local Government and Housing Act 1989 (the 1989 Act) amongst other things provides a power to create a housing renewal policy.
- 6.7 The Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) amongst other things creates powers for the provision of disabled facilities grants.
- 6.8 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO 2002) removed various financial burdens in relation to housing from local authorities and broadened the forms of financial assistance provided by a local authority to persons in the context of housing maintenance and improvements under the powers contained in the 1985, 1989 and 1996 Acts. To exercise the additional powers they must be included in a local authority approved and published policy i.e. in the Council's case this is its Comprehensive Housing Renewal policy.
- 6.9 Housing Act 2004 (licensing of houses in multiple occupation and powers to issue improvement and repairs notices).

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

The additional tools that will be made available to the Council by amending the policy will enable the Council to help more people than at present.



## **7.2 SUSTAINABILITY IMPLICATIONS**

One of the key principles of the Comprehensive Housing Renewal policy is to create a more sustainable housing stock for the district. The policy framework enables the Council to fulfil its existing commitments whilst also working to develop a better knowledge of the housing markets on a local and regional basis.

The Housing service will continue to work with neighbouring Local Authorities and other regional partners to gather information and develop initiatives to tackle local and regional problems. This will inform evolution of the policy for a more sustainable district.

Levering in private finance and providing advice, encouragement and support to individuals to enable them to help themselves shifts the perceived burden of responsibility for maintaining the district's housing stock onto homeowners. This will enable scarce public resources to be utilised more widely and be more sustainable.

## **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

Any work done to a domestic property to remove excess cold as a hazard or to improve its energy efficiency is likely to have the effect of reducing the domestic carbon emissions of that property (in addition to reducing the household's heating bills). This will contribute to meeting the District's Greenhouse Gas Emissions targets.

## **7.4 COMMUNITY SAFETY IMPLICATIONS**

One of the hazards assessed by officers using the Housing Health and Safety Rating system (HHSRS) relates to entry by intruders. Where the hazard of entry by intruders has been identified in a home where assistance to improve the property's condition is being offered measures to address that hazard will be included.

## **7.5 HUMAN RIGHTS ACT**

No implications under the Human Rights Act have been identified.

## **7.6 TRADE UNION**

No Trade Union implications have been identified.

## **7.7 WARD IMPLICATIONS**

The Comprehensive Housing Renewal Policy enables assistance to be provided to



eligible residents throughout the district.

## **8. NOT FOR PUBLICATION DOCUMENTS**

None.

## **9. OPTIONS**

### **9.1 Option 1 – To extend the Comprehensive Housing Renewal Policy to enable Bradford to take advantage of new forms of assistance made available through regional and national funding**

The Comprehensive Housing Renewal Policy already takes significant advantage of the new freedoms made possible under the Regulatory Reform Order. However the policy continues to evolve as new forms of assistance become available to help homeowners maintain their own homes.

A significant number of homeowners within the District are asset rich but income poor, the introduction of suitable loan products which will help these people to invest in their own homes will enable the Council to utilise the decreasing levels of public resources to help a larger number of homeowners with the same level of resources.

Funding is increasingly being made available to Authorities on a regional basis. It is imperative that Bradford actively participates in the development of programmes that take advantage of these regionally allocated resources to ensure that Bradford receives an appropriate share of the funding available.

Participation in the pilot loan and energy efficiency programmes on a regional and sub regional basis enables Bradford to benefit from the availability of alternative forms of assistance, thereby benefiting from efficiency savings, without having to bear all of the risks associated with the piloting of new initiatives.

This approach will have a long term sustainable future as the Council further develops the policy to lever in increasing levels of private finance and works with its partners to support, advise and encourage homeowners to exercise their responsibilities.

### **9.2 Option 2 – To continue to operate within the existing Comprehensive Housing Renewal Policy**

The Comprehensive Housing Renewal policy takes advantage of some of the freedoms and flexibility introduced by the RRO 2002. The Council has worked hard with partners to develop and introduce suitable products to assist vulnerable homeowners to maintain their own homes. However some products have only just been developed and were not therefore available when the current policy was introduced.

With decreasing levels of financial support from Central Government it is important



that the Council takes advantage of new tools that become available, particularly when they offer an opportunity to lever in private finance to improve housing conditions within the District.

## **10. RECOMMENDATIONS**

- 10.1 That the Executive approve Option 1 for implementation and the appropriate Strategic Directors be authorised to conclude appropriate contractual arrangements for this purpose.
- 10.2 That the Comprehensive Housing Renewal Policy set out in Appendix 1 be approved.
- 10.3 That the appropriate Strategic Director continue to make changes to the Comprehensive Housing Renewal Policy under delegated authority in consultation with the Portfolio Holder with responsibility for Housing.

## **11. APPENDICES**

- 11.1 City of Bradford Metropolitan District Council Comprehensive Housing Renewal Policy.

## **12. BACKGROUND DOCUMENTS**

- 12.1 BRE Integrated Dwelling Level Housing Stock Modelling Report 2015



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# **City of Bradford Metropolitan District Council**

## **Comprehensive Housing Renewal Policy**

**Department of Regeneration**  
**Updated December 2016**



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## 1.0 LEGISLATIVE PROVISIONS AND AIMS

- 1.1 This policy is intended to provide a vehicle through which the Council and its partners can facilitate housing renewal within the district.
- 1.2 The policy is drafted having in mind the legislative requirements of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (the RRO 2002).
- 1.3 The RRO 2002 makes repeals and amendments to amongst other legislation the Housing Act 1985 (The 1985 Act), The Local Government Act 1988, (The 1988 Act), The Local Government and Housing Act 1989 (the 1989 Act) and the Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) .
- 1.4 Local authorities have extensive statutory duties and powers to intervene where they consider housing conditions are unacceptable. These include:
- Declaration of renewal areas;
  - Disabled Facilities Grants;
  - Enforcement activity (e.g. to remedy unfitness, to repair, demolish or close unfit dwellings);
  - Slum clearance;
  - Compulsory purchase orders.
- 1.5 The above statutes and regulations make provision for financial and other assistance for or in connection with the improvement, repair and renovation of housing but the RRO 2002 provides new general powers to give assistance and provides local authorities with a much greater degree of flexibility in devising both its strategy for dealing with poor housing conditions and in the policy tools available.
- 1.6 Within this context the overall strategic aim of this policy is to develop a variety of mechanisms to facilitate and deliver advice, support and assistance to give the people of the Bradford District the opportunity to obtain decent housing, with priority being given to the most vulnerable.
- 1.7 Those principles form a framework that will continue to evolve as existing commitments are fulfilled and valuable local, regional and national research informs future policy development.
- 1.8 This policy intends to strike a balance for the Council between:
- Home owners maintaining and investing in their own properties
  - Levering in private investment wherever appropriate to supplement limited public resources
  - Public funds being used to assist the most vulnerable living in poor housing that is impacting detrimentally on their health
  - Effective targeting of resources to secure overall strategic objectives

- 1.9 In order to use the powers provided in the RRO the Council must approve and publish its Housing Renewal Policy.
- 1.10 Provisions relating to mandatory Disabled Facilities Grants, clearance and enforcement remain largely unchanged but must be included in this policy.
- 1.11 To acknowledge the need to make minor changes to policy over time with the minimum of disruption to its operation the Executive acknowledge that only future major changes will require its approval.
- 1.12 The Government's view is that it is primarily the responsibility of homeowners to maintain their own property. It is recognised however, that some homeowners, particularly the elderly and vulnerable, do not have the necessary resources to keep their homes in good repair and that Local Authorities have an important role in these cases to provide assistance.

## **2.0 LOCAL HOUSING CONDITIONS**

- 2.1 The 2015 Private Sector Stock Condition Survey estimated that 16% of the District's private sector stock contained a Category 1 hazard when assessed using the Housing Health and Safety Rating System (HHSRS), with the most frequently occurring hazards being associated with falls and excess cold.
- 2.2 Analysis of the presence of Category 1 hazards by tenure shows that 14% (19,986) of owner occupied properties and 21% (8,291) of privately rented properties contain such hazards.
- 2.3 For the majority of people within the District owner occupation is the tenure of choice and provides decent housing that satisfies their needs and aspirations. From the Stock Condition survey we know that almost 120,000 homes do not contain a Category 1 hazard.
- 2.4 It is estimated that poor housing conditions are responsible for over 1,774 harmful events that require medical treatment every year. The estimated cost to the NHS of treating accidents and ill health caused by these hazards is £6.5m per year. If these hazards were mitigated the total annual savings to society are estimated to be £16.3m including £6.1m savings to the NHS.
- 2.5 The Private Sector Stock Condition Survey identified excess cold as one of the most frequently occurring hazards. It also estimated that fuel poverty affects 15% of owner occupiers and 28% of those in the private rented sector, with those considered most at risk being elderly and low income households. This underlines the need for an integrated approach to tackle poor housing conditions and energy efficiency.
- 2.6 A comparison with the results from the previous Stock Condition Survey undertaken in 2007 indicates that there has been an improvement in property conditions but that there are still significant issues with property condition in the private sector and, in particular, the private rented sector

### **3.0 THE LOCAL STRATEGIC CONTEXT**

3.1 The importance of having decent homes that people can afford to live in is one of the six key objectives within the Council Plan. The fundamental principles of the Comprehensive Housing Renewal Policy contribute not only to the housing objective within the Council Plan but also more widely as:-

- Good quality housing attracts companies and workers - leading to an economically prosperous district
- Children and young people are better able to benefit from education if they are well housed – leading to a district of excellence in learning
- Good quality housing promotes community safety – leading to a safer place in which to live, work and play
- High quality, affordable, warm homes promote health and well being – leading to a healthy district

3.2 The Housing and Homelessness Strategy sets out the Council's approach to addressing house conditions and needs as well as contributing to other corporate and government priorities such as fuel poverty, equality and the environment through a series of associated Action Plans. Performance against the Action Plans is regularly monitored and targets included within the Plans are reviewed and updated on an annual basis.

### **4.0 THE POLICY DETAILS**

The proposed Housing Renewal policy is based on three fundamental principles:

- The Needs of People for Improved Living Conditions- ('people')
- Sustainability
- Advice and Support

#### **4.1 The Needs of People for Improved Living Conditions- 'People'**

4.1.1 One of the main emphases in the RRO2002 is that the responsibility for maintaining a property must lie with its owner. It is accepted however that certain homeowners, particularly the elderly and the most vulnerable, may not have the necessary resources to keep their homes in good repair.

4.1.2 The 'people' element of the policy will provide support to the most vulnerable members of the community, utilising defined social and economic criteria to target resources.

4.1.3 The Council will allocate a proportion of its housing budget for the provision of assistance to these vulnerable groups. This allocation will be subject to resources being available from the Housing budget.

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4.1.4 Individuals who are found to be vulnerable using the defined criteria will be considered for assistance from the Council. The eligibility criteria and conditions of assistance are included at Appendix 1.

Assistance will be funded/resourced in the following priority order from:

- Firstly – the individual's own resources and savings (Savings will be assessed having regard to the current Regulations governing means testing, so disregarding the first £6000 of savings at the current time. Savings taken into account for these purposes will include any equity in property and/or investments).
- Secondly – Commercial loans based on the individual's ability to pay from income
- Thirdly – Through equity release – refer to Appendix 1
- Fourthly – through last resort grant assistance

Assistance will only be provided for defined health and safety priority works. The criteria for assistance is identified at Appendix 1.

## 4.2 **Sustainability**

4.2.1 The aim of this element of the policy is to create a more sustainable housing stock for the people of Bradford so making the district a more attractive place to live in line with the 2020 vision and the Community Strategy.

4.2.2 A sustainable housing stock will be created using a combination of:

- Area based activity
- Activity aimed at creating a more appropriate housing stock for the population of the Bradford District

4.2.3 The Council will allocate a proportion of its housing budget for the provision of assistance to create a more sustainable stock. This allocation will be subject to resources being available from the Housing budget.

### 4.2.4.1 **AREA BASED ACTIVITY**

- A programme of Clearance, Redevelopment, Group Repair following a Neighbourhood Renewal Assessment (N.R.A)
- A programme of Facelift Schemes and Environmental works within agreed priority areas
- Activity in line with the Local Investment Plan (L.I.P)

### 4.2.4.2 **A MORE APPROPRIATE HOUSING STOCK**

- Disabled Facilities Grants (D.F.G)
- Removal assistance for disabled people assessed as eligible for D.F.G.
- Relocation assistance for displaced households as a result of clearance or compulsory purchase activity undertaken by the Private Sector Housing service

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- Living Over The Shops (L.O.T.S) and conversion of non-domestic premises assistance
- Enforcement activity in line with the Council's Private Sector Housing Enforcement policy
- Action to Reduce the Number of Empty Homes
- Assistance to improve energy efficiency and reduce fuel poverty

#### 4.3. **Area Based Activity**

##### **a. A programme of Clearance, Redevelopment and Group Repair following a Neighbourhood Renewal Assessment (N.R.A)**

The Local Government and Housing Act 1989 introduced guidance that the Council must have regard to when determining the most satisfactory course of action to take in respect of unfit dwellings.

This guidance refers to the Neighbourhood Renewal Assessment (N.R.A) procedure which enables the Local Authority to consider a range of options available to deal with unfit properties taking into account all costs, benefits and implications.

Having completed an N.R.A. the Local Authority will ensure that the option determined to be the most satisfactory course of action is facilitated, whether this be clearance, group repair or renovation. This will be incorporated into a programme of activity for the Authority.

Where clearance is determined to be the most appropriate course of action, enforcement activity will be taken in line with current legislation and the Private Sector Housing Enforcement Policy, as approved by Executive Committee 28.2.06.

Where group repair is determined to be the most appropriate course of action, assistance will be given to all owners of properties within the blocks concerned. Assistance will be given in line with the criteria utilised to facilitate group repair assistance (see Appendix 1).

Where renovation is determined to be the most appropriate course of action, assistance will be given to owners of properties to remedy the defects identified as making the property unfit subject to the conditions and eligibility criteria at Appendix 1.

This activity will be subject to resources being available from the Housing budget.

##### **b. A Programme of Facelift Schemes and Environmental Works within agreed priority areas**

Subject to the availability of resources the Local Authority may allocate a proportion of its housing budget to implement a programme of Facelift schemes and associated environmental works within agreed priority areas.

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Priority areas will only be determined following consideration of agreed criteria and following approval by the relevant Strategic Director.

The eligibility criteria and conditions of assistance are included at Appendix 1.

#### 4.4 **A More Appropriate Housing Stock**

##### **a. Disabled Facilities Grants (DFG)**

The legislation for providing mandatory D.F.G assistance remains largely unchanged as the legislation regulating this assistance remains.

##### ***Mandatory Assistance***

Mandatory assistance can be provided up to the statutory maximum grant to enable disabled people to live independently in their own homes. Works that are required will be identified in consultation with Social Services and within the requirements of the Housing Grants, Construction and Regeneration Act 1996 (as amended).

Enquiries for D.F.G assistance, where the works are required to meet the needs of the disabled person, will normally be processed in order of date of initial enquiry to the Local Authority within the priority identified by the Occupational Therapist.

The Council has chosen to exercise its discretion to apply a local land charge for the provision of mandatory assistance in line with the Housing Grants, Construction and Regeneration Act 1996; Disabled Facilities Grant (Conditions relating to approval or payment of Grant) General Consent 2008.

##### ***Discretionary Assistance***

The Local Authority will allocate a proportion of its housing budget for the provision of discretionary D.F.G assistance. This allocation will be subject to resources being available from the Housing budget.

Discretionary assistance should only be available where the cost of the recommended works exceeds the maximum mandatory grant and where the grant applicant(s)/property owner(s) is assessed as being unable to fund the cost of the works or the additional costs themselves.

Grant applicants who are deemed to require discretionary disabled facilities assistance will be independently financially assessed to determine whether they can fund the required works to their property via the Council's loan assistance or other private funding. The cost of the required works will be funded/resourced in the following priority order:

- Firstly – the household's own resources and savings (Savings will be assessed having regard to the current Regulations governing means testing, so disregarding the first £6000 of savings at the current time. Savings taken



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into account for these purposes will include any equity in property and/or investments).

- Secondly – Commercial loans based on the individual's ability to pay from income
- Thirdly – Through equity release – refer to Appendix 1
- Fourthly – through last resort grant assistance

Where applicants are assessed as eligible to receive discretionary assistance this will normally be limited to a maximum of £25,000. Any recommended assistance in excess of this maximum will only be approved following individual case review by a Review Panel which will include 3 representatives appropriate to the case but will always include representatives from Occupational Therapy and Housing.

The eligibility criteria and conditions of assistance are included at Appendix 1.

**b. Removal assistance for disabled people assessed as eligible for D.F.G.**

The Local Authority will allocate a proportion of its housing budget for the provision of removal assistance for disabled people assessed as eligible for D.F.G. This allocation will be subject to resources being available from the Housing budget.

Removal assistance up to a maximum of £5000 per property will be made available to assist disabled households to move to a property that is more appropriate to their needs.

Removal assistance will normally be available where the adaptations required to assist the disabled person in their present accommodation are considered to be so complex or expensive that it would be more appropriate to assist the individual to find alternative permanent accommodation that already met their needs or could be more easily adapted to do so.

Removal assistance will only be available where the alternative accommodation has been approved as appropriate by the Occupational Therapist.

Individuals who receive removal assistance will still be eligible, where appropriate and necessary, to benefit from D.F.G assistance in their new accommodation.

Removal assistance will only be approved following individual case review by a Review Panel which will include 3 representatives appropriate to the case but will always include representatives from Occupational Therapy and Housing.

The eligibility criteria and conditions of assistance are included at Appendix 1.

**c. Relocation Loan Assistance for Displaced Households as a result of Clearance Activity undertaken by the Private Sector Housing Service**

The Local Authority will consider providing relocation loan assistance where it is undertaking clearance activity.

This assistance will be subject to resources being available from the Housing budget.

The eligibility criteria and conditions of assistance are included at Appendix 1.

**d. Living Over the Shop (L.O.T.S) Assistance and Conversion of Non-Domestic Buildings into Residential Accommodation**

The Local Authority will allocate a proportion of its housing budget for the provision of L.O.T.S assistance and the conversion of non-domestic dwellings into residential accommodation. This allocation will be subject to resources being available from the Housing budget.

Living Over the Shop (L.O.T.S) assistance can be made available using powers under the Local Government Act 1988 Section 24 to enable empty space within commercial premises to be converted into residential accommodation to provide good quality, rented homes for people to live in.

Criteria have been established for determining the value for money and financial viability of applicants' schemes and consideration must be given to those factors when determining whether to offer assistance.

Conditions attached to this assistance requires owners to offer the converted accommodation for rent at affordable rents for a period of ten years. Affordable rents will be determined in consultation with the Rent Officer Service.

The eligibility criteria and conditions of assistance are included at Appendix 1.

**e. Enforcement Activity**

The Private Sector Housing Service will continue to take action to maintain and improve housing conditions within the Bradford District in line with relevant legislation.

All activity will be taken in line with the Private Sector Housing Enforcement Policy, as approved by Executive Committee 28.2.06.

The Stock Condition Survey indicated that the poorest standards of accommodation were within the privately rented accommodation of the District. Due to the limited capacity of the service to address housing standards priority will normally be given to undertaking enforcement activity within the privately rented sector.

**f. Action to Reduce the Number of Empty Homes**

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The Housing Service will work with the owners of empty properties and other partner organisations to offer advice and guidance to encourage owners to bring empty properties back in to use.

All actions taken in to bring empty properties back into use or demolish them will be taken in line with current legislation and the Council's Empty Homes Delivery Plan.

Where it is found to be necessary to take enforcement activity in respect of empty properties all such actions will be taken in line with the Private Sector Housing Enforcement Policy, as approved by Executive Committee 28.2.06.

The Local Authority will offer a range interventions to encourage owners of long term empty properties back into use. These will include Empty Property Loans and Empty Property Assistance.

This assistance will be subject to resources being available from the Housing budget.

The eligibility criteria and conditions of assistance are included at Appendix 1.

#### **g. Assistance to improve energy efficiency and reduce fuel poverty**

The service will continue to work with partner organisations to address fuel poverty and improve the energy efficiency of homes within the Bradford district.

The Council is currently developing an Energy Repayment Loan (ERL) to assist vulnerable owner occupiers to access energy efficiency measures through the Better Homes Yorkshire (BHY) scheme.

The eligibility criteria and conditions of assistance are included at Appendix 1

Provision of such assistance will be subject to available resources.

#### **4.5 Advice And Support**

4.5.1 In line with the Housing and Homelessness Strategy Action plans the Council will continue to develop advice and support initiatives for owner occupiers, landlords and tenants of privately rented accommodation.

4.5.2 The Council will also continue to administer the statutory licensing scheme for Houses in Multiple Occupation (HMOs) and to support and promote the Unipol Code of Standards for student accommodation in order to improve standards within privately rented accommodation within the District.

## **5.0 GENERAL PROVISIONS**

- 5.1 It is recognised that any policy is unlikely to take account of every individual situation. Each case therefore needs to be considered on its merits. This policy will act as the guide for officers. In cases where officers consider that a decision should be made outside this policy, they will first refer the matter to the relevant Strategic Director who will consider all of the information prior to making a decision.
- 5.2 Financial assistance would not normally be available to improve, adapt or repair living accommodation of Registered Social Landlords (RSL) on the basis that:
- Information from the Stock Condition Survey 2015 shows that very few RSL properties are unfit and that this stock is in relatively good condition compared to the private sector
  - RSLs should have robust business plans which will ensure their properties achieve relevant statutory standards
  - The Council does have recourse to enforcement action in line with its Private Sector Housing Enforcement Policy
- 5.3 The only exception to this provision will be in the provision of assistance through mandatory disabled facilities grant. Applications for assistance will be considered from RSL tenants. However in such instances the Council will expect the RSL to have explored all alternative solutions, including funding the adaptation from within its own capital programme before attempting to use scarce public resources.
- 5.4 The Council will normally only provide financial assistance for home energy efficiency measures as part of grant assistance where an individual has been shown to be unable to obtain the identified works through the Government's energy schemes.
- 5.5 The expenditure programme will be determined annually having regard to the capital resources and revenue/staff resources available.

## **6.0 SERVICE DELIVERY ISSUES**

- 6.1 This policy framework has reshaped the use of the capital programme for housing renewal, from one based around grant assistance to one where public resources are used to provide support for homeowners to raise their own private finance or to unlock equity in order to achieve decent homes.
- 6.2 Government guidance encourages Local Authorities to consider the use of loans and equity release schemes as part of their Housing Renewal toolkit. The Council will continue to work with the other partners to develop new products and approaches relevant to the people and district of Bradford.

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- 6.3 The move towards a system where homeowners increasingly use their own finances to support housing renewal will encourage them to take more responsibility but also give them increased choice and control.
- 6.4 It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide individuals towards independent financial advisors and will not provide financial advice itself.
- 6.5 Delivery of any new services would be carried out wherever possible with local partners but it is still anticipated that such new initiatives will have staffing/resource implications for the Private Sector Housing service. In view of this the service will continue to bid for additional resources in order to achieve strategic objectives.

## **7.0 PROCESSES AND PROCEDURES**

- 7.1 The processes and procedures involved in the implementation of the Housing Renewal Policy are included as Appendix 2.
- 7.2 These include;-
- The Complaints procedure
  - The Appeals procedure.

## APPENDIX 1

### A .PEOPLE

#### A.1 Assistance with Health and Safety Works

##### 1.0 Introduction

1.1 This assistance will be used to support the most vulnerable members of the community using defined social and economic criteria to target resources.

1.2 This assistance can also be used to support those vulnerable members of the community where one member of the household is proven to be suffering from one or more of the following chronic health conditions which is affecting their daily living and which has been confirmed by a health professional:

- Coronary Heart Disease
- Cerebrovascular Accident
- Peripheral Vascular Disease
- Diabetes – long term, poorly managed (would not include diet controlled), treated with medication
- Chronic obstructive pulmonary disease
- Children with life limiting or chronic diseases.

1.3 Vulnerable households will contain one or more individuals who meet **at least one** of the following criteria:

The homeowner will have a low income including one or more of the following:

- Means tested benefits **or**
- Gross income below £25,000 only (savings in excess of the amount specified in the current means testing Regulations will be considered to be available to fund the works i.e. currently £6,000. Savings taken into account for these purposes will include any equity in property and/or investments).

1.4 Individuals who are deemed to be vulnerable using the above criteria will be eligible for assistance from the local authority providing that the applicant is unable to finance a mortgage or loan to fund the works via the Council's Loan Assistance or other private funding as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide individuals towards independent financial advisors and will not provide financial advice itself.

Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital

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for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.

- 1.5 Where applicants are able to access their own funding via the Council's Loan Assistance the Council will pay the set up fees to facilitate the funding (up to a maximum of £1000).
- 1.6 Applicants able to access their own funding will be encouraged to bring their properties up to a decent standard.
- 1.7 The Health and Safety Assistance will be limited to one per property and be subject initially to a maximum of £5,000 (excluding V.A.T). This amount to be reviewed annually by the Director.
- 1.8 Enquiries for Health and Safety Assistance will be dealt with in date order of receipt of eligible enquiry within the appropriate service delivery team except for those eligible enquiries relating to potentially hazardous situations.
- 1.9 Applications for repairs will normally only be considered from owners for properties which have not received any financial assistance for repairs administered by the local authority under current policy or previous legislation within the last 10 years.
- 1.10 Applications will only be considered for properties, which have been built at least 10 years prior to the application being made.
- 1.11 The Council will not entertain an application for Health and Safety Assistance if the property is part of a commercial premise ie a flat located above a shop, unless the ownership of the dwelling is separate to the commercial premise, there is a separate entrance to the dwelling that does not involve accessing the commercial premise and that all services are supplied separately to each premise.
- 1.12 All work carried out will be to the Council's specification. Eligible work is that deemed so by the Council.

## **2.0 Eligible Works**

- 2.1 Assistance with health and safety works funded through either the Council's loan assistance or Health and Safety Assistance will be allocated in accordance with the following priorities and cover the works listed:

### Priority 1

Eliminate or reduce Category 1 hazard to Category 2 or below.

Outside water closet where none exists internally.

Lack of an effective central heating system to the main habitable rooms where the applicant is not eligible for other government energy initiatives.

### Priority 2

Category 2 hazards

Other additional works considered necessary to relieve the client's chronic health condition (where appropriate) in order of priority given by the Council's health practitioner

Priority 3

General repairs found to be affecting the health of the occupiers.

Where a Category 1 hazard associated with Overcrowding and Space is identified, homeowners will first be made aware of the situation and encouraged to accommodate their household in alternative accommodation more suitable to their needs. Where this is accepted as an unviable alternative, assistance will only be given to alleviate the hazard within the confines of the existing fabric and structure of the building.

### **3.0 Application**

- 3.1 The Council will not entertain an application for Health and Safety Assistance unless they are satisfied that the applicant is unable to finance a mortgage or loan to fund the works via the Council's Loan Assistance or other private funding as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

(Where the local authority is provided with information from the Independent Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating, the local authority will have the discretion to refuse the application for assistance)

**And**

- a) that an applicant is aged 18 or over on the date of application
- b) that the applicant lives in the dwelling as their only or main residence
- c) that the applicant has an owners interest (as defined by section 101 Housing Grants Construction and Regeneration Act 1996) in the dwelling alone or jointly with others

**And**

- d) The applicant is in receipt of a means tested benefit, income support or income based job seekers allowance or working tax credit with an income of less than £15050 **or**
- e) Has a gross income of less than £25,000 p.a. discounting savings of £6000. Savings taken into account for these purposes will include any equity in property and/or investments).

- 3.2 No assistance shall be paid unless an application for it is made to the Council and approved by them.
- 3.3 An applicant will normally be required to submit two competitive estimates for the work and must not start work until agreement is received from the local authority.
- 3.4 A certificate of title is required to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property, certifying the applicant's ownership.
- 3.5 Where a household has one or more individuals living there who suffer from a chronic health condition specified at Paragraph 1.2 (above) which is affecting their daily living, this will need to be confirmed by a health professional.



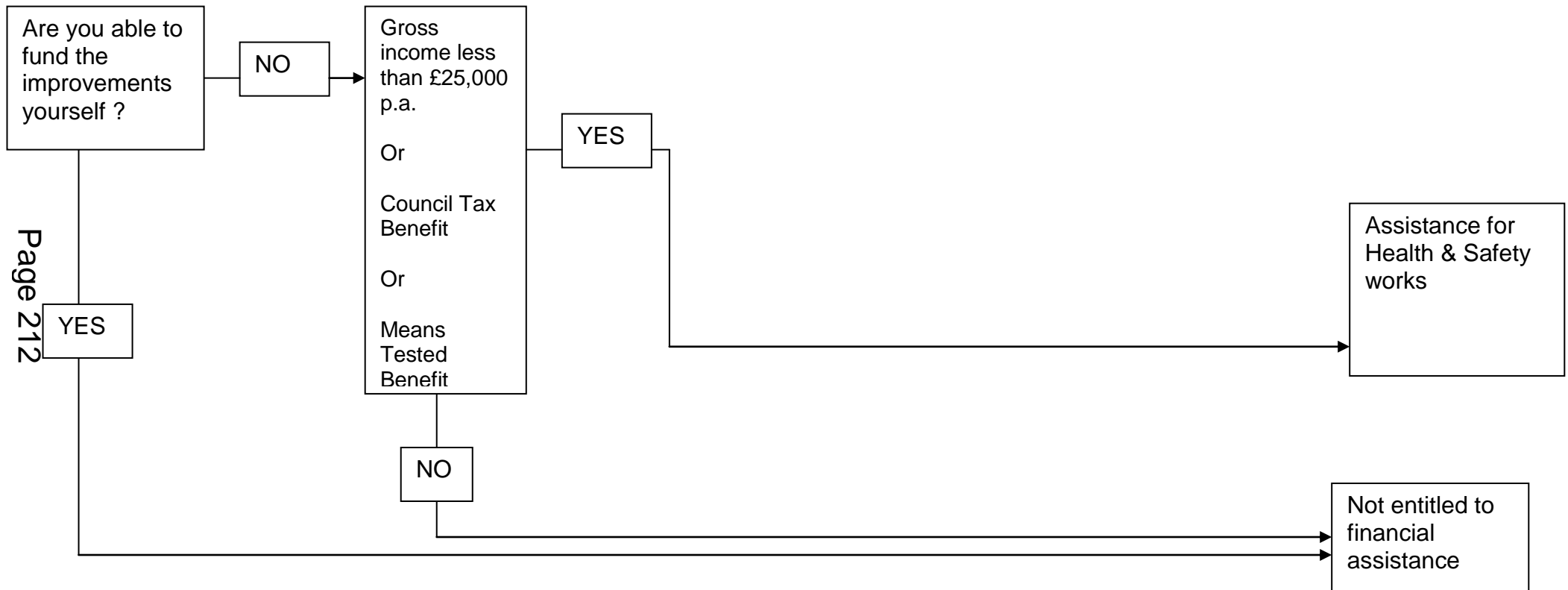
#### **4.0 Approval**

- 4.1 The applicant will be notified in writing specifying the amount of assistance available and the eligible works and advising of the conditions. The total cost of the eligible works will normally be based on the Local Authority's assessed costs.
- 4.2 It is a condition of the assistance that the eligible works are carried out within 3 months from the approval date or such further period as agreed by the local authority.
- 4.3 Eligibility does not confer entitlement to assistance. Priority will be given having regard to available resources and individual circumstances.

#### **5.0 Completion and Payment**

- 5.1 The payment of grant is conditional on the works being executed to the satisfaction of the local authority or its agents and on receipt of an acceptable invoice, demand or receipt for payment of the works.
- 5.2 Payment will be made direct to the contractor unless a receipted invoice is received then payment will be made to the applicant. In cases of dispute where the work is not to the satisfaction of the applicant, but the local authority is satisfied, the payment will be made to the applicant.

# APPENDIX 1(A) Assistance for Health & Safety Works



## **B. SUSTAINABILITY**

### **Area Based Activity**

#### **B1 Group Repair Scheme Assistance**

##### **1. Introduction**

1.1 Group Repair (GR) Scheme Assistance will be available:

- (i) to blocks of properties identified by the Council as those being in the worst condition by use of an established Group Repair Prioritisation Procedure, and included in the Council's Group Repair Programme and where GR is determined to be the most satisfactory course of action following an NRA carried out by the Council, **or**
- (ii) where group repair is determined to be the most satisfactory course of action for a block of properties at any location in the district following a Neighbourhood Renewal Assessment carried out by the Council.

1.2 Group Repair Schemes (GRS) allow the external fabric of a group of houses to be renovated at the same time, under one contract, let and supervised by the Council, so that they are left in reasonable repair and structurally stable on completion of the works.

##### **2. Eligibility Criteria**

2.1 To be eligible for GR assistance the block of properties must include at least two qualifying buildings.

2.2 A building can be included in a GRS if:

- (a) The whole or some part of the exterior of the building is not in reasonable repair, or
- (b) The whole or some part of the building is unstable.

2.3 Each scheme must contain at least one "primary" building which, as well as meeting one or other of the above two conditions, must comprise at least TWO dwellings. Since a building can be part of a terrace as well as the whole block, two houses or flats in a terrace would fulfil the criteria.

2.4 Additional buildings can also be included in a scheme if:

- (a) Each building comprises at least one dwelling; and
- (b) Carrying out the works to the building and the primary building at the same time is the most effective way of securing the repair or structural stability of each of them.

2.5 Should 25% or more of the owners of properties in disrepair in a scheme fail to give their consent to participate in the scheme then the scheme should normally be discounted. A decision not to proceed with GR will be made by the Assistant Director with responsibility for Housing

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- 2.6 A property which is for sale cannot be included in a scheme. The property would have to be taken off the market and the owner agrees to occupy the property for 12 months following completion of the works. Where a property changes hands during the life of the GRS scheme a new owner may be considered for participation providing the works have not been completed.
- 2.7 An owner who is out of the country may agree to participate in a scheme using a Power of Attorney. This should be in the form of a document stamped and therefore verified by a "Notary Public" or solicitor in either this country or the country where the owner is residing at the time.
- 2.8 A block of properties may include properties that are the subject of Rental Purchase. This is an agreement whereby a purchaser will occupy the property while making weekly/monthly payments for a number of years (typically 11) to a company, at the end of which he/she becomes the owner. For the duration of the agreement the owner of the property is the vendor, and the purchaser only becomes the registered owner after the final payment. Legal precedent dictates that such properties are eligible for inclusion in a Group Repair Scheme.
- 2.9 Commercial premises such as shops, offices or garages may also be included if they are part of a qualifying building and their inclusion is necessary to give satisfactory visual or structural effect to other scheme works. Owners would be treated as non-assisted participants and would have to pay for the full cost of the works.
- 2.10 **Group Repair Eligible Works**
- Eligible works can include any necessary works to the exterior part of the building, that is to say any part which is exposed to the elements i.e. Roofs, chimneys, walls, doors, windows, rainwater goods and external pipe-work. NB. For cavity walls, works to both the inner and the outer skin can be regarded as eligible works if the outer skin faces the open air.
- 2.11 Works can also be carried out to repair retaining walls within the curtilage of the building and to make good internal works where the Council determines that damage has been caused by doing the external works. E.g. re-plastering, loft insulation, etc.
- 2.12 It is not expected that the Council's limited resources should be used to repair or replace such structures that are not part of the habitable dwelling.
- 2.13 Where the owner of a property does not consent to participate in the scheme or is not eligible, "linking works" can still be carried out to the property but only if they are necessary to satisfactorily complete works to another building which is participating in the scheme, or the absence of the works would materially detract from the environmental appearance of a completed scheme.

### **3 Applications and Approvals**

- 3.1 The Council shall not entertain participation in a Group Repair Scheme unless they are satisfied:
- a) that an applicant is aged 18 or over on the date of application,
  - b) that the applicant has an owners interest (as defined by section 101 Housing Grants Construction and Regeneration Act 1996) in the dwelling alone or jointly with others,
  - c) that the applicant agrees to keep the property in their ownership and occupied for a period of 12 months following completion of the work,
  - d) that a certificate of title has been provided to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property indicating the applicant's ownership.
- 3.2 Participants will normally receive assistance for the full cost of the works.
- 3.3 Once a formal decision has been made that a GRS is to proceed the local authority enters into a contract with each participating owner authorising the Council to carry out the agreed works. Consent from all participants is required to enable any scheme to proceed.
- 3.4 The Local Authority is responsible for initiating group repair schemes, which includes the necessary arrangements for execution and payment for works.
- 3.5 GRS may be varied at any time before the completion date. The variation may relate to the participants, the buildings, the works or any other matter.
- 3.6 The owner of a property must consent in writing to linking/environmental works being carried out even though they have not agreed to participate in the GRS.
- 3.7 The costs of linking works are borne by the Local Authority.
- 3.8 In the case of properties subject to a Rental Purchase Agreement the owner (vendor) of the property is required to complete one form - a proof of ownership - and provide a copy of the Rental Purchase Agreement to demonstrate the applicant for the grant is the signatory for the Rental Purchase Agreement. Provision of these items is considered consent for the grant to proceed.

### **4. Completion and Conditions**

- 4.1 When the works specified in a group repair scheme have been completed the Council will notify each participant of the date on which the works were completed to the authority's satisfaction.
- 4.2 It is a condition of receiving group repair assistance that no further assistance for repairs will be available for a period of 10 years following the certified date of completion of the works.
- 4.3 If an assisted participant wishes to withdraw their property from the scheme at any time after signifying scheme consent the owner must pay on demand any costs to the Council in connection with the GRS in relation to their property. Notification to withdraw from the scheme must be given in writing.

- 4.4 If the owner sells the property at any time up to one year after completion of the works this will be considered a breach of a condition and the owner for the time being of the dwelling or house shall pay to the Local Housing Authority on demand an amount equivalent to the increase in market value of the property attributable to the Group Repair works, as determined by the Local Housing Authority (Asset Management Department).
- 4.5 This condition is a local land charge, which is also binding on anyone who takes over ownership of the property if the obligation has not already been discharged.
- 4.6 The local authority may determine not to demand payment or to demand a lesser amount. Any person who feels aggrieved by the demand can access the Council's appeals process outlined in Appendix 2.
- 4.7 The conditions cease to apply once the amount has been paid or any demand for payment has been satisfied.

## **B2 Renovation Assistance**

### **1. Introduction**

- 1.1 Renovation assistance will only be given as a direct result of an (Neighbourhood Renewal Assessment) (NRA) carried out by the local authority as part of a programme of area based work. The programme will be determined using the local authority prioritisation process for NRA's and will be implemented subject to available resources.
- 1.2 Renovation Assistance will be limited to works to make a property free from Category 1 hazards. Reference to be made to the Statutory Guidance in relation to the Housing Health and Safety Rating System (HHSRS).
- 1.3 The owner of the property will be financially assessed to determine whether they are able to fund the works themselves as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.
- 1.4 Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.
- 1.5 Assistance will normally be limited to £50,000 per property.

### **2. Applications and Approvals**

- 2.1 The Council will not entertain an application for Renovation Assistance unless they are satisfied that the applicant is unable to finance a mortgage or loan to fund the works via the Council's Loan Assistance or other private funding as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

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(Where the local authority is provided with information from the Independent Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating, the local authority will have the discretion to refuse the application for assistance)

- a) that an applicant is aged 18 or over on the date of application
  - b) that the applicant lives in the dwelling as their only or main residence.
  - c) that the applicant has an owners interest( as defined by section 101 Housing Grants Construction and Regeneration Act 1996) in the dwelling alone or jointly with others
  - d) That the applicant agrees to keep the property in their ownership and occupied for a period of 12 months following completion of the work.
- 2.2 No assistance shall be paid unless an application for it is made to the local housing authority and approved by them.
- 2.3 An application shall be in writing and shall specify the premises to which it is related and contain-
- a) particulars of the works in respect of which the assistance is sought
  - b) an estimate of the cost of the works
  - c) particulars of any preliminary or ancillary services and charges in respect of the cost of which the assistance is sought
- 2.4 A certificate of title is required to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property indicating the applicant's ownership.
- 2.5 The owner must sign a certificate agreeing to keep the property occupied and in their ownership for 12 months following the completion date of the works and this is to accompany their application.
- 2.6 The local housing authority may approve renovation assistance if they are satisfied that the works will make the house free from Category 1 hazards.
- 2.7 The amount of assistance shall be determined by the local housing authority having regard to the eligible expense of the recommended works to make the house free from Category 1 hazards, reduced by the amount of funds/loan which the applicant has been assessed as being able to raise.

### **3. Completion and Conditions**

- 3.1 It is a condition of the assistance that the eligible works are carried out within 12 months from the approval date or such further period as agreed by the local authority.
- 3.2 The payment of assistance is conditional on the works being executed to the satisfaction of the local authority and on receipt of an acceptable invoice, demand or receipt for payment of the works.
- 3.3 Payment will be made direct to the contractor unless a receipted invoice is received then payment will be made to the applicant. In cases of dispute where the work is not to the satisfaction of the applicant, but the local authority is satisfied, the payment will be made to the applicant.

- 3.4 The condition re occupation and ownership for 12 months is a local land charge and comes into force on the completion date of the works. It is binding on any person who for the time being is the owner of the dwelling or house.
- 3.5 In the event of a breach of a condition the owner for the time being of the dwelling or house shall pay to the local housing authority on demand the increased value attributable to the renovation works, of the property following improvement as determined by the local housing authority.
- 3.6 The local authority may determine not to demand payment or to demand a lesser amount. Any person who feels aggrieved by the demand can access the Council's appeals process outlined in Appendix 2.
- 3.7 It is a condition of receiving renovation assistance that all the works must be delivered through the Council's In House Agency Service.
- 3.8 It is a condition of receiving renovation assistance that no further assistance for repairs will be available for a period of 10 years following the date of completion of the works.

### **B3 Facelift Assistance**

#### **1. Introduction**

- 1.1 Facelift Assistance will be available to improve the external appearance of blocks of properties within areas identified by the Council.
- 1.2 Facelift Schemes allow elements of the external fabric of a group of houses to be renovated at the same time, under one contractual arrangement, agreed, let and supervised by the Council.
- 1.3 Facelift schemes are intended to improve the aesthetic appearance of a block of properties as part of a programme to improve housing market conditions within areas.

#### **2. Eligibility Criteria**

- 2.1 To be eligible for Facelift assistance the block of properties must include at least two qualifying buildings.
- 2.2 Each scheme must contain at least one "primary" building which, as well as meeting one or other of the above two conditions, must comprise at least TWO dwellings. Since a building can be part of a terrace as well as the whole block, two houses or flats in a terrace would fulfil the criteria.
- 2.3 Additional buildings can also be included in a scheme if:
  - (a) Each building comprises at least one dwelling; and
  - (b) Carrying out the works to the building and the primary building at the same time is the most effective way of securing the repair or structural stability of each of them.



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- 2.4 Should 25% or more of the owners of properties in a scheme fail to give their consent to participate in the scheme then the scheme should normally be discounted. A decision not to proceed with facelift will be made by the Head of Service, Housing.
- 2.5 An owner who is out of the country may agree to participate in a scheme using a Power of Attorney. This should be in the form of a document stamped and therefore verified by a "Notary Public" or solicitor in either this country or the country where the owner is residing at the time.
- 2.6 A block of properties may include properties that are the subject of Rental Purchase. This is an agreement whereby a purchaser will occupy the property while making weekly/monthly payments for a number of years (typically 11) to a company, at the end of which he/she becomes the owner. For the duration of the agreement the owner of the property is the vendor, and the purchaser only becomes the registered owner after the final payment.

Legal precedent dictates that such properties are eligible for inclusion in a Facelift Scheme.

- 2.7 Commercial premises such as shops, offices or garages may also be included if they are part of a qualifying building and their inclusion is necessary to give satisfactory visual or structural effect to other scheme works.
- 2.8 Facelift Eligible Works

Eligible works will normally only include any necessary works to:

- Rainwater pipes and eaves gutters
- Boundary walls
- The provision of gates to yard areas (where appropriate)
- Low pressure stone cleaning to properties (where appropriate)
- Roof
- Chimneys

- 2.9 It is not expected that the Council's limited resources should be used to repair or replace such structures that are not part of the habitable dwelling.

### **3. Applications and Approval**

- 3.1 The Council shall not entertain participation in a Facelift Scheme unless they are satisfied:
- a) that an applicant is aged 18 or over on the date of application,
  - b) that an applicant has an owners interest (as defined by section 101 Housing Grants Construction and Regeneration Act 1996 (as amended)) in the dwelling alone or jointly with others,
  - c) that a certificate of title has been provided to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property indicating the applicant's ownership.
- 3.2 Once a formal decision has been made that a facelift scheme is to proceed the Council will enter into a contract with each participating owner authorising the

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Council to carry out the agreed works. Consent from all participants is required to enable any scheme to proceed.

- 3.3 In the case of properties subject to a Rental Purchase Agreement the owner (vendor) of the property is required to complete one form - a proof of ownership - and provide a copy of the Rental Purchase Agreement to demonstrate the applicant for the grant is the signatory for the Rental Purchase Agreement. Provision of these items is considered consent for the grant to proceed.
- 3.4 The Council is responsible for initiating facelift schemes, which includes the necessary arrangements for execution and payment for works.
- 3.5 Facelift may be varied at any time before the completion date. The variation may relate to the participants, the buildings, the works or any other matter.

#### **4. Completion and Conditions**

- 4.1 When the works specified in a Facelift scheme have been completed the Council will notify each participant of the date on which the works were completed to the authority's satisfaction.
- 4.2 It is a condition of receiving facelift assistance that no further assistance for repairs will be available for a period of 10 years following the certified date of completion of the works.
- 4.3 If a participant wishes to withdraw their property from the scheme at any time after signifying scheme consent the owner must pay on demand any costs to the Council in connection with the Facelift in relation to their property. Notification to withdraw from the scheme must be given in writing.
- 4.4 The local authority may determine not to demand payment or to demand a lesser amount. Any person who feels aggrieved by the demand can access the Council's appeals process outlined in Appendix 2.

#### **B4 Removal Assistance for Disabled People living in difficult to adapt property.**

Assistance up to a maximum of £5,000 will be made available to assist disabled households to move to a property that is more appropriate to their needs.

Assistance will only be provided on the condition that the applicant's present accommodation has been assessed as unsuitable for their needs and difficult or expensive to adapt, by an Occupational Therapist and Home Improvement Officer employed by the local authority.

Assistance will only be provided on the condition that the proposed property has been approved as suitable for their needs by the Occupational Therapist or capable of being adapted at reasonable cost.

All offers of removal assistance will be determined by The Review Panel which looks at the full range of options open to families at individual case reviews.

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The assistance will cover the valuation, surveying costs, legal fees removal expenses and reinstatement of services.

The amount of assistance will be determined on the submission of accounts up to the maximum of £5,000.

## **B5 Relocation Loan Assistance**

### **1. Introduction**

- 1.1 The purpose of relocation loan assistance is to facilitate the clearance of poor quality and/or obsolete housing.
- 1.2 Assistance will be available to owner occupiers to bridge the 'affordability gap' between the market value compensation paid for the loss of a property being demolished and the cost of buying a new home.
- 1.3 Relocation Loan Assistance will only be given as a direct result of an (Neighbourhood Renewal Assessment) (NRA) carried out by the local authority and will be subject to available resources.

### **2. Eligibility Criteria for Assistance**

- 2.1 An application for assistance will only be considered if it is made by a person who:
  - (a) has an owners interest in the 'original property' which has been, or is to be, acquired by the Council under Section 290 of the Housing Act 1985 (acquisition of land for clearance) or section 154 of the Town and Country Planning Act 1990 (effect of valid blight notice); and
  - (b) the 'original property' was their only or main residence (whether or not they were living in it) both on the date on which the outcome of the N.R.A was determined by the Council **and** throughout the period ending with the acquisition date (section 133(6) Housing Grants, Construction and Regeneration Act 1996 (as amended)).
- 2.2 Assistance will only be considered to assist the applicant to acquire an owners interest in a dwelling in an area inside or outside the Council's area.
- 2.3 The applicant must intend to live in the dwelling they propose to acquire as their only or main residence
- 2.4 Joint owners of a property will normally only be permitted one application for relocation loan assistance whether that be a joint application or an application made by one of the parties individually.
- 2.5 The dwelling which is to be acquired must be:
  - Be in a reasonable state of repair and free from Category 1 hazards; and
  - In the opinion of the Principal Manager Housing be appropriate for the needs of the intended occupant/s i.e. have a sufficient number of living rooms and bedrooms having regard to the age and number of the occupiers; and

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- In the case of a disabled occupier the accommodation, including access and egress, must either be suitable for that person's needs or be capable of being adapted at reasonable expense to make it suitable

### **3. Applications and Approvals**

- 3.1 Each application for assistance will be considered on its own merits and at the discretion of the relevant Strategic Director. There is no obligation to make relocation assistance available to all displaced persons.
- 3.2 In making an application for assistance the following information shall be required:
- (i) details of the 'original property' including particulars of the interest held and the occupants,
  - (ii) details of the property which the applicant proposes to purchase, including details of the interest to be acquired, the price and its condition.
- 3.4 It is a condition of receiving relocation loan assistance that the applicant will normally be expected to use the sum paid by the Council in respect of market value compensation for the original dwelling for the specific purpose of purchasing their new home.
- 3.5 Applicants will be required to sign a certificate which certifies that the applicant proposes to acquire an owner's interest in the qualifying dwelling and that they intend to live in that dwelling as their only or main residence.
- 3.6 The amount of loan to be offered will vary according to:
- the value of the property
  - the market value compensation paid
- 3.7 The maximum loan available will normally be 50% of either the current market valuation or purchase price, whichever is the lower, of the property the client proposes to purchase as their new home to a maximum of £70,000.
- 3.8 The minimum loan will normally be £1000.
- 3.9 Eligibility does not confer entitlement to assistance. Priority will be given having regard to available resources and individual circumstances.

### **4. Completion and Conditions**

- 4.1 The sum of the assistance will be made available to the solicitor acting for the applicant at the time the principal sum is required to complete the contract for the purchase of the qualifying dwelling.
- 4.2 Loan Applicants will be required to take out Buildings Insurance on their home.
- 4.3 The Loan will be secured as a Land Charge.
- 4.4 The applicant will be subject to the conditions attached to the loan.
- 4.5 The applicant will be eligible for Loan Support Assistance (see B10).

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- 4.6 At the point of loan redemption the Council may determine not to make such a demand for payment or to demand a lesser amount. Any person who feels aggrieved by the demand can access the Council's appeals process outlined in Appendix 2.
- 4.7 The obligation to repay the assistance is chargeable against the qualifying dwelling in the same way as a mortgage. The main mortgage for the purchase of the property and any further amount advanced by the lender takes precedence so that, if the property is sold, the lender gets first call on the proceeds of the sale.

## **B6 Living Over The Shops (LOTS) Assistance & Conversion of Non-domestic Buildings into Residential Accommodation**

### **1. Introduction**

- 1.1 The Council will offer assistance to create good quality, affordable privately let accommodation by:
- (i) the conversion of empty/vacant space situated above commercial premises into self contained residential units of accommodation in order to be privately rented.
  - (ii) the conversion of non-domestic buildings into self contained residential units.
- 1.2 Powers to give this assistance are bestowed upon the Council by Part III of the Local Government Act 1988 s. 24 – s.26, 'Power to provide financial assistance for privately let housing accommodation'. Powers under this legislation remain unchanged by the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

### **2. Eligibility Criteria**

- 2.1 In order for a property to be eligible it must be empty/vacant space in commercial buildings that has not been used for residential accommodation before, or has not been used for residential accommodation in the past 15 years, and requires conversion work (at minimum the creation of separate access) in order to form self contained units of accommodation.
- 2.2 Assistance will not be considered for:
- (a) the conversion of existing satisfactory living accommodation to that of a different type, i.e. conversion of flats to smaller units or bedsits. However, some adaptation can be included to an existing unit if it forms part of, and facilitates the provision of, units from previously unused space.
  - (b) the renovation of empty/vacant space above commercial premises where separate access from the commercial element exists, where services already exist and where partitioning/room layouts already lend themselves to self contained units.
- 2.3 The applicant should either be the owner of the property in question or hold a long term lease on the property, of which not less than 10 years remain unexpired at the date of application.
- 2.4 The units of accommodation created must be fully self-contained, containing within them their own kitchen, living area, separate bedroom/s and separate bathroom.

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Each unit shall be provided with, in addition to basic amenities, a suitable cooker, fridge, heating appliance/s, appropriate floor coverings and shall be decorated to the satisfaction of the Council (including all wall, ceiling and exposed joinery surfaces).

### 3. Application and Approval

- 3.1 The Council shall not accept an application for LOTS assistance unless they are satisfied:
- a) that an applicant is aged 18 or over on the date of application,
  - b) that he/she has an owners interest in the premises **or** holds a long term lease on the premises,
  - c) that he/she agrees and signifies his/her agreement to comply with the conditions of the assistance.
- 3.2 A Certificate of title is required to confirm either ownership or the long term lease held on the premises, signed by a Solicitor, Bank or Building Society stating the interest in the premises.
- 3.3 An application for assistance should comprise of:
- a) A completed business plan/application form stating;
    - (i) the address, type and quantity of the proposed accommodation,
    - (ii) the applicants estimated cost of works,
    - (iii) any other grants received or being applied for,
    - (iv) whether the project is to be funded by a loan,
    - (v) the total assistance requested,
    - (vi) calculated scheme viability taking into account management, maintenance, bad debts, voids and annual financing costs,
    - (vii) the owners/lessees name & address.
  - b) A plan showing the existing layout and use of the premises and the layout of the proposed accommodation.
  - c) A fully itemised estimate for the conversion and creation of the proposed accommodation.
  - d) A certificate of title is required to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property indicating the applicant's ownership
- 3.4 The maximum level of financial assistance given by the Council will be that which is assessed as being necessary to make the scheme financially viable.
- 3.5 The Council will only approve the schemes which offer the best value for money in direct comparison with each other and having regard to the costs involved in previous successful schemes
- 3.6 LOTS schemes will only be approved if the applicant can provide documentation to show that full Planning Consent and Building Regulation Approval has been gained for the conversion of the premises.

- 3.7 The applicant must sign a contract with the Council prior to approval, agreeing to comply with the conditions of the assistance given (see section 4) which includes an agreement to complete the conversion works on a date agreed with the Council. The date upon which the works must be finished may be altered but only if agreed in writing with the Council. Failure to complete work within the agreed timescale may result in the withdrawal of the assistance in part or in full.
- 3.8 Where the assistance given is in excess of £50,000 (or such other amount agreed by the Strategic Director) the applicants compliance with conditions will be secured by a mortgage on the property proposed by the Conveyancing Unit of the Council's Legal Services Dept. The mortgage will cease at the end of the 10 year condition period.
- 3.9 Any monies offered by the Council shall not be used towards financing any conversion works towards any commercial element remaining within the premises.

#### **4. Completion and Conditions**

- 4.1 When the full works of the conversion have been completed to the satisfaction of the Council and in line with the LOTS contract (which must include confirmation from Building Control and Planning that works have been completed satisfactorily) the Council will make the final payment of the assistance awarded and issue the applicant with a completion certificate, specifying the date on which works were completed to the Council's satisfaction.
- 4.2 It is a condition of the assistance given that:
- (i) Upon completion the applicant shall place all vacancies for the new accommodation on the Council's Allocations system in order to find tenants. All vacancies will remain on the system for 2 weeks (10 working days) or longer if the applicant chooses. However if after the initial 2 weeks any of the accommodation has not been filled, the applicant can remove the vacancies from the system and locate tenants privately.  
  
The applicant will be expected to accept tenants found through the Allocations system unless he/she can demonstrate to the satisfaction of the Assistant Director with responsibility for Housing that the tenants found are unsuitable.
  - (ii) Following the initial vacancies, for a period of normally 6 years, the applicant will follow the same process as identified in (i) above for each vacancy that arises and then for a further 4 years for each alternate vacancy that arises.
  - (iii) The accommodation will be let with formal tenancy agreements which must give the tenants no less security of tenure than an Assured Shorthold Tenancy under the Housing Act 1988 as amended or replaced.
  - (iv) The rent, excluding payments for services, shall be no higher than an amount as determined by the Rent Officer.
  - (v) The applicant shall maintain the property and its equipment in a good state of repair during the 10 year condition period.

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- (vi) Any commercial element of the premises will be let for normal retailing and commercial activity in line with Planning consent and will not include any process that by means of noise, vibration, fume or any other matter is likely to affect the comfort and well-being of the tenants of the residential units.
  - (vii) If the property is sold or leased during the 10 year condition period, compliance with the above conditions will be included as a condition of the sale or lease and will transfer to the new owner/leaseholder.
- 4.3 Any breach of conditions may render repayable in full or part monies paid by the Council towards the scheme. Any person who feels aggrieved by the demand can access the Council's appeals process outlined in Appendix 2.
- 4.4 The conditions will cease to apply once the amount has been paid or any demand for payment has been satisfied.
- 4.5 In order to monitor compliance with the conditions, the Council will send the applicant, on an annual basis, a Certificate of Compliance which will require the applicant to complete and sign the certificate confirming that they are continuing to comply with the scheme conditions. Failure to comply with this requirement will constitute a breach of conditions in itself and will prompt an investigation by the Council and ultimately may lead to a requirement to repay in full or part monies paid by the Council towards the scheme.

## **B7 Disabled Facilities – Discretionary Assistance**

### 1.0 Introduction

- 1.1 Discretionary assistance should only be available where the cost of the recommended works exceeds the maximum mandatory grant and where the grant applicant(s)/property owner(s) is/are assessed as being unable to fund the cost of the works or the additional costs themselves.
- 1.2 Grant applicants who are deemed to require discretionary D.F.G. assistance will be independently financially assessed to determine whether they can fund the recommended scheme of works to their property via the Council's Loan Assistance or other private funding. The cost of the required works will be funded/resourced in the following priority order:
- Firstly – the household's own resources and savings (Savings will be assessed having regard to the current Regulations governing means testing, so disregarding the first £6000 of savings at the current time. Savings taken into account for these purposes will include any equity in property and/or investments).
  - Secondly – Commercial loans based on the individual's ability to pay from income
  - Thirdly – Through equity release– refer to B8 Appendix 1
  - Fourthly – through last resort grant assistance
- 1.3 Where applicants are assessed as requiring discretionary assistance in addition to the maximum mandatory disabled facilities grant this will only be approved following individual case review by a Review Panel which will include 3



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representatives appropriate to the case but will always include representatives from Occupational Therapy and Housing.

- 1.4 Where applicants are assessed as only eligible to receive discretionary assistance this will normally be limited to a maximum of £25,000. Any recommended assistance in excess of this maximum will only be approved following individual case review by a Review Panel which will include 3 representatives appropriate to the case but will always include representatives from Occupational Therapy and Housing.
- 1.5 It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide individuals towards independent financial advisors and will not provide financial advice itself.
- 1.6 Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.
- 1.7 Where applicants are able to access their own funding via the the Council's Loan Assistance they will be eligible for Loan Support Assistance (see B10).

## **2.0 Application**

2.1 The Council will not entertain an application for discretionary disabled facilities assistance unless they are satisfied:

a. that the applicant is unable to finance a mortgage or loan to fund the works as determined by their Financial Advisor who will carry out the assessment on behalf of the Council.

(Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance).

b. that an applicant is aged 18 or over on the date of application

c. that the applicant lives in the dwelling as their only or main residence

d. that the applicant has an owner's interest (as defined by section 101 of the Housing Grants, Construction and Regeneration Act 1996) in the dwelling or jointly with others OR

e. where the property is rented from a private landlord or social landlord, that the property owner has given formal, written consent for the works to take place.

2.2 No assistance shall be paid unless an application for it is made to the Council and approved by them.

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- 2.3 An application shall be in writing and shall specify the premises to which it is related and contain:
- a. particulars of the works in respect of which the assistance is sought
  - b. an estimate of the cost of the works
  - c. particulars of any preliminary or ancillary services and charges in respect of the cost of which the assistance is sought
- 2.4 A certificate of title is required to confirm ownership signed by a solicitor, bank or building society or sight of the deeds of the property indicating the applicants ownership.
- 2.5 Where a property is rented from a social landlord the Council will approach the landlord to request that they contribute towards the cost of the works before any application for assistance is considered.

### **3.0 Approval**

- 3.1 The amount of assistance shall be determined by the local housing authority having regard to the eligible expense of the recommended works of adaptation reduced by the amount of funds/loan which an applicant has been assessed as being able to raise by the Council's financial advisor.

The Local Authority must be satisfied that it is reasonable and practicable to carry out the relevant works having regard to the age and condition of the dwelling.

- 3.2 The applicant will be notified in writing specifying the amount of assistance approved, the eligible works and advising of the conditions.
- 3.3 It is a condition of the assistance that the eligible works are carried out within 12 months from the approval date or such further period as agreed by the local authority.

### **4.0 Completion and Payment**

- 4.1 The payment of assistance is conditional on the works being executed to the satisfaction of the local authority or its agents and on receipt of an acceptable invoice, demand or receipt for payment of the works.
- 4.2.1 Payment will be made direct to the contractor unless a receipted invoice is received, then payment will be made to the applicant. In cases of dispute where the work is not to the satisfaction of the applicant, but the local authority is satisfied, the payment will be made to the applicant.

## **B8 Home Appreciation Loan**

### **1. Introduction**

1.1 The purposes for which a Home Appreciation Loan (HAL) may be given are:-

- To assist the applicant to carry out repairs to their dwelling to enable it to meet Health and Safety and "Decent Home" Standards

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- To assist in the provision of discretionary Disabled Facilities Assistance for adaptations.
- To assist the applicant to access mandatory Disabled Facilities Grant for adaptations by facilitating payment of the applicant's contribution
- To fund the cost of eligible adaptation work where a client has chosen to borrow the money in lieu of a disabled facilities grant
- To enable an empty house to be brought back into use as housing accommodation (all criteria relating to loan assistance for empty homes are included at Section B10 of this Policy)
- To assist the applicant to install energy efficiency measures through the Better Homes Yorkshire scheme where a client is unable to access sufficient funding to install the recommended measures via the Council's Energy Repayment Loan (all criteria relating to loan assistance for energy measures are included at Section B13 of this Policy)

1.2 The amount of loan to be offered will vary according to:-

- the value of eligible works
- the value of the property
- the value of current charges or outstanding mortgage on the property.

1.3 The maximum loan available will normally be 70% of the improved house value calculated as a percentage of the anticipated improved value of the property following completion of the renovation works deemed necessary by the Council less any outstanding mortgage or charge on the property.

1.4 The minimum loan will normally be £1000 or 1.5% of the improved value of the house, whichever is the greater.

## **2. Application and Approval**

2.1 The Council will not entertain an application unless it is satisfied that:-

- Continued occupation of the dwelling is sustainable
- The applicant has an owner's interest in the property.
- Any owner has completed an Owner's consent, which confirms that he owns the dwelling and consents to the assisted work being carried out AND
- The applicant satisfies the eligibility criteria for Health and Safety Assistance in relation to household composition, income and benefit eligibility and that the dwelling does not meet the HHSRS standard and that no other form of assistance other than from the Council is available which will enable the dwelling to be brought up the standard OR
- The applicant satisfies the eligibility criteria for a mandatory Disabled Facilities Grant and the dwelling requires adaptation for a disabled person occupying the property as their only or main residence which falls within the scope of mandatory Disabled Facilities Grant but which can only be accessed on payment of an applicant's contribution made

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possible through use of loan assistance OR

- The applicant satisfies the eligibility criteria for a mandatory Disabled Facilities Grant and the dwelling requires adaptation for a disabled person occupying the property as their only or main residence which falls within the scope of mandatory Disabled Facilities Grant but adaptation works in excess of the mandatory grant are required which can only be made possible through use of loan assistance OR
- The applicant satisfies the eligibility criteria for a mandatory Disabled Facilities Grant and the dwelling requires adaptation for a disabled person occupying the property as their only or main residence which falls within the scope of mandatory Disabled Facilities Grant but the applicant has chosen to apply for loan assistance to fund the works in lieu of a disabled facilities grant
- The applicant satisfies the eligibility criteria for an Energy Repayment Loan (ERL) in relation to household composition, income and benefit eligibility

- 2.2 Eligibility does not confer entitlement to assistance. Priority will be given having regard to available resources and individual circumstances.
- 2.3 All owners of a property must be party to the loan.
- 2.4 The Council may decline an application for a loan if they are aware of information that could adversely affect the security of the loan, regarding either the title of the property or the applicants' financial history.
- 2.5 All work carried out will be to the Council's specification. Eligible work is that deemed so by the Council.
- 2.6 No assistance shall be paid unless an application for it is made to the Council and approved by them.

### **3. Completion and Conditions**

- 3.1 Release of the loan will be made on completion of work to the satisfaction of the Council. Payment will be made direct:-
- To the contractor carrying out the work.
  - To the organisation responsible for loan administration, the part of the assistance related to the cost of setting up the loan (where this is not being paid as Loan Support Assistance).
  - To the Council or Home Improvement Agency, the part of the assistance for preliminary and ancillary service charges (where this is not being paid as Loan Support Assistance).
- 3.2 If a loan application is cancelled:-
- after a valuation has been effected, then the fee accruing will be recoverable from the loan applicant at cost
  - after the solicitor has been instructed, then any work effected and charged by the solicitor will be recoverable from the loan applicant at cost.

- 3.3 Loan Applicants will be required to take out Buildings Insurance on their home.
- 3.4 The Loan will be secured as a Land Charge.
- 3.5 The applicant will be subject to the conditions attached to the loan.
- 3.6 It is a condition of the assistance that the eligible works are normally carried out within 6 months from the approval date or such further period as agreed by the Council.
- 3.7 At the point of loan redemption the Council may determine not to demand payment or to demand a lesser amount. Any person who feels aggrieved by the demand can access the Council's appeals process as outlined in Appendix 2.
- 3.8 It is a condition of receiving loans assistance and loan support assistance that no further assistance for the same work will be available for a period of 10 years following the date of completion of the works.

## **B9 Loan Support Assistance**

- 1.1 Where applicants are able to access their own funding via the Council's Loan Assistance Schemes the Council will normally pay the set up fees to facilitate the funding.
- 1.2 These set up fees will be subject normally to a maximum of £1000.
- 1.3 Further loan support assistance may be available to cover the Council's charges for preliminary and ancillary services to facilitate the work required.
- 1.4 In order to be eligible to receive loan support assistance an applicant must have received approval for Loan Assistance via the Council's Loan Assistance Schemes.
- 1.5 Payment will be made on completion of all work to the satisfaction of the Council as follows:-
  - To the Council or Home Improvement Agency direct, the part of the assistance for preliminary and ancillary service charges
  - To the Financing Agency or nominee, the part of the assistance related to the cost of setting up the loan
  - For relocation loan assistance cases to the solicitor acting for the applicant at the time the principal sum is required to complete the contract for the purchase of the qualifying dwelling.
- 1.6 In deciding the amount of loan to be approved, regard will be taken of the type of loan being offered, and where relevant:-
  - Property Valuation and current available equity
  - Property price trends in the immediate area.
  - Impact of Council activities on House prices in the area.
  - Information from, and recommendations of, the financial assessment conducted by the organisation responsible for loan administration
  - Other available solutions to meeting the objectives of the loan provision.

## **B10 Empty Property Loan**

### **1. Introduction**

- 1.1 The empty property loan may be given to assist the owner/s of an empty house to carry out repairs to their dwelling to enable it to meet health and safety and/or decent homes standard and to bring the property back into use as housing accommodation.
- 1.2 The loan is an equity release product normally provided for a period not exceeding five years. The loan will be the amount of money borrowed, as a percentage of the anticipated improved value of the property following the renovation works.
- 1.3 The loan will normally be redeemed in full at five years or when the ownership of the property changes, whichever is the soonest.
- 1.4 The amount of loan to be offered will vary according to:-
  - the value of eligible works
  - the value of the property on completion of work
  - the value of current charges or outstanding mortgage on the property
- 1.5 The loan will not normally be considered for less than £1,000 or above £30,000 and in accordance with the lending criteria set out above.

### **2. Eligibility Criteria**

- 2.1 Only one loan per owner will be approved at any one time.
- 2.2 Loans will not normally be considered from companies, businesses or owners who own a number of properties.
- 2.3 All owners of a property must be party to the loan.
- 2.4 The Council may decline an application for a loan if they are aware of information that could adversely affect the security of the loan, regarding either the title of the property or the applicants' financial history.
- 2.5 The Council must be satisfied that the owner/s have realistically considered how the loan will be paid back at the end of the loan period.
- 2.6 The loan will be provided to carry out works at the property to enable it to meet health and safety standards and/or decent home standard.
- 2.7 Where the cost of the works to enable the property to meet health and safety standards exceeds the maximum loan available, the application will normally be refused unless the owner can demonstrate to the Council's satisfaction that they can raise the additional funds needed to carry out the works deemed necessary by the Council but not covered by the maximum available loan.

- 2.8 The loan will be the amount of money borrowed, calculated as a percentage of the anticipated improved value of the property following completion of the renovation works deemed necessary by the Council.
- 2.9 The dwelling that is to be the subject of the loan must be currently empty and have been empty for a minimum of six months prior to the date of the application.
- 2.10 The Council will not entertain an application for an Empty Property Loan if the property is part of a commercial premise ie a flat located above a shop, unless the ownership of the dwelling is separate to the commercial premise, there is a separate entrance to the dwelling that does not involve accessing the commercial premise and that all services are supplied separately to each premise.

### 3. **Application and Approval**

- 3.1 The Council will not normally entertain an application unless it is satisfied that:-
- All owners of the property are party to the loan
  - The applicant/s have an owner's interest in the property
  - The dwelling is currently empty and has been empty for at least six months prior to the application
  - The applicant has not received any financial assistance for repairs to the property administered by the local authority under current policy or previous legislation within the last 10 years.
  - The applicant/s satisfy the eligibility criteria for the loan
  - The dwelling requires works to be carried out to bring it up to health and safety and/or decency standards
  - The value of the loan is not more than 50% of the anticipated improved market value of the property once works deemed necessary by the Council have been carried out
  - The value of the loan, plus any other borrowings against the property, does not exceed 70% of the anticipated improved market value of the property once works deemed necessary by the Council have been carried out.
- 3.2 No assistance shall be paid unless an application for it is made to and approved by the Council .No works should be undertaken prior to approval.
- 3.3 Eligibility does not confer entitlement to a loan. Priority will be given having regard to available resources and individual circumstances.
- 3.4 All work carried out will be to the Council's specification. Eligible work is that deemed so by the Council.

#### 4. **Completion and Conditions**

4.1 Release of the loan will be made on completion of work to the satisfaction of the Council. Payment will be made direct:-

- To the contractor carrying out the work.

To the organisation responsible for loan administration, the part of the assistance related to the cost of setting up the loan.

To the Council, the part of the assistance for preliminary and ancillary service charges.

4.2 The applicants' loan shall be subject to the relevant application documents being completed and shall specify the premises to which the loan relates. The application will contain:

- Particulars of the works in respect of which the loan is sought
- An estimate of the cost of the works

4.3 If a loan application is cancelled after the full application has been submitted then any costs incurred by the Council, its agents and the appointed solicitors since the full application was submitted will be recoverable from the loan applicant at cost.

4.4 Loan applicants will be required to take out Buildings Insurance for the property from the completion date of the loan works and for the duration of the loan period.

4.5 The loan will be secured as a Legal Charge against the property.

4.6 The loan must be repaid five years from the start date of the loan, or when ownership of the property changes, whichever occurs first. Repayment, in full, can be made before this time.

4.7 The eligible works must be completed within six months of the approval of the loan.

4.8 The property must be occupied as a primary home or sold within 6 months of the start of the loan period.

4.9 If, during the loan period, and following occupation, the property becomes unoccupied for a period of time exceeding three months, this represents a breach of conditions unless the owner can prove to the satisfaction of the Council that they have made every attempt to ensure that the property is occupied,

4.10 In the event that the property depreciates in value, the Council, upon repayment of the loan, will require repayment of the amount of the loan and not the % of improved value. The loan is, however, subject to a no negative equity guarantee.

4.11 Reasonable administration, final valuation, legal, set up fees and charges (land registry) will be added to the loan. A schedule of these costs will be provided in advance and form part of the loan agreement. Applications for Empty Property Loans will not be eligible for Loan Support Assistance.



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- 4.12 In the event that the last surviving owner of the property dies within the loan period, the loan must be repaid within 18 months of the death by the executors of the estate.
- 4.13 In the event of a breach of the conditions of the loan, the Council will normally demand repayment of the loan, together with all sums owing but unpaid.
- 4.14 The application will be subject to the conditions attached to the loan.
- 4.15 The start date of the loan is the date on which the loan works are certified as completed by the applicant and/or the Council.

## **B11 Local Land Charge for Mandatory Disabled Facilities Grant**

The Council has chosen to exercise its discretion to apply a local land charge for the provision of mandatory assistance in line with the Housing Grants, Construction and Regeneration Act 1996; Disabled Facilities Grant (Conditions relating to approval or payment of Grant) General Consent 2008.

## **B12 Empty Property Assistance**

### **1. Introduction**

- 1.1 Empty property assistance may be given to assist the owner/s of an empty house to carry out repairs to their dwelling to enable it to meet health and safety and/or a lettable standard and to bring the property back into use as housing accommodation.
- 1.2 Individuals who are deemed to be eligible for empty property assistance from the local authority may be given assistance providing that the applicant is unable to finance a mortgage or loan to fund the works via the Council's Empty Property Loan as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide individuals towards independent financial advisors and will not provide financial advice itself.

Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.

- 1.3 Applicants able to access their own funding will be encouraged to bring their properties up to a decent standard.
- 1.4 Empty Property Assistance will be limited to one per property and be subject initially to a maximum of £5,000 (excluding V.A.T). This amount to be reviewed annually by the relevant Strategic Director.

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- 1.5 Enquiries for Empty Property Assistance will be dealt with in date order of receipt of eligible enquiry within the appropriate service delivery team.
- 1.6 Applications for assistance will normally only be considered from owners for properties who have not received any financial assistance for repairs to the property administered by the local authority under current policy or previous legislation within the last 10 years
- 1.7 Applications will normally only be considered for properties, which have been built at least 10 years prior to the application being made.
- 1.8 The amount of assistance to be offered will vary according to the value of eligible works.

## **2.0 Eligible Works**

- 2.1 Assistance to bring an empty property back into use funded through either the Council's Empty Property Loan or Empty Property Assistance will be allocated in accordance with the following priorities and cover the works listed:

Priority 1

Eliminate or reduce Category 1 hazard to Category 2 or below.

Priority 2

Category 2 hazards

Priority 3

General repairs and works to bring the property to a lettable standard.

## **3.0 Application and Approval**

- 3.1 The Council will not entertain an application for Empty Property Assistance unless they are satisfied that the applicant is unable to finance a mortgage or loan to fund the works via the Council's Empty Property Loan or other private funding as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

(Where the local authority is provided with information from the Independent Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating, the local authority will have the discretion to refuse the application for assistance)

### **And**

- d) that an applicant is aged 18 or over on the date of application
- e) that the applicant has an owners interest (as defined by section 101 Housing Grants Construction and Regeneration Act 1996) in the dwelling alone or jointly with others
- f) All owners of the property are party to the assistance
- g) The dwelling is currently empty and has been empty for at least six months prior to the date of enquiry

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- h) The applicant has not received any financial assistance for repairs to the property administered by the local authority under current policy or previous legislation within the last 10 years.
- i) The applicant/s satisfy the eligibility criteria for the assistance
- j) The dwelling requires works to be carried out to bring it up to health and safety and/or a lettable standards

3.2 No assistance shall be paid unless an application for it is made to the Council and approved by them.

3.3 An applicant will normally be required to submit two competitive estimates for the work and must not start work until agreement is received from the local authority.

3.4 A certificate of title is required to confirm ownership signed by a Solicitor, Bank or Building Society or sight of the deeds of the property, certifying the applicant's ownership.

3.5 Only one application for assistance per owner will be approved at any one time.

3.6 Applications for assistance will not normally be considered from companies, businesses or owners who own a number of properties.

3.7 Where the cost of the works to enable the property to meet health and safety standards exceeds the maximum assistance available, the application will normally be refused unless the owner can demonstrate to the Council's satisfaction that they can raise the additional funds needed to carry out the works deemed necessary by the Council but not covered by the maximum available assistance. Where this occurs the applicant will be required to utilise their own funds before accessing assistance from the Council.

3.8 The Council will not entertain an application for Empty Property Assistance if the property is part of a commercial premise ie a flat located above a shop, unless the ownership of the dwelling is separate to the commercial premise, there is a separate entrance to the dwelling that does not involve accessing the commercial premise and that all services are supplied separately to each premise.

3.9 Eligibility does not confer entitlement to assistance. Priority will be given having regard to available resources and individual circumstances.

3.10 All work carried out will be to the Council's specification. Eligible work is that deemed so by the Council.

3.11 The applicant will be notified in writing specifying the amount of assistance available and the eligible works and advising of the conditions. The total cost of the eligible works will normally be based on the Local Authority's assessed costs.

3.12 The applicants' assistance shall be subject to the relevant application documents being completed and shall specify the premises to which the assistance relates. The application will contain:

- Particulars of the works in respect of which the assistance is sought
- Two estimates of the cost of the works

#### **4. Completion and Conditions**

- 4.1 Release of the assistance will be made on completion of work to the satisfaction of the Council. Payment will be made direct:-
- To the contractor carrying out the work.
  - To the Council, the part of the assistance for preliminary and ancillary service charges.
- 4.2 The payment of assistance is conditional on all of the works identified as necessary to bring the property back into use being executed to the satisfaction of the local authority or its agents and on receipt of an acceptable invoice, demand or receipt for payment of the works.
- 4.3 Payment will be made direct to the contractor unless a receipted invoice is received then payment will be made to the applicant.
- 4.4 The eligible works must be completed within 3 months of the approval of the assistance.
- 4.5 The property must be occupied as a primary home within 6 months of the date on which the works are certified as completed by the Council.
- 4.6 In the event of a breach of the conditions of the assistance, the Council will normally demand repayment of the assistance.

#### **B13 Energy Repayment Loan**

##### **1. Introduction**

- 1.1 The Energy Repayment loan (ERL) may be given to assist the owner(s) of a residential property to install energy efficiency measures through the Better Homes Yorkshire scheme.
- 1.2 In order to be eligible for assistance the homeowner will have a low income including one or more of the following:
- Means tested benefits **or**
  - Gross income below £25,000 only (savings in excess of the amount specified in the current means testing Regulations will be considered to be available to fund the works i.e. currently £6,000. Savings taken into account for these purposes will include any equity in property and/or investments).
- 1.3 Individuals who are deemed to be vulnerable using the above criteria will be eligible for assistance from the local authority providing that the applicant is unable to finance a mortgage or loan to fund the works via a high street lender as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide

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individuals towards independent financial advisors and will not provide financial advice itself.

Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.

- 1.4 The loan will be an interest free loan, secured as a legal charge against the property.
- 1.5 The loan amount will vary according to the value of the eligible works. The loan amount will be determined by the Council and will normally include any loan set up fees that the client wishes to add to the loan.
- 1.6 The maximum loan will normally be £3000 and the minimum loan normally £300.
- 1.7 The loan will be repayable on a monthly basis. The term for the loan to be repaid over and the monthly repayments will be determined by the Regional Homes and Loans service (who will administer the loan on the Council's behalf) based on a full assessment of the client's ability to repay a monthly repayment.
- 1.8 The minimum term for the loan is normally 6 months and the maximum term normally 60 months.
- 1.9 The client has the right to repay the loan in full at any time. There are no early repayment charges payable if the loan is repaid early.
- 1.10 Only one loan per owner will be approved at any one time.
- 1.11 Loans will not normally be considered from companies, businesses or owners who own a number of properties.
- 1.12 All owners of a property must be party to the loan.
- 1.13 The Council may decline an application for a loan if they are aware of information that could adversely affect the security of the loan, regarding either the title of the property or the applicants' financial history.
- 1.14 Where the cost of works to install the required energy efficiency measures exceed either the maximum loan amount or the amount of loan that the applicant is assessed as being able to repay the applicant will be considered for a Home Appreciation Loan (HAL) subject to their meeting the eligibility criteria for that assistance (eligibility criteria for the HAL are included at Section B8 of this policy).

## **2. Application and Approval**

- 2.1 The Council will not normally entertain an application unless it is satisfied that:-
  - Continued occupation of the dwelling is sustainable

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- The applicant/s has an owner's interest in the property
- The applicant/s satisfy the eligibility criteria for the loan
- The dwelling requires energy efficiency works
- Any owner has completed an Owner's consent, which confirms that s/he owns the dwelling and consents to the assisted work being carried out AND
- The applicant satisfies the eligibility criteria for energy measures through the Better Homes Yorkshire scheme

2.2 No assistance shall be paid unless an application for it is made to and approved by the Council. No works should be undertaken prior to approval.

2.3 Eligibility does not confer entitlement to a loan. Priority will be given having regard to available resources and individual circumstances.

2.4 All work carried out will be to the Council's specification. Eligible work is that deemed so by the Council.

### **3. Completion and Conditions**

3.1 Release of the loan will be made on completion of work to the satisfaction of the Council. Payment will be made direct:-

- To the contractor carrying out the work.

To the organisation responsible for loan administration, the part of the assistance related to the cost of setting up the loan.

To the Council, the part of the assistance for preliminary and ancillary service charges.

3.2 The applicants' loan shall be subject to the relevant application documents being completed and shall specify the premises to which the loan relates. The application will contain:

- Particulars of the works in respect of which the loan is sought
- An estimate of the cost of the works

3.3 If a loan application is cancelled after the full application has been submitted then any costs incurred by the Council, its agents and the appointed solicitors since the full application was submitted will be recoverable from the loan applicant at cost.

3.4 The loan will be secured as a Legal Charge against the property.

3.5 The loan must be repaid within the agreed loan period or when ownership of the property changes, whichever occurs first. Repayment, in full, can be made before this time.

3.6 The eligible works must be completed within six months of the approval of the loan.

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- 3.7 Reasonable administration, legal, set up fees and charges (land registry) can be added to the loan. A schedule of these costs will be provided in advance and form part of the loan agreement. Applications for Energy Repayment Loans will not be eligible for Loan Support Assistance.
- 3.8 In the event that the last surviving owner of the property dies within the loan period, the loan must be repaid within 18 months of the death by the executors of the estate.
- 3.9 In the event of a default in scheduled repayments, default fees will normally be added to the client's outstanding loan on each default occasion. A schedule of these fees will be provided to the client.
- 3.10 In the event that the client's loan has an outstanding balance at the end of the agreed loan term and no repayment plan has been agreed with the Council, interest will be charged to the outstanding balance at an interest rate of 4% on an annual compound basis until the loan is repaid in full.
- 3.11 The application will be subject to the conditions attached to the loan.
- 3.12 The start date of the loan is the date on which the loan works are certified as completed by the applicant and/or the Council.

### **C Disabled Facilities Grant Review Panel**

The Review Panel will have the responsibility of hearing and reviewing individual Disabled Facilities grant cases that:

- are likely to cost over the maximum mandatory grant amount or
- are likely to cost over £25,000 (for cases requiring discretionary works only)
- involve applications for Removal Assistance.

The Panel is required to satisfy itself that the full range of options open to the family has been considered and to ensure that the family's needs have been fully taken into account. They are also required to ensure that the family cannot raise a loan for the discretionary costs as determined by the Council's Financial Advisor who will carry out the assessment on behalf of the local authority.

It is not proposed that the Council itself provide loans for eligible work. It is important that the Council is not exposed to liability resulting from individuals taking out inappropriate financial products. Therefore the Council will guide individuals towards independent financial advisors and will not provide financial advice itself.

Where the local authority is provided with information from their Financial Advisor that the applicant is unable to fund the works through loan assistance due to a poor credit rating or because the applicant has deprived themselves of income or capital for the purposes of increasing their eligibility for financial assistance from the Council, the local authority will have the discretion to refuse the application for assistance.

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A joint report from the Occupational Therapist (O.T) and Home Improvement Officer (H.I.O) will be submitted to the Panel. The report will identify the needs of the disabled person and their carer, the layout of the property, the full range of options, confirmation that the family are unable to fund the works with loan assistance and their recommendations.

The cases will be heard once all the relevant information has been gathered but must be before any grant approval is given. The OT and HIO will present the case to the Panel and answer any questions that may arise.

The Panel membership should normally include 3 representatives with expertise relevant to the case being discussed. This will always include a Manager from Occupational Therapy and a manager from the Housing Service. The panel will meet as and when necessary to review cases.

All decisions will be recorded on the respective files and notified to the family as soon as possible.

Applicants who are dissatisfied with the decision made by the Review Panel will have the right to appeal to the Housing and Non Domestic Rates Appeals Panel (as outlined in Appendix 2).



## **APPENDIX 2**

The processes and procedures involved in the implementation of the Housing Renewal Policy are included as Appendix 2.

These include;-

- The Complaints Procedure
- The Appeals Procedure.

### **1. The Complaints Procedure**

Any individual who is dissatisfied with the service that they have received is entitled to exercise their right to complain.

All complaints about the service will be dealt with in line with the Council's established Complaints Policy.

Details of the Council's Complaints Policy are available on request from the Service or any Council offices or contact point or from the Council's website. A leaflet outlining the Complaints Policy is also available on request and at Council offices or contact points.

### **2. The Appeals Procedure**

This process is available to anyone who is dissatisfied with an officer's decision made in line with the Council's Housing Renewal Policy.

Appeals should be made in writing stating the nature of the appeal and the reasons the appellant is unhappy with the decision. The letter should be addressed to the manager of the section who made the decision.

The facts of the case will be reviewed by the manager and if the manager considers that the appeal is justified the assistance will be processed in line with the Council's Housing Renewal Policy.

If the manager does not consider that there are grounds for the appeal, the appellant will be advised that the matter will be referred to the Housing and Non Domestic Rates Appeals Panel and that they will be contacted in due course when a date for the hearing has been arranged.

The report and supporting documents including photographs, if necessary, will be sent as soon as possible to the Committee Secretariat.

The Committee Secretariat will contact the Chair of the Panel to arrange a date when three Council Members can hear the case.

Notification of the hearing date will be sent to the Appellant by Committee Secretariat and the officer and section involved will also be notified. At least 7 days notice of the hearing will be given to the appellant.

Guidance on the Appeals protocol will be sent to the appellant by Committee Secretariat.

### 3. General Provisions

This Housing Renewal Policy and framework has been developed to comply with the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 and Government guidance. The Council's framework ensures:

- An accessible service. The main access point will continue to be the Home Improvement Service but information on the availability of support will be provided to other agencies throughout the District and on the service's website;
- The provision of good information, advice and publicity will summarise the authority's policy and procedures;
- A pre-application process for the health and safety assistance to enable the rapid assessment of initial enquiries;
- Before providing assistance setting out in writing to each person the terms and conditions to which the assistance is to be subject;
- That a person's ability to contribute towards or repay any assistance is taken into account;
- That work for which the assistance is being provided, or conditions relating to the assistance, can only be varied with the consent of persons likely to be materially affected;
- That the consent of the owner and tenant of the dwelling is obtained before works are undertaken, providing the tenant does not unreasonably refuse to consent;
- Risk and fraud is minimised by following Government's Housing Renewal Guidance and working closely with Internal Audit.

The policy also provides for the Authority to require a person:

- (a) to whom assistance has been provided; or
- (b) who has applied for assistance

To give the authority, within 21 days, such information or evidence (including information or evidence relating to that person's financial circumstances) as the authority may reasonably require for the purpose of, or purposes connected with, the exercise of powers under Article 3 of The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

The preliminary and ancillary fees and charges associated with the provision of assistance will attract a 100% grant. These fees and charges will include:

- In-house grant agency services (pre-inspection, assisting with grant application producing specification of works, drawings and inviting tenders, supervision of works).
- Private architects and surveyors or Home Improvement Agencies.
- Loan Support Assistance.

## Report of the Strategic Director of Children's Services to the meeting of the Executive to be held on 6<sup>th</sup> December 2016

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**AM**

**Subject:**

**Regionalisation of Adoption Services**

**Summary statement:**

The proposals around the Regionalisation of Adoption were previously presented to the Executive on 19<sup>th</sup> July 2016. The Executive endorsed the proposal that work should begin to develop the establishment of a Regional Adoption Agency and that fuller information regarding this should be presented to the executive in December 2016

The purpose of this report is to inform the Executive on the progress regarding the regionalisation of adoption services and to seek a formal decision regarding the arrangements for the delegation of the adoption service to a Regional Adoption Agency (RAA). The government's adoption reform proposals contained within the Education and Adoption Act 2016 are clear that all local authorities will be part of a RAA or will have delegated their adoption functions to a RAA by 2020.

Bradford has been working in collaboration with other Local Authorities and the Voluntary Adoption Alliance (VAA) throughout the Yorkshire and Humber region to create a new model of service delivery for adoption services in line with the government's agenda. This report provides the up to date position on the plans for Bradford's Adoption Service to transition to the new arrangements and to seek a decision to delegate the adoption service function to a shared service between the 5 West Yorkshire authorities with the appointment of a Joint Committee to oversee the arrangements

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Michael Jameson  
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Services

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**Portfolio:**

**Health & Wellbeing**

**Overview & Scrutiny Area:**

**Children's Services**

## **1. SUMMARY**

- 1.2 The Government is committed to adoption services being reorganised under regional arrangements whereby a group of local authorities collaborate to provide services in a newly created Regional Adoption Agency (RAA). The driver for this proposed change is to enhance the outcomes for children in achieving more timely placements of children for adoption; facilitate greater recruitment of the right adopters for children and speedier identification of the matches of children and families. This will take place with an increased emphasis upon the paramount need for timely and expert adoption support at every step of the adoption journey for families from recruitment right through to adoption support.
- 1.3 In July 2016, the Executive gave permission to support and endorse the proposals towards progressing the arrangements to establish a Regional Adoption Agency and the creation of a West Yorkshire Adoption Agency hosted by Leeds City Council.
- 1.4 Further work has been completed regarding progressing this and this report is now seeking a decision to formally delegate the functions of the adoption service to a Joint Committee (JC), made up of elected members from the 5 West Yorkshire councils to oversee the arrangements. The JC will sub-delegate the function to the Director of Children's Services in the host agency.
- 1.5 The regional agency will be operated under the terms of a Partnership Agreement, which will confirm the legal and governance arrangements; the budget; staffing and funding contributions for the 5 local authorities.
- 1.6 The operational accountability of the regional agency will be to the Management Board, which will comprise of Senior Officers delegated by each Director of Children Services with representation drawn also from key stakeholders, including the Adopter Voice Forum and the Voluntary Adoption Alliance (VAA).
- 1.7 The regional agency will be led by a Head of Service with a staffing structure, which has been designed with reference to the application of best practice drawn from West Yorkshire, the voluntary sector and extensive research.
- 1.8 Staff from Bradford and the other 3 Local Authorities will be transferred into the employment of Leeds City Council, to the RAA as a TUPE transfer in accordance with TUPE legislation. There has been ongoing engagement with staff affected and the trade unions about the transfer of the function and about the vision and aims of the new agency.

## **2. BACKGROUND**

### ***Nationally***

- 2.1 The Education and Adoption Act 2016 is clear about the regionalisation agenda and government is clear that all local authorities will be part of a Regional Adoption Agency (RAA) or will have delegated their adoption functions to a RAA by 2020.

The background of the national landscape and drivers are covered in detail in the paper that came before the Executive in July 2016.

### ***Yorkshire and Humber Region***

- 2.2 The Yorkshire and Humberside Local Authorities and Voluntary Adoption Agencies have been part of an adoption consortium for many years and have worked pro-actively to develop the best arrangements as we move towards a regionalised approach for the delivery of adoption services in the region. This has been assisted with transitional funding from the Department for Education (DfE).
- 2.3 There will be three groupings who will become separate Regional Adoption Agencies within the wider Yorkshire and Humberside (Y &H) region; South Yorkshire, North and the Humber and West Yorkshire. The West Yorkshire councils are Bradford, Calderdale, Kirklees, Leeds and Wakefield.
- 2.4 The Y& H project has been selected as one of the 5 demonstration projects by the DfE (out of 19 projects in England). It is anticipated that the West Yorkshire RAA will commence operation on 1 April 2017. West Yorkshire councils have all agreed *in principle* at the Executive/Cabinet Boards to the transfer of the adoption service function to establish a regional adoption agency.
- 2.5 These three RAA's – South, North and West are connected by a Hub who will fulfil some functions on behalf of all the three Regional Adoption Agencies (RAA's) across the Yorkshire and Humber region. The work that the hub will do on behalf of the three RAA's is still work in progress but aims to add value and improve outcomes for children as well as providing value for money.

### **3. REPORT ISSUES**

The Education and Adoption Act 2016 is clear about the regionalisation agenda and government is clear that all local authorities will be part of a Regional Adoption Agency (RAA) or will have delegated their adoption functions to a RAA by 2020.

- 3.1 The plan is that the West Yorkshire RAA will become operational by April 2017 providing a high quality service for children and adoptive families.

#### ***Corporate Parenting role***

- 3.2 The RAA will work in partnership with social work services in each Local Authority (LA). Each LA will retain the corporate parenting responsibility for looked after children and each Local Authority will still retain the responsibility for decisions about the planning for children and the match with a family. In Bradford, this will remain the responsibility of the Deputy Director, Children's Social Care.
- 3.3 The RAA will be a regional agency with an emphasis on the local delivery of services. The RAA will retain a base in each local authority office and will work with each LA to ensure that children's needs are prioritised and that there is a sense of urgency in the planning for children regarding permanence. This will also ensure

that families are recruited to meet children's needs and that adoption support can be delivered effectively at a local level.

### ***Governance and legal arrangements***

- 3.4 The new arrangements will be overseen by a Joint Committee (JC) of councillors representing the 5 local authorities, who have knowledge of and responsibility for Children's Services. It is proposed that this will meet as a minimum of two meetings per year with others to be arranged at the chair's discretion. It is envisaged that in the first year of the new arrangements, 4 meetings will be proposed. This will enable flexibility in terms of number of meetings if Members feel more control is necessary in the early days but are happy to exercise a lighter touch as the RAA becomes established.

The Joint Committee will exercise the corporate parenting role of the Participating Authorities in relation to the functions of One Adoption Agency for West Yorkshire. The remit of the JC will be to agree the annual report and receive reports in relation to the performance and progress of the agency, oversee the discharge of the Delegated Functions, including monitoring of the budget and strategic direction of the service.

- 3.5 The operational accountability of the regional agency will be to the Management Board, which will comprise senior officers delegated by each Director of Children's Services with representation drawn also from other stakeholders, including the Adopter Voice forum and the Voluntary Adoption Alliance. The management board will meet 2 monthly to review both RAA functioning and also the impact for West Yorkshire's children, adopters and birth families. Specifically it will promote good performance in relation to the Delegated Functions, reflecting added value brought by One Adoption Agency for West Yorkshire in outcomes for children and their adoptive families; monitor the budget allocated to One Adoption Agency for West Yorkshire and review value for money achieved by One Adoption Agency for West Yorkshire. The Director of Children's Services in Leeds will appoint a Head of Service for the RAA.
- 3.6 The adoption functions to be delegated to the West Yorkshire RAA include Adoption services including: Recruitment and approval of potential adopters; Identification of potential matches between children and adopters; Provision of adoption panels; and provision of adoption support services to adopters, adopted people and birth families.
- 3.7 In the five LA's, non- agency adoption work is carried out within the adoption services in 3 out of the five LA's and will become part of the new RAA. However, further work is still required about the resources required to undertake this specific function and this reports seeks agreement from the Executive that the DCS can make further arrangements for extending the breadth of the City of Bradford district Council's delegation to this aspect of the function. In addition, there is also further scoping work to be done to look at the support for Special Guardians in 2017 to be considered as part of the RAA as the project develops and again is seeking approval from the Executive that the DCS can agree this with the management board and Joint Committee as the project develops.

- 3.8 The regional agency will be operated under the terms of a Partnership Agreement, which will confirm the legal and governance arrangements; the budget; funding contributions for the 5 local authorities. *The principles regarding the partnership agreement are set out and explained in Section {4.5} of this report with some aspects discussed below for clarity.* .Ultimately one or all partnership members will be able to withdraw from the partnership agreement (and therefore the regional agency) upon giving 18 months' notice.

### **Staffing Issues**

- 3.9 The regional agency will be led by a Head of Service with a staffing structure, which has been designed with reference to the application of best practice drawn from West Yorkshire, the voluntary sector and extensive research.
- 3.10 Staff from Bradford, Wakefield, Kirklees and Calderdale adoption services will be transferred into the employment of Leeds City Council, within the RAA. The transfer of staff requires detailed HR processes to address TUPE, assimilation, due diligence etc. as well as formal consultation with the staff and trade unions in the coming months. For the Bradford employees who TUPE transfer to Leeds City Council their pension benefits within the West Yorkshire Fund will transfer to Leeds City Council. The value of the pensions benefit for transferring employees will not be affected by the transfer.
- 3.11 There has been engagement with the affected staff and trade unions by each local authority and in addition the regional adoption project has had actively engaged with affected staff from all the 5 agencies. This is covered further in Section {4.4}.
- 3.12 Leeds City Council will be employing around 105 Full time equivalent staff to discharge the function. This will include both existing Leeds employees and approximately 60 staff from the other 4 West Yorkshire local authorities. This will include employing a Head of Service for the agency. . There will be 28 staff within the adoption service in Bradford who will transfer to the new agency
- 3.13 The Regional Adoption Agency will be based in Leeds and staff will be based in offices in all 5 local authority areas. Appropriate arrangements will be put in place to ensure that they have adequate resources.

3.14 **Budget**

The budget proposals put forward have been agreed by a working group from across the five local authorities for approval as part of the budget setting process. The proposed budget is 6.85 million and is described in Appendix 2. The contributions of each LA have been calculated as the % of each council's budget in proportion to the aggregated budget of all 5 LAs for the provision of adoption services in 2016-17.

- 3.15 The budget proposal does not include "adoption allowances" that are provided directly to adoptive families to support the arrangement. In Bradford this budget is just under 2 million. The majority of these will be long standing commitments by each Local Authority to families that will continue until the children in the families reach adulthood. The payment of adoption allowances and the corresponding budgets show a significant degree of variance between the 5 local authorities and

the new management of the RAA service will have very limited scope to influence this large expenditure for several years. These historical arrangements will continue to be administered and reviewed by each local authority whilst further work is undertaken regarding new system for recipients from April 2017. This work will need to consider the eligibility criteria for support, financial assessment model, rates, duration and review.

- 3.16 In drafting the proposed budget, consideration has been given to the efficiencies that will be made from bringing together five adoption services. However, as a new venture and a national demonstration project it is important that the agency is able to function effectively as a new entity. In addition the numbers of children requiring adoption at a national level are in a period of flux and therefore the budget needs to be able to be flexible enough to respond to this.
- 3.17 One of the key drivers in bringing agencies together is to improve practice in adoption and improve outcomes for children and families. It is essential that the staffing structure provides a good skill mix of staff to deliver the service; setting up policies, systems and processes to support the work; providing good management oversight and practice leadership; and develop quality assurance systems to ensure a high quality service in the region.
- 3.18 In Year 1 the proposed budget achieves efficiencies are reductions with regard to rationalising adoption panels, commissioned services for adoption support and inter agency fees. Over time there are likely to be further efficiencies in adoption support and management costs as practice is embedded and the systems are put in place to support the service.
- 3.19 The RAA budget will be ring fenced during the year to the agency, with any underspend in the budget at the end of the year apportioned out to each local authority in line with the funding formula. Conversely, should there be an overspend (due to increased demand) this would be met by each Local Authority.
- 3.20 In future years the proportion of the annual budget that each authority pays will be in accordance with a pre-agreed formula but the budget itself is subject to the agreement of each individual authority through the management board. The budget will only change in line with local authority pay settlements and changes to the scope of the function that is being discharged.
- 3.21 The financial challenge to One Adoption West Yorkshire will be maintained by the overview of performance and financial efficiency by the Finance lead for Leeds City Council (as host agency) , the jointly appointed Head of Service (as leader of the agency) and the Management Board. As noted in 3.18 above, it is envisaged that efficiencies will be identified in the first year of operation. The progress on achieving these efficiencies which will be reported to the Management Board and the Joint Committee to determine the ongoing service priorities, partner contributions and the apportionment of any costs savings.

#### **4. OTHER CONSIDERATIONS - THE BRADFORD CONTEXT**

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



- 4.1 There has been regional consultation with lead members for children across the region to keep them updated about progress and this has also taken place locally. Steps have also been taken to ensure that new elected members have been briefed and there will be more detailed and ongoing consultation as the project develops.
- 4.2 There have been regular information provided and discussions with affected staff across West Yorkshire to ensure they are up to date regarding the progress of regionalisation. The trade unions have also been kept up to date on the progress of the plans to date.
- 4.3 The transfer of the adoption function to the regional agency and staff from other Local Authorities to Leeds will require detailed HR processes to address TUPE, assimilation, due diligence etc. as well as formal consultation with the staff and trade unions in the coming months. There has already been engagement with staff across West Yorkshire regarding the vision and the aims of the new RAA as well as discussions about practice improvement and service delivery.
- 4.4 In October, three engagement sessions were held with staff about the vision and aims of the agency, the legal and governance arrangements and to involve staff in thinking about the structure to ensure a high quality service delivery. In addition, an intended measures letter is in the process of being completed and will be provided to the trade unions and affected staff prior to the Executive.
- 4.5 Engagement of adopted young people, adoptive parents and birth families has been undertaken and is on-going regarding this agenda, with adoptive parents on the project board to ensure that the service is developed to meet the needs of adoptive families as the RAA is being developed.
- 4.6 Corporate Parenting Panel considered the updated information regarding Adoption Regionalisation on 9<sup>th</sup> November 2016 and resolved as follows:
- 1) That the arrangements for the new Regional Adoption Agency be endorsed and that the submission of the recommendations of the report submitted to the Executive be supported
  - 2) That the Panel considers that one meeting per annum of the Joint Committee is not sufficient and asks the Executive to give consideration to this issue.

## **5. OPTIONS**

- (a) Bradford has been working in collaboration with other Local Authorities and Voluntary adoption agencies (VAA's) throughout the Yorkshire and Humber region to create a new model of service delivery for adoption services in line with the government's agenda. There is an agreed approach to the future delivery of services in West Yorkshire. This will improve services for children and adoptive families and deliver a more effective and cost efficient service, utilising government funding to manage the transition and improve the practice in this important area of work.
- (b) If Bradford does not implement this proposal this does not meet the governments expectation to reduce the number of adoption agencies and

Bradford would be out of step with the Yorkshire and Humber Local Authorities and would also miss the opportunity of government funding to implement the agency.

## 6. FINANCIAL & RESOURCE APPRAISAL

- 6.1 A regional adoption budget has been proposed and covers the costs of running the RAA, including the staff that will be transferring into the service. (Appendix 2). It is not envisaged that there will be additional financial costs to the authority and this has been discussed in Section 3.
- 6.2 It is envisaged that significant practice improvement for children and adopters will be achieved, as well as the scope for economies of scale and cost efficiencies, through the establishment of a regional agency over time.
- 6.3 The adoption staff will be working in a number of locations across the West Yorkshire area including in Bradford. The main office base will be within Leeds.

## 7. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 7.1 The new arrangements will be underpinned by a detailed Partnership Agreement, determining a regional adoption budget with an agreed funding formula from each of the LA's. The following information relates to the key elements within the partnership agreement for the Executive to be aware of: These issues have been discussed in section 3 but specific issues are highlighted here.
- 7.2 The agreement will detail the adoption service that is being provided and the responsibilities of the head of the regional agency.
- 7.3 Management board: this will be made up of one representative from each authority along with representatives from the third sector. The board will work on the basis of one member one vote with the third sector only having a vote on matters that they can usefully contribute to (e.g. the third sector will not be involved in approving the annual budget). The management board will take decisions on a majority basis with the exception of approval of the annual budget which will require the unanimous agreement of the local authority members. In the event of an agreement not being reached then a dispute resolution process is proposed within the partnership agreement with an escalation of this to Directors of Children's Services and Chief Executives in each local authority if the matter cannot be resolved by the management board.
- 7.4 Budget: In future years the proportion of the annual budget that each authority pays will be in accordance with a pre-agreed formula but the budget itself is subject to the agreement of each individual authority through the management board. The budget will only change in line with local authority pay settlements and changes to the scope of the function that is being discharged.
- 7.5 Term of Agreement: The term of the agreement will be 10 years with an initial review after 5 years. The partnership members will be able to renew the term at expiry of the 10 year period. One or all partnership members will be able to withdraw from the partnership agreement (and therefore the regional agency) upon

giving [18] months' notice. This ability to withdraw from the RAA is subject to following a dispute resolution procedure first and can be triggered if one or more partners have concerns about the operation of the RAA and at will. The partnership agreement will deal with allocation of costs, losses and liabilities between the partnership members in the event of termination.

- 7.6 The details of the partnership agreement, including those set out above, are subject to change as the project develops but the principles will remain the same. The Director of Children's Services will continue to consult with Members and officers including the lead member for Children and Families as the agreement and the project as a whole is developed and finalised.

## **8. LEGAL APPRAISAL**

- 8.1 The adoption functions included in the proposed transfer are executive functions of the local authority. The proposal to discharge functions jointly with other authorities is lawful and governed by the Local Government Act 1972 and the Local Authorities (Arrangements for the Discharge of Functions (England) Regulations 2012.
- 8.2 The Education and Adoption Act 2016 provides the Secretary of State with the power to direct one or more local authorities to make arrangements for any or all of their specified adoption functions to be carried out on their behalf by one of the local authorities named or by another adoption agency. The Secretary of State can either name which adoption agency should carry out these functions, or instruct the local authorities to determine who should carry out the functions. The effect of the provisions is that the Government has the power to remove the adoption function from a local authority and direct that another authority or adoption agency carries out that function.
- 8.3 The proposals would involve a transfer of staff from City of Bradford MDC to Leeds City Council. It is considered that the Transfer of Undertakings (Protection of Employment Regulations 2006 ("TUPE") would apply to such a transfer. If collective redundancies are envisaged, information and consultation duties under Trade Union and Labour Relations (Consolidation) Act 1992 may also apply. The Council should also bear in mind any relevant collective agreement, policy and/or procedure. It is important to inform the recognised trade unions long enough before the proposed transfer of staff to enable effective consultation with representatives of any affected employees to take place.

## **9. OTHER IMPLICATIONS**

- 9.1 IT and Performance Management systems will require further development but the timeline and cost of procurement for a new system does not fit with the proposed implementation date for the Agency and further work/collaboration will be needed.

### **9.2 EQUALITY & DIVERSITY**

Implementation of a Regional Adoption Agency should optimise the potential range of families available for Bradford children within the West Yorkshire region and avoid those children losing connection with their West Yorkshire heritage by virtue of being placed outside of the region. The RAA will complete a full impact

assessment within the first 6 months of the new agency being operational.

### **9.3 SUSTAINABILITY IMPLICATIONS**

The establishment of a Regional Agency will bring about economies of scale and make the adoption service more resilient to service cuts impacting adversely on service delivery. The RAA will complete a full impact assessment within the first 6 months of the new agency being operational.

### **9.4 GREENHOUSE GAS EMISSIONS IMPACTS**

None.

### **9.5 COMMUNITY SAFETY IMPLICATIONS**

None.

### **9.6 HUMAN RIGHTS ACT**

None.

### **9.7 TRADE UNION**

The trades unions have already been involved in the process of consultation with staff and will continue to be involved with any HR processes taking place at both a West Yorkshire and Bradford level.

### **9.8 WARD IMPLICATIONS**

All Bradford children and families are affected equally by these proposals.

### **9.9 AREA COMMITTEE ACTION PLAN IMPLICATIONS**

Not applicable.

## **10. NOT FOR PUBLICATION DOCUMENTS**

None.

## **11. RECOMMENDATIONS**

11.1 That the Executive to endorse the arrangements for the new Regional Adoption Agency and make the following decisions;

11.2 That the Executive formally appoint the Joint Committee with effect from the 10<sup>th</sup> January 2017 and contingent upon all other authorities also agreeing to appoint to the Joint Committee.

11.3 That the Executive approve the Constitution, Terms of Reference and Procedure Rules of the Joint Committee (Appendix 1a, b and c).

- 11.4 That the Executive note that the Leader will appoint a Principal and two Elected Members to the Joint Committee as substitutes.
- 11.5 That the Executive note the principles of the partnership agreement as set out in Section {7} and the process for setting the budget as set out in section [3.20] of this report and authorise the Director of Children’s Services to approve the Regional Adoption Agency funding formula and terms and signature of the partnership agreement through their existing delegated powers.
- 11.6 That the Executive note that the Joint Committee will delegate responsibility to the Director of Children’s Services of the Lead Agency for the recruitment and assessment of adopters, adoption panels, family finding and adoption support.
- 11.7 That the Executive note the transfer of staff via TUPE from Bradford into the employment of Leeds City Council to work within the RAA.
- 11.8 That the Executive formally agree that Leeds City Council hosts the West Yorkshire Adoption Agency that is a shared service and that the name of the Agency is One Adoption West Yorkshire.
- 11.9 That the Executive note the creation of an organisational unit within Leeds City Council for the West Yorkshire Adoption Agency. The lead officer for this will be the Director of Children’s Services for Leeds and the unit will sit within Children’s Services.
- 11.10 That the Executive note that this report discusses further work required regarding non agency adoption and support for special guardians and therefore seeks agreement from the Executive that the Director of Children’s Services can make further arrangements for extending the breadth of the delegation to this aspect of the function following agreement by the management board and Joint Committee as the project develops and
- 11.11 That the Executive authorises the Director of Children’s Services to progress with the other local authorities in order to implement the Regional Adoption Agency.

## **12. APPENDICES**

Appendix 1a Constitution of the Joint Committee

Appendix 1b Procedure Rules

Appendix 1c Terms of reference

Appendix 2 Budget Information

## **13. BACKGROUND DOCUMENTS**

None.

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**APPENDIX 1a**  
**THE WEST YORKSHIRE ADOPTION JOINT COMMITTEE**

Constitution

1) Introduction

- a) The West Yorkshire Adoption Joint Committee ('WYAJC') is a joint committee under S9EB of the Local Government Act 2000 and pursuant to Regulation 11 of the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.
- b) The Participating Authorities have entered into a Partnership Agreement dated XXX ('the Partnership Agreement'<sup>1</sup>) for the discharge of functions by the Host Authority (acting as a Regional Adoption Agency to be known as One Adoption Agency for West Yorkshire.)
- c) WYAJC will exercise functions delegated to it by the Participating Authorities in relation to adopter recruitment and assessment, family finding, adoption panel and adoption support ('the Delegated Functions') as set out in the WYAJC Terms of Reference.
- d) Political proportionality rules do not apply to the WYAJC.

2) Participating Authorities

- a) WYAJC will comprise the following authorities ('the Participating Authorities'):-
  - i) City Of Bradford Metropolitan District Council;
  - ii) Calderdale Council;
  - iii) The Council of the Borough of Kirklees Council;
  - iv) Leeds City Council ('the Host Authority'); and
  - v) Wakefield City Council.

3) Membership

- a) WYAJC shall comprise one Member from each Participating Authority<sup>2</sup> ('the Principal Member').
- b) Co-option of Members onto WYAJC is not permitted.
- c) Each Participating Authority shall have a pool of up to two named substitute Members<sup>3</sup>. The clerk to WYAJC must be advised before the commencement of the meeting if a substitute is to attend in place of the Principal Member.
- d) In the event of a Principal Member ceasing to be a member of the Participating Authority, he/she shall also cease to be a member of WYAJC and the relevant authority shall appoint another Principal Member in his/her place as soon as reasonably practicable.

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<sup>1</sup> Which term shall be understood to include any later amendments to the Partnership Agreement

<sup>2</sup> The Leader of each authority shall make arrangements for the appointment of the Principal Member who may be the Lead Member for Children or another, and may be a Member of the Executive or of the authority.

<sup>3</sup> The Leader of each authority shall make arrangements for the appointment of substitute Members who may be Members of the Executive or of the authority

- e) Each Participating Authority may remove its Principal Member and or any of those Members named in its pool of Substitute Members and appoint a different Principal Member or additional Substitute Member to the pool by providing 24 hours' notice to the clerk to WYAJC.
- 4) Chair
- a) The chair of WYAJC ('the Chair') shall be the Member appointed by the Host Authority.
  - b) A vice chair ('the Vice Chair') shall be elected from amongst the Principal Members at the first meeting of the committee each municipal year.
  - c) Where, at any meeting or part of a meeting of WYAJC the Chair is either absent or unable to act, to the Vice Chair shall preside for that meeting or part of that meeting as appropriate.<sup>4</sup>
- 5) Delegation of Functions
- a) Sub Committees  
WYAJC may set up Sub-Committees as required to enable it to execute its responsibilities effectively and may delegate tasks as it sees fit to these bodies, which may be formed of such members of WYAJC as it considers appropriate.
  - b) Advisory Groups  
WYAJC may set up advisory groups as required to enable it to execute its responsibilities effectively and may delegate tasks as it sees fit to these bodies, which may be formed of officers and / or members of the Participating Authorities or such third parties as WYAJC considers appropriate.
  - c) Officers  
WYAJC may delegate such of its functions as it sees fit to the Director of Children's Services for the Host Authority<sup>5</sup>.
- 6) Hosting and Administration
- a) WYAJC shall be hosted by Leeds City Council ('the Host Authority')
  - b) The Host Authority shall provide clerking services and legal advice in addition to fulfilling monitoring officer and S151 officer roles for the WYAJC.
  - c) The administrative costs of supporting WYAJC will be met by the Participating Authorities in accordance with the funding formula agreed between them and set out in the Partnership Agreement.

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<sup>4</sup> For the avoidance of doubt, the role of chair vests in the Principal Member concerned and in his/her absence the role of chair will not automatically fall to the relevant Principal Member's substitute.

<sup>5</sup> Unless expressly indicated the fact that a function has been delegated to the Director for Children's Services of the Host Authority does not require that officer to give the matter his/her personal attention. The officer may arrange for such delegation to be exercised by an officer of suitable experience and seniority. However the Director of Children's Services will remain responsible for any decision taken pursuant to such arrangements.



- 7) Access to Information
  - a) Those documents and notices relating to WYAJC which are made available for public inspection will be published on the One Adoption Agency for West Yorkshire's website. Participating Authorities may provide links to the site from their own websites.
  
- 8) Conduct of Members
  - a) Members of WYAJC shall comply with the Members' Code of Conduct as adopted by their own authority
  - b) Members of WYAJC shall maintain their register of interests as required by the Members' Code of Conduct,
  - c) Members of WYAJC shall declare any disclosable pecuniary interest<sup>6</sup> in a matter to be considered by the committee in accordance with the agenda for the meeting
  - d) Any complaint in relation to the conduct of a member of WYAJC shall be referred to the Monitoring Officer of their own authority and dealt with in accordance with the rules and procedures in place at and at the cost of that authority.
  
- 9) Scrutiny of Decisions
  - a) Participating Authorities shall continue to operate overview and scrutiny functions in relation to the joint arrangements.
  
- 10) Winding up of WYAJC
  - a) Participating Authorities may cease to participate in the joint committee in accordance with the provisions set out in the Partnership Agreement.
  - b) WYAJC may be wound up on the unanimous consent of all Participating Authorities in accordance with the provisions set out in the Partnership Agreement.
  
- 11) Amendment of this Constitution
  - a) This constitution can only be amended by resolution of each of the Participating Authorities.

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<sup>6</sup> As defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012/1464

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**APPENDX 1b**  
**THE WEST YORKSHIRE ADOPTION JOINT COMMITTEE**

**Rules of Procedure for Meetings**

1) Frequency of Meetings

- a) WYAJC shall meet a minimum of once per year.
- b) Additional meetings shall be fixed at the discretion of the Chair.

2) Agenda for Meetings

- a) The clerk shall settle the agenda for any meeting in consultation with the Chair.
- b) In settling the agenda the Clerk shall ensure that at each meeting of WYAJC the following business will be conducted:
  - i) consideration of the minutes of the last meeting;
  - ii) exempt information – potential exclusion of the press and public, if any;
  - iii) late items, if any;
  - iv) declarations of interest, if any;
  - v) consideration of reports submitted by the Chair of the Management Board or the Director of Children’s Services for the Host Authority, if any; and
  - vi) any other matter set out in the agenda for the meeting(which shall indicate which are Key Decisions<sup>1</sup> and which are not).

3) Notice of Public Meetings

- a) The Clerk will arrange to give notice of the time and place of a public meeting by publishing the agenda, together with every report, for that meeting on the One Adoption Agency for West Yorkshire website at least five clear working days before the meeting.
- b) Where the meeting is convened less than five clear working days before the meeting, notice will be given by publishing the agenda, together with every report, for that meeting on the One Adoption Agency for West Yorkshire website at the time the meeting is convened.
- c) Where an item is added to the agenda for a meeting after publication of that agenda, copies of the revised agenda and any report relating to that item, will be published on the One Adoption Agency for West Yorkshire website when the item is added to the agenda.
- d) Nothing in this rule requires a copy of an agenda, item or report to be available for inspection by the public until a copy is available to members of the decision making body concerned.

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<sup>1</sup> As determined in accordance with the definition used by the Host Authority.

#### 4) Notice of Private Meetings

- a) The Clerk will exclude access by the public to reports which in his/her opinion<sup>2</sup> contain:
  - i) confidential information; or.
- b) exempt information, and the report includes the reasons why, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
- c) Where the whole or part of any report is not available for inspection by the public because it contains confidential or exempt information every copy of that report or part of that report must be marked “not for publication” and must state that it contains confidential information or, by reference to Schedule 12A Local Government Act 1972 the description of exempt information which it contains.

#### 28 Days' Notice

- d) At least 28 clear calendar days before a meeting at which exempt or confidential information is to be considered, the Clerk will arrange for a notice to publish on the One Adoption Agency for West Yorkshire website a notice of the intention to hold a meeting, or part of a meeting of WYAJC in private.
- e) The notice will include a statement of the reasons why it is intended that the meeting, or part of the meeting, should be held in private.

#### 5 Days' Notice

- f) At least five clear working days before a meeting at which exempt or confidential information is to be considered, the Clerk will publish further notice of the intention to hold the meeting of WYAJC in private. This will be done by including in an open report to the meeting:-
  - i) A statement of the reasons for the meeting to be held in private;
  - ii) Details of any representations received about why the meeting should be open to the public; and
  - iii) A statement of response to any such representations

#### Urgent Meetings At Which Exempt Or Confidential Information Is To Be Considered

- g) Where the date a meeting must be held makes compliance with rules 4d to 4f impracticable then the meeting may only consider exempt or confidential items in private with the agreement of the chair of the relevant Scrutiny Board of the Host Authority. In considering the matter the Scrutiny Board Chair must be satisfied that the meeting is urgent and cannot reasonably be deferred.

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<sup>2</sup> The Clerk shall be advised by the Monitoring Officer where there is any doubt as to the confidentiality of any matter

- h) As soon as reasonably practicable after obtaining the Scrutiny Chair's agreement the Clerk will publish on the One Adoption Agency for West Yorkshire website notice of the intention to hold the meeting at which exempt or confidential information is to be considered. This will be done by including in an open report to the meeting:-
  - i) The reason why the meeting is urgent and cannot reasonably be deferred
  - ii) Confirmation of the agreement of the chair of the relevant Scrutiny Board.

5) Meetings to be held in public

- a) All meetings of WYAJC will be held in public<sup>3</sup>. However the public must be excluded from the the part or parts of a meeting whenever:-
  - i) Confidential information is likely to be disclosed during an item of business;
  - ii) The meeting passes a resolution, identifying the relevant part of the meeting to which it applies, that the public should be excluded because exempt information, described with reference to Schedule 12A Local Government Act 1972, is likely to be disclosed during an item of business; or
  - iii) A lawful power is used to exclude a member or members of the public in order to maintain orderly conduct or prevent misbehaviour at the meeting. The public may only be excluded from that part or parts of the meeting to which the circumstances set out above relate, and where, if required, notice has been given in accordance with paragraphs 4d to 4h above.
- b) The Recording Protocol: Third Party Recording of Committees, Boards and Panels<sup>4</sup> shall apply to public meetings of WYAJC.

6) Quorum

- a) The quorum shall be three members.
- b) No business shall be transacted at a meeting unless a quorum exists at the beginning of a meeting. If at the beginning of the meeting the clerk to WYAJC after counting the members present declares that a quorum is not present, the meeting shall stand adjourned.

7) Attendance at meetings

- i) The Chair may invite any person, whether a member or officer of one of the Participating Authorities or a third party, to attend the meeting and speak on any matter before WYAJC.

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<sup>3</sup> Regulation 3, Executive Arrangements Regulations 2012

<sup>4</sup> Appendix 1 to this document

- ii) Any person, whether a member or officer of one of the Participating Authorities or a third party, may be invited to attend on a standing basis following a unanimous vote of those present and voting at any meeting of WYAJC<sup>5</sup>.

8) Voting

- a) Each Participating Authority shall have one vote which shall be exercised by the Principal Member or their substitute provided that the clerk has been advised of the substitution prior to commencement of the meeting.
- b) Voting shall be conducted by a show of hands.
- c) All questions shall be decided by a simple majority of the votes of the members present, the Chair having the casting vote in addition to his/her vote as a member of WYAJC in event of a tie.
- d) The minutes of the meeting shall include a record of the names of members who cast a vote for a decision, against a decision or abstained from voting on a decision where, before a vote is taken on any matter by WYAJC, any two members present may demand that the votes are recorded, or where a record of the votes is required by law.

9) Recording of Decisions Taken at Meetings of WYAJC

- a) As soon as reasonably practicable after any meeting of WYAJC, the Clerk will produce a minute of every decision taken at that meeting and publish it on the WYAJC website together with the report in relation to the decision made. The minute will include;
  - i) A record of the decision including the date it was made,
  - ii) a statement of the reasons for each decision,
  - iii) details of any alternative options considered and rejected at that meeting and
  - iv) a record of any interest declared by any Member together with a note of any dispensation granted in respect of that interest .

10) Public Access to Documents

Agendas, Reports and Minutes

- a) For six years after a meeting, the Council will make available for inspection:-
  - i) The agenda for the meeting;
  - ii) Reports relating to items when the meeting was open to the public;
  - iii) The minutes of the meeting excluding any part of the minutes of proceedings when the meeting was not open to the public or which disclose exempt or confidential information;

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<sup>5</sup> Such person shall not be a Member of the Committee and shall not be entitled to vote in relation to any item, however they shall be entitled to send a substitute to attend the meeting in their place.

- iv) A summary of any proceedings not open to the public where the minutes open to inspection would not provide a reasonably fair and coherent record;

#### Background Papers

- b) The author of a report will set out a list of those documents ('Background Papers') relating to the subject matter of the report which in his/her opinion:
  - i) Disclose any facts or matters on which the report or an important part of the report is based; and
  - ii) Have been relied on to a material extent in preparing the reportBut this does not include:-
  - i) published works;
  - ii) works which disclose confidential or exempt information;
  - iii) the advice of a political advisor; or
  - iv) any draft report or document.
- b) A copy of each of the documents listed will be made available for public inspection for four years after the date of the meeting.

#### Documents Available for Public Inspection

- c) In addition to publication on the One Adoption Agency for West Yorkshire website the Clerk will make available for inspection by the public on request during office hours at the Host Authority's offices at Civic Hall, Leeds and shall supply copies of :
  - i) Any agenda and reports which are open to public inspection;
  - ii) Any further statements or particulars necessary to indicate the nature of items in the agenda which are not open to public inspection; and
  - iii) If the Monitoring Officer thinks fit, copies of any other documents supplied to Members in connection with an itemto any person on payment of a charge for postage, copying and any other costs.

#### 11) Interpretation

- a) The ruling of the Chair<sup>6</sup> as to the interpretation of any question in relation to these rules of procedure shall be final.

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<sup>6</sup> Who shall seek the advice of the clerk

**Recording<sup>7</sup> Protocol: Third Party Recording of Committees, Boards and Panels**

**WYAJC wants to be open and transparent in the way in which it conducts its decision-making. Therefore recording is allowed at all meetings of the WYAJC to enable those not present to see or hear the proceedings either as they take place (or later) and to enable the reporting of those proceedings.**

1. Filming or other recording of all meetings of the authority, whilst those meetings are open to the public, is permitted<sup>8 9</sup>.
2. Those wishing to record proceedings should, as a courtesy, inform the chair (or clerk) of the committee of their intentions to record prior to the commencement of the meeting.
3. Recordings may only be taken overtly from the area designated for the public and;
  - a. Recording devices must be in silent mode
  - b. No flash or additional lighting is permitted
  - c. Recordings must be taken from one fixed position and must not obstruct others from observing proceedings
4. The chair of a meeting has the authority to instruct that recordings be stopped where<sup>10</sup>:
  - a. The press and public have been excluded from the meeting due to the nature of (exempt or confidential) business being discussed.
  - b. There is public disturbance or a suspension/adjournment of a meeting
  - c. The recording has become disruptive or distracting to the good order and conduct of the meeting.
  - d. Continued recording is against the wishes of an individual<sup>11</sup>

**Use of Recordings by Third Parties– code of practice**

The following code of practice applies to the use of recordings.

- A. Any published recording should be accompanied by a statement of when and where the recording was made, the context of the discussion that took place, and a clear identification of the main speakers and their role or title.
- B. Those making recordings must not edit the recording in a way that could lead to misinterpretation or misrepresentation of the proceedings or comments made by attendees. In particular there should be no internal editing of published extracts; recordings may start at any point and end at any point but the material between those points must be complete.

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<sup>7</sup> This includes both video and audio recording

<sup>8</sup> In accordance with any regulations relating to such matters.

<sup>9</sup> All agendas will indicate that recordings may be made at the meeting by third parties; signage will also be displayed indicating this

<sup>10</sup> In all cases recording equipment must be switched off.

<sup>11</sup> Where members of the public raise an objection to being recorded, then those individuals will not be filmed. However continued audio recording will be permitted where the contributions are material to the resolutions to be made.



APPENDIX 1c  
WEST YORKSHIRE ADOPTION JOINT COMMITTEE  
Terms of Reference

Purpose

- 1) WYAAJC brings together the five participating authorities to:-
  - a) Engage with voluntary adoption agencies in the region;
  - b) Deliver adopter recruitment, matching, adoption panel and support functions through a regional adoption agency known as One Adoption Agency for West Yorkshire;
  - c) Promote excellent and innovative practice; and
  - d) Ensure value for money.

The Delegated Functions

- 2) WYAJC will discharge the following functions on behalf of the Participating Authorities<sup>1</sup>:-
  - a) Adoption services including:-
    - i) Recruitment and approval of potential adopters;
    - ii) Identification of potential matches between children and adopters;
    - iii) Provision of adoption panels; and
    - iv) Provision of adoption support services<sup>2</sup> to adopters, adoptees, birth families and relevant professionals.

Remit

- 3) WYAJC will:-
  - a) Receive reports in relation to the performance and progress of One Adoption Agency for West Yorkshire from both the Head of Service and the Management Board;
  - b) discuss and agree the strategic direction of One Adoption Agency for West Yorkshire, including the setting of stretch targets;
  - c) oversee the discharge of the Delegated Functions;
  - d) promote good performance in relation to the Delegated Functions, reflecting added value brought by One Adoption Agency for West Yorkshire in outcomes for children and their adoptive families ;
  - e) monitor the budget allocated to One Adoption Agency for West Yorkshire;
  - f) review value for money achieved by One Adoption Agency for West Yorkshire; and
  - g) exercise the corporate parenting role of the Participating Authorities in relation to the functions of One Adoption Agency for West Yorkshire.

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<sup>1</sup> Functions in relation to individual children (including decisions to place for adoption and to approve a match) remain the responsibility of each Participating Authority.

<sup>2</sup> Including maintenance of and access to adoption records

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## Appendix 2

### Regional Adoption Agency Budget 2017/18

<b><u>WYRAA Budget Breakdown</u></b>		<b>£</b>	
Staffing		4,219,500	
Commissioned Services		267,500	
Inter Agency Expenditure		1,508,000	
Other		848,815	
		<b>6,843,815</b>	
<b><u>WYRAA Partner contribution to 17/18 Budget and Percentage split</u></b>			
	<b>Based on</b>	<b>Based on</b>	<b>%age</b>
	<b>16/17 Return</b>	<b>%age Contribution</b>	<b>Split</b>
<b>Partner Contributions</b>	<b>£</b>	<b>£</b>	
Bradford	1,294,329	1,294,329	18.9%
Calderdale	831,148	831,148	12.1%
Kirklees	982,314	982,314	14.4%
Leeds	2,898,269	2,898,269	42.3%
Wakefield	837,755	837,755	12.2%
	<b>6,843,815</b>	<b>6,843,815</b>	<b>100%</b>

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## Report of the Strategic Director of Children's Services to the meeting of Executive Committee to be held on 06 December 2016.

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**AN**

**Subject:**

Update on pupil place planning across the District and request to allocate Basic Need Funding to several school expansion schemes.

**Summary statement:**

This report asks the Executive to:

- Note the need for additional school places across the District.
- Support the expansion of Immanuel College's and Ilkley Grammar Schools by the allocation of Basic Need funding to allow the Council expand the schools.

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Michael Jameson  
Strategic Director - Children's Services

**Portfolio:**

**Education, Skills & Culture**

Report Contact:  
Judith Kirk, Deputy Director

**Overview & Scrutiny Area:**

**Children's Services**

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## **1. SUMMARY**

This report asks the Executive to:

- 1.1 Note the need for additional school places across the District.
- 1.2 Support the expansion of Immanuel College and Ilkley Grammar Schools by the allocation of Basic Need funding to allow the Council to expand the Schools.

## **2. BACKGROUND**

- 2.1 The Council has been delivering a programme of Primary School expansions since 2010 and has created over 8500 additional primary places across the District. Whilst there is still some pressure on primary school places across parts of the District the main pressure which will be faced over the next few years will be on secondary school places as the extra pupils at primary level transfer to secondary schools. The expansion programme is based on pupil forecasts and places are created across the District where the forecasts show the greatest need will be.

### **2.2 FUNDING ALLOCATIONS**

The Council receives Basic Need funding from the government to provide extra pupil places. The funding allocation the Council received for the year 2017/18 was reduced to £727k and delayed the plans the Council had to expand secondary schools. In March 2016 however the Council received an allocation of £23.8m in Basic Need funding for years 2018/19 and is now looking to target this funding to the areas of greatest pressure on pupil places. It is important that the Basic Need settlement the Council receives in 2017 is sufficient to allow the continuation of the secondary school expansion programme. Since the allocation in March the Council has been working on plans for school expansions and a number of schools have been undertaking consultation exercises required under legislation on expansion. The Executive has already (in June 2016) approved the expansion of Parkside Secondary School and there will be further reports to the Executive in the future in relation to other proposed expansions.

### **2.3 IMPACT OF NEW FREE SCHOOLS**

In September 2016 new Free Schools were announced in the Bradford District by the Department for Education and these are:

- New college Post 16 Free School
- Dixons Post 16 Free School
- Bradford Girls Academy

One of the impacts of the two new Post 16 Free Schools over the next few years is likely to be the closing of sixth forms in some secondary schools where the numbers are no longer viable as pupils move to the Post 16 Free Schools. In these circumstances it is likely that some former sixth form areas in some schools may be available for expansion to cater for a greater number of 11-16 aged pupils. This coupled with further secondary free schools which the Council understands may be planned is likely to mean that the Council is unlikely to need to build a new Secondary School (which it can only do by going down the Free School Presumption route) but instead will need to focus on the expansion of individual secondary schools provided they do not become too large and their learning offer is compromised. The Council does not have the statutory powers any more to open its own new schools, all new schools need to be Free Schools.

## **2.4 KEY PRESSURES AT SECONDARY LEVEL**

Based on the current forecasts there are a number of key pressures on secondary school places for September 2017 which reduce in September 2018 due to expansions which are already planned. The Council is currently working with and meeting with secondary schools to agree a strategy to mitigate the short fall in places in these planning areas.

## **2.5 IMPACT OF HOUSE BUILDING ACROSS THE DISTRICT**

The proposed core strategy is predicated on over 40,000 new homes being built over the next 15 years. This level of house building will undoubtedly impact on pupil pressures across the District however the Council is only allowed to include in its official pupil forecasts those developments where planning permission has actually been approved. On average new housing developments yield an extra 2 per pupil places per school year group per 100 new homes, this obviously varies depending on the type of housing built. The pupil place planning team works closely with colleagues in planning to look at applications for new housing and understand the potential impact on pupil places.

## **2.6 PROPOSED PRIMARY SCHOOL EXPANSIONS**

Whilst the Council has expanded to date over 40 primary schools it is currently consulting on expanding Poplars Farm Primary, Steeton Primary and Ilkley All Saints Primary to deal with further pressures on pupil places at Primary level. Depending on the outcome of these consultations a further report may be brought to the Executive requesting permission to allocate Basic Need funding.

## **3.0 PROPOSED SECONDARY SCHOOL EXPANSIONS**

### **3.1 Immanuel College**

- 3.1.1 Forecasts show that there will be an increase in demand for secondary school places particularly in the east of the District. The current capacity of Immanuel College including post 16 provision is 1421 with a possible shortfall of over 200 by 2020.
- 3.1.2 As an Academy, the school's governing body is responsible for its own admission arrangements and must consult those affected by their proposals to expand before seeking the RSC/Secretary of State's approval to the change.
- 3.1.3 During the summer term a consultation was carried out by the school on a proposed increase in the published admission number (PAN) from 240 to 300 (equivalent to a 2 Forms of Entry increase) with effect from September 2018 and the expansion of the school premises subject to funding being available.
- 3.1.4 Subject to Executive approval the Council is proposing to allocate Basic Needs funding to enable the expansion of the school and for the school to be able to admit additional pupils.
- 3.1.5 If an Academy Trust wishes to expand, they need to consult those who could be affected by the change and then seek approval to the change from the RSC/Secretary of State.
- 3.1.6 Consultation was carried out between 27 June 2016 and 22 July 2016
- 3.1.7 At its meeting of the Governors on 27 September 2016 it was decided to seek the RSC/Secretary of State's approval to proceed with the expansion of the school subject to funds being made available. See extract from minutes in Appendix A.

3.1.8 The proposed increases would begin for pupils entering schools in September 2018 and would be incremental year on year until all age groups are increased.

3.1.9 The proposed increase in PAN across all year groups would enable the Local Authority to better meet the preferences expressed by parents and reduce the number of appeals lodged.

### **3.2 Ilkley Grammar School**

3.2.1 Forecasts show that there will be an increase in demand for secondary school places particularly in the Wharfedale area of the District.

3.2.2 The current capacity of Ilkley Grammar School including post 16 provision is 1558 with a possible shortfall of over 118 by 2020.

3.2.3 As an Academy, the school's governing body is responsible for its own admission arrangements and must consult those affected by their proposals to expand before seeking the RSC/Secretary of State's approval to the change.

3.2.4 A consultation was carried out by the school on a proposed increase in the published admission number (PAN) from 261 to 300 with effect from September 2018 and the expansion of the school premises subject to funding being available.

3.2.5 Subject to Executive approval the Council is proposing to allocate Basic Needs funding to enable the expansion of the school and for the school to be able to admit additional pupils.

3.2.6 If an Academy Trust wishes to expand, they need to consult those who could be affected by the change and then seek approval to the change from the RSC/Secretary of State.

3.2.7 Consultation was carried out between 14 September 2016 and 12 October 2016.

3.2.8 At its meeting of the Governors on 17 October 2016 it was decided to seek the RSC/Secretary of State's approval to proceed with the expansion of the school subject to funds being made available. See extract from minutes in Appendix C.

3.2.9 The proposed increases would begin for pupils entering schools in September 2018 and would be incremental year on year until all age groups are increased.

3.2.10 The proposed increase in PAN across all year groups would enable the Council to better meet the preferences expressed by parents and reduce the number of appeals lodged.

## **4. OPTIONS**

That Executive can decide to:

4.1 Approve the allocation of Basic Need Funding to enable the enlargement of the premises of Immanuel College and Ilkley Grammar Schools.

Or

4.2 Reject the allocation of Basic Need Funding for the enlargement of the premises of Immanuel College and Ilkley Grammar Schools.



## **5. FINANCIAL & RESOURCE APPRAISAL**

- 5.1 Schools receive funding through the Fair Funding Formula which allocates funding to schools based on the number of pupils attending the school.
- 5.2 Capital funding will be allocated from “Basic Need” funding allocations which the Council receives from the Education Funding Agency to fund the creation of new school places.
- 5.3 The proposed allocation for expansion schemes at Immanuel College and Ilkley Grammar School is £4.7million each (based upon a 2FE increase). These budgets are indicative at this stage pending the commencement of detailed design work subject to Executive approving the School expansions. The allocation would consist of S106 and Basic Need funding.

## **6 RISK MANAGEMENT**

- 6.1 There are no significant risks arising out of the implementation of the proposed recommendations. Processes will be put in place to manage all operational risks associated with the expansion projects

## **7. LEGAL APPRAISAL**

- 7.1 Under section 14 of the Education Act 1996, the Local Authority has a statutory duty to provide sufficient school places for all pupils in its area.
- 7.2 Academy Trusts wishing to increase their Published Admission Number (PAN) are contractually obliged to comply with the requirements of the School Admissions Code including the timescale for changing admissions.
- 7.3 Proposals for a significant expansion of the premises must be submitted to the Secretary of State: Either the ‘fast track’ application or ‘full business case’ for a decision to be made by the Regional Schools Commissioner (RSC) or Secretary of State, as appropriate. Changes which do not meet the fast track criteria will require a full business case. Academies rated ‘good’ or ‘outstanding’ at their last inspection, proposing to physically expand their school premises, may follow the fast track process, unless the proposal results in an increase of over: 50% in the school’s capacity; and/or increases pupil numbers to 2,000 pupils or more.
- 7.4 Academy trusts will need to confirm to the RSC/Secretary of State that a fair and open local consultation has been undertaken for a minimum of four weeks with all those who could be affected by the proposed change and that the proposal takes account of all responses received; the change is aligned with local pupil place plans and it is unlikely to have a negative impact on educational standards at the academy or at other local schools or colleges; that all required funding is in place and appropriate planning permissions and other consents have been secured to support all proposals. The RSC/Secretary of State will need to be satisfied that the Local Authority has been consulted, and will consider any reasonable objections from them.
- 7.5 Where an academy agrees to expand to meet a local need for places Basic Need Funding can be allocated. Basic Need Funding is provided to Local Authorities to help support them to meet their statutory duty to secure sufficient school places in their area.
- 7.6 The RSC/Secretary of State will consider the proposals and either approve or reject them.

## **8. OTHER IMPLICATIONS**

### **8.1 EQUALITY & DIVERSITY**

The schools will continue as before to cater for the needs of all and serve their communities.

### **8.2 SUSTAINABILITY IMPLICATIONS**

Any buildings works undertaken as part of these proposals will have an impact on sustainability in the district. The Council will aim to ensure that development is undertaken in a sustainable way which minimises the future impact of the Council's carbon footprint.

### **8.3 GREENHOUSE GAS EMISSIONS IMPACTS**

The proposals would not impact on gas emissions. If children are able to attend their local schools this could lead to a reduction in emissions.

### **8.4 COMMUNITY SAFETY IMPLICATIONS**

Concerns have been raised in relation to traffic and parking issues. The Local Authority will work with both Schools to try and mitigate any adverse impact on traffic and parking.

### **8.5 HUMAN RIGHTS ACT**

The Human Rights Act incorporates the European Convention on Human Rights which provides that no person shall be denied the right to education.

### **8.6 TRADE UNION**

Trade unions have been informed of the proposals. The proposed enlargement of the schools may lead to an increase in staffing levels.

### **8.7 WARD IMPLICATIONS**

Ward Councillors have been consulted about the proposed changes to the Schools in their wards.

## **9. NOT FOR PUBLICATION DOCUMENTS**

None.

## **10. RECOMMENDATIONS**

- 10.1 To approve the allocation of Basic Need and S106 Funding to the expansion of Immanuel College and Ilkley Grammar School. .

## **11. APPENDICES**

Appendix A Extract of minutes from Immanuel Governing Body meeting 27.9.16  
Appendix B Initial Impact Equalities Assessment Immanuel College  
Appendix C Extract of Ilkley Grammar Governing Body minutes  
Appendix D Initial Impact Equalities Assessment Ilkley Grammar

## 12. BACKGROUND DOCUMENTS

### 12.1 Education Organisation Plan


[https://www.bradford.gov.uk/bndc/education\\_and\\_skills/planning\\_education\\_provision](https://www.bradford.gov.uk/bndc/education_and_skills/planning_education_provision)

Extract from minutes of Immanuel College Governing Body Meeting 27.9.16

Following discussion and consideration of the outline proposal for school expansion the Full Governing Body resolved to proceed in principle with the expansion noting the benefit this would afford the children of the immediate area and community; WITH THE PROVISIO that this agreement is conditional on both facilities of appropriate quality and up front funding being made available to the College prior to the arrival of the first additional students at the school.

## Initial Equalities Impact Assessment

Department: School Organisation and Place Planning, Children's Services	Completed by (lead): Nina Mewse	Date of initial assessment:
Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)	Report to the Executive requesting permission to use Basic Need Funding to expand Immanuel College	
Is this existing or new function/policy, procedure, practice or decision?	Decision	
What evidence has been used to inform the assessment and policy? (please list only)		
Pupils forecasting, number of applications and appeals for the school.		


1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.		The use of Basic Need Funding would enable the Local Authority to work with Immanuel College to increase the capacity of the school and enable it to admit additional pupils. There is a need to provide additional secondary school places, particularly in Bradford East as demand increases. The expansion would assist the Local Authority in its' statutory duty of providing sufficient school places.		
The Public Sector Equality Duty requires the Council to have "due regard" to the need to:- (1) eliminate unlawful discrimination, harassment and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups (see guidance notes)		2. What is the level of impact on each group/protected characteristics in terms of the three aims of the duty?  Please indicate high (H) medium (M), low (L), no effect (N) for each.	3. Identify the risk or positive effect that could result for each of the group/protected characteristics?	4. If there is a disproportionately negative impact what mitigating factors have you considered?
Protected characteristics	Age	L	n/a	n/a
	Disability	L	n/a	n/a
	Gender reassignment	L	n/a	n/a
	Race	L	n/a	n/a
	Religion/Belief	L	n/a	n/a
	Pregnancy and maternity	N	n/a	n/a
	Sexual Orientation	L	n/a	n/a
	Sex	L	n/a	n/a
	Any other area	n/a	n/a	n/a
5. Has there been any consultation/engagement with the appropriate protected characteristics?			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
6. What action(s) will you take to reduce any disproportionately negative impact, if any?			None required	
7. Based on the information in sections 2 to 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment? (recommended if one or more H under section 2)			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Assessor signature:  		Approved by:		Date approved:

### Extract from minutes of Ilkley Grammar School Governing Body Meeting 17.10.16

“The Board of Governors met on October 17th to review all responses to the consultation. Having considered all points put forward, the governors decided that it is in the best interests of IGS to proceed with the permanent PAN expansion to 300 - subject to approval for sufficient Basic Needs capital funding from the Executive of Bradford Council; they also decided to approve the expansion of our Post 16 from 342 to 460.”

## Initial Equalities Impact Assessment

Department: School Organisation and Place Planning, Children's Services	Completed by (lead): Nina Mewse	Date of initial assessment:
Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)	Report to the Executive requesting permission to use Basic Need Funding to expand Ilkley Grammar School	
Is this existing or new function/policy, procedure, practice or decision?	Decision	
What evidence has been used to inform the assessment and policy? (please list only)		
Pupils forecasting, number of applications and appeals for the school.		

1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.		The use of Basic Need Funding would enable the Local Authority to work with Ilkley Grammar School to increase the capacity of the school and enable it to admit additional pupils. There is a need to provide additional secondary school places, particularly in the Wharfe Valley as demand increases. The expansion would assist the Local Authority in its statutory duty of providing sufficient school places.		
The Public Sector Equality Duty requires the Council to have "due regard" to the need to:- (1) eliminate unlawful discrimination, harassment and victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups (see guidance notes)		2. What is the level of impact on each group/protected characteristics in terms of the three aims of the duty?  Please indicate high (H) medium (M), low (L), no effect (N) for each.	3. Identify the risk or positive effect that could result for each of the group/protected characteristics?	4. If there is a disproportionately negative impact what mitigating factors have you considered?
Protected characteristics	Age	L	n/a	n/a
	Disability	L	n/a	n/a
	Gender reassignment	L	n/a	n/a
	Race	L	n/a	n/a
	Religion/Belief	L	n/a	n/a
	Pregnancy and maternity	N	n/a	n/a
	Sexual Orientation	L	n/a	n/a
	Sex	L	n/a	n/a
	Any other area	n/a	n/a	n/a
5. Has there been any consultation/engagement with the appropriate protected characteristics?			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
6. What action(s) will you take to reduce any disproportionately negative impact, if any?			None required	
7. Based on the information in sections 2 to 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment? (recommended if one or more H under section 2)			YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Assessor signature:  		Approved by:		Date approved:

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## **Report of the Strategic Director (Regeneration) to the meeting of Executive to be held on Tuesday 6<sup>th</sup> December 2016**

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### **AO**

#### **Subject:**

Keighley Town Centre Traffic Management Measures

#### **Summary Statement:**

At its meeting on 8 March 2016 the Executive approved a strategy for short, medium and long term improvements to assist traffic flow around Keighley town centre and complement regeneration opportunities of key development sites.

This report updates Executive on progress and the current position of the project and seeks the delegation of decisions needed to progress and implement the works to the Strategic Director (Regeneration).

---

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#### **Portfolio:**

Regeneration, Planning & Transport

#### **Overview & Scrutiny Area:**

Environment & Waste



## 1. SUMMARY

- 1.1 At its meeting on 8 March 2016 the Executive approved a strategy for short, medium and long term improvements to assist traffic flow around Keighley town centre and complement regeneration opportunities of key development sites.
- 1.2 This report updates Executive on progress and the current position of the project, and;
- 1.3 Following further development of the strategy the report seeks the delegation of various decisions needed to progress and implement the works to the Strategic Director (Regeneration.)

## 2. BACKGROUND

- 2.1 Keighley Town Centre experiences high levels of congestion in the morning and evening peak periods and often at other times of the day. The local highway network is constrained by physical features such as bridges and buildings and consequently there is limited scope to provide major highway improvements without significant cost and potential damage to the fabric of the town.
- 2.2 An allocation of £1.168m was approved by Executive at its meeting of 12 March 2013 towards a scheme for Keighley Town Centre from the former Regional Transport Board. Initial studies into potential solutions to the congestion issues in the town centre proposed a one-way clockwise gyratory scheme. These proposals were further developed and taken to public consultation in June 2015. Following the consultation and consideration by the Keighley Area Committee and further referral Executive at its meeting on 8 March 2016 approved a strategy for short, medium and long term improvements, these being:
  - a) **Short term - Minor Works:** This option looked at a series of individual low cost interventions which could be delivered in 2016/17.
  - b) **Medium term – North Street widening and re-allocation of road space between junctions of Cavendish Street and High Street.** This scheme demonstrated a very high level of journey time savings and value for money but would require acquiring land from the former Keighley College site.
  - c) **Long term – Gresley Road one-way gyratory (including East Parade one-way and Bradford Road railway bridge):** This option requires significant capital investment but demonstrated the highest level of journey time savings of any option which was assessed. Again due to the significant capital investment costs this option only achieved a low/medium value for money assessment. However, discussions with Planning identified the potential for an alternative gyratory

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alignment through the former Worth Valley shopping centre development site which could be discussed with the developer to allow either a contribution to the capital costs or a reduction in land costs thereby strengthening the value for money case. Early discussions have now been held with the developer to explore this possibility.

- 2.3 Following the 8 March 2016 Executive approval ongoing development work has included additional traffic surveys and modelling to ensure the package of measures are complimentary and robust, along with liaison with interested parties, transport operators, cycle groups etc. Ongoing progress with proposals for the former Keighley College site will allow the medium term proposals to be brought forward sooner than originally anticipated and work on this package is now progressing.
- 2.4 An important consideration in finalising the proposals has been to ensure, whilst addressing congestion and traffic flow issues, that due consideration has been given to all users e.g. pedestrians, cyclists and public transport whilst respecting and maintaining the character of the town centre setting and recent public realm investments.
- 2.5 A current detailed description of each option is included in Appendix A – Option Appraisal Matrix of this report with summarised costs as below.

<b>Short Term Intervention (&lt;12 months)</b>	<b>Medium Term Intervention (1-3 years)</b>	<b>Long Term Intervention (3-5 years)</b>
Delivery of Option 2 package of interventions.	Subject to negotiations in relation to land requirements on the former Keighley College site.)	In discussion with the developer of the Worth Valley shopping centre site, and subject to future WT+TF fund investment.
£53,000	£810,000	£7,000,000

- 2.6 It should be noted that development work in conjunction with bus operators and the West Yorkshire Combined Authority (WYCA) has identified low cost/high benefit alterations to the bus station operation that can be implemented as part of the short term works, negating the need for the element of bus station alterations previously included in medium term proposals of the 8 March 2016 Executive report. This alteration to the bus station operation and re routing of some bus services along Cooke Street to join Cavendish Street achieves significant savings in bus journey times. Subject to the completion of minor enabling works within the bus station by WYCA it is expected that the new bus route will be operational in early 2017.
- 2.7 Preparation work for the short term interventions is well advanced and key to delivery and implementation of the various strategy elements is the approval of the design, procurement of works and processing of legal matters for which

specific Committee approvals are needed. It is proposed that this be through the delegation of authority to the Strategic Director (Regeneration).

### **3. OTHER CONSIDERATIONS**

- 3.1 The delivery of the proposed strategy of short, medium and long term interventions affords the best possible opportunity for the Council to deliver a solution to the traffic issues in Keighley based on the findings of the appraisal work done by officers.
- 3.2 It is expected that implementation of those short term measures not subject to legal process can be achieved before April 2017. Implementation of the medium term works is dependent on land acquisition from the former Keighley College site and progress on building demolition and the proposed redevelopment. Current indications are that the site may be available from summer 2017.

### **4. FINANCE & RESOURCE APPRAISAL**

- 4.1 An allocation of £1.168m has previously been allocated by Executive to works in Keighley town centre. The balance of this allocation would be sufficient to deliver the short-term and medium term measures identified in the current work packages.
- 4.2 Third-party contributions to the long term proposals, together with linking the GVA benefits of the road improvements to developments in the town centre, could be allied with the potential overlap of projects associated with Keighley rail station. Subject to further development and discussions, this could demonstrate a positive GVA improvement to attract additional investment from the Transport Fund to allow delivery of the long-term strategy within the proposed timescale.
- 4.3 Any potential residual budget from the West Yorkshire+Transport Fund Hard Ings Road project could, subject to appropriate approvals being obtained from the West Yorkshire Combined Authority, contribute funds towards delivery of the long- term strategy.
- 4.4 Subject to further development and discussions the balance of the long-term funding could be sought from the Transport fund and to this end a project Mandate is being prepared
- 4.5 The staff resources and specialist technical services required to develop the scheme referred to this report are funded through the scheme budget and exist within the Council's current establishment.

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 Implementation of any of the proposals which would require use of the West Yorkshire+ Transport Fund would require compliance with the governance arrangements of the West Yorkshire Combined Authority (WYCA) which is defined in its Assurance Framework.

## **6. LEGAL APPRAISAL**

- 6.1 The schemes identified in this report can be implemented through the Council's powers as Highway and Traffic Regulation Authority. Any land required in order to implement the scheme which could not be acquired by negotiation with land owners may require the use of compulsory purchase powers under the Highways Act 1980.

## **7. OTHER IMPLICATIONS**

### **7.1 Equality & Diversity**

The proposals identified in this report take into account the needs of people with specific access needs and vulnerable road users. The project consultation process discussed in this report was undertaken, and the recommended scheme packages determined, with due regard to Section 149 of the Equalities Act 2010.

### **7.2 Sustainability Implications**

The delivery of the options described in this report will assist in the regeneration and sustainability of Keighley by reducing the overall level of traffic congestion in the town centre from that which would have occurred without the scheme.

### **7.3 Greenhouse Gas Emissions Impacts**

A detailed assessment has not been made on the impacts of the proposals on CO<sub>2</sub> emissions.

### **7.4 Community Safety Implications**

The safety of all road users will be considered during the detailed design of the proposals. The provision of safe pedestrian crossing points and cycling facilities (where possible) in the town centre has been a priority in the development of the proposals. As the scheme develops it will be subject to Road Safety Audits at appropriate stages in line with national guidance and the Council's Road Safety Audit policy.

## 7.5 **Human Rights Act**

There are no implications on the Human Rights Act associated with this report.

## 7.6 **Trade Union**

There are no trade union implications associated with this report.

## 7.7 **Ward Implications**

The scheme lies within the Keighley Central and Keighley East wards. Ward Members and the local community will be consulted on the proposals as the scheme reaches appropriate stages of development.

## 8. **NOT FOR PUBLICATION DOCUMENTS**

None

## 9. **OPTIONS**

9.1 Executive may decide to continue to support the proposed strategy for transport improvements in Keighley town centre and delegation of decisions to the Strategic Director (Regeneration) as described above.

9.2 Alternatively, Executive may wish to recommend an alternative approach in which case appropriate officer advice will be provided on the proposed solution.

## 10. **RECOMMENDATIONS**

10.1 That the Strategic Director (Regeneration), in consultation with the Portfolio Holder (Regeneration, Planning and Transport), be given delegated authority pursuant to Article 14.20 of the Constitution to:

- a. progress and approve the detailed design of the short, medium and long term schemes and undertake appropriate consultation including with the relevant Area Committees;
- b. undertake negotiations with landowners to secure by private treaty the timely acquisition and internal appropriation of land required for the implementation of the scheme;
- c. undertake negotiations with leaseholders of Council owned land affected by the scheme with a view to securing surrender of any extant leases;
- d. as may be required, secure the procurement of specialist external services having regard to the Council's Contract Standing Orders and EU procurement legislation in order to advise the Council on matters relating to the delivery of the proposals;

- e. Advertise any necessary legal orders required to facilitate the delivery of the strategy and to make any necessary applications to seek planning permission. Any objections to be referred to the Keighley Area Committee;
- f. Approve the implementation of the works.

## 11. **APPENDICES**

Appendix A – Option Appraisal Matrix

## 12. **BACKGROUND DOCUMENTS**

- 12.1 Report of the Strategic Director (Regeneration) to the Executive, 8 March 2016, Keighley Town Centre Traffic Management Measures.
- 12.2 Report of the Strategic Director (Regeneration) to Keighley Area Committee, 3 December 2015, Keighley Town Centre Traffic Management Measures.
- 12.3 Report of the Strategic Director (Regeneration) to Keighley Area Committee, 22<sup>nd</sup> January 2015, Keighley Town Centre Traffic Management Measures
- 12.4 Report of the Strategic Director (Regeneration and Culture) to Keighley Area Committee, 11 April 2013, Keighley Transport Improvements.

## APPENDIX A – Option Appraisal Matrix

Option	Route Description	Cost	Journey Time Benefit	Value for Money
Note	For ease of comparison Option numbers are those used in the March 2016 Executive report.			
1	Do Nothing	£0	-	-
<b>2</b>	<b>Short term: Low Cost measures to be implemented in the short-term and would complement many of the longer term interventions prioritised in terms of cost benefits</b>	<b>Total £53k</b>	<b>Medium</b>	<b>High</b>
(a)	Traffic Light priority at East Parade / Bradford Road / Cavendish Street and North Street / Cavendish Street junctions. Traffic Light priority at the pedestrian crossings at North Street, Cavendish Street and Bradford Road (adjacent to rail station)	£25k		
(b)	Co-ordination of signal timings and pedestrian crossings along the length of North Street	£1k		
(c)	Linking of traffic signal timings of Cavendish Street / Bradford Road / East Parade junction with pedestrian crossing at Sainsbury's entrance.	£1k		
(d)	Changes the Green period for vehicles at existing pedestrian crossing between the railway station and Asda at Bradford Road.	£1k		
(e)	Provide two traffic lanes on North Street (southbound) between junctions with Cavendish Street and High Street. Includes re-configuration of traffic lane at North Street / Cavendish Street (southbound). (Now part of Option 3)	£0k		
(f)	Replace existing pedestrian crossing at Cavendish Street / Lawkholme Lane with staggered crossing. (not now required, benefits can be achieved via signal linking in Option 2c)	£1k		
(g)	Removal of 4 car parking spaces at East Parade (adj. 137-141).	£7k		
(h)	Dedicated right turn facility at North Street / Spring Garden Lane to replace existing yellow box junctions with 'Keep Clear' markings to protect right-turn into Spring Garden Lane.	£1k		
(i)	One-way street at Albert Street (towards Scott Street) to provide No Left Turn from Albert Street into North Street.	£5k		
(j)	Introduce a banned right-turn from North Street into Devonshire Street. (Not now required).	£0k		
(k)	Re-design of all yellow box junctions on North Street between junction with Cavendish Street and High Street.	£2k		
(l)	Re-design of yellow box junction at Bradford Road adjacent to Fire Station entrance.	£1k		
(m)	Re-design of yellow box junction at Cavendish Street / Sainsbury's car park entrance.	£1k		
(n)	Alterations to the operation of bus station and bus re-routeing. (was part of Option 3)	£2k		
(o)	Town centre cycle study	£5k		
<b>3</b>	<b>Medium term: North Street widening and reallocation of road space between junctions of Cavendish Street and High Street. (Dependent upon acquiring land from former Keighley College site).</b> Excludes alterations to bus station – now in Option 2n.	<b>£810k</b>	<b>Very High</b>	<b>Very High</b>
<b>8</b>	<b>Long term: Gresley Road one-way gyratory (including East Parade one-way)</b>	<b>£7m*</b>	<b>Very High</b>	<b>Low/Medium</b>

\* Works cost only – land costs not yet defined



# Report of the Strategic Director of Regeneration to the meeting of the Executive to be held on 6<sup>th</sup> December 2016.

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**AP**

**Subject:**

**Bradford District Local Flood Risk Management Strategy**

**Summary statement:**

The report seeks Members to adopt the Local Flood Risk Management Strategy (LFRMS). As Lead Local Flood Authority (LLFA), the City of Bradford Metropolitan District Council is required under Section 9 of the Flood and Water Management Act (FWMA) 2010, to develop, maintain, apply and monitor a strategy for local flood risk management – a “Local Flood Risk Management Strategy” (LFRMS). The strategy must detail the risk management authorities and the functions that they can exercise within the Bradford Lead Local Flood Authority area, assess local flood risk, the objectives for managing that risk and measures proposed to implement those objectives.

The FWMA requires the LFRMS to demonstrate how it contributes to the achievement of wider environmental objectives. To fulfil our legislative requirements a Strategic Environmental Assessment (SEA) of the LFRMS was commissioned. The Draft SEA states that there are no negative environmental effects identified from the LFRMS objectives and that many of the proposed LFRMS objectives have the potential for both direct and indirect environmental benefits.

The LFRMS (attached as Appendix 1) is an all-encompassing or umbrella document for the implementation of the FWMA, which sets out how the LLFA intend to fulfil the requirements of the FWMA and who (within the council) will be responsible for the different areas. It will therefore act as a tool to deliver the benefits of well managed and hence reduced flood risk to people, properties and the wider environment of Bradford District.

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**Portfolio:**

**Regeneration, Planning and Transport  
Portfolio**

**Overview & Scrutiny Area:**

**Environment and Waste Management**

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## 1. SUMMARY

Adverse weather is a national concern and the risk of flooding in England is predicted to increase as a result of climate change and development in areas at risk. The Environment Agency's (EA) 2008 National Flood Risk Assessment showed 2.4 million properties are at risk of flooding from rivers and sea, with one million of those also susceptible to surface water flooding. A further 2.8 million properties are susceptible to surface water flooding alone. This equates to 1 in 6 at risk properties with expected annual damage costs of more than £1 billion to residential and non-residential properties.

Flood risk across the Bradford District is varied but caused in the main by overland flow following short, high intensity, or heavy, prolonged rainfall events and/or overtopping rivers and watercourses. There is a history of land and property flooding, the most recent and severe flooding in the district in 15 years being a consequence of Storms Desmond and Eva in 2015.

It is important to realise that it is not possible to prevent all flooding, it is inevitable and can occur at any time, however, there are actions that can be taken to manage risk and reduce impact.

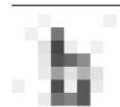
This local Flood Risk Management Strategy provides Bradford Council's approach for managing flood risk from all sources throughout the District and has been developed to align with current legislation and guidance. It builds on work that has already been undertaken to assess the risk of flooding in the district, most recently the draft Strategic Flood Risk Assessment (amended February 2014), and aims to:-

- Ensure increased understanding of local flood risk to enable investment in flood management activities to be appropriately prioritised.
- Engage and enable all Risk Management Authorities, residents, communities and businesses to manage flood risk in partnership.
- Ensure emergency plans and responses to flood incidents are effective and communities are facilitated to recover quickly and effectively after flood events.
- Guide local spatial planning and prevent inappropriate development.

It is important that flood risk management activities are targeted effectively. Bradford Council is utilising information from all available sources, including national flood maps, historic records and information shared with other Risk Management Authorities, to increase understanding of district wide flood risk and to effectively prioritise resources.

The Local Flood Risk Management Strategy is developed and maintained by Bradford Council. It sets out the Council's objectives and measures for managing local flood risk and aims to guide effective flood risk management activities undertaken by the Risk Management Authorities operating within the District.

We have prepared this LFRMS based on the latest information and will keep it up to date in line with any developments in the understanding of local flood risk so that it reflects new



information available on its management. It is proposed that this strategy will be reviewed once every six years

The Local Flood Risk Management Strategy will be made available on Bradford Council's website to provide residents, businesses and communities with the Council's strategic aims and objectives for managing flood risk.

## **2. BACKGROUND**

The European Union Flood Directive (2007/60/EC) was consolidated into British law in the Flood risk Regulations (FRR, 2009) and, following the UK floods of 2007, the government-commissioned Pitt Review produced an extensive set of recommendations some of which were transposed into new legislation as the Flood and Water Management Act (FWMA), which came into effect on the 12th April 2010.

The FWMA created a general responsibility for Lead Local Flood Authorities (LLFA's: County and Unitary Councils) to take leadership for the coordination and management of flood risk and to exercise flood risk management functions.

To exercise these functions and deliver the requirements of the FWMA, CBMDC is to develop, maintain and apply a Local Flood Risk Management Strategy (LFRMS) for the District and the LFRMS is developed to align with current legislation relating to flood risk management. The principal regulations being:-

- Flood Risk Regulations, 2009 (FRR)
- National Flood and Coastal Erosion Risk Management Strategy, 2011 (FCERM)
- National Planning Policy Framework, 2012 (NPPF)
- Emerging Core Strategy and Local Development framework for Bradford MDC area (to supersede Replacement Unitary Development plan, 2008)
- Environmental Assessment of Plans and Programmes Regulations, 2004
- Water Environments (Water Framework Directive (WFD)) Regulations 2003

LLFAs are responsible for developing and applying their local strategy, and other risk management authorities must act consistently with the local strategy in respect to FCERM. The other partners in delivering a local strategy include district authorities, IDBs, water companies and highways authorities. There is no prescribed format or scope beyond the legislative requirements contained in the FWMA. LLFA's need to consider and determine the exact scope of their local strategy, which should reflect local circumstances, aspirations and priorities. The nature and prevalence of flood risk locally is likely to shape the scope of any local strategy.

Partnership working with risk management authorities will ensure that due consideration is given to all sources of flood risk and that wider river catchment work is progressed. Bradford Council has established a Flood Programme Board with Investment, Resilience and Data sub groups of representatives from the Council, the Environment Agency, Yorkshire Water and local Community groups. This multi-agency board will ensure that we are fully engaged in partnership working and communicating flood risk and flood risk management activities to all stakeholders. The board has recently secured £850k of Local



Levy funding to undertake investigative scoping work and resilience work in Bradford District over the 2016/17 and 2017/18 financial years.

### **3. OTHER CONSIDERATIONS**

Not applicable.

### **4. FINANCIAL & RESOURCE APPRAISAL**

Adoption of the LFRMS requires no additional funding measures. The LFRMS sets out that the Lead Local Authority seeks to secure external funding streams. Internal match funding in terms of European Interreg projects will be met from existing staff time and budget.

### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

The LFRMS sets out the statutory requirements of the Lead Local Flood Authority under Section 9 of the FWMA 2010. The strategy sets out the Council's objectives and measures for managing local flood risk and to guide effective flood risk management activities undertaken by Risk Management Authorities (RMA's) operating within Bradford District. Progression of the measures detailed within the strategy through the LFRMS Action Plan will lead to an overall reduction in risk.

### **6. LEGAL APPRAISAL**

As Lead Local Flood Authority (LLFA), the City of Bradford Metropolitan District Council is required under Section 9 of the Flood and Water Management Act 2010, to develop, maintain, apply and monitor a strategy for local flood risk management – a "Local Flood Risk Management Strategy".

The LFRMS aligns with the Principal Legislation relating to flood Risk Management, these being:

- Flood Risk Regulations, 2009 (FRR)
- National Flood and Coastal Erosion Risk Management Strategy, 2011 (FCERM)
- National Planning Policy Framework, 2012 (NPPF)
- Emerging Core Strategy and Local Development framework for Bradford MDC area (to supersede Replacement Unitary Development plan, 2008)
- Environmental Assessment of Plans and Programmes Regulations, 2004
- Water Environments (Water Framework Directive (WFD)) Regulations 2003

### **7. OTHER IMPLICATIONS**



## **7.1 EQUALITY & DIVERSITY**

There are no direct Equality and Diversity implications arising from this report.

## **7.2 SUSTAINABILITY IMPLICATIONS**

There are no direct sustainability implications arising from the report. The Local Authority however, has a duty to aim to make a contribution towards sustainable development. The LFRMS details the requirements of the LLFA as a statutory consultee to the Planning Authority to ensure that robust sustainable drainage systems are provided where appropriate. The strategy also sets out objectives to:-

- Utilise all available flood risk and climate change information to deliver sustainable outcomes for development sites allocated through the Local Plan process.
- Develop a process with the Council's Planning department to create clear guidance for developers to manage flood risk on smaller development sites.
- Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with and benefitting from them.
- Offset the environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.

## **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

Not applicable.

## **7.4 COMMUNITY SAFETY IMPLICATIONS**

There are no direct community safety implications arising from this report.

## **7.5 HUMAN RIGHTS ACT**

There are no direct human rights implications arising from this report.

## **7.6 TRADE UNION**

There are no trade union implications arising from this report.

## **7.7 WARD IMPLICATIONS**

There are no Ward or area implications arising from this report.

## **7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)**

Not applicable.

## **8. NOT FOR PUBLICATION DOCUMENTS**

None.



## **9. OPTIONS**

Members can resolve to either adopt the strategy as attached (Appendix 1) or adopt and give delegated authority for amendments following the publication of the SEA Post Adoption Statement. The SEA must be open to statutory and public consultation (in progress) before it is finalised and the SEA Post Adoption Statement can be published. As no negative environmental effects were identified in the draft SEA and many objectives have potential for both direct and indirect environmental benefits it is not anticipated that consultation of the document will result in anything other than minor text amendments to the LFRMS.

## **10. RECOMMENDATIONS**

Executive is recommended that the LFRMS be adopted, and that delegated authority is given to the Strategic Director for Regeneration to amend the LFRMS as a result of the consultation on the SEA, and following consultation with the Portfolio Holder for Regeneration, Planning and Transport.

## **11. APPENDICES**

**Appendix 1:** Bradford District Local Flood Risk Management Strategy (Bradford LFRMS).  
Appendix F of the Bradford LFRMS is a Strategic Environmental Assessment  
Draft Environmental Report by JBA Consulting.

## **12. BACKGROUND DOCUMENTS**

Not applicable.





Bradford District

# Local Flood Risk Management Strategy



November 2016

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City of Bradford MDC

[www.bradford.gov.uk](http://www.bradford.gov.uk)



## **Executive Summary**

**Adverse weather is a national concern and the risk of flooding in England is predicted to increase as a result of climate change and development in areas at risk. The Environment Agency's (EA) 2008 National Flood Risk Assessment showed 2.4 million properties are at risk of flooding from rivers and sea, with one million of those also susceptible to surface water flooding. A further 2.8 million properties are susceptible to surface water flooding alone. This equates to 1 in 6 at risk properties with expected annual damage costs of more than £1 billion to residential and non-residential properties.**

**Flood risk across the Bradford District is varied but caused in the main by overland flow following short, high intensity, or heavy, prolonged rainfall events and/or overtopping rivers and watercourses. There is a history of land and property flooding, the most recent and severe flooding in the district in 15 years being a consequence of Storms Desmond and Eva in 2015.**

**It is important to realise that it is not possible to prevent all flooding, it is inevitable and can occur at any time, however, there are actions that can be taken to manage risk and reduce impact.**

**As Lead Local Flood Authority, the City of Bradford Metropolitan District Council is required under Section 9 of the Flood and Water Management Act 2010, to develop, maintain, apply and monitor a strategy for local flood risk management – a "Local Flood Risk Management Strategy". The strategy must detail the risk management authorities and the functions that they can exercise within the Bradford Lead Local Flood Authority area, assess local flood risk, the objectives for managing that risk and measures proposed to implement those objectives.**

**This local Flood Risk Management Strategy provides Bradford Council's approach for managing flood risk from all sources throughout the District and has been developed to align with current legislation and guidance. It builds on work that has already been undertaken to assess the risk of flooding in the district, most recently the draft Strategic Flood Risk Assessment (amended February 2014), and aims to:-**

- Ensure increased understanding of local flood risk to enable investment in flood management activities to be appropriately prioritised.**
- Engage and enable all Risk Management Authorities, residents, communities and businesses to manage flood risk in partnership.**
- Ensure emergency plans and responses to flood incidents are effective and communities are facilitated to recover quickly and effectively after flood events.**
- Guide local spatial planning and prevent inappropriate development.**



**It is important that flood risk management activities are targeted effectively. Bradford Council is utilising information from all available sources, including national flood maps, historic records and information shared with other Risk Management Authorities, to increase understanding of district wide flood risk and to effectively prioritise resources.**

**The Local Flood Risk Management Strategy is developed and maintained by Bradford Council. It sets out the Council's objectives and measures for managing local flood risk and aims to guide effective flood risk management activities undertaken by the Risk Management Authorities operating within the District.**

**A summary of the Local Flood Risk Management Strategy will be made available on Bradford Council's website to provide residents, businesses and communities with the Council's strategic aims and objectives for managing flood risk. It is proposed that this strategy will be reviewed once every six years.**

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## 1.0 Introduction

National flood management has previously been managed in a disjointed way. Flooding from rivers (fluvial) has passed between successive government agencies, whilst land drainage and sewer flooding has been managed in a variety of combinations of local authorities and public and private water companies. The blurring of boundaries for responsibilities and uncoordinated actions of different risk management authorities has resulted in a failure to provide consistent and coordinated actions in response to local flooding events.

Development pressures and more severe rainfall (pluvial) events due to climate change mean that flood risk is increasing. Since 2000 the deleterious impact of floods in York (2000), Boscastle, Cornwall (2004), Carlisle (2005), Yorkshire (2007), Morpeth, Northumberland (2008), Cumbria (2009), Calderdale and York (2012) and Cumbria and Yorkshire (2015) have been well publicised and have highlighted the negative impact of flooding on communities and the vulnerability of the country's infrastructure. A flood event affects people's wellbeing and security, impacts on health and, in extreme events, can result in the loss of life. Flooding also has consequences for the economy and the environment that can extend well beyond the immediate duration of the event.

It must be noted that flooding is a natural occurrence and it is universally recognised that it is neither physically nor economically possible to prevent flooding altogether. Public organisations have a duty to inform households and businesses of their risk and to advise them of what steps they can take to make their property more resilient, but flooding is inevitable, can occur at any time and the primary responsibility for the protection of land, property, infrastructure and businesses rests with the owner.

Severe flooding events in continental Europe during the same time period resulted in European legislation being published. The European Union Flood Directive (2007/60/EC) was consolidated into British law in the Flood risk Regulations (FRR, 2009) and, following the UK floods of 2007, the government-commissioned Pitt Review summarised the historic failings of flood management and an extensive set of recommendations were transposed into new legislation as the Flood and Water Management Act (FWMA) which came into effect on the 12th April 2010.

The FWMA created a general responsibility for Lead Local Flood Authorities (LLFA's: County and Unitary Councils) to take leadership for the coordination and management of flood risk and to exercise flood risk management (FRM) functions.

To exercise these functions and deliver the requirements of the FWMA, CBMDC is to develop, maintain and apply a Local Flood Risk Management Strategy (LFRMS) for the District and the LFRMS is developed to align with current legislation relating to FRM. The principal regulations being:-

- Flood Risk Regulations, 2009 (FRR)
- National Flood and Coastal Erosion Risk Management Strategy, 2011 (FCERM)
- National Planning Policy Framework, 2012 (NPPF)

- Emerging Core Strategy and Local Development framework for Bradford MDC area (to supersede Replacement Unitary Development plan, 2008)
- Environmental Assessment of Plans and Programmes Regulations, 2004
- Water Environments (Water Framework Directive (WFD)) Regulations 2003

## **2.0 The City of Bradford Metropolitan District Council Powers and Duties**

Under the FWMA, 2010 the CBMDC is identified as the LLFA and is given powers and duties in order to enable it to exercise its FRM function. These powers and duties are:-

- A duty to produce a LFRMS
  - Section 9 of the FWMA sets out the statutory requirements for LFRMS's. It states that LLFA's must "develop, maintain, apply and monitor a strategy for local flood risk management in its area". The LFRMS must be consistent with the Environment Agency's (EA) FCERM for England, other Risk Management Authorities (RMA's) that may be affected by the strategy must be consulted and a summary of the LFRMS must be published.
- A duty to co-operate with other RMA's.
- Powers to request information from other RMA's in connection with local FRM function.
- A duty to appropriately investigate flooding within the district.
- A duty to maintain a register of structures or features that have a significant effect on flood risk.
- A duty to make a contribution to sustainable development.
- A power to formally consent works within ordinary watercourses.

## **3.0 Risk Management Authorities within Bradford District**

The FWMA places a duty on all RMA's (see table 1 below) to co-operate with each other. Within the CBMDC there are a number of different sections that are either directly or indirectly involved in managing flood risk and flooding within the District. Whilst neighbouring LLFA's have separately defined political and administrative

areas, local FRM is a cross boundary issue as land topography and river catchments determine where flooding is likely to occur.

The Neighbouring LLFA's of North Yorkshire County Council, Calderdale Council, Kirklees Council, Leeds City Council and Wakefield Council adopt a partnership approach and co-operate in knowledge sharing and the delivery of FRM responsibilities through the West Yorkshire Flood Risk Management Partnership (WYFRMP) and LLFA meetings.

**Table 1. Flood Risk Management Authorities**

<h2 style="margin: 0;">The Environment Agency</h2> <p style="margin: 0; font-size: small;">Strategic overview role for all sources of flooding and coastal erosion; the delivery of flood and coastal erosion risk management activities on main rivers (usually larger rivers and streams as designated on a main river map) and the coast.</p>	
<h3 style="margin: 0;">Lead Local Flood Authority (CBMDC)</h3> <p><b>Drainage Section:</b> Manage the LLFA function for the district in accordance with the FRR and FWMA. Performs duties of LLFA as specified in Section 9 of FWMA. Responsible authority for ordinary watercourses.</p> <p><b>Development Control:</b> Local planning authority of CBMDC. Consult Drainage and the EA in determining development appropriateness and impact where drainage requirements are concerned. They have a key function in the implementation of sustainable development.</p> <p><b>Parks and Landscapes:</b> Responsible for public open spaces and as a riparian owner and reservoir undertaker, they are responsible for maintenance of watercourses and reservoirs in public open spaces under the Land Drainage Act 1991 and the Reservoirs Act 1975 respectively.</p> <p><b>Emergency Management Team:</b> Category 1 responder under Civil Contingencies Act, 2004. Responsible for planning for and responding to flood risk. They prepare and test emergency plans to ensure the District is prepared to respond and help to reduce the consequences of an event. Emergency Planning Co-ordinate activities between CBMDC, Emergency Services and other agencies during an event and assist in recovery following an event.</p>	<h3 style="margin: 0;">The Highway Authority (CBMDC)</h3> <p>Responsible for maintaining the public highway network including highway drainage and assets such as bridges, culverts and retaining walls.</p>
<h2 style="margin: 0;">The Highways Agency England</h2> <p style="margin: 0; font-size: small;">Responsible for maintaining the motorway network, including its drainage, within the district. Acts as the Highway Authority for the M606 and M62 in Bradford.</p>	
<h2 style="margin: 0;">Yorkshire Water Services (YWS) Limited</h2> <p style="margin: 0; font-size: small;">The sole water and sewerage company operating in the CBMDC district, YWS are responsible for maintaining an effective public sewerage and sewage treatment system throughout the district.</p>	
<h2 style="margin: 0;">Airedale Internal Drainage Board</h2> <p style="margin: 0; font-size: small;">Responsible for maintaining effective land drainage within the low lying areas along the River Aire between Eastburn and Steeton Ings.</p>	

Other authorities and stakeholders, whilst having no designated role under the FWMA, have a responsibility for FRM within their own areas of discipline. These include infrastructure providers such as Northern Gas Networks, Northern Powergrid, Network Rail and The Canal and River Trust; the North west section of which is responsible for the maintenance (and historically, for the FRM) of the Leeds and Liverpool Canal within Bradford District.

The Met Office; the United Kingdom's weather service, Natural England; the government's adviser for the natural environment in England, the Association of British Insurers (ABI) and local flood risk partnerships, forums and community groups all have a role to play.

Riparian owners are people who own land with a watercourse passing through it or whose property abuts its bank(s). If your land boundary is next to a watercourse it is assumed that you own the land up to the centre of the watercourse; if you own land with a watercourse running through or underneath it, it is assumed you own the stretch of watercourse and any associated structures that run through your land. Riparian ownership is a common law function of the land and includes rights and responsibilities which are detailed in the EA's Living on the Edge guide (See Appendix D for link details). As such, riparian owners have a duty to manage flood risk.

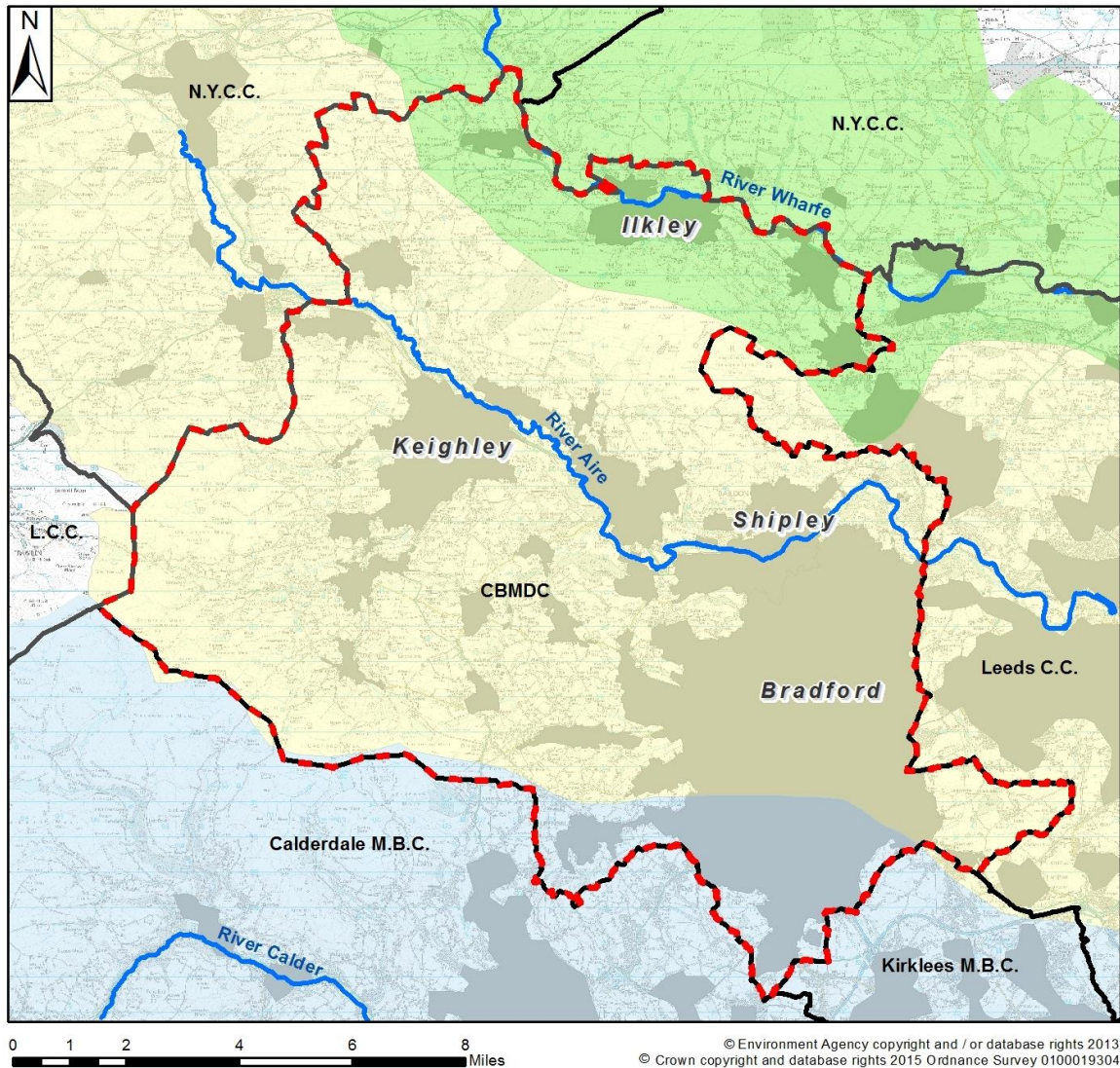
## 4.0 Spatial Extent of Strategy

For the purposes of this strategy the spatial extent is defined by the administrative boundary of the CBMDC and this is illustrated in Figure 1. Bradford is the fourth largest metropolitan district (in terms of population) in England and covers an area of approximately 370 km<sup>2</sup> stretching across Airedale, Wharfedale and the Worth Valley. Over 70% of the district is clean, green open space and the population is estimated at 528,200 (Office of National Statistics (ONS), 2015). Communities in the Bradford district area include the City of Bradford, Keighley, Ilkley, Bingley, Shipley and Silsden. There are a number of smaller settlements in the more rural parts of the area.

CBMDC is located within the River Aire & Calder and River Wharfe & Lower Ouse catchments which are also shown in Figure 1. Flood processes and flood risk issues across the Council area are inextricably linked by the Rivers Aire, Worth and Wharfe plus their many tributaries. In addition, 24 km<sup>2</sup> of Bradford District drains to the River Calder. This area includes the M606 motorway and major employment sites. The purpose of this document is not to duplicate information that has been reported in depth. Full details of Bradford Districts Drainage Area can be viewed in the draft Strategic Flood Risk Assessment, 2014 (SFRA, see Appendix D for link details). The risk of flooding from rivers, surface water, sewers, groundwater, canals and reservoirs has been explored for the CBMDC area as part of the SFRA.



Figure 1. Bradford Districts Administrative Area and River Catchments



**Legend**

- City of Bradford MDC Authority Boundary
- Neighbouring Local Authority Boundaries
- Urban areas
- Large river
- River Wharfe catchment
- River Aire catchment
- River Calder catchment

**5.0 Sources of Flooding**

Flooding can occur from one source or a combination of sources. The scope of this LFRMS covers local flood risk from all sources. These sources are detailed in Table 2 and to give a better understanding, examples are provided within the context of Bradford District.

**Table 2. Flooding Sources and their Context in Regard to Bradford District**

<p style="text-align: center;"><b>Source</b></p> <p>Exceedance of any source can impact on another source leading to combination flood events.</p>	<p style="text-align: center;"><b>Bradford District</b></p> <p>The nature of flood risk across the CBMDC district is varied due to the different flood sources.</p>	
<p><b>Main River Flooding</b></p> <p>Rivers are usually larger watercourses or strategic watercourses for which the EA is the RMA. Flooding from main river occurs when the capacity of the river channel is exceeded causing banks to overtop and adjacent areas to flood.</p>	<p><b>Main Rivers within Bradford District</b></p>	
	<p style="text-align: center;"><b>Aire &amp; Calder Catchment</b></p> <ul style="list-style-type: none"> <li>• River Aire</li> <li>• River Worth</li> <li>• North Beck (part)</li> <li>• Silsden Beck</li> <li>• Bridgehouse Beck</li> <li>• Eastburn Beck</li> <li>• Providence Lane</li> <li>• Nab Wood Beck</li> </ul>	<p style="text-align: center;"><b>Wharfe &amp; Lower Ouse Catchment</b></p> <ul style="list-style-type: none"> <li>• River Wharfe</li> <li>• Town Beck</li> <li>• Backstone Beck</li> </ul>
<p><b>Ordinary Watercourse Flooding</b></p> <p>An ordinary watercourse is every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows and which does not form part of a main river. Flooding from an ordinary watercourse occurs when the capacity of the watercourse is exceeded (open or piped) causing banks to overtop and adjacent areas to flood.</p>	<p>Ordinary watercourses in the Aire catchment from Steeton Ings to the Craven Boundary are managed by both the Airedale IDB and CBMDC.</p> <p>The vast network of ordinary watercourses in Bradford District, many of which are unmapped. Most notably, Bradford Beck which traverses Bradford City Centre and the many tributaries such as Pitty Beck, Chellow Dene Beck, Eastbrook, Westbrook and Bowling Beck.</p>	
<p><b>Surface Water Flooding</b></p> <p>Occurs when rainwater does not soak away into the ground or drain away through local drainage systems such as surface water sewers, combined sewers and highway drains. As a result, water ponds and flows above ground.</p>	<p>Surface water and drainage related issues are known to cause flood risk in Idle, Apperley Bridge, Addingham, Silsden, Cross Hills on Skipton Road and Bradford City Centre, Mill Hey, Haworth, Keighley, Castlefields industrial estate, Bingley. (Final Draft SFRA, 2014)</p>	



**Table 2 continued. Flooding Sources and their Context in Regard to Bradford District**

Source	Bradford District
<p><b>Groundwater Flooding</b> Occurs when ground water levels rise and reach the surface as a consequence of storm events. It can affect properties and structures above and below ground.</p>	<p>Bradford has a high proportion of properties with cellars compared to many other cities in the UK and has recorded between 550 and 725 calls per year regarding flooded cellars. Possible flood sources include groundwater.</p>
<p><b>Sewer Flooding</b> Occurs when the capacity of a sewer or sewer network is exceeded, resulting in area and property flooding. Public sewers are the responsibility of YWS Ltd.</p>	<p>Within many areas of CBMDC surface water runoff is channelled into the combined sewer system. During wet weather, the capacity of the system is often exceeded or affected by blockage and this is managed through Combined Sewer Overflows (CSOs) which discharge to watercourses and exist in considerable numbers within the Bradford District.</p>
<p><b>Reservoir Flooding</b> A reservoir is an enlarged natural or artificial lake, storage pond or impoundment created using a dam or lock to store water. Reservoirs can be a major source of flood risk and whilst the probability of dam failure or breaching is very small, the consequence of such an event can be devastating presenting a risk of flooding that must be considered.</p>	<p>There are a number of reservoirs within the Bradford District. These are the responsibility of either YWS Ltd or in the case of Upper and Lower Chellow, Harold Park and Park Dam, the CBMDC.</p>
<p><b>Canal Flooding</b> Canals are human-made channels for water. A navigation canal parallels a river and shares its drainage basin. Canal flooding may occur either as a result of its channel being overwhelmed or as a result of dam or bank failure.</p>	<p>The Leeds and Liverpool canal runs through Bradford District and is managed by the Canal and River Trust.</p>

## 6.0 Historic Flooding within Bradford District

Bradford district has experienced significant flooding. Flooding has been caused by a combination of high river and watercourse levels, excessive surface water runoff, saturated ground, groundwater fluctuations and exceeded capacity in sewer and highway drainage systems. Some records of flooding go back over 300 years and records of many incidents have been collated, though it is not a complete record. In particular, historically, records from more localised events have not always been captured. This has led to a limited understanding of the interaction of the different sources of flooding.

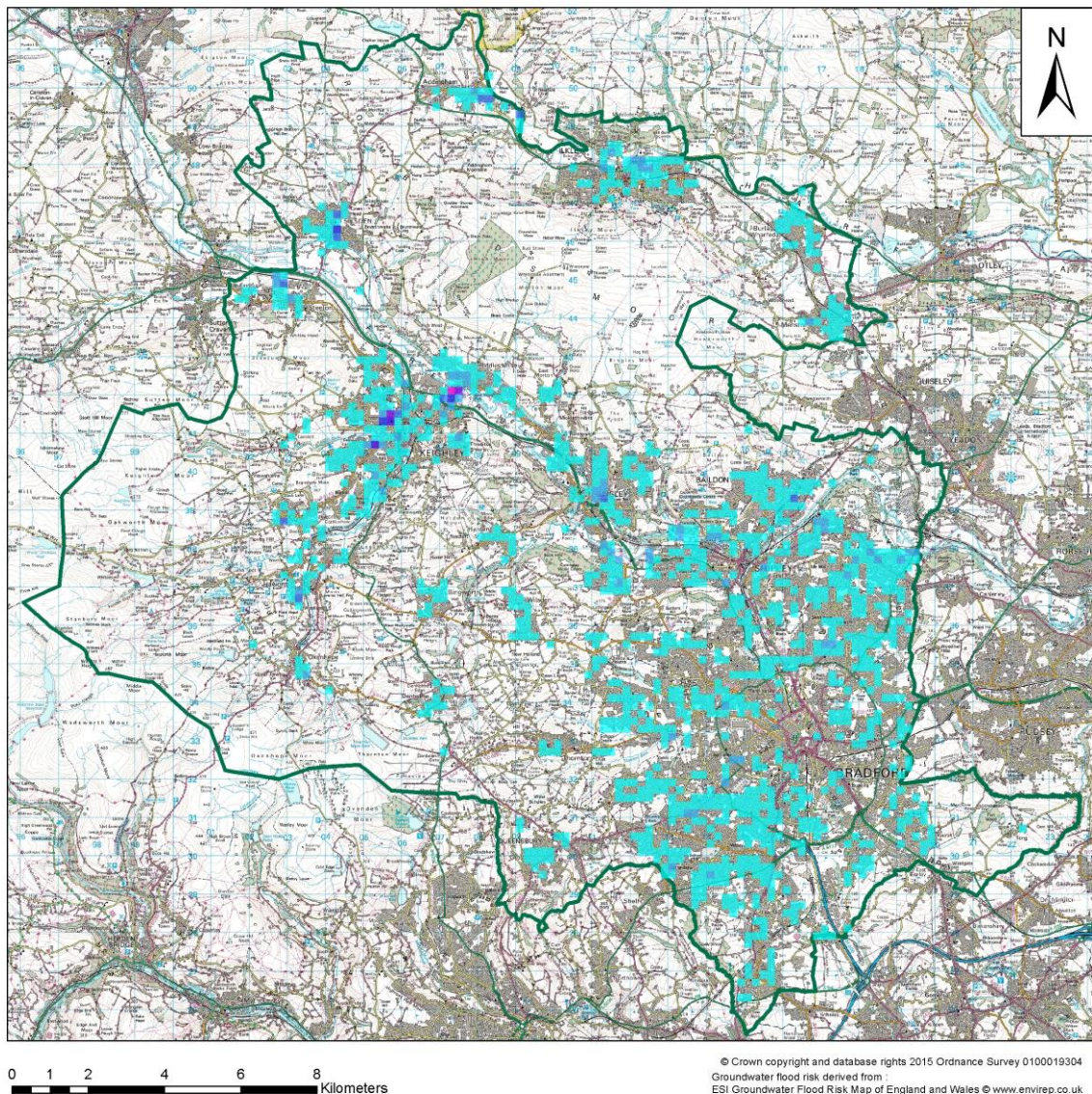
To provide a more consistent basis for future FRM activities, an authority wide mapping analysis of flood risk has been carried out to show those areas where a flooding event is likely to affect residential properties. To ensure consistency in data quality and coverage across the district, national datasets produced by the EA were used to identify the areas at risk of flooding from watercourses and surface water run off. Information on potential groundwater flooding produced by the ESI (Earth Science Information) and based on British Geological Survey mapping with additional historic data was also used. The data sets were used to identify high level district-wide risk (as opposed to property specific risk) and show the *relative* flood risk to residents. Figure 2 shows the relative risk throughout the district of flooding from all sources. It should be noted that the lack of colour in non-residential areas is *not* indicative of *no* risk. All areas could be regarded as potentially at risk to varying degrees but the map is concerned with risk to residential areas. Evidence of historic flooding events has been produced in detail in the SFRA. For the purposes of the LFRMS, Table 3 provides details on recorded major flood events that have occurred in the past 16 years.

As previously mentioned, historic data on flooding from ordinary watercourses is incomplete. Limited data is only available for Bradford Beck. Flood risk from Bradford Beck has been a problem in the past due to increased urbanisation and the resulting unusually large proportion of hard surfaces that produce large quantities of surface water runoff. These are drained to Bradford's combined sewer system which has been unable to cope with the rapid increase in population. A large number of CSO's were constructed to relieve the system during heavy rainfall. These reduced the effects of flooding directly from the sewer system; however, the untreated flows were directed into the culverted Bradford Beck and its tributaries, which did not have sufficient capacity to deal with them. This resulted in significant flooding from the Bradford Beck, which affected the City Centre on average once every ten years.

The Bradford Beck Flood Alleviation Scheme was constructed in the early 1990s. It is a diversion tunnel designed to allow storm flows to bypass the City Centre and prevent flooding for up to a 1 in 50 annual probability event (the national standard at that time). The risk of flooding from the Bradford Beck has been significantly reduced by the diversion tunnel, and CBMDC have confirmed that no flooding has been reported in the city centre since the works were undertaken.



**Figure 2. Relative Flood Risk to Residential Properties from all Sources in Bradford District**



Although the number of registered calls in relation to cellar flooding has been ascertained it has only been possible to confirm groundwater as the source of flooding for a limited number of these events. For example, between 2005 and 2010, 130 events were confirmed with groundwater as the source. Due to the geology of the area (clay stratum) and the lack of records of confirmed cases, groundwater has not historically been identified as a major problem.

**Table 3. Major Flood Events in Bradford District 2000 to Current.**

Date	Source of Flooding	Area Affected
October- November 2000	River	Flooding from the River Aire and Silsden Beck saw 370 properties flood and people evacuated in Stockbridge, 7 at Shipley, 58 at Bingley and 6 at Apperley Bridge.
November 2000	River	Ilkley, 3 properties affected
February 2002	River	Flooding reported in Bingley and Goose Eye.
July- August 2002	River	Properties flooded in Gargrave, Bingley, Apperley Bridge.
	Surface Water	Properties flooded in Bingley.
August 2004, July 2005	River and Surface Water	Mill Hey, Haworth
September 2008	River	Between 5th and 8th September, 14 flood watches and 9 flood warnings were issued. Flooding to 2 properties at Castlefields on the River Aire at Shipley.
November – December 2015	River and surface water flooding	<p>Eastburn Beck suffered as a result of high water levels in the Aire leading to internal property flooding and inundated highways within the Steeton Area.</p> <p>Silsden Beck overtopped along Silsden Main Street leaving informal flood walls damaged and local businesses flooded.</p> <p>Keighley was affected mainly due to the large proportion of the rainfall in the catchment falling here. Bridgehouse Beck the River Worth caused widespread disruption with flooding experienced in Haworth, Ingrow, the Worth Village and Stockbridge areas of Keighley.</p> <p>Numerous areas in Bingley such as Castlefields, Ireland Bridge, Wagon Lane, Ash Grove and Branksome Drive were heavily flooded.</p> <p>Areas of Saltaire were victim to the flooding with damages caused to residential areas and large parcels of public open space.</p> <p>Shipley and Baildon suffered significantly with Otley Road closed for sometime and large clusters of residential and business properties inundated.</p> <p>Esholt Village was overcome by ordinary watercourse flooding and main river flooding from the Aire.</p> <p>The main highway link From the City to Leeds Bradford Airport was severed in Apperley Bridge and a number of businesses and residential properties were inundated.</p> <p>Property and road flooding was recorded in Addingham, Burley-in-Wharfedale and Ilkley.</p> <p>Further up catchments smaller tributaries and local drainage networks were completely consumed causing localised flood incidents across the district.</p>



## **6.1. October - November 2000 Floods**

The Aire catchment was already fully saturated following a sustained summer of wet weather. This precondition led to high river levels caused by the widespread and heavy rainfall across the whole catchment. The events were triggered by abnormally high rainfall sustained over a period of hours in the upper part of the main Aire valley. The high rainfall led to flows and levels in the upper Aire that were higher than any on record with return periods perhaps in excess of 100-years. As the flood peaks moved downstream they were still amongst the largest ever observed, with evidence that in the middle and lower reaches of the river only the 1946, and possibly the 1866 flood events exceeded them. As well as residential and commercial properties being flooded, roads were significantly affected in the upper and middle Aire valley and in Bradford. The East Coast mainline was severely disrupted and damaged, with the main line to Keighley and Skipton being flooded for several days.

## **6.2. July – August 2002 Floods**

The flooding of late July / early August was caused by intense and localised rainfall generated by a series of convective rainfall events. The first storms caused relatively limited flooding problems but critically, saturated the upland parts of a number of catchments. During the second period of storms, a number of locations experienced the equivalent of two months average rainfall in two days. Due to the intensity of the rainfall the result was rapid runoff that caused flooding in the upper reaches of some catchments. A further two periods of rainfall occurred on the 7 and 10 August, when flooding was caused by surface water. Within the Aire catchment area a number of properties were flooded. However, the main impact of this event was on roads and railways. Several roads were closed on both Tuesday 30 July and Friday 2 August, due to surface water flooding.

## **6.3. November – December 2015 Floods**

Flooding problems started due to prolonged heavy rainfall from a succession of Atlantic storms during November and December. Records of flooding were received over this period, and most notably on Christmas Day and Boxing Day 2015. Unprecedented severe flooding stretched over the extremities of the district from the Western to Eastern boundaries. For the first time, to our knowledge, all four large main rivers (Aire, Wharfe, Worth and Silsden Beck) surcharged simultaneously. Flooding occurred from a number of additional sources in combination. Roads were closed and there was significant damage to properties and infrastructure in a wide number of areas across Bradford District. Over 1000 homes and businesses were flooded and the major impact of the flooding estimated in financial terms at £18 million to residential properties and £15.5 million to businesses. The personal impact on Bradford residents and communities is still being felt and long-term health impacts cannot yet be quantified.

## 7.0. Climate Change and Flood Risk

Global warming is predicted to cause significant changes to the world's climate in the coming decades. The precise nature of those changes remains uncertain, especially at a regional or local level. Climate change research suggests that such changes may include more frequent short-duration, high intensity rainfall or more periods of long duration rainfall, resulting in an increase in peak storm flows to contend with, whether that be in rivers, watercourses or surface water.

The National Planning Policy Framework (NPPF) sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change. Making allowances for climate change in flood risk assessments is a way of achieving this. NPPF and supporting practice guidance on flood risk and coastal change explain when and how flood risk assessments should be used. This includes demonstrating how flood risk will be managed now and over the development's lifetime taking climate change into account. Local planning authorities refer to the published guidelines when preparing local plans and considering planning applications.

Advice on climate change was previously set at a national level however research suggested that future guidelines for changes to peak river flows as a result of climate change might be more appropriate if considered on a regional scale. New allowances were produced by the Environment Agency in April 2016 (Flood Risk Assessments: Climate Change Allowances) and there are different allowances for different periods of time over the coming century. Bradford District lies within the Humber river basin district and allowances for changes to peak river flows range from 10 to 50%. Peak rainfall intensity is set nationally at a range of 5 to 40%.

It is imperative that the effects of more extreme flooding in Bradford District are mitigated against and plans and schemes are being developed to better manage and adapt to any increased risk of local flooding as a result of climate change. This affects the functions of all RMA's and all council departments.

## 8.0. Objectives and Measures for Managing Local Flood Risk

The LFRMS is developed and maintained by the CBMDC. It sets out CBMDC's objectives and measures for managing local flood risk and aims to guide effective FRM activities undertaken by RMA's operating within Bradford District. As LLFA, the CBMDC's objectives for managing district wide flood risk, subject to resources, are to:

- Improve understanding of flood risk
- Reduce the impact of flooding on a priority basis
- Communicate flood risk to partners and stakeholders
- Carry out targeted maintenance on a priority basis

- Ensure appropriate development
- Improve flood response and post flood recovery

### **8.1. Improve Understanding of Flood Risk within Bradford District**

To improve the understanding of flood risk from watercourses, surface water, groundwater and other sources, the CBMDC proposes to utilise flood risk information from all available sources (local historic flood records, local flood incident reports, flood investigations, external Risk Management Authority asset and flood incident records, national flood maps, etc.). In addition, the CBMDC has a statutory duty to maintain a register of all structures and features likely to have a significant effect on flood risk. To improve understanding of flooding from all sources, the CBMDC is required to:

- Maintain a statutory register of significant obstructions to flow within the District's watercourses, based on flood risk (recording the location, capacity, condition, ownership, etc.) Significant obstructions to flow include bridges, culverts, trash screens, flumes, weirs, etc.
- Maintain a statutory register of other watercourse structures and features (walls, embankments, etc.) that are deemed to act as flood defences.
- Ensure that future reports of watercourse, surface water and groundwater flooding are responded to by carrying out appropriate site investigations to capture relevant flood detail, including the mechanisms of flooding and resulting impact.
- Maintain effective communication links with external FRM authorities to share information on flood risk and arrive at effective flood responses.

In addition, the CBMDC proposes to:

- Capture all available recorded and reported information on significant flooding incidents caused by watercourses, surface water run off and groundwater.
- Maintain open communication with internal risk management teams and ensure that relevant flooding records are held in order to improve overall understanding of flood risk.

## **8.2. Reduce the Impact of Flooding (Subject to Available Resources)**

To reduce the impact of significant flooding within the District, the CBMDC proposes to:

- Utilise potential funding sources to undertake necessary investigations which will identify risk areas where there are capital needs. Investigations will utilise local flood risk information and, where appropriate, employ computer modelling analysis to accurately assess flooding mechanisms within each of these areas to arrive at cost effective flood management solutions, subject to available resources. Structural and non-structural solutions will be considered and measures which will achieve multiple benefits, such as water quality, biodiversity and amenity benefits will be encouraged and promoted where possible.
- Maintain engagement with riparian owners and significant land owners to negotiate the effective use of watercourses and open land for flood storage, subject to available resources.

## **8.3. Communicate Flood Risk to Partners and Stakeholders**

To effectively communicate information on managing flood risk the CBMDC is required to publish the summary of its LFRMS and maintain open communication with other FRM authorities, including neighbouring LLFA's. The Council will continue to liaise with the West Yorkshire Flood Risk Management Partnership (WYFRMP) and attend and hold LLFA meetings.

In addition, the CBMDC proposes to enhance published information regarding local flood risk, responsibilities, property protection, resilience and Flood Re (promoting availability and affordability of flood insurance for affected individuals) on the Council's website. The CBMDC also proposes to communicate directly with communities, businesses, organisations, landowners and the general public and contribute to community forums in identified risk areas to raise awareness and provide guidance on FRM.

In producing the LFRMS the council have consulted internally, with other RMA's that may be affected by the strategy, the public and also other LLFA's to ensure that the LFRMS is consistent with the catchment "cell" approach set out in the National FCERM Strategy.

## **8.4. Targeted Maintenance**

To ensure watercourse systems effectively serve the district's drainage, the CBMDC proposes to:

- Continue targeted investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by the CBMDC. The frequency of works based on flood risk and available resources.



- Ensure private riparian owners are contacted when maintenance works are required to maintain unimpeded flow within privately managed watercourses.

### **8.5. Ensure Appropriate Development in Bradford District**

The FWMA 2010 and National Planning Policy Framework (NPPF) 2015 have significantly changed the focus on FRM. The importance of sustainable development is central to both and influences flood risk, spatial planning policy and development management. Planning can influence flood risk measures through strategic policy allocations, policy measures and requirements of sustainable drainage systems (SuDS), master planning, design and enforcement.

From April 2015 the LLFA became a statutory consultee for all major development applications (10 dwellings or more) under the NPPF to ensure robust SuDS are provided wherever appropriate. A list of national non-statutory technical standards was issued by DEFRA to back this change to legislation.

The FWMA transferred the Section 23 powers of the Land Drainage Act 1991 to LLFAs. The new legislation underpins the regulation of ordinary watercourses. As part of this updated legislation, we will seek to preserve, enhance and promote conservation, recreation and public access in regard to Ordinary Watercourses. By consenting or rejecting works on Ordinary Watercourses, we will have another tool to manage flood risk. We can do this by ensuring that works on or near to a watercourse do not increase flood risk. We will also be able to reduce the negative impact works and development has on the environmental and amenity value of the watercourse in question. The Council will consent and enforce works that will impact on Ordinary Watercourses.

In addition the CBMDC proposes to:

- Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for sites that become allocated for development through the Local Plan process. This will be actioned according to the SFRA and Bradford's core strategy.
- Develop a process with Bradford Council's Planning Department to create clear guidance for developers to manage local flood risk arising from, and in relation to, their development proposals of less than 10 properties.
- Engage with significant developers to raise awareness of catchment wide FRM initiatives and potentials for aligning with and benefiting from them.
- Seek to secure developer contributions where appropriate.

- Offset the environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.

## **8.6. Improve Flood Response and Post Flood Recovery**

To improve flood response and post flood recovery, the CBMDC proposes to:

- Maintain effective communication links with the Met Office and the EA to ensure the most accurate forecast information on rainfall and anticipated flood impact is received.
- Maintain regular liaison with flood risk partners, emergency services, Bradford Council's Emergency Planning team, other service areas and Bradford Council's Contact Centre before, during and after significant rainfall events.
- Provide clear messages and regular updates via an internal indicative flood forecast and the media.
- Maintain the use of on the ground observers to feedback and record information on flood extents and impact during and post event.
- Works with partners to Investigate opportunities to establish volunteer flood wardens within the district.
- In conjunction with other Council Departments and the EA, develop Community Emergency and Flood Plans for Parish and Town Councils within Bradford District.
- Ensure Council departments inspect all Council watercourses and structures for debris and damage post event and take appropriate action.

## **9.0. Funding for Strategic Measures**

The enormous economic, personal, health and wellbeing costs associated with flooding make the argument for investment in flood defences and other measures to reduce risk a persuasive one. Despite this, raising finances to fund improvements is a huge challenge.

Funding for FRM works and activities to achieve LLFA objectives is limited and the available funding comes from a number of different streams; the largest proportion coming from central government. Funding for flood risk mitigation favours areas where the concentration of risk is high (e.g. large numbers of residential properties and individuals at risk in any given area) and is weighted by other indicators such as poverty and deprivation. Furthermore, contributions from the beneficiaries of defence schemes are also sought, in particular significant

business interests. Obtaining funding when risks and benefits are widely distributed is difficult but CBMDC is working to secure both internal and external streams of funding. A summary of funding sources is shown in Table 4.

**Table 4. Summary of Available Funding**

Source	Description	Administered By	Appropriate For
<b>Flood &amp; Coastal Erosion Risk Management Grant-in-Aid (FCRMGiA)</b>	Central government funding for flood (and coastal) defence projects – recently revised to encourage a partnership approach to maximise match-funding, work towards achieving specified outcomes with a requirement to evidence a reduction in flood risk to properties	Environment Agency	Any capital FRM projects
<b>Local Levy</b>	An annual contribution from Councils to a regional “pot”, smaller than the FDGiA budget but offers more flexibility on the type and size of project it can fund.	Environment Agency	Smaller FRM projects or as a contribution to FDGiA projects
<b>Community Infrastructure Levy (CIL)</b>	A local levy applied by the Planning Authority on developers to contribute to a general infrastructure fund. The CBMDC has not yet implemented a CIL scheme. A bid for CIL would have to be made for flood management/drainage improvements against other competing council priorities.	CBMDC	All measures outlined in the Strategy
<b>Council Tax</b>	A “ring-fenced” provision within the annual council tax for the specific purpose of addressing FRM.	CBMDC	All measures outlined in the Strategy
<b>Private Contributions</b>	Voluntary, but funding from beneficiaries of projects could make contributions from national funding viable. Contributions could be financial or “in kind” e.g. land, volunteer labour	CBMDC	All projects
<b>Section 106 contributions (Town &amp; Country Planning Act)</b>	Contributions from developers, linked to specific development sites where off-site improvements to drainage infrastructure are required to make the developers proposals acceptable	CBMDC	Larger development sites
<b>European Union</b>	CBMDC has been successful in the past in securing EU match funding for FRM Projects i.e. UWC, FRC, NoRIS and SKINT.	EU/CBMDC	All projects

## 10.0 Wider Environmental Objectives

The LFRMS offers an opportunity to work with the natural environment to reduce flood risk and enhance the environment (Natural Flood Management – NFM). We intend to use the LFRMS to further promote these opportunities. FRM is just one benefit of managing catchments in an environmentally sensitive way. For example using blue and green corridors for flood flow pathways, upstream attenuation and land management can deliver other environmental amenity and economic benefits.

Schemes that offer multiple benefits in catchments upstream of problem locations include NFM through upland attenuation, small wetlands, farmland management, large scale upstream wetlands and attenuation basins. Multiple benefits in urban areas close to problem locations can be achieved through strategic large scale SuDS for new developments, the use of blue/green corridors for flood flow pathways and the use of urban green space to redirect flood flow paths and for storage. Allowing space for surface water flood flows (and SuDS) during development planning and river restoration or daylighting problem culvert watercourses are further examples.

To ensure that the LFRMS contributes to wider environmental objectives required under the WFD and the Strategic Environmental (SEA) Directive, the LFRMS has been produced to align with the Sustainability Appraisal of the Bradford Core Strategy (Draft) and a Strategic Environmental Assessment (SEA) of the LFRMS has been undertaken (Appendix F).

The SEA framework is used to identify and evaluate the potential environmental issues associated with the implementation of the LFRMS. The framework comprises a set of SEA objectives that have been developed to reflect the key environmental issues identified through the baseline information review. These objectives are supported by a series of indicators, shown in Table 5, which are used as a means to measure the potential significance of the environmental issues and can also be used to monitor implementation of the LFRMS objectives. The LFRMS objectives were tested against the SEA assessment framework to identify whether each option will support or inhibit achievement of each objective. The full Environmental Assessment Report is provided in Appendix F.

Assessment of the LFRMS objectives and underpinning actions against the SEA objectives has been undertaken. No negative environmental effects have been identified from the LFRMS objectives. Many of the proposed LFRMS objectives have the potential for both direct and indirect environmental benefits. There is opportunity through the LFRMS to achieve a range of biodiversity benefits including new habitat creation, enhancement of existing habitats and greater habitat connectivity.

In addition, as expected of a strategy for managing flood risk, the majority of the objectives within the LFRMS will contribute to achievement of the SEA objectives that seek to reduce flood risk to people, property and infrastructure. As a result, the LFRMS is likely to have a significant positive effect on reducing flood risk to local communities.



Some of the LFRMS objectives are also likely to assist with climate change adaptation. In particular, measures that reduce flood risk, promote better use of water resources, seek to deliver new habitat creation and better connection between existing habitats (such as de-culverting), could make a significant positive contribution to achievement of SEA objective 12 (Table 5.).

A detailed assessment of the potential cumulative effects of the LFRMS actions should be undertaken when further details regarding specific project level measures and their implementation are known.

The SEA Regulations require CBMDC to monitor the significant environmental effects (positive and negative) upon implementation of the LFRMS. Key potential environmental effects that require monitoring have been identified together with the monitoring indicators that can be applied to track whether such effects occur.

A Habitats Regulations Assessment (HRA) Test of Likely Significant Effect (TLSE) has also been prepared in accordance with the requirements of the Habitats Regulations to determine whether the LFRMS is likely to have a significant effect on sites designated for their nature conservation interest at an international level (known as European sites, which include Special Areas of Conservation (SAC), Special Protection Areas (SPA), and by UK Government policy, Ramsar sites). The TLSE concluded that the LFRMS is not likely to have a significant effect on any of the European sites lying partially or wholly within 15km of the CBMDC administrative area.

**Table 5. SEA Objectives and Indicators**

Receptor	Objective	Indicator
Landscape	1 Protect the integrity of the District's urban and rural landscapes, and promote the key characteristics of the NCA's, LCA's, the Green Belt and the World Heritage Site in Saltaire.	Changes in the condition and extent of existing characteristic elements of the landscape.  The condition and quality of new characteristics introduced to the environment.  Percentage of open countryside, Green Belt or Green Infrastructure.
Biodiversity, flora and fauna	2 Protect and enhance designated and BAP habitats and species in the district.	Area of designated sites adversely affected by flooding.  Monitoring of reported status of designated nature conservation sites.
	3 Maintain and enhance habitat connectivity and wildlife corridors within the district.	Percentage of land designated as nature conservation sites as a result of LFRMS measures.
	4 Maintain existing, and where possible create new, riverine and wetland habitat to benefit migratory and aquatic species and fisheries, and maintain upstream access.	Area of habitat created as a result of implementation of the LFRMS (e.g. flood storage areas creating wetland habitat).  Review of maintenance regimes annually.  Number of habitat improvement projects delivered through flood risk management projects.

**Table 5 continued. SEA Objectives and Indicators**

Receptor	Objective	Indicator
Water environment	5	<p>Improve the quality and quantity of the water in the District's rivers.</p> <p>Water quality of the District's watercourses.                      Number of pollution incidents.                      Number of SuDS schemes installed as part of the LFRMS and registered on the asset register.                      Number and volume of Environment Agency licensed abstractions.                      Numbers of sites with high pollution potential (e.g. landfill sites, waste water treatment works) at risk from flooding.                      Number of ordinary watercourse consents and main river permits within the district.</p>
	6	<p>Do not inhibit achievement of the WFD objectives and contribute to their achievement where possible.</p> <p>Achievement of WFD objectives.                      Percentage of water bodies achieving 'Good' ecological status/potential.                      Number of physical modifications approved by other consent processes                      Number of enforcement cases on physical modifications affecting land drainage                      No deterioration in WFD status.</p>
Soils and geology	7	<p>Reduce the risk of soil erosion and pollution.</p> <p>Area of agricultural, rural and greenfield land affected by flooding or LFRMS measures.                      Numbers of sites with high pollution potential (e.g. landfill sites, waste water treatment works) at risk from flooding.</p>
Historic environment	8	<p>Preserve and, where appropriate enhance historic, environmental and cultural sites in the district</p> <p>Number of historic assets at risk from flooding, and assessment of impact.                      Number of vulnerable historic assets protected from flooding by implementation of the LFRMS.                      Number of heritage assets whose significance has been harmed through flood defence works</p>
Population	9	<p>Minimise the risk of flooding to communities and social infrastructure.</p> <p>Number of residential properties at risk of flooding.                      Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding.                      Number of property level protections schemes per year.                      Number of community flood plans in place.                      Number of exercises completed annually on flood response plans.</p>
	10	<p>Increase the use of SuDS, particularly in all new developments.</p> <p>Number of SuDS schemes installed as part of the LFRMS.</p>
Material assets	11	<p>Minimise the impacts of flooding to the district's transport network and key critical infrastructure.</p> <p>Length of road and rail infrastructure at risk from flooding.                      Number of key infrastructure assets at risk from flooding.                      Number of reviewed and existing flood warning systems in the district.</p>
Climate	12	<p>Reduce vulnerability to climate change impacts and promote measures to enable adaptation to climate change impacts.</p> <p>Number of residential properties at risk of flooding.                      Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding.                      Area of habitat created as a result of implementation of the LFRMS (e.g. flood storage areas creating wetland habitat).</p>

## Appendix A – Flood Re



**Flood Re launches in April 2016 and will promote the availability and affordability of flood insurance for up to 350,000 homeowners across the UK who are at risk of flooding.**

This leaflet explains more about how Flood Re will work as well as providing general advice to homeowners on managing flood risk.

### What is Flood Re?

Here in the UK, our standard buildings and contents insurance policies usually cover us against damage from flooding, along with other problems like fire or theft. In recent years, we have had several very serious floods, and this has meant the cost of flood insurance rates has been increasing. Many people who live in places that have flooded, or are very likely to flood in the future, are already struggling to find more affordable home insurance – **your household may have experienced this problem already.**

Insurance companies and the Government have been working together to develop a different way of dealing with flood insurance. They have decided on a scheme that will:

- Enable flood cover to be more affordable for the households at highest risk of flooding
- Increase the availability and the choice of insurers for customers
- Allow time for the Government, local authorities, insurers and communities to become better prepared for flooding.

This scheme will be in operation for the next 25 years, which may sound like a long time, but there is a lot that has to be done during this period. There is more about this later in this leaflet.

#### How does Flood Re work and what does it mean for you?

Flood Re makes no difference to the way you buy your home insurance. Any claims you need to make will continue to be handled by the insurance company you've chosen. As a result of the

creation of the Flood Re scheme, you should have greater choice of insurance policies and they should be more competitively priced.

You won't have to pay anything directly to Flood Re, because your insurance company will be dealing with that for you. All insurance companies contribute to the costs of the scheme, as they pay a special 'levy' to Flood Re.

Your insurance company will continue to be responsible for setting the premiums they charge to you, after taking into account all the things they already look at (like the risks of fire, theft, or subsidence).

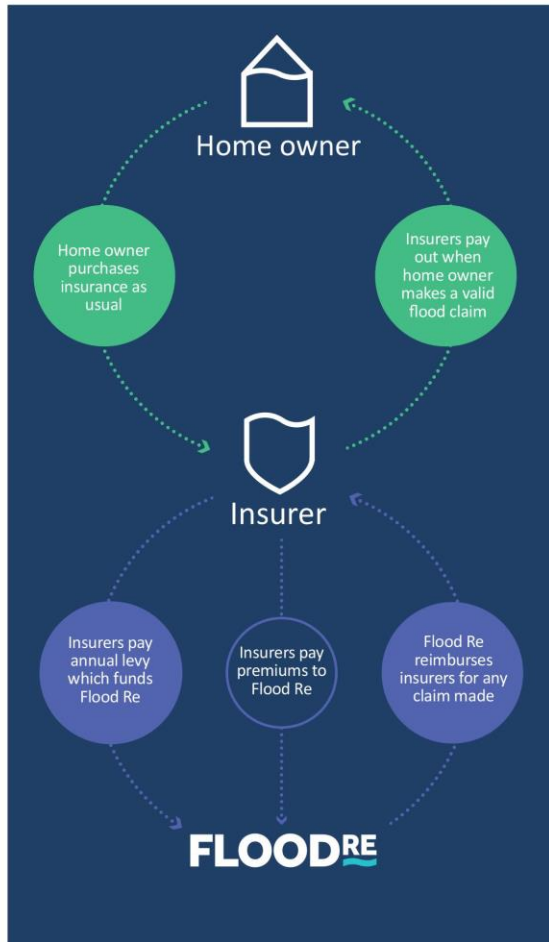
#### Why will Flood Re only be in place for 25 years?

Flood Re has another important role to play, as well as helping to enable home insurance to be more widely available and affordable in areas at risk of flooding. Part of the Flood Re scheme means offering help to people to increase their understanding of their level of flood risk and explaining how, where possible, they can take action to reduce that risk. There is more information about this on Flood Re's own website: [www.floodre.co.uk](http://www.floodre.co.uk)

By the end of the 25 years of Flood Re, we should be able to return to a system for home insurance prices that will be based more accurately on the kind of flood risks each household actually faces. This will work rather like motor insurance does today, where those who run the highest risks of needing to claim on their policies will usually pay more than those who are only at low risk.

While Flood Re is in force, there will be a review at least every five years, to check how much progress has been made on managing this return to pricing flood cover according to risk. These reviews could mean looking again at the premiums charged for each policy, as well as the 'levy' charged by Flood Re to UK home insurers.

## Appendix A – Flood Re



### General advice on flood risk, and how you can protect your property

You can find out about the level of flood risk in your area and how to take precautions to help minimise the impact of flooding on your property here:

[www.gov.uk/prepare-for-a-flood](http://www.gov.uk/prepare-for-a-flood)

Information on any flood warnings that have been issued can be found on the following sites.

#### England

[www.gov.uk/check-if-youre-at-risk-of-flooding](http://www.gov.uk/check-if-youre-at-risk-of-flooding)

#### Wales (available in English and Welsh)

[www.naturalresources.wales/flooding/alerts-and-warnings](http://www.naturalresources.wales/flooding/alerts-and-warnings)

#### Scotland

[www.floodlinescotland.org.uk](http://www.floodlinescotland.org.uk)

#### Northern Ireland

[www.nidirect.gov.uk/flooding-in-your-area](http://www.nidirect.gov.uk/flooding-in-your-area)

For information about the kind of things you can do to reduce the damage a flood might do to your home and belongings (for example, you can get flood doors, airbrick covers and have electrical sockets moved higher up on the wall) or to explain how to commission a property-level flood risk survey, the following sites will be of help:

#### Property-level flood risk surveys (Association of British Insurers)

[www.abi.org.uk/insurance-and-savings/topics-and-issues/flooding/assessing-your-flood-risk](http://www.abi.org.uk/insurance-and-savings/topics-and-issues/flooding/assessing-your-flood-risk)

#### The Chartered Institution of Water and Environmental Management (CIWEM)

Maintains a professionals directory, including a list of flood risk consultants

[www.ciwem.org](http://www.ciwem.org)

#### The Royal Institution of Chartered Surveyors (RICS)

Publishes a guide to flooding for property owners, and also maintains a list of chartered surveyors

[www.rics.org/uk](http://www.rics.org/uk)

### Information and advice on finding the right kind of flood protection for your home is available from the following sites:

**The National Flood Forum:** [www.nationalfloodforum.org.uk](http://www.nationalfloodforum.org.uk)

**The Scottish Flood Forum:** [www.scottishfloodforum.org](http://www.scottishfloodforum.org)

**The Blue Pages:** [www.bluepages.org.uk](http://www.bluepages.org.uk)

**Flood Protection Group (Part of The Property Care Association):** [www.property-care.org/homeowners/flood-protection](http://www.property-care.org/homeowners/flood-protection)





## Appendix B - CBMDC Required and Proposed Objectives

Improve Understanding of Flood Risk	Reduce the Impact of Flooding	Communicate Flood Risk to Partners and Stakeholders	Target Maintenance	Ensure Appropriate Development	Improve Flood Response and Recovery
Maintain statutory register of watercourses / structures based on flood risk	Secure external funding streams to undertake investigation to identify risk areas where there are capital needs.	Produce, publish and review LFRMS	Targeted investigation and clearance works of watercourses and associated assets managed by the CBMDC to reduce flood risk	Confirm land allocation for development  LDF: Policy and strategy responses to core documents / development site and site specific development policies and plans	Maintain communication links with Met Office and EA to ensure the most accurate forecast information on rainfall and anticipated flood impact is received.
Maintain statutory register of other watercourse structures deemed to act as flood defences.	Secure internal and external match funding	Enhance publicly available information relating to riparian responsibilities	Ensure private riparian owners are contacted to address maintenance/ flood issues.	Consult on Planning Applications  Negotiate commuted sums/S106/CIL/pre-application enquiries  Check designs, ensure condition compliance and enforcement	Regular liaison with flood risk partners, emergency services, Emergency Planning and other service areas before, during and after significant rainfall events.
Continued site investigations of reports of flooding	Maintain engagement with riparian owners.	Enhance publicly available information relating to flood risk and resilience	Apply legislation to guide residents regarding their flood risk	Manage applications for consent of watercourse works	Provide clear messages and regular updates via an internal indicative flood forecast and the media.
Effective communication links with internal and external RMA's		Produce community flood and emergency plans		Engage with developers to raise awareness of flood risk and risk management activities	Maintain use of on the ground observers to feedback and record information on flood extents and impact.
Capture all available recorded and reported information on flooding incidents		Ensure ongoing communication with all internal and external RMA's		Actively encourage use of sustainable drainage systems in developments	
Ensure relevant records are held.		Plan/Attend community forums to raise awareness			
Complete and publish SFRA					

## Appendix C – CBMDC Action Plan

Priority		Timescales		Status	Description
High	H	Long (L)	Over 5 years	Continue (C)	Continue to carry out existing role in future
Medium	M	Medium (M)	2 to 5 years	Develop (D)	Develop and expand upon existing roles or increase existing service area
Low	L	Short (S)	0 to 2 years	Establish (E)	Establish a new role or service area
				Achieved (A)	Action is already achieved

Note: The CBMDC is undergoing review and the delivery of FRM activities will be guided by the outcomes of the review. The LFRMS is a living document and will be updated to reflect any changes that occur as a result of the Council review\*

Measure	Reference to Section	Proposed Delivery	Priority	Timescales	Status
Improve Understanding of Flood risk	8.1	The drainage section will maintain and update statutory register of known watercourse structures deemed to act as flood defences.	M	L	C
	8.1	The drainage section will investigate flooding within Bradford District as and when flooding occurs.	H	L	C
	8.1/8.3	Ensure effective communication links with internal and external RMA's within Bradford District.	M	L	C
	8.1	Capture all available recorded and reported information on flooding incidents as and when flooding occurs. All internal RMA's record and report flood events.	M	L	C
	8.1	Complete and publish level 1 SFRA.	H	S	C
Reduce the Impact of Flooding	8.2	Secure external funding streams (Defra, Local Levy funding) to undertake investigation to identify risk areas where there are capital needs.	H	L	D
	8.2	Secure internal match funding for FRM activities	H	S	D
	8.2	Secure external match funding for FRM activities (European Union Funding)	H	L	D
	8.2/8.3	The drainage section will maintain engagement with riparian owners in regards to consent to watercourses and ensuring that riparian responsibilities are upheld.	M	L	C
Communicate Flood Risk to Partners and Stakeholders	8.3	Produce, publish and review LFRMS in accordance with FRR 2009.	H	S	A
	8.3/8.1	Enhance publicly available information relating to riparian responsibilities.	M	S	C
	8.3/8.1	Enhance and update publicly available information relating to flood risk and resilience.	M	S	C
	8.3/8.1	Produce community flood and emergency plans in liaison with Emergency Planning, Neighbourhoods and the Environment Agency.	H	S	E
	8.3/8.1	Ensure ongoing communication with all internal and external RMA's to share knowledge and ensure the effective delivery of FRM activities.	M	L	C
	8.3/8.1	Hold and/or Attend RMA meetings and LLFA meetings on FRM. Engage with North Yorkshire County Council in addition to neighbouring LLFA's.	M	L	C
	8.3/8.1	Plan/Attend community forums to raise awareness of flood risk and provide flood risk guidance.	M	L	C
Target Maintenance	8.4/8.2	Targeted investigation and clearance works of watercourses and associated drainage assets managed by all RMA's in the CBMDC to reduce flood risk.	H	S	D
	8.4/8.1/8.3	Ensure other riparian owners are contacted to address maintenance/ flood issues.	M	L	C
Ensure Appropriate Development	8.5	Confirm land allocation for development. Ensure appropriate policies and guidance within the Local Plan are followed and in accordance with relevant Flood Risk Legislative documentation.	H	M	C
	8.5	Consult on Planning Applications. Negotiate commuted sums/S106/CIL/pre-application enquiries. Check designs; ensure condition compliance and enforcement through the planning process.	M	L	C
	8.5/8.1 - 8.4	Manage applications for consent of watercourse works.	M	L	C
	8.5/8.1 - 8.3	Engage with developers to raise awareness of flood risk and risk management activities for major developments through Property and developer forums. Engage with developers for small and large-scale developments at the pre-application stage of the Planning process.	M	L	C
	8.5	Actively encourage use of sustainable drainage systems in all suitable developments through the planning process.	M	L	C
	8.5	Strategic Environmental Assessment of LFRMS.	H	S	C
Improve Flood Response and Recovery	8.6	Maintain communication links with Met Office and EA to ensure the most accurate forecast information on rainfall and anticipated flood impact is received. Led by Emergency Planning.	M	L	C

## Appendix D - Relevant Guidance and Information

Water Framework Directive (WFD), European Parliament, 2010.

[http://ec.europa.eu/environment/water/index\\_en.htm](http://ec.europa.eu/environment/water/index_en.htm)

Flood Risk Regulations (FRR), HMSO, 2009.

[http://www.legislation.gov.uk/uksi/2009/3042/pdfs/uksi\\_20093042\\_en.pdf](http://www.legislation.gov.uk/uksi/2009/3042/pdfs/uksi_20093042_en.pdf)

Flood and Water Management Act (FWMA), HMSO, 2010.

[http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga\\_20100029\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf)

National Flood and Coastal Erosion Risk Management Strategy for England, EA and Defra, July 2011.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/2898/9780108510366.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/2898/9780108510366.pdf)

National Planning Policy Framework, 2012.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

Planning Policy Statement 25: Development and Flood Risk (PPS25), DCLG, March 2010.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7772/pps25guideupdate.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7772/pps25guideupdate.pdf)

Aire Catchment Flood Management Plan (CFMP), Environment Agency, July 2010.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289346/River\\_Aire\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289346/River_Aire_Catchment_Flood_Management_Plan.pdf)

Ouse Catchment Flood Management Plan (CFMP), Environment Agency, July 2010.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289228/River\\_Ouse\\_Catchment\\_Flood\\_Management\\_Plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289228/River_Ouse_Catchment_Flood_Management_Plan.pdf)

Strategic Flood Risk Assessment, Level 1 (SFRA), City of Bradford metropolitan District Council, Final Draft Report amended February 2014.

[http://www.bradford.gov.uk/bmdc/the\\_environment/planning\\_service/local\\_development\\_framework/evidence\\_base\\_assessment](http://www.bradford.gov.uk/bmdc/the_environment/planning_service/local_development_framework/evidence_base_assessment)

Planning Policy Statement 25: Development and Flood Risk (PPS25), DCLG, March 2010.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7772/pps25guideupdate.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7772/pps25guideupdate.pdf)

Flood Risk Assessments: Climate Change Allowances, EA, 2016.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Guidance for risk management authorities on sustainable development in relation to their flood and coastal erosion risk management functions, Defra, 2011.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69447/pb13640-sdg-guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69447/pb13640-sdg-guidance.pdf)

Living on the Edge: A Guide to Your Rights and Responsibilities of Riverside Ownership, 5<sup>th</sup> Edition, Environment Agency, 2014.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/454562/LIT\\_7114.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/454562/LIT_7114.pdf)

Yorkshire Water <https://www.yorkshirewater.com/about-us>

Environment Agency <https://www.gov.uk/government/organisations/environment-agency>

Bradford Council Drainage

[http://www.bradford.gov.uk/bmdc/the\\_environment/environmental\\_health/water\\_management](http://www.bradford.gov.uk/bmdc/the_environment/environmental_health/water_management)

Flood Re <http://www.floodre.co.uk/>

## Appendix E

### Acronyms

<b>CBMDC</b>	City of Bradford Metropolitan District Council
<b>CIL</b>	Community Infrastructure Levy
<b>EA</b>	Environment Agency
<b>FCERM</b>	Flood and Coastal Erosion Risk Management
<b>FRC</b>	Flood Resilient City
<b>FRR</b>	Flood Risk Regulations
<b>FWMA</b>	Flood and Water Management Act
<b>LFRMS</b>	Local Flood Risk Management Strategy
<b>LLFA</b>	Lead Local Flood Authority
<b>NoRIS</b>	No Rainwater In Sewers
<b>NPPF</b>	National Planning Policy Framework
<b>RMA</b>	Risk Management Authority
<b>SEA</b>	Strategic Environmental Directive
<b>SFRA</b>	Strategic Flood Risk Assessment
<b>SKINT</b>	Skills, Integration and New Technologies
<b>UWC</b>	Urban Water Cycle
<b>WFD</b>	Water Framework Directive
<b>YWS</b>	Yorkshire Water Services

## Appendix F – Strategic Environmental Assessment Report









**JBA**  
consulting

# **Bradford Local Flood Risk Management Strategy – Strategic Environmental Assessment**

**Environmental Report**  
November 2016

**City of Bradford MDC**

[www.bradford.gov.uk](http://www.bradford.gov.uk)

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## Revision history

Revision Ref / Date Issued	Amendments	Issued to
V1.0	Add HRA Test of Likely Significance as Appendix	Kirsty Breaks
V1.1	Add recommendations and contact details for Metropolitan BC	Kirsty Breaks
V1.2	Table 5.4 and Table 5.5 adjustments	Kirsty Breaks

## Contract

This report describes work commissioned by Bradford Council. Matthew Williams and Charlotte Beattie of JBA Consulting carried out this work.

Prepared by ..... Matthew Williams BSc MSc  
 Environmental Consultant

Reviewed by..... Charlotte Beattie  
 Chartered Senior Analyst

## Purpose

This document has been prepared as a Draft SEA Environmental Report for Bradford MDC. JBA Consulting accepts no responsibility or liability for any use that is made of this document other than by the Client for the purposes for which it was originally commissioned and prepared.

JBA Consulting has no liability regarding the use of this report except to Bradford MDC.

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JBA is aiming to reduce its per capita carbon emissions.

## Non-Technical Summary

Bradford Metropolitan District Council (MDC) is currently preparing a Local Flood Risk Management Strategy (LFRMS). As part of this process, the Council is also carrying out a Strategic Environmental Assessment (SEA), which considers the potential environmental effects of the LFRMS. This Environmental Report sets out findings of the SEA. It has been produced to meet the requirements of *The Environmental Assessment of Plans and Programmes Regulations 2004* (hereafter referred to as the 'SEA Regulations') and follows the guidance contained within *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005).

The full range of environmental receptors has been considered through the SEA. This meets the requirements of the SEA Directive, which requires that an assessment identifies the potentially significant environmental impacts on *'biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural and archaeological heritage, landscape and the interrelationship between the above factors'*.

The SEA Scoping Report for the LFRMS was issued to the statutory consultation bodies in October 2016. A number of comments were received on the scope of the assessment and assessment framework, which were incorporated into the preparation of this Environmental Report.

Assessment of the SEA objectives against three management options ('do nothing', 'maintain current flood risk management regime' and 'manage and reduce local flood risk') was undertaken. This identified the potential effects on the environment associated with these different management actions. The 'do nothing' option is likely to result in a number of significant adverse effects, particularly in relation to people and property, and other environmental assets including historic sites and biodiversity, where increased flooding may create new pathways for the spread of invasive non-native species. Surface water and groundwater quality could also be adversely affected, with increased flooding of contaminated sites leading to greater impacts on water resources. Conversely, increased flood risk may result in greater connectivity between watercourses and their floodplains, offering opportunities for habitat creation to benefit a range of protected and notable species.

The option to 'maintain current flood risk management regime' is likely to result in little or no change in the environmental baseline in the short to medium term as the existing flood risk management regime continues to maintain existing levels of flood protection. However, in the future, as a result of climate change, flood risk will increase, resulting in many of the impacts identified under 'do nothing', although potentially to a lesser extent and significance.

The option to 'manage and reduce local flood risk' has the potential to provide a range of environmental benefits. Flood risk management initiatives, if designed and implemented in an appropriate manner, could provide multiple benefits. This could include reducing flood risk to people and property, contributing to the protection of heritage assets, improvements in water quality, providing new opportunities for habitat creation and the provision of new recreation and amenity assets. Conversely, flood risk management measures, if implemented in an inappropriate manner, could result in adverse effects on a range of environmental features. However, this risk is managed through the preparation of this SEA and through the planning and consenting process, which is likely to require consideration of the sustainability of a project prior to its implementation.

Therefore, it is evident that by doing nothing or maintaining current levels of management, there are likely to be detrimental effects on the SEA objectives, which may be prevented by carrying out active flood risk management as proposed by the LFRMS.

Assessment of the LFRMS objectives and underpinning actions against the SEA objectives has been undertaken. No negative environmental effects were identified from the LFRMS objectives. Many of the proposed LFRMS objectives have the potential for both direct and indirect environmental benefits. LFRMS objective two in particular has potential to provide a positive contribution to all of the SEA objectives and make a significant positive contribution to two of them, the objective seeks to reduce the impact of flooding and therefore could benefit the environment, people, historic environment, property and material assets. There is opportunity through the

LFRMS to achieve a range of biodiversity benefits, including new habitat creation, enhancement of existing habitats and greater habitat connectivity.

In addition, as expected of a strategy for managing flood risk, the majority of objectives within the strategy will contribute to achievement of the SEA objectives that seek to reduce flood risk to people, property and infrastructure. As a result, the LFRMS is likely to have a significant positive effect on reducing flood risk to local communities.

Some of the LFRMS objectives, objective six in particular, is also likely to assist with climate change adaptation. In particular, measures that reduce flood risk, promote better use of water resources, seek to deliver new habitat creation and better connection between existing habitats (such as de-culverting), could make a significant positive contribution to achievement of SEA objective twelve.

A detailed assessment of the potential cumulative effects of the LFRMS actions should be undertaken when further details regarding specific project level measures and their implementation are known.

The SEA Regulations require Bradford MDC to monitor the significant environmental effects (positive and negative) upon the implementation of the LFRMS. Key potential environmental effects that require monitoring have been identified together with the monitoring indicators that can be applied to track whether such effects occur.

A Habitats Regulations Assessment (HRA) Test of Likely Significant Effect (TLSE) has also been prepared in accordance with the requirements of the Habitats Regulations to determine whether the LFRMS is likely to have a significant effect on a European site. The TLSE concluded that the LFRMS is not likely to have a significant effect on any of the European sites. This assessment does not preclude the requirements for further Habitats Regulations Assessments arising from LFRMS.

This Environmental Report will be subject to public consultation for five weeks alongside the previously consulted draft Bradford MDC LFRMS. All consultation responses received will be reviewed and taken into consideration for the next stage of appraisal process. This will involve the preparation of a Post-Adoption Statement, which will set out how the findings of the Environmental Report and the views expressed during the consultation period have been taken into account as the LFRMS has been finalised and formally approved. The Post-Adoption Statement will also set out any additional monitoring requirements needed to track the significant environmental effects of the strategy.

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## Abbreviations

AONB.....	Area of Outstanding Natural Beauty
AQMA .....	Air Quality Management Area
ASStGWf.....	Areas Susceptible to Groundwater Flooding
BAP .....	Biodiversity Action Plan
BGS .....	British Geological Society
CAMS.....	Catchment Abstraction Management Strategy
FWMA.....	Flood and Water Management Act
GEP .....	Good Ecological Potential
GVZ.....	Groundwater Vulnerability Zone
HMWB.....	Heavily Modified Water Body
HRA .....	Habitats Regulations Assessment
IMD .....	Index of Multiple Deprivation
JNCC .....	Joint Nature Conservation Committee
LFRMS.....	Local Flood Risk Management Strategy
LGA.....	Local Government Association
LLFA .....	Lead Local Flood Authority
LNR.....	Local Nature Reserve
LWS .....	Local Wildlife Site
MDC.....	Metropolitan District Council
NCA .....	National Character Area
NNR .....	National Nature Reserve
ODPM .....	Office of the Deputy Prime Minister
RBMP.....	River Basin Management Plan
RIGS .....	Regionally Important Geological Sites
RMA .....	Risk Management Authority
SAC.....	Special Area of Conservation
SEA.....	Strategic Environmental Assessment
SLA .....	Special Landscape Area
SPA.....	Special Protection Area
SPZ .....	Source Protection Zone
SSSI.....	Site of Special Scientific Interest
SuDS.....	Sustainable Drainage Systems
UKCP09 .....	UK Climate Projection
WFD.....	Water Framework Directive

# 1 Introduction

## 1.1 Background

Bradford MDC (or the Council) has prepared a draft Local Flood Risk Management Strategy (LFRMS). As part of this process, the Council is also carrying out a Strategic Environmental Assessment (SEA), which considers the potential environmental impacts of the LFRMS. This Environmental Report sets out findings of the SEA. It has been produced to meet the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the 'SEA Regulations') and follows the guidance contained within A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005).

The ODPM guidance sets out a five stage process (A to E) to be followed (see Table 1-1). This report addresses stages B and C of the SEA process wherein LFRMS options and alternatives are identified and the predicted environmental effects of the LFRMS are assessed.

Consultation (Stage D) on this Environmental Report will be conducted as outlined in Section 7.1 of this document, whilst monitoring of the significant effects of the LFRMS (Stage E) will be undertaken in accordance with the outline monitoring programme included in Section 6.3.

Table 1-1: Stages in the SEA process

SEA Stage	Purpose
<b>Stage A:</b>	Setting the context and objectives, establishing the baseline and deciding on the scope
<b>Stage B:</b>	Developing and refining alternatives and assessing effects
<b>Stage C:</b>	Preparing the Environmental Report
<b>Stage D:</b>	Consulting on the draft plan or programme and the Environmental Report
<b>Stage E:</b>	Monitoring the significant effects of implementing the plan or programme on the environment.

## 1.2 Strategic Environmental Assessment (SEA)

SEA is a statutory assessment process required under the *Environmental Assessment of Plans and Programmes Regulations 2004* (the 'SEA Regulations'). These regulations transpose into UK law the requirements of the European Directive 2001/42/EC *on the assessment of the effects of certain plans and programmes on the environment* (the 'SEA Directive')<sup>1</sup>. The SEA Directive requires formal assessment of plans and programmes which are likely to have significant effects (either positive or negative) on the environment. It applies to all plans and programmes which are '*subject to preparation and/or adoption by an authority at national, regional or local level*' or are '*required by legislative, regulatory or administrative provisions*'<sup>2</sup>.

Local Government Association (LGA) guidance<sup>3</sup> on the production of the LFRMS identifies the likely requirement for an SEA, stating that '*the Local [Flood Risk Management] FRM Strategy is likely to require statutory SEA, but this requirement is something the [Lead Local Flood Authority] LLFA must consider*'. A SEA screening process was therefore undertaken and the Council has confirmed the requirement for its LFRMS to undergo SEA.

<sup>1</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

<sup>2</sup> Office of the Deputy Prime Minister (2004), Environmental Assessment of Plans and Programmes Regulations 2004 (No. 1633)

<sup>3</sup> Local Government Association (2011), Framework to Assist the Development of the Local Strategy for Flood Risk Management.



SEA involves the systematic identification and evaluation of the potential environmental impacts of the LFRMS. This information is then used to aid the selection of a preferred option(s) for the strategy, which are those that best meet its economic, environmental and social objectives, and legal requirements.

The full range of environmental receptors has been considered through the SEA. This meets the requirements of the SEA Directive, which requires that an assessment identifies the potentially significant environmental impacts on *'biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural and archaeological heritage, landscape and the interrelationship between the above factors'*<sup>1</sup>.

Annex I of the SEA Directive sets out the scope of information to be provided by the SEA. This is described in Table 1-2 below, which also identifies where in the SEA process for the LFRMS that the relevant requirement will be met.

Table 1-2: Stages in the SEA process as identified within Annex I of the SEA Directive

SEA Directive requirements	Where covered in the SEA
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 1.3
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 2
(c) the environmental characteristics of areas likely to be significantly affected;	Section 2
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 2
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 2
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Sections 4 and 5
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 5
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 4
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 6.3
(j) a non-technical summary of the information provided under the above headings.	Executive summary

The first output from the SEA process is the production of a Scoping Report (JBA Consulting, 2016), which outlines the scope and methodology of the assessment. A proportionate approach was adopted towards establishing the scope of the SEA, reflecting the high-level nature of the LFRMS. Consultation with the statutory consultees (Historic England, Natural England and the Environment Agency) was undertaken in October 2016 to confirm the baseline environment of the study area and the assessment framework (see Section 1.5 for further information).

This Environmental Report has now been prepared to set out the likely significant effects on the environment of implementing the LFRMS.



### 1.3 Local Flood Risk Management Strategy

The Flood and Water Management Act (FWMA) was passed in April 2010. It aims to improve both flood risk management (FRM) and the way we manage our water resources. The FWMA creates clearer roles and responsibilities and instils a more risk-based approach to flood risk management. This includes a new lead role for the Council as a Lead Local Flood Authority (LLFA) in managing and leading on local FRM from surface water, groundwater and ordinary watercourses.

Under the requirements of the FWMA, the Council must develop, maintain, apply and monitor a LFRMS for its area. The LFRMS provides a delivery vehicle for improved FRM and supports the development of partnership funding and strategic investment programme.

The LFRMS will set out:

- The roles and responsibilities for each Risk Management Authority (RMA) and their FRM functions; and
- Opportunities, objectives and measures for flood risk reduction of existing communities, including ways to minimise the risk from future growth.

Development of the LFRMS provides considerable opportunities to improve and integrate land use planning and FRM. It is an important tool to protect vulnerable communities and deliver sustainable regeneration and growth.

### 1.4 Study area

The City of Bradford is a local government district of West Yorkshire, England, with the status of a city and metropolitan borough. It is named after its largest settlement, Bradford, but covers a far larger area which includes the towns of Keighley, Shipley, Bingley, Ilkley, Haworth, Silsden and Denholme. (Figure 1-1 Study area). It forms part of the West Yorkshire Urban Area conurbation which in 2011 had a population of 1.77 million and the city is part of the Leeds-Bradford Larger Urban Zone (LUZ). Bradford has a population of 528,200, making it the fourth-most populous metropolitan district and the sixth-most populous local authority district in England (City of Bradford MDC, 2015). The borough covers an area of approximately 370 km<sup>2</sup>. The City of Bradford is situated on the edge of the Pennines, and is bounded to the east by the City of Leeds, the south east by the Metropolitan Borough of Kirklees and the south west by the Metropolitan Borough of Calderdale. Three river systems serve the City of Bradford, along with 23 km of canal. The Airedale towns of Keighley, Bingley and Shipley lie on the River Aire. The River Wharfe runs through Ilkley and Burley in Wharfedale, and tributaries of the River Calder run through the district.

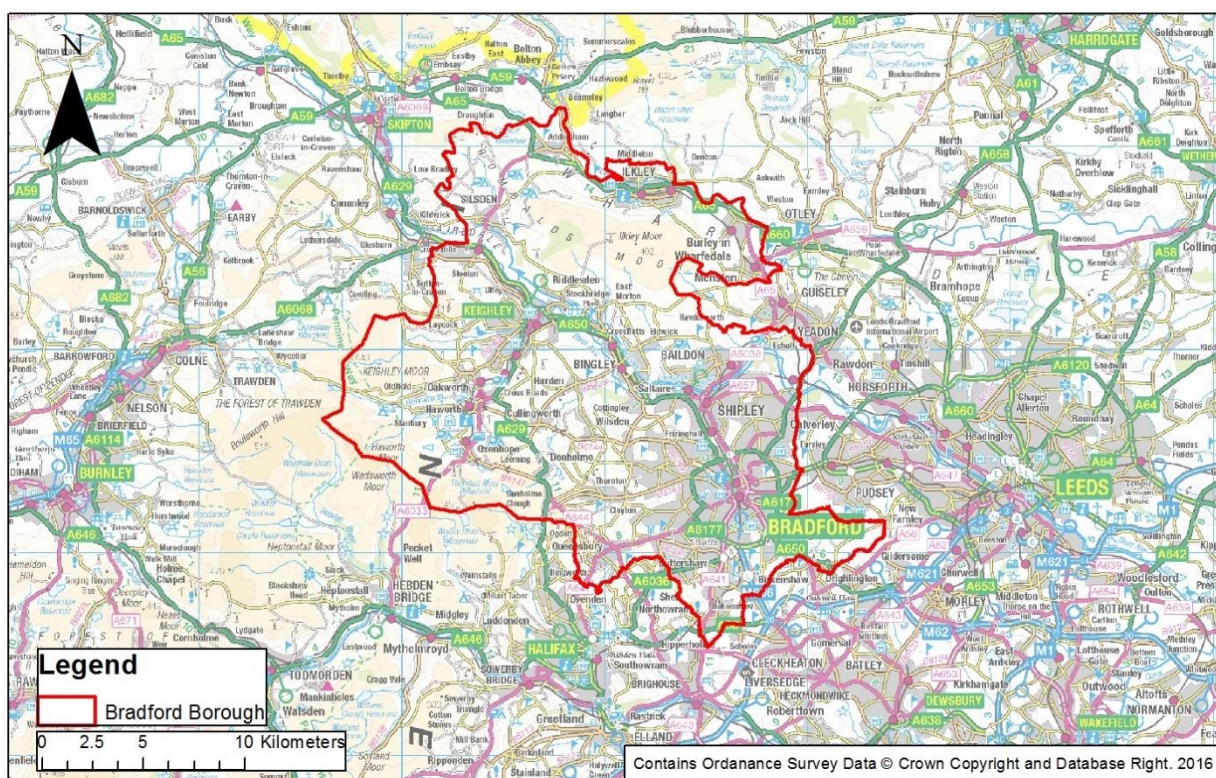


Figure 1-1: Study area

## 1.5 SEA scoping

The SEA Scoping Report for the LFRMS was issued to the statutory consultation bodies on 4 October 2016. Several comments were received on the scope of the assessment and assessment framework, which were incorporated into the preparation of this Environmental Report. Table 1-3 below summarises the comments received and how they have been addressed within this Environmental Report.

Table 1-3: SEA scoping consultation responses

Consultee	Comment received	Action taken
<b>Natural England</b>	No comments received.	n/a
<b>Environment Agency: Email dated 13 October 2016</b>	Section 4.4.5 Flooding gives a good overview of the district.	No action required
	In the paragraph at the top of page 29 I wonder where the data about the number of properties and business has been gained from? I had think the final numbers were more than this...the Leeds City Region Review documents record:  783 residential properties and 189 businesses.	Flooded property data reviewed and adjusted accordingly in description.
	On page 30, the Surface water section. I wondered if it would be useful to include specific reference to Surface Water Flooding at Florist Street (and surrounding streets) in Keighley.	Small additions to Surface Water section.
	On page 30 in the Reservoirs Section can I suggest Silsden Reservoir is included as a storage option.	Silsden reservoir is included in the list of reservoirs which can be used as storage options
<b>Historic</b>	Small changes identified to Table 3-1 For	The suggested literature was added to

Consultee	Comment received	Action taken
<b>England: Email received 14 October 2016</b>	<p>completeness, reference should also be made to the following: -</p> <p><i>International</i></p> <ul style="list-style-type: none"> <li>· European Landscape Convention (Florence Convention)</li> <li>· The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)</li> <li>· The European Convention on the Protection of Archaeological Heritage (Valetta Convention)</li> <li>· UNESCO World Heritage Convention 1972</li> </ul> <p><i>Regional/Local</i></p> <ul style="list-style-type: none"> <li>· Saltaire World Heritage Site Management Plan</li> </ul>	the list of references
	<p>The following has been superseded by the NPPF and can be deleted: National PPS5 Planning for the Historic Environment.</p>	The reference to superseded document was deleted
	<p>Table 5-2 Objective 8 first line amended to read ""Preserve and, where appropriate enhance the historic and environment and cultural sites etc. Additional indicator " Number of heritage assets whose significance has been harmed through flood defence works".</p>	The first line of Table 5-2 was amended
	<p>Strongly advise that Councils conservation section and West Yorkshire Archaeology Service are closely involved throughout the preparation of the SEA of the strategy as they are best placed to advise/access data and identify conflicting priorities and shape policy. Advice is based on information provided to date.</p>	Two additional internal consultee to SEA consultation of Environmental Report.
<b>Airedale Internal Drainage Board</b>	<p>The risk of flooding should be reduced as far as practicable and surface water arising from development should mimic surface water flows. In areas of drainage problems, development should not be allowed at any location until the Authority is satisfied that the scheme will not adversely affect the surface water drainage of the area and the amenity of adjacent properties. Development within Flood Zone 3 is not considered desirable or sustainable in the longer term. The Board usually focusses on consultations from individual developments but if there are development areas which fall within the Boards drainage district, the Board would be happy to provide comments as appropriate.</p>	Comments reflective of LFRMS objectives and measures. The details of the LLFA consultation role could be drawn up to potentially involve Airedale Internal Drainage Board where required.
<b>Aires River Trust</b>	<p>References to population figures in 2001 suggested to be changed. Some small additional references to existing plans, and copy of Aire and Calder Partnership Actionable Plan provided, plus the Management Plan for Bradford Beck. Suggestion to include the Dales River Trust in draft of SEA. Some re-emphasis required for role of River Aire and definitions of main rivers. Potential impacts or relationship from climate</p>	Some small changes, additional documents regionally within scope and minor changes or amendments.

Consultee	Comment received	Action taken
Pennine Prospects	change and flood protection measures for minimising pollution should be stated.	
	No comments received	n/a
Yorkshire Water	No comments received	n/a
Yorkshire Wildlife Trust	No comments received	n/a

## 1.6 Habitats Regulations Assessment

The European Council Directive *on the Conservation of Natural Habitats and of Wild Fauna and Flora* (92/43/EEC, 'the Habitats Directive') as implemented through the Conservation of Habitats and Species Regulation 2010 (as amended) ('the Habitats Regulations') requires a competent authority to carry out a Habitats Regulations Assessment (HRA) of a plan or project to establish whether it will have a 'likely significant effect' on sites designated for their nature conservation interest at an international level (known as European sites, which include Special Areas of Conservation (SAC), Special Protection Areas (SPA), and by UK Government policy, Ramsar sites). The LFRMS for Bradford, as a statutory plan, is subject to the requirements of the Habitats Directive.

Assessing the impacts of a plan under the Habitats Regulations is a separate process to SEA. However, there is overlap between these two types of assessment. A Test of Likely Significant Effect (TLSE) screening assessment was undertaken in accordance with the requirements of the Habitats Regulations to determine whether the LFRMS is likely to adversely affect the integrity of a European site (alone or in-combination with other plans, policies and projects). Consultation on the outcome of the screening assessment was undertaken as part of the SEA scoping consultation process.

All European sites lying partially or wholly within 15km of the Borough boundary were included in the assessment in order to address the fact that measures in the Bradford LFRMS may affect European sites which are located outside the administrative boundary of the strategy.

There are two SAC's and one SPA within Bradford borough. There is also three SACs and one SPA outside of the borough, within a 15km radius.

- North Pennine Moors SAC and SPA
- Denby Grange Colliery Ponds SAC
- Craven Limestone Complex SAC
- North Pennines Dales Meadows SAC
- South Pennine Moors Phase 2 SPA
- South Pennine Moors SAC

More detailed information on these European sites is provided in Section 2.5.1. The TLSE concluded that it is not likely that any of these designated sites would be adversely impacted by FRM activities undertaken in the Borough and as such, no further assessment is required under the Habitats Regulations for purpose of this LFRMS. Further details of this assessment are provided in the TLSE screening appraisal included in Appendix A of this report and a summary of its outcomes is provided in Section 6.4. Consultation with Natural England on the outcomes of this assessment has been undertaken as part of the consultation process outlined in Section 7.1 and it was agreed that the Borough is of a sufficient distance from these sites that no likely significant effect is identified and an Appropriate Assessment is not required.



## 2 Environmental baseline

### 2.1 Introduction

The following section presents the findings of the Scoping Report (JBA Consulting, 2016), which identified the context and objectives of the LFRMS and identified and the scope of the assessment.

### 2.2 Other relevant policies, plans and programmes

As part of the SEA process, an assessment of the integration of existing policies, plans and programmes on the proposed LFRMS is required. This is to address the requirement within the SEA Directive to determine the *'relationship [of the plan or programme] with other relevant plans and programmes'* (Annex I (a)), including, *'environmental protection objectives, established at international, [European] community or [national] level'* (Annex I (e)).

Identifying these relationships enables potential synergies to be determined, strengthening the benefits that can be gained from implementation of the LFRMS. This information is also used to inform the development of the environmental baseline and the identification of key issues and problems. In addition, any inconsistencies or constraints can be identified, which could hinder the achievement of the environmental protection objectives or those of the LFRMS, and therefore providing a broad appraisal of the strategy's compliance with international, national and local considerations.

The ODPM SEA guidance recognises that no list of plans or programmes can be definitive and as a result this report describes only the key documents that may influence the LFRMS. These are shown in Table 2-1.

Table 2-1: Policies, plans and programmes reviewed through this SEA process

Plan, Policy or Programme
<b>International</b>
EU Sustainable Development Strategy (revised 2006)
European Biodiversity Strategy to 2020
EC Birds Directive – Council Directive 2009/147/EEC on the conservation of wild birds
EU Floods Directive – Directive 2007/60/EC on the assessment and management of flood risks
EU Groundwater Directive – Directive 2006/118/EC on the protection of groundwater against pollution and deterioration
EC Habitats Directive – Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora
Urban Wastewater Treatment Directive – Directive 91/271/EEC concerning urban waste water treatment
EU Water Framework Directive – Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy
UNESCO World Heritage Convention (1972)
European Landscape Convention (Florence Convention)
The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)
The European Convention on the Protection of Archaeological Heritage (Valetta Convention)
<b>National</b>
Securing the Future – the UK Government Sustainable Development Strategy (2005)
Flood and Water Management Act (2010)
Flood Risk Regulations (2009)
Water for People and the Environment, Water Resources Strategy for England and Wales (2009)
Future Water, The Government's water strategy for England (2008)
Making Space for Water – taking forward a new Government strategy for flood and coastal erosion risk management in England (2005)
The National Flood and Coastal Erosion Risk Management Strategy for England (2011)
Water Act (2003)
Draft Water Bill (2012)
The National Flood Emergency Framework for England (2011)
The Carbon Plan (2011)
Building a Low Carbon Economy – the UK's Contribution to Tackling Climate Change (2008)

Plan, Policy or Programme
Climate Change Act (2008)
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems (2011)
England Biodiversity Framework (2008)
UK Biodiversity Action Plan (1994)
National Wetland Vision (2008)
Wildlife and Countryside Act (as amended) (1981)
Natural Environment and Rural Communities (NERC) Act (2006)
Salmon and Freshwater Fisheries Act (1975)
Contaminated Land (England) Regulations (2006)
National Planning Policy Framework (2012)
Historic Environment Good Practice Advice in Planning: Historic Environment Records (2014)
Historic Environment Good Practice Advice Guide in Planning: Note 3: The Setting of Heritage Assets.
Regional / Local
Aire Catchment Flood Management Plan (2010)
Ouse Catchment Flood Management Plan (2010)
Bradford Strategic Flood Risk Assessment Level 1 Report (2014)
Humber River Basin Management Plan (2015)
Managing Drought in the North West (2011)
City of Bradford Metropolitan District Council Preliminary Flood Risk Assessment (2011)
Bradford Air Quality Action Plan (2009)
Bradford Highways Infrastructure Asset Management Strategy (2015)
West Yorkshire Local transport plan 2011 – 2026 (2011)
City of Bradford Local Biodiversity Action Plan (2011)
Bradford Local Climate Impact Profile (2010)
Bradford Open Space and Built Recreation Facilities Scoping Report (2007)
Bradford Core Strategy DPD (2014)
Bradford City Centre Area Action Plan (2015)
Shipley and Canal Road Corridor Area Action Plan (2015)
Bradford District Local Flood Risk Management Strategy (2016)
Aire and Calder Partnership Actionable Plan (2016)
Fresh Aire Vision and Delivery Plan (2010)
The Management Plan for Bradford Beck (2012)
Saltaire World Heritage Site Management Plan (2014)

### 2.3 Environmental characteristics and key issues

A search of baseline environmental information was undertaken to identify the key environmental characteristics of the Borough. This included details of the environmental status and condition of notable environmental features; current and future predicted trends in the evolution of the environment; and issues and problems currently affecting the environment. The baseline information is used as the basis for predicting and monitoring the effects of the LFRMS implementation.

The information obtained through this desk study is broadly strategic in nature and reflects the high-level objectives of the LFRMS. It has been obtained from a broad range of sources and no new investigations or surveys were undertaken as part of the scoping process. The baseline may require updating throughout the duration of the SEA process as the LFRMS is developed further and new information becomes available.

### 2.4 Landscape and visual amenity

Bradford is a large metropolitan authority which forms one of the five districts within the West Yorkshire conurbation. The Bradford Metropolitan District is characterised by a mixture of urban and rural areas with distinctive character and attractive landscapes. The topography of Bradford means most of the industrial and residential development is in the south of the district and along the valley bottoms, with the majority of the population living in the urban centres of Bradford and within the freestanding settlements of Keighley, Bingley and Shipley, in Airedale, and Ilkley, in

Wharfedale. While the urban areas are quite densely developed, two-thirds of the District is rural with moorland and attractive valleys surrounding and penetrating into the urban areas.

Bradford City is not built on any substantial body of water but is situated at the junction of three valleys, one of them, that of the Bradford Beck which rises in moorland to the west, and is swelled by its tributaries, the Horton Beck, Westbrook, Bowling Beck and Eastbrook.

A large percentage of the district area is designated as Metropolitan Green Belt and a substantial areas of upland Heathland (3836ha) known as the Milestone Grits of the South Pennines and blanket bog (741ha).

Bradford District has approximately 210,000 dwellings (derived from Council Tax data, 2013) occupied by around 200,000 households (CLG 2011 based Interim Household Projections). The age of the housing stock also reflects the growth of the District, with a third of stock being built before 1919. Bradford District contains a rich and diverse built heritage which consists of the third highest number of designated assets in the Region and one of only two World Heritage Sites in Yorkshire. The District's 2,289 listed building entries on the National Heritage List for England range from 16th century farmsteads and parish churches to grand Victorian houses. The architectural and historic wealth of protected buildings and 59 designated conservation areas are highly valued for the essential contribution they make to local distinctiveness and environmental identity. The benefits of the built heritage to the economy and tourism have been demonstrated by successful regeneration projects.

The World Heritage Site of Saltaire stands as an example model town built with the wealth produced by the industries prevalent in this area. Saltaire is a Victorian model village located in Shipley. The Victorian Era Salt's Mill and associated residential district located by the River Aire and Leeds and Liverpool Canal is a designated UNESCO World Heritage Site and an Anchor Point of the European Route of Industrial Heritage.

The unique association of the Brontes with Haworth, the surrounding Pennine landscape and the wider district is demonstrated by sustained tourism. The District also benefits from designated historic landscapes and gardens, many of which are municipal parks, some restored to their Victorian glory and five with green flag status. A 16-mile navigable stretch of the Leeds and Liverpool Canal protected by conservation area designation with iconic historic structures such the Five Rise Locks, a historic battlefield and a complex assemblage of scheduled Bronze Age carved rocks demonstrate the wealth of heritage within the District.

One of the most striking features of the District is the quality of its landscape and in particular the proximity of the main urban areas to areas of high landscape value. The character of the District's landscape is very varied, ranging from the rugged open moorland of the South Pennine uplands to rolling farmland, and open river valleys to wooded hillsides.

The habitats in the Bradford District are largely influenced by their underlying geology. The Millstone Grits of the Southern Pennines to the west of the District give rise to substantial areas of upland heathland and blanket bog, whilst the softer shales of the Coal Measures have produced more woodlands, valley wetlands and unimproved grasslands. The uplands support a wide range of bird species. The demand for development on the lower-lying Coal Measures has fragmented these habitats, although unique habitats have also been created throughout the District as by-products of industrialisation, such as reservoirs, canals and quarries (City of Bradford MDC, 2016).

Most of the agricultural land in Bradford consists of improved and semi-improved pastures on the upland fringes of the north-west of the District or the neutral (neither alkaline nor acidic) grasslands to the east and south of Bradford City. Agriculture in Bradford District is generally based around rearing stock, mainly sheep, although cattle rearing takes place in areas along the river valleys and on lowlands to the east of the district (City of Bradford MDC, 2014).

The highest elevations of the borough are in the south-west, where ground levels reach approximately 450m Above Ordnance Datum (AOD). Dick Delf Hill is the highest point within the borough boundary at 452m AOD. There are natural low points along the River Aire in the north-east between Esholt Hall and Apperley Bridge (50m AOD).



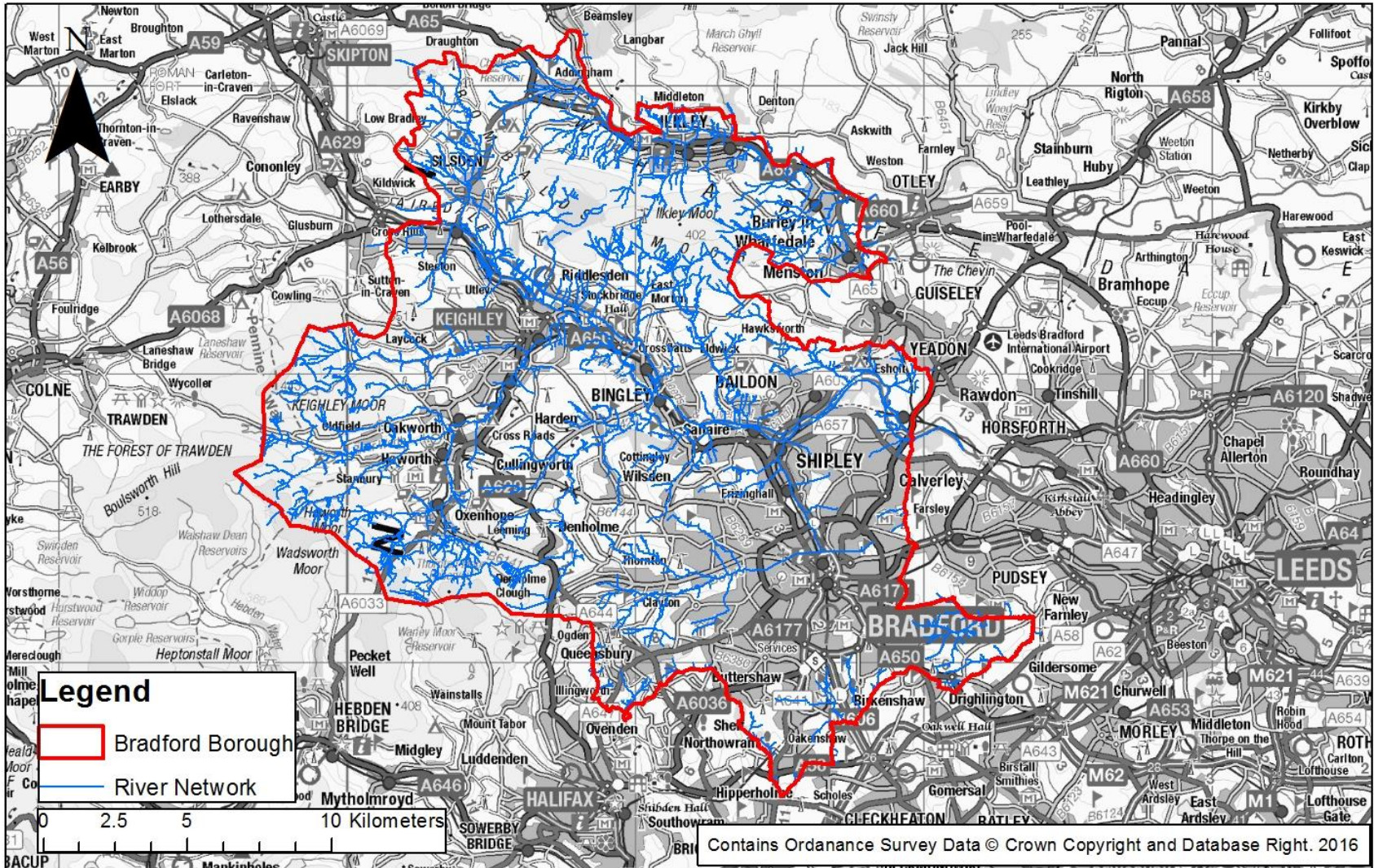


Figure 2-1: River Network in Bradford



There are no AONBs or National parks within the borough of Bradford, but the Yorkshire Dales National Park and Nidderdale AONB border the borough, just north of the town of Ilkley.

Bradford Borough is located in three National Character Areas (NCAs); Yorkshire Southern Pennine Fringe (coal measures), Nottinghamshire, Derbyshire and Yorkshire Coalfield (coal measures) and the Southern Pennines.

The Southern Pennines NCA (36) are part of the Pennine ridge of hills, lying between the Peak District National Park and Yorkshire Dales National Park. This is a landscape of large-scale sweeping moorlands, pastures enclosed by drystone walls, and gritstone settlements contained within narrow valleys. The area contains internationally important mosaics of moorland habitats which support rare birds such as merlin, short-eared owl and twite (Natural England, 2012).

The Yorkshire Southern Pennine Fringe NCA (37) is a transitional landscape from the upland areas of the Southern Pennines NCA in the west through to the low-lying land of the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA to the east. The landscape is dominated by industrial buildings and structures such as factories, chimneys, railways and canals. The NCA is characterised by steep slopes that are cut through by narrow rivers, which open up into valleys on lower land. The river corridors provide links through the NCA from the uplands into the towns and cities in the valleys, supplying not only water for the large population in these areas but also opportunities for people to access and enjoy the natural environment and for species movement through the landscape (Natural England, 2013).

The geological deposits of coal and iron, along with the water supply in the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA (38), brought mass industrialisation to the area to exploit these resources. A generally low-lying area, with hills and escarpments above wide valleys, the landscape embraces major industrial towns and cities as well as villages and countryside. Over half of the NCA (64%) is currently designated as greenbelt land (Natural England, 2013).

Work has taken place to identify the potential for increasing habitat linkages across the regions landscapes and within the District in relation to grassland, woodland, wetland and heathland networks. In future the effects of drought could result in greater fragmentation of habitats. To adapt to climate change the Yorkshire and Humber Climate Change Adaptation Study recommends improving connectivity and an overall expansion in habitat types currently suffering from isolation or fragmentation, to improve habitat permeability.

The Landscape Character SPD provides an existing statement of the landscape of Bradford District describing its distinctive attributes and features, which are desirable to preserve and enhance and ten landscape character areas. Each of the ten Landscape Character Assessment details the condition of the landscape and the sensitivity of the landscape to change, along with providing a set of policy guidelines for development (City of Bradford Metropolitan District Council, 2008). The ten landscape character areas in the Bradford District are summarised as follows:

- **Airedale;** The largest and most complex character area in the district. It is a distinctive broad U shaped valley, with contrasts between the open exposed upland pastures above 250m A.O.D. and the busy settlements and industrial areas of the valley floor. There is also a contrast between the valley sides with the south facing side containing enclosed pastures with settlements and the north facing steeper slopes dominated by woodlands.
- **Esholt;** characterised by a strong, well defined, sense of enclosure created by the valley landform and the woodland blocks. It has a lush, green, lowland character because of the combination of the high amounts of tree cover present in the form of woodlands, tree clumps, and hedgerow trees; and the significant areas of hedgerow-bounded pastures.
- **Pennine Upland;** a sparsely inhabited landscape characterised by a large tract of elevated open moorland and sweeps of upland pastures whose landform is highlighted by the strong field patten of stone walls across the rolling contours of the land.
- **Rombalds Ridge;** a primarily high level plateau with an upland character dominated by moorland. Strong cultural association, archaeological interest, ecological importance and recreation value add depth and meaning to this Character Area.
- **South Bradford;** It contains a wide range of different land uses within a relatively small area but is, in general degraded and fragmented by pockets of urban/industrial development which have wakened its character. The landscape is an open lowland,

typical of the Yorkshire Coalfield landscape and has few characteristics which could be applied over the whole area because of its variability.

- **Thornton / Queensbury**; an area of relatively high, but settled land sloping east towards the centre of Bradford from the uplands of the South Pennines. It is an exposed landscape with scattered tree cover, mainly in the small interconnecting valleys.
- **Tong Valley**; a green, relatively well wooded, and gently undulating, lowland landscape in between the Leeds and Bradford conurbations. In general, it is an enclosed landscape with a ring of estate and high-rise flat developments featuring on distant skylines.
- **Wharfedale** has a strong visual connection with the adjoining Yorkshire Dales National Park and Nidderdale AONB. This is partly due to its physical separation from Airedale by Rombalds Moor, but also because Wharfedale has avoided the full impact of the Industrial Revolution, possibly due to the better quality of soils and gently sloping valley sides which has supported a stronger agricultural land use.
- **Wilsden**; a sheltered, settled landscape dominated by the three principle settlements of Harden, Wilsden and Cullingworth which nestle in the concave landform of sheltered hollows and dips
- **Worth & North Beck Valley**; the area comprises three settled valleys running west, south west and south from Keighley and dissecting the moorland of the Pennine Upland and South Pennine Moors (City of Bradford Metropolitan District Council, 2008).

#### 2.4.1 Key environmental issues

Key issues and challenges arising from current and anticipated forces for change in the Bradford landscape are:

- Ensuring that any potential new development is sited to minimise impacts on landscape character, designations and visual amenity of international, national and local significance.
- Addressing the adverse impacts of small-scale incremental changes on the character and quality of the landscape.
- Preserving and enhancing the unique heritage and character of the World Heritage Site of Saltaire.

Pressure from new development and associated infrastructure are likely to present significant challenges as the area responds to an increasing population and the demands of economic development and climate change.

Flood risk management measures have the potential to affect the landscape characteristics in the borough. This includes changes to the river corridors, impacts on existing open spaces, and impacts on the setting of local landmarks and landscape features. Many of these aspects are protected through regional and local policies and as such could restrict the implementation of LFRMS objectives if they are shown to present a risk to the quality of the landscape. There are LFRMS management measures which could contribute towards the preserving and enhancement of landscape character areas and features and NCA's.

## 2.5 Biodiversity, flora and fauna

### 2.5.1 Designated nature conservation sites

Bradford supports internationally designated nature conservation sites and whilst there are no Ramsar sites in the borough or within 15km of the borough. There are two SAC's and one SPA within Bradford borough. There is also three SACs and one SPA outside of the borough, within a 15km radius. (Figure 2-2 and Figure 2-3 ). European sites within the borough and within 15km of the borough are listed and briefly described in Table 2-2.

Table 2-2: European sites within 15km of Bradford borough

Site name	Distance from Bradford Borough	General Site Character
North Pennine Moors SAC and SPA	1.6km north of Bradford Borough	SAC Summary: Bogs, Marshes, Water fringed vegetation, Fens (41%); Heath, Scrub, Maquis and Garrigue, Phygrana (32%); Dry grassland, Steppes (26.5%) Broad-leaved deciduous woodland (0.5%) (JNCC, 2015) SPA Summary: It encompasses extensive tracts of semi-natural moorland habitats. The site is of European importance for several upland breeding species, including birds of prey and waders.
Denby Grange Colliery Ponds SAC	14.4km south-east of Bradford Borough	SAC Summary: Inland water bodies (Standing water, running water) (5%); Improved grassland (12%); Broad-leaved deciduous woodland (75%); Coniferous woodland (5%); Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites) (3%) (JNCC, 2015)
Craven Limestone Complex SAC	14.6km north-west of Bradford Borough	SAC Summary: Inland water bodies (Standing water, running water) (1%); Bogs, Marshes, Water fringed vegetation, Fens (3%); Dry grassland, Steppes (85%) Broad-leaved deciduous woodland (1%); Inland rocks, Scree, Sands, Permanent Snow and ice (10%) (JNCC, 2015)
North Pennines Dales Meadows SAC	Within Bradford borough	SAC Summary: Dry grassland, Steppes (1%); Humid grassland, Mesophile grassland (99%) (JNCC, 2015)
South Pennine Moors Phase 2 SPA	Within Bradford borough	SPS Summary: It covers extensive tracts of semi-natural moorland habitats including upland heath and blanket mire. The site is of European importance for several upland breeding species, including birds of prey and waders. Both Merlin <i>Falco columbarius</i> and Golden Plover <i>Pluvialis apricaria</i> spend some of their time feeding outside the SPA on adjacent areas of in-by-land (JNCC, 2016).
South Pennine Moors SAC	Within Bradford borough	SAC Summary: Inland water bodies (Standing water, running water) (1%); Bogs, Marshes, Water fringed vegetation, Fens (43%); Heath, Scrub, Maquis and Garrigue, Phygrana (46%); Dry grassland, Steppes (5%); Humid grassland, Mesophile grassland (5%); Broad-leaved deciduous woodland (1%)



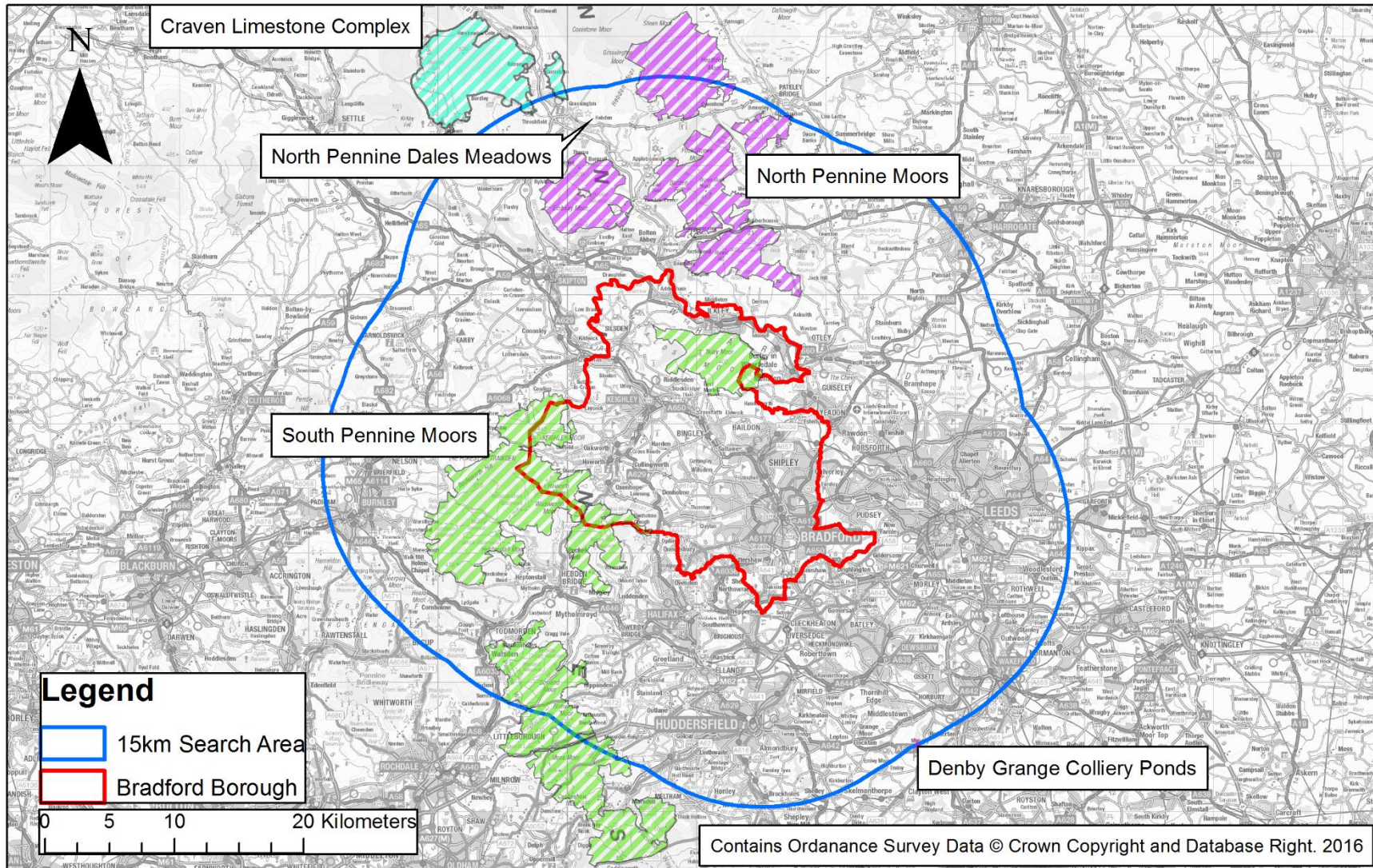


Figure 2-2: Special Areas of Conservation (SAC) within 15km of Bradford



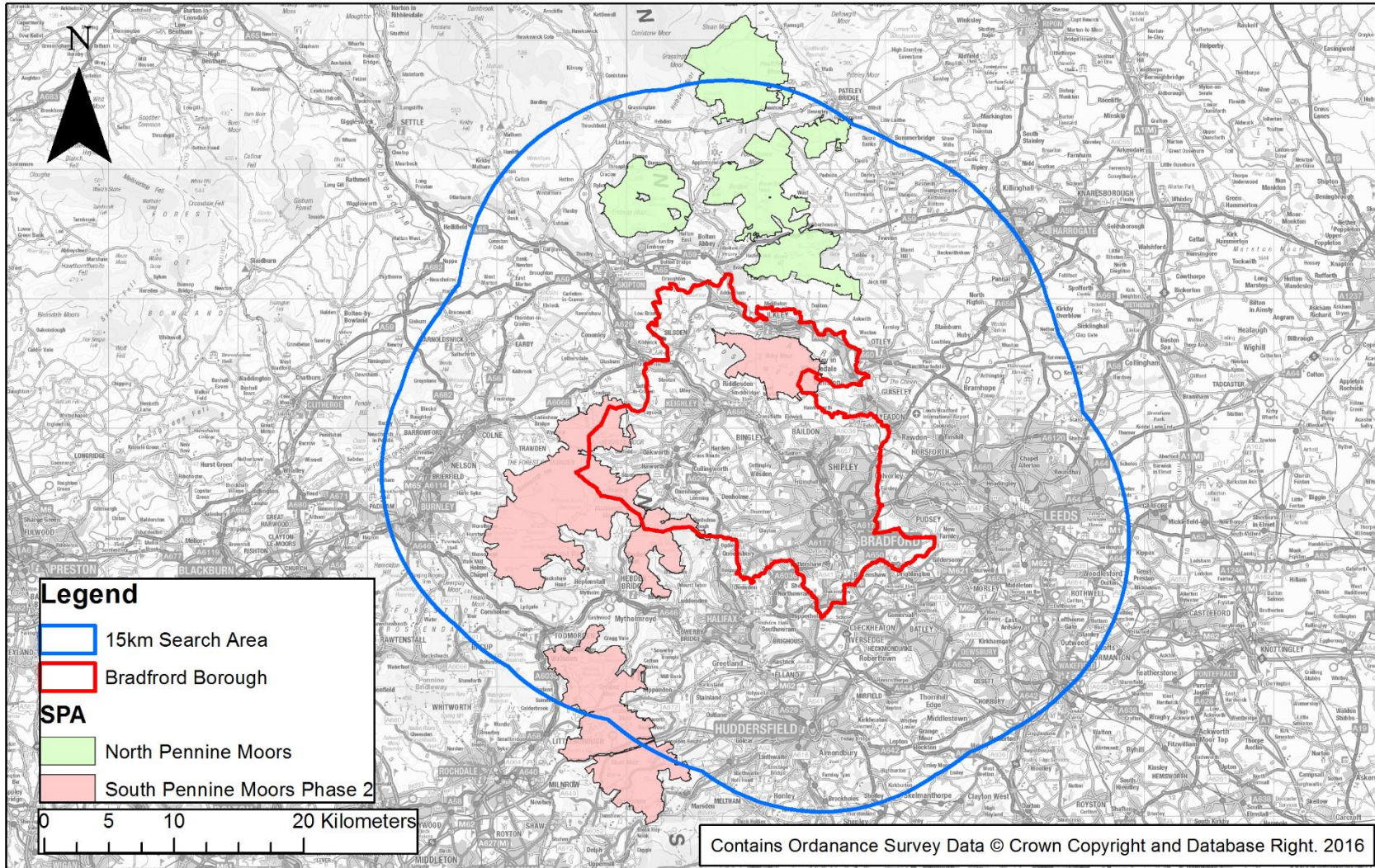


Figure 2-3: Special Protection Areas (SPA) within 15km of Bradford

There are four Sites of Special Scientific Interest (SSSI) in Bradford (Figure 2-4) with only one of these sites classified by Natural England as in a favourable condition (Natural England, 2016). Bradford's SSSIs are listed and described in Table 2-3. Favourable sites are defined as sites with habitats and features which are in a healthy state and are being conserved by appropriate management.

Table 2-3: SSSIs within Bradford borough

SSSI name	Location	Interest features	SSSI condition
Bingley South Bog	This small mire occupies a peat-filled hollow in undulating ground between the Leeds Liverpool Canal and the River Aire, at Bingley, north of Bradford.	The surviving wetland provides a transition from fen to dam neutral grassland, maintained in a species-rich condition, probably by grazing. Open water occurs in a depression caused by the weight of an aqueduct embankment.	Unfavourable – Recovering (87.05%) Destroyed (12.95%)
South Pennine Moors	This site forms part of the Southern Pennines lying between Ilkley in the north and the Peak District National Park boundary in the south. Most the site is within West Yorkshire but it also covers areas of Lancashire, Greater Manchester and North Yorkshire.	The site is the largest area of unenclosed moorland within West Yorkshire and contains the most diverse and extensive examples of upland plant communities in the county. Extensive areas of blanket bog occur on the upland plateaux and are punctuated by species rich acidic flushes and mires. There are also wet and dry heaths and acid grasslands.	Unfavourable - No change (4.16%) Unfavourable – Recovering (94.68%) Favourable (1.16%)
Trench Meadows	Trench Meadows are situated in the River Aire valley between the towns of Shipley and Bingley, on the fringe of the Southern Pennines.	The meadows are of special interest for their neutral grassland, which occurs with smaller areas of acid grassland and rush pasture, the latter associated with a number of flushes which run downslope through the fields.	Unfavourable – Recovering (100%)
Yeadon Brickworks & Railway Cutting	This site is situated in New Scarborough, north of Spring Wood.	This quarry and adjacent railway cutting display an excellent section through the rocks of late Namurian age, and the importance of this site is recognised by its being the type locality for the Yeadonian Stage	Favourable (100%)



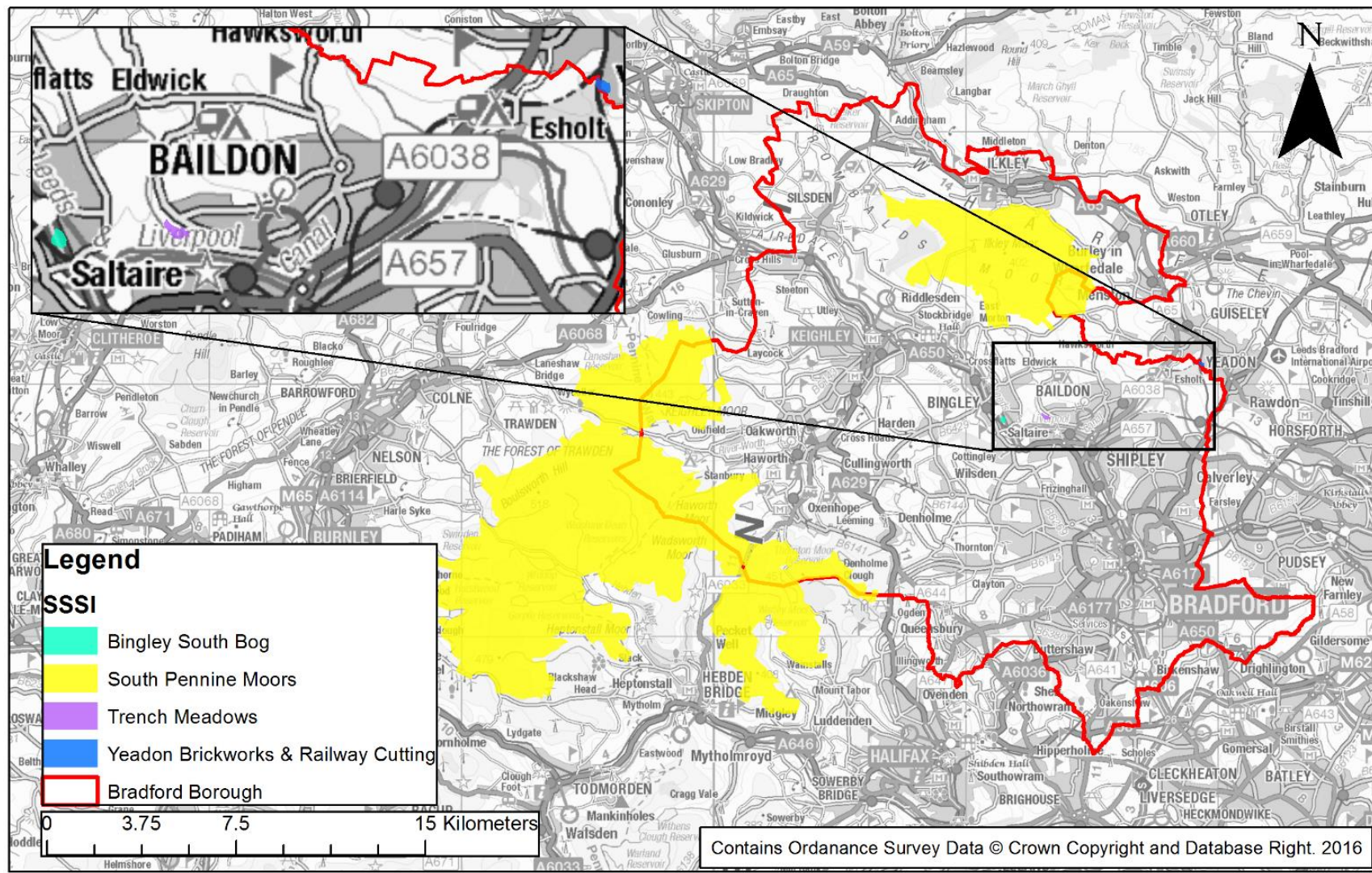


Figure 2-4: Sites of Special Scientific Interest (SSSI) in Bradford

There are no identified National Nature Reserves (NNR) in Bradford, or within 15km of Bradford

### 2.5.2 Local designated sites

There are three Local Nature Reserves (LNRs) within the Bradford Borough Boundary (as shown in Figure 2-5 and Figure 2-6). These are Ben Rhydding Gravel Pits LNR, and Sun Lane (Burley in Wharfedale) LNR in the North, and Railway Terrace LNR in the South.

Ben Rhydding Gravel Pits LNR is a former gravel pit characterised in some area by, undisturbed by the gravel extraction, and mature trees. Elsewhere in the workings colonization, has resulted in tree cover, mostly birch and willow approximately 40 years old. There are lagoons in the centre of the site and several informal paths (Bradford MDC, 2016).

The 12-acre Sun Lane LNR is on the site of the old Village Tip which was in use until 1975. In the early 1990's pollution was found to be leaching from the site and contaminating the River Wharfe. This necessitated the installation of an anti-pollution system by Bradford Council (who own the site) incorporating reedbeds, willow carr and water courses (Burley-in-Wharfedale Village, 2016).

Railway Terrace (locally known as Raw Nook) LNR was designated an LNR in 2008. The site is an old railway goods yard and engine shed, and is locally important for lowland heathland and wildflower meadows (Natural England, 2008).

There are 48 Local Wildlife Sites (LWS) (WYJS), as shown in Figure 2-7. These are sites that are of local importance and are designated by the local authority, however, they have no statutory protection. The LWSs include areas of ancient woodland, hedgerows and green lanes, post-industrial brownfield sites, reedbeds and chalk grassland.



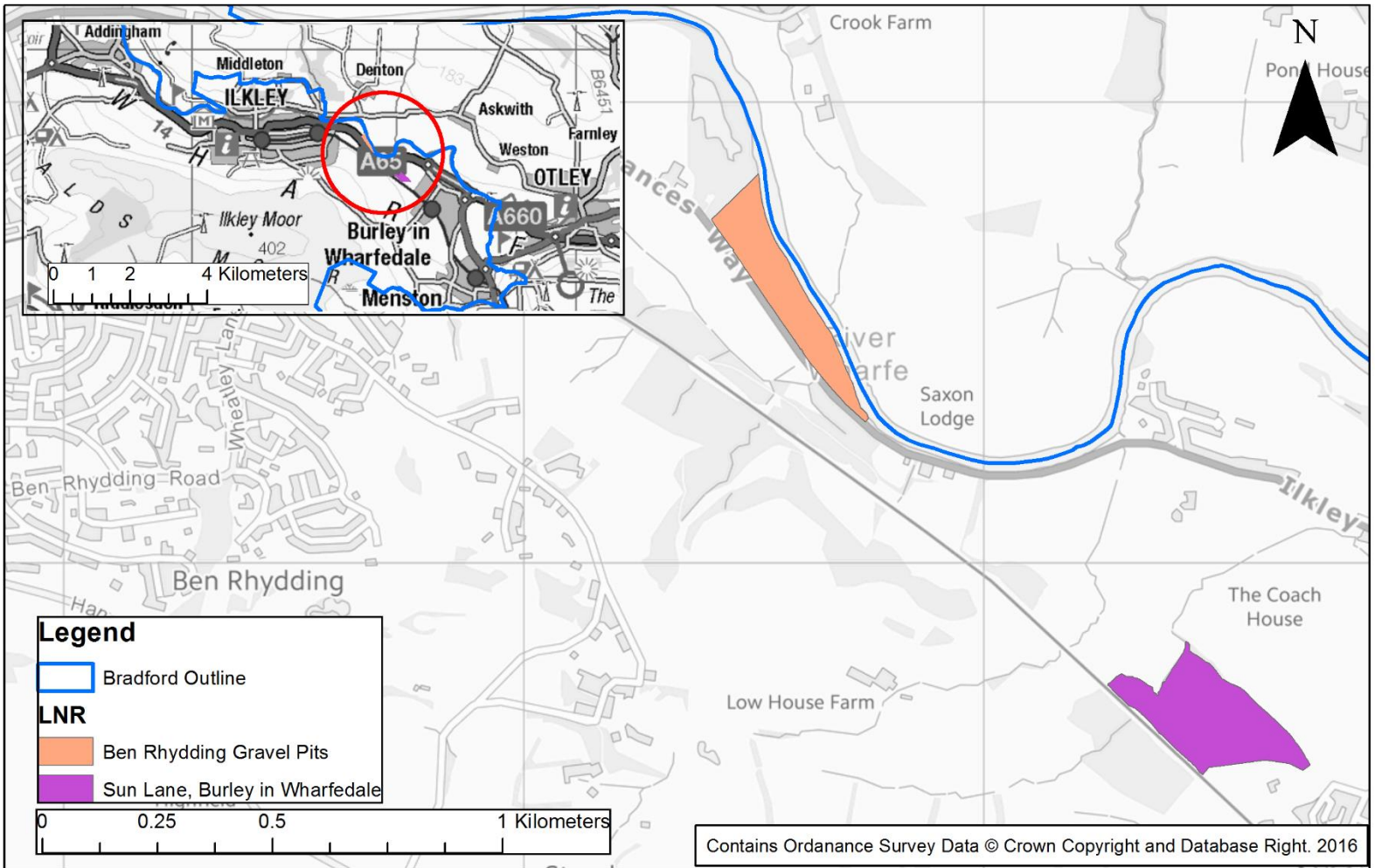


Figure 2-5: Local Nature Reserves (LNR) in the North of Bradford

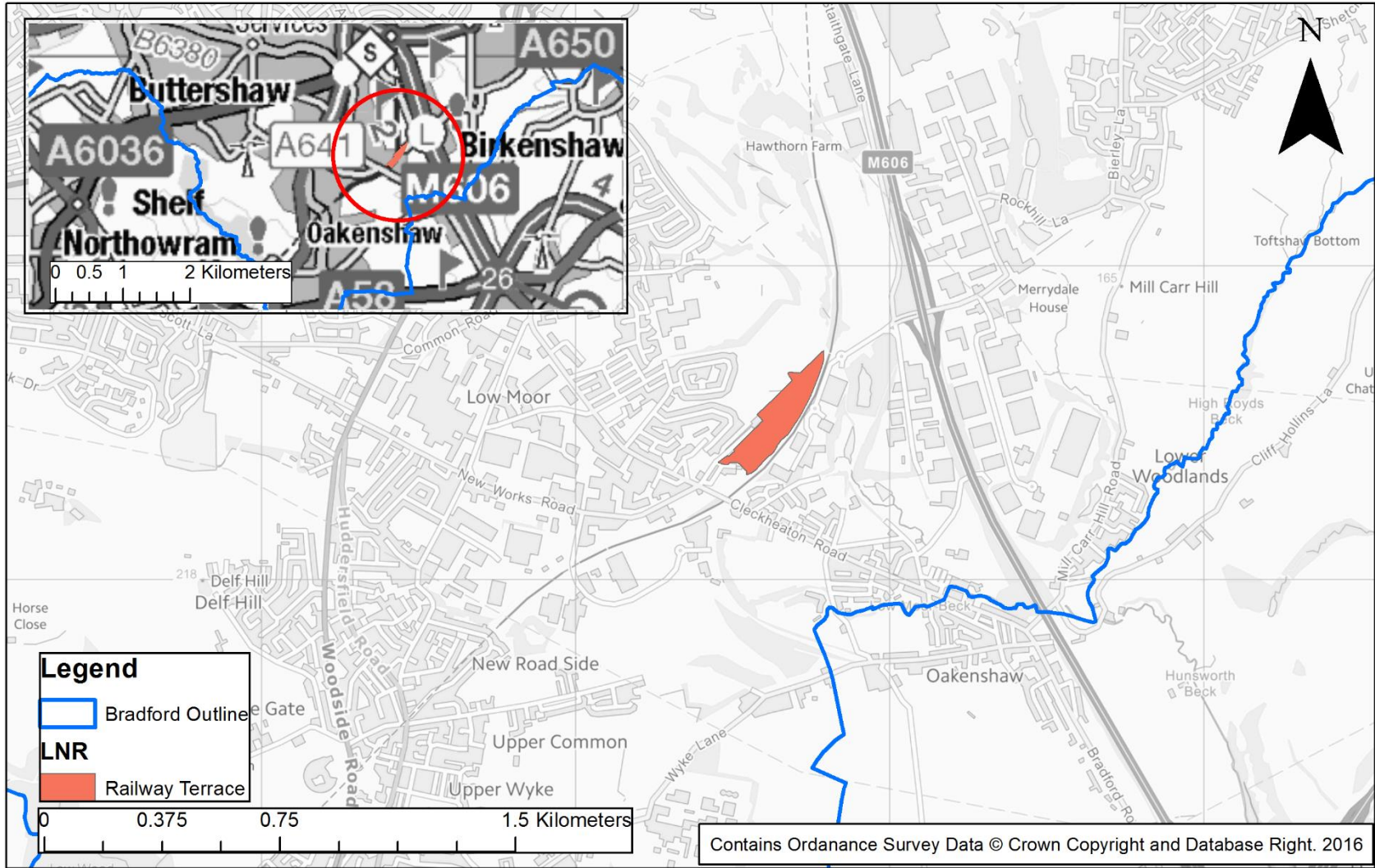


Figure 2-6: Local Nature Reserves (LNR) in the South of Bradford



### 2.5.3 Notable habitats and species

As described above, Bradford has a variety of habitats, including ancient woodland, heathland, meadows, and lagoons. Ancient woodland does not cover a large amount of Bradford, being mainly fragmented in the centre and north (Figure 2-7).

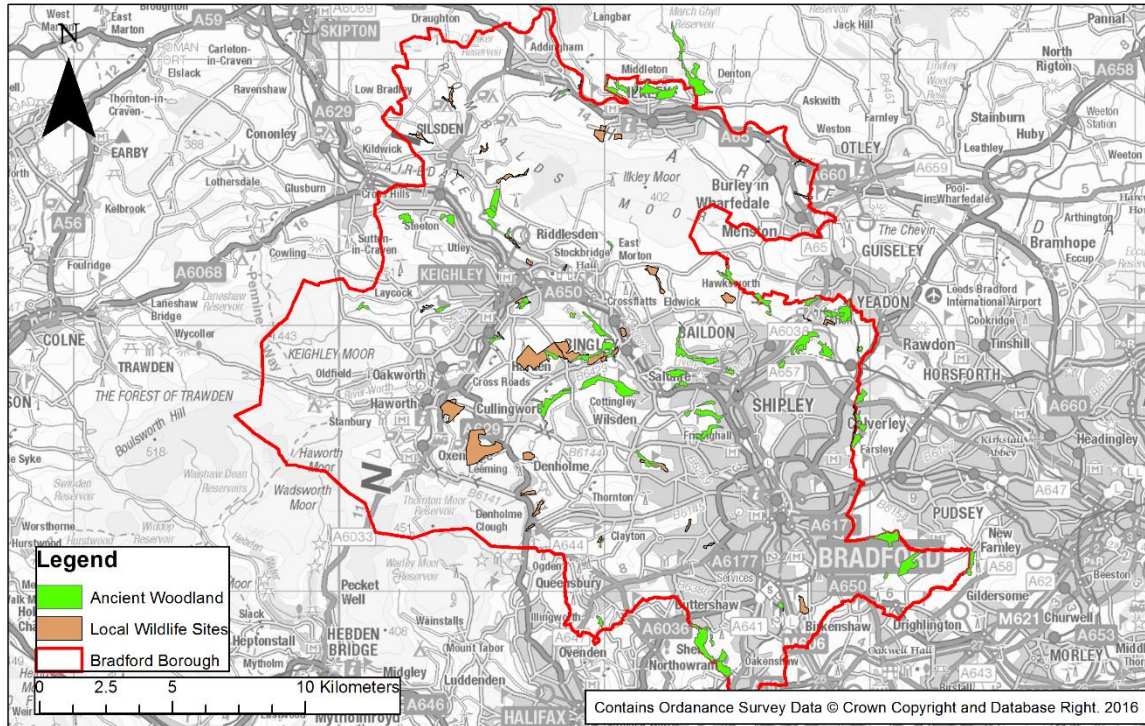


Figure 2-7: Ancient Woodland and Local Nature Reserves (LNRs) in Bradford

An ancient woodland is a woodland that has existed continuously since 1600 or before in England, Wales and Northern Ireland. Before those dates, planting of new woodland was uncommon, so a wood present in 1600 was likely to have developed naturally. There is approximately 720 hectares of ancient woodland in Bradford as shown in Figure 2-7. There are also 48 local wildlife sites including; St Paul’s Wood, Chellow Dean Woods and Reservoir, Elam Wood and Bingley North Bog. These sites are mainly present in the centre of the district, south of Keighley and North of Bradford, as shown in Figure 2-7.

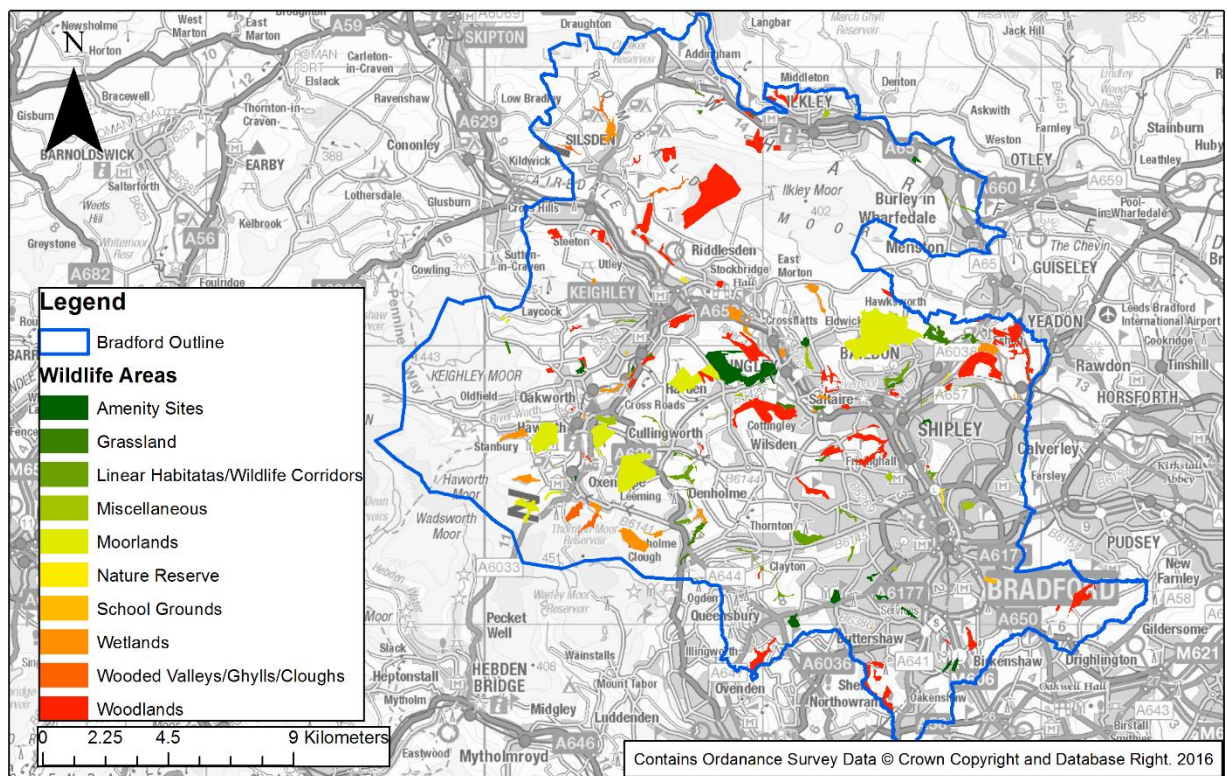


Figure 2-8: Wildlife areas in Bradford

Less than 5% of the Bradford District is woodland compared to a national average of 10%, as shown in Figure 2-8. The Forest of Bradford Project has planted over 270,000 trees (135 hectares) of new native woodland and hedgerows since 1998.

The City of Bradford Local Biodiversity Action Plan whilst somewhat out of date is still relevant. Its overarching aim is to conserve and enhance wildlife species and habitats of the district as part of Bradford’s contribution to the conservation of UK and global biodiversity. Its six objectives of plan, protection, policy, partnerships and public awareness are still applicable. As described earlier in section 4.2. The habitats in Bradford District are largely influenced by their underlying geology where the Milestone Grits of Southern Pennines give rise to substantial areas of upland heathland and blanket bog. The softer shales of the Coal Measures have produced more woodlands, valley wetlands and unimproved grasslands. The demand for development and industrialisation has fragmented these habitats and created unique habitats of reservoirs, quarries and canals. Many field boundaries consist of dry stone walls and some hedgerows provide important habitats and wildlife corridors. Urban habitats in area are important and the many brownfield sites and landscaped urban areas area’s support range of wildlife species.

The following habitats have Biodiversity Action Plans (BAP) to protect and enhance their status in the Bradford District (City of Bradford MDC, 2016).

**Habitats**

- Upland Oak Woodland
- River Corridors
- In Bye Pasture
- Hedgerows

Furthermore, the following habitats have Habitat Action Plans

- Enclosed pasture and hay meadow below open moorland
- Rushes and wet flushes
- Wide variety of invertebrates
- Important for wading birds – snipe, curlew, lapwing and redshank

## Species

The wildlife in Bradford is influenced by climate topography and latitude. The network of river and beck corridors and In-bye pasture form local key habitats important for species like migratory fish, otters and white-clawed crayfish which depend on continuity of habitat. The upland peatlands, valleys and associated dykes are important water and wetland habitats, as are smaller features such as ponds, lakes, millponds and reservoirs that form part of a wider ecological network with other habitat types. The following local key species have Biodiversity Action Plans (BAP) to protect and enhance their status in the Bradford District (City of Bradford MDC, 2016).

- Otter
- Water Vole
- Pipistrelle
- Brown Hare
- Crayfish
- Grayling (fish)
- White Letter Hairstreak Butterfly
- Green Hairstreak Butterfly
- Blue Butterflies
- Twite
- Yellowhammer
- Lapwing
- Lesser Twayblade
- Marsh Fern

Some species within the Bradford District are protected by national and international laws:

- Bats  
Eight species of bat are found in the Bradford District. Their roosts are sometimes destroyed by insensitive development, house repairs or tree felling.
- Badgers
- Otters
- Water voles  
Water voles are now rare in the Bradford District due to:
  - Competition from illegally-released mink
  - Loss of bankside habitat and disturbance
- White Clawed Crayfish

### 2.5.4 Fisheries

Bradford has over 50km of main rivers and 23km of canal running through the district. Both the River Wharfe, which supports a variety of fish, including a salmon, brown trout and grayling and the Leeds Liverpool Canal are designated as Sites of Ecological or Geological Interest (SEGIs) for their nature conservation value. The other main river that flows through the district, the River Aire has been affected by years of pollution, although water quality has recently improved significantly through a variety of infrastructure initiatives (City of Bradford MDC, 2014). The River Aire now supports a sustainable coarse and brown trout fishery and, as evidenced by sightings downstream of the Bradford boundary, appears capable of supporting migratory species as and when the remaining barriers to fish passage are eliminated.

### 2.5.5 Key environmental issues

The rural areas within Bradford are under increasing pressure from development and changes in land use, particularly because of changes in farming practice, alternative uses for buildings in the countryside and pressure for outdoor recreation, leisure and commercial uses.



Many designated sites are under pressure from climate change and development. These are dependent on underlying hydrological conditions and are therefore vulnerable to flooding and changes in hydrology. These sites support several species that are reliant on riverine habitat, and are subsequently at risk from flooding events, poor water quality, changes to hydrological regimes and habitat changes.

Future incidences of flooding could potentially damage and change the nature of habitats and supporting species composition within the designated nature conservation sites both within and outside the borough. The LFRMS will need to consider whether any flood risk management measures will lead to adverse impacts on the water bodies within the borough and whether the LFRMS can help contribute to delivering any mitigation measures such as through improvements to fish passage. Implementation of the LFRMS may also provide opportunity to enhance or create new habitats within the borough.

Flooding and flood risk management has the potential to significantly impact on many species of note in the borough. Some, such as water vole and crayfish, are dependent upon aquatic and riparian habitats, and are sensitive to changes in habitat conditions, changes in water quality, flow, vegetation cover and bank profile.

## 2.6 Water environment

### 2.6.1 Water resources

Bradford District includes the catchment areas of the River Aire and the River Wharfe.

Bradford is not built on any substantial body of water but is situated at the junction of three valleys, one of them, that of the Bradford Beck which rises in moorland to the west, and is swelled by its tributaries, the Horton Beck, Westbrook, Bowling Beck and Eastbrook.

Rivers in Bradford include:

- River Aire; a major river in Yorkshire, 71 miles (114 km) in length.
- Bradford Beck; a river that flows through Bradford and on to the River Aire at Shipley. As it reaches Bradford city centre it runs underground after being built over in the 19th century.
- Harden Beck; a stream that flows from Hewenden Reservoir, over Goit Stock Waterfall to the River Aire in Bingley, West Yorkshire
- River Worth; It flows from minor tributaries on the moors above Watersheddles Reservoir down the Worth Valley to Haworth, where it is joined by Bridgehouse Beck which flows from Oxenhope. The River Worth is itself a tributary of the River Aire, which it joins at the end of the Worth Valley in Keighley.

In addition to the two river systems, there are several smaller watercourses, ditches and drains within the borough. The Leeds and Liverpool canal also runs through Bradford. Over a distance of 127 miles (204 km), it crosses the Pennines, and includes 91 locks on the main line. It has several small branches, and in the early 21st century a new link was constructed into the Liverpool docks system.

The Humber RBMP has identified that the objectives for drinking water protected areas are to ensure that:

- under the water treatment regime applied, the drinking water produced meets the standards of the Drinking Water Directive plus any UK requirements to make sure that drinking water is safe to drink
- the necessary protection to prevent deterioration in the water quality in the protected area to reduce the level of purification treatment required

These objectives are at risk when increasing pollution levels caused by human activity could lead to more treatment being needed in the future and where measures are needed to reduce pollution.

### 2.6.2 Water Framework Directive (WFD)

Bradford is covered by the Humber River Basin Management Plan (RBMP), which identifies the current quality of water bodies in the borough and sets objectives for making further improvements to the ecological and chemical quality.

The Humber river basin district (Figure 1) covers an area of 26,100km<sup>2</sup> and extends from the West Midlands in the south, northwards to North Yorkshire and from Staffordshire in the west to part of Lincolnshire and the Humber Estuary in the east.

The WFD indicator of the health of the water environment is whether a water body is at good status or potential. This is an assessment of a range of quality elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed as less than good. Within the Aire and Calder Catchment there are 125 waterbodies, Table 4 shows that the ecological status for most of these waterbodies is determined to be 'moderate and the chemical status for almost all of the waterbodies is 'Good'.

Number of water bodies	Ecological status or potential				Chemical status		
	Bad	Poor	Moderate	Good	High	Fail	Good
125	0	5	113	7	0	1	124

Table 4-1: Number of water bodies in the Aire and Calder catchment area

### 2.6.3 Surface water quality

Work by the Council has started on producing development control standards for drainage design and surface water treatment. To achieve high water quality standards, the council has identified that, surface runoff should be passed through the correct levels of treatment prior to discharging to an outfall. The levels of treatment are dependent on the pollution risk from the development and the sensitivity of the receiving outfall.

The Council will continue to work with partner organisations to safeguard ground and surface water resources and to protect and improve water quality. Proposals for development are only acceptable provided there is no adverse impact on water bodies and groundwater resources, in terms of their quantity, quality and the important ecological features they support. In the longer term, the aim will be to improve the ecological status of water within Bradford.

The Humber RBMP has identified that 38% of waterbodies are at risk of pollution from waste water. Waste water, or sewage, can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. It can enter water bodies where sewage treatment technology to remove enough of the phosphorus and harmful chemicals doesn't exist, from leakages from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage having a significant impact on bathing waters. Population growth and changes in rainfall patterns are increasing the pressure on the sewer network.

Rainwater from draining roofs, roads and pavements carries pollutants, including grit, bacteria, oils, metals, vehicle emissions, detergent and road salt drains to surface water. Many homes and workplaces have 'misconnected' drains, meaning that dirty water often enters surface waters and groundwater rather than foul sewer drains.

In rural areas, the objective of the Nitrates Directive is to reduce water pollution caused by nitrates from agricultural sources and to prevent further such pollution occurring. Nitrate vulnerable zones (NVZs) are designated where nitrate concentrations in water bodies are high or increasing, or water bodies are, or may become, eutrophic due to agricultural nitrate pollution. Farmers within NVZs must comply with mandatory action programme measures to reduce agricultural nitrate losses. In addition, a code of good agricultural practice has been established for voluntary implementation by all farmers. There is a large surface water Nitrate Vulnerable Zone (NVZ) just to the south of the city of Bradford. These zones are designated where land drains and contributes to the nitrate found in 'polluted' waters (Environment Agency, 2016).

### 2.6.4 Groundwater quality

Groundwater provides vital resources for public water supply in the borough. The impacts on groundwater are broadly related to land use, with agricultural areas representing a source of nitrates.

Groundwater aquifers in Bradford are all considered to be minor, providing provide modest amounts of water. They support water supplies at a local rather than strategic scale (such as for private supplies)

and remain important for rivers, wetlands and lakes and have a wide range of water permeability and storage. In the north and west of the district the vulnerability of these aquifers is low because of the characterisation of low leaching soils and/or the presence of low permeability drift deposits. In the east and south of Bradford, the groundwater vulnerability is high. High areas can easily transmit pollution to groundwater and they are characterised by high leaching soils and the absence of low permeability drift deposits.

For groundwater bodies, not meeting the Humber RBMP objectives can result in the water body is classed as poor chemical status. Safeguard zones are non-statutory areas identified for 'at risk' abstractions where land use management practices and other activities can affect the quality of the untreated water. Measures to prevent and reduce pollution are targeted within these zones.

There are four areas in Bradford which are covered by groundwater source protection zones (SPZ) located in Harden, south of Haworth, south of Yeadon and north of Silsden. These zones show the risk of contamination from any activities that might cause pollution in the area.

According to the RBMP the predicted chemical status for groundwater in Bradford was 'Poor' and the predicted quantitative status for groundwater was 'Good'. For groundwater quality, the main reasons for poor status are high or rising nitrate concentrations with failures for pesticides and chemicals associated with mine working.

A ground water body will only be classified as having poor quantitative status in the following circumstances; where low ground water levels are responsible for an adverse impact on rivers and wetlands normally reliant on ground water; where abstraction of ground water has led to saline intrusion; where it is possible that the amount of groundwater abstracted will not be replaced each year by rainfall (Environment Agency, 2009).

## 2.6.5 Flooding

Bradford has experienced significant flooding and has a history of land and property being flooded through heavy downpours of rain and watercourses overflowing their banks. Potential sources of flooding usually result from a combination of high river and watercourse levels, associated with rivers Aire and Wharfe, excessive surface water runoff and saturated ground, high groundwater and exceeded sewer and localised surface water drainage incidents.

Whilst major parts of urban Bradford lie outside the flood plain, the Strategic Flood Risk Assessment (SFRA) identifies where built up areas are at risk of flooding from many different sources. Flooding has been recorded when the River Aire overtops into the Leeds-Liverpool Canal, causing increased flood risk to communities located close to the canal network (JBA Consulting, 2014). Shipley is identified as an area at risk from several different sources of flooding, as is Keighley which has experienced groundwater and surface water flooding as well as fluvial flooding.

The city of Bradford is a heavily urbanised area, important to the economic growth of the Yorkshire and Humber region. Its regionally important role to economic growth places significant pressure for development in the area, particularly along the riverside where, due to its industrial history, previously developed sites are located and the floodplain is very constrained by development. River flooding from Bradford Beck, Clayton Beck and Pitty Beck has occurred (Environment Agency, 2010). Flooding in Bradford also comes from sewers and the urban drainage system, including culverts. There are currently 1,047 properties at risk of river flooding, assuming no defences from the one per cent probability flood event. This rises to 1,086 in the future. Further north in the areas surrounding Keighley, many of the rivers are steep leading to rapid onset of flooding from rivers, surface water and sewer flooding. Currently there are just over 3,630 properties at risk from the one per cent flood event not taking into consideration defences. In the future, this risk could increase to almost 3,880 properties in the sub area. Potential flooding from the canal, surface water and sewers is also likely to increase in the future (Environment Agency, 2010).

Not all historical flooding events have been recorded and the available evidence and/or data about events is limited. The draft Local Flood Risk Management Strategy (2016) identifies six separate major flooding events. The most recent occurring in November-December 2015 Boxing Day floods was caused by river and surface water flooding. According to the Leeds City Region Review, the area affected included 972 properties of which 783 were residential properties and 189 were businesses. Infrastructure damages were recorded to retaining walls, bridges and roads and data on the event is still being recorded.



**Fluvial**

The metropolitan Borough district of Bradford includes the catchment areas of the River Aire. The Bradford MDC area includes reaches of the following rivers:

Aire Catchment
River Aire
River Worth
North Beck
Silsden Beck
Bridgehouse Beck
Eastburn Beck
Providence Lane

The River Aire within Bradford District is characterised by several swift flowing upland streams which then flow down through the towns along the valley. The upper reaches of the River Aire within Bradford District have a largely rural character and the floodplain in the Silsden and Steeton with Eastburn area is quite extensive. The River Worth is one of the larger contributing catchments and joins the River Aire at Keighley. The middle reaches of the River Aire are heavily urbanised and contain the towns of Keighley, Bingley, Shipley and the City of Bradford. Between Keighley and Leeds, the valley floor steepens and becomes narrower.

The density of development within the valley has resulted in significant restrictions to the natural floodplain. Periods of heavy rainfall in the uplands can therefore produce high flows in the tributary catchments between Keighley and Bradford. This problem becomes most acute in densely developed areas where gradients are steep, for example within the Bradford Beck corridor. (City of Bradford MDC, 2014)

There are two flood storage areas in the form of controlled washlands in the upper Aire catchment at Skipton and Cononley. These washlands are flooded on several occasions throughout the year and significantly reduce levels during medium and high floods through Bingley, Shipley and Leeds. In some flood events, the distribution of rainfall produces high flows on the tributary catchment between Keighley and Leeds. The most urbanised catchments, like the River Worth and Bradford Beck, can react very quickly to rainfall, with a time to peak of one to three hours. These tributary flows cannot be attenuated by the washlands upstream of Keighley.

On some of the tributaries of the River Aire there is a risk of localised bank side walls collapsing. This is due to a combination of undermining by erosion and poor maintenance by private landowners. Damaged or breached walls will greatly increase the risk of flooding to properties situated behind the affected area. Possible locations where this could occur include Silsden Beck and the upper reaches of the River Worth.

It is also worth noting that significant weirs on both the main Aire spine and its tributaries, such as at Saltaire, could have a significant impact on fluvial flooding in the Bradford district.

**Surface water**

Surface water is most common in urban areas, because of the shape of the local landform can result in water flowing across hard impermeable surfaces in large volumes, which cause flooding or to pond in low spots and resulting in localised or widespread flooding. This type of flooding can be and is sometimes more, devastating than fluvial or tidal flooding. The topography of the Bradford MDC area, especially in and around a number of the built-up areas make them potentially prone to flooding caused by direct rainfall due to the number of impermeable surfaces and the lack of sufficient sewer capacity.

Surface water and drainage related issues are known to occur flood risk in the following locations:

- Idle (Haigh Beck) - Residential properties affected by flooding within lower reaches. Complex combined sewer network of unknown capacity.

- Apperley Bridge (Carr Beck) - Properties affected by watercourses within lower reaches near the confluence with the Aire;
- Addingham (Town Beck) – Residential properties affected by watercourse and drainage flooding within constrained upper reaches;
- Silsden (Silsden Beck Tributaries) - Residential properties affected by localised flooding within constrained upper reaches; • Cross Hills on Skipton Road;
- Bradford City Centre (Bradford Beck) - High value commercial properties affected by localised flooding within the city centre. Complex combined sewer network upstream.

Surface water flooding can also occur in rural areas where either land management or the intensity of rainfall results in water running straight off fields without entering the drainage or river systems. This situation has been noted to occur in Keighley and Castlefields industrial estate, Bingley.

### Groundwater

Within the Bradford MDC area there are several locations where groundwater flooding has been reported. Between 1999 and 2004, Bradford MDC received between 550 and 725 calls per year regarding flooded cellars (JBA Consulting, 2014). Possible sources of this flooding include:

- Rising groundwater;
- Springs;
- Defective drains or sewers;
- Burst water mains.

Bradford has a high proportion of properties with cellars compared to many other cities in the UK. There are unconfirmed records of groundwater flooding within Bradford, where Keighley is known to suffer from groundwater flooding. Groundwater flooding within the Bradford MDC area is not thought to be a major problem due to the geology of the catchment.

### Reservoirs

There are several reservoirs located within the boundaries of Bradford MDC, these include, Silsden, Keighley Moor, Water Sheddles, Ponden, Lower Laithe, Thornton Moor, Reva, Doe Park and Hewenden. Reservoirs can both store and attenuate flows in a similar manner to washlands and floodplains, depending upon how they are managed. At present these reservoirs are often full in winter and therefore provide little potential flood attenuation (JBA Consulting, 2014).

Furthermore, the prime use for many of these reservoirs is for a water supply, which may limit their application for flood storage.

### Canals

Non-natural or artificial sources of flooding can include canals where water is retained above natural ground level. Canal flooding may occur either because of the facility being overwhelmed or as a result of dam or bank failure. This can happen suddenly resulting in rapid-flowing and deep water that can cause significant threat to life and major property damage. Flooding has been recorded when the River Aire overtops into the canal causing increased flood risk to communities located close to the canal network (JBA Consulting, 2014). Shipley has been identified as an area at risk.

## 2.6.6 Key Environmental Issues

The water environment in the Bradford district is key to the development of LFRMS measures, and actions, and whilst there are several relevant plans and policies relevant to this water environment at the local, regional, catchment and nation scale. It will be important to identify the interactions. The Humber RBMP has identified that physical modifications affect 42% of waterbodies in the river basin district, pollution from wastewater affects 38% of water bodies and pollution from towns, cities and transport affects 16% of waterbodies. Bradford has pressures relating to pollution and development therefore the LFRMS must ensure that any future development does not exacerbate these issues. LFRMS measures or policies to prevent or limit physical modifications could positively impact on water environment.

Flooding has the potential to create pathways through which potential contamination sources (e.g. sewage treatment works) could result in pollution. The LFRMS could help protect or adapt these sites to future flood risk and improve water quality for users of waterbodies in the district.

Some of the water bodies in Bradford currently fail to meet good ecological status/potential under the WFD. The LFRMS will need to consider whether any flood risk management measures will lead to adverse impacts on the watercourses within the borough and whether the LFRMS can help contribute to achieving WFD objectives and improving water quality

## 2.7 Soils and geology

Bradford City, Keighley and Silsden primarily have slowly permeable, seasonally wet, acid loamy and clayey soils. This is interspersed with freely draining, slightly acid, loamy soils. In the uplands, the soil type is either very acid loamy upland soils with a wet peaty surface, or blanket bog peat soils. In the river valley and the floodplains soil is primarily loamy and clayey floodplain soils with naturally high groundwater (Cranfield University, 2016). Generally, the soils are not particularly fertile in the Bradford District with most agricultural land classifications being classified as 'Urban' or 'Grade 4' agricultural land, where Grade 1 is 'excellent quality' and Grade 5 is 'poor quality' (Figure 2-9).

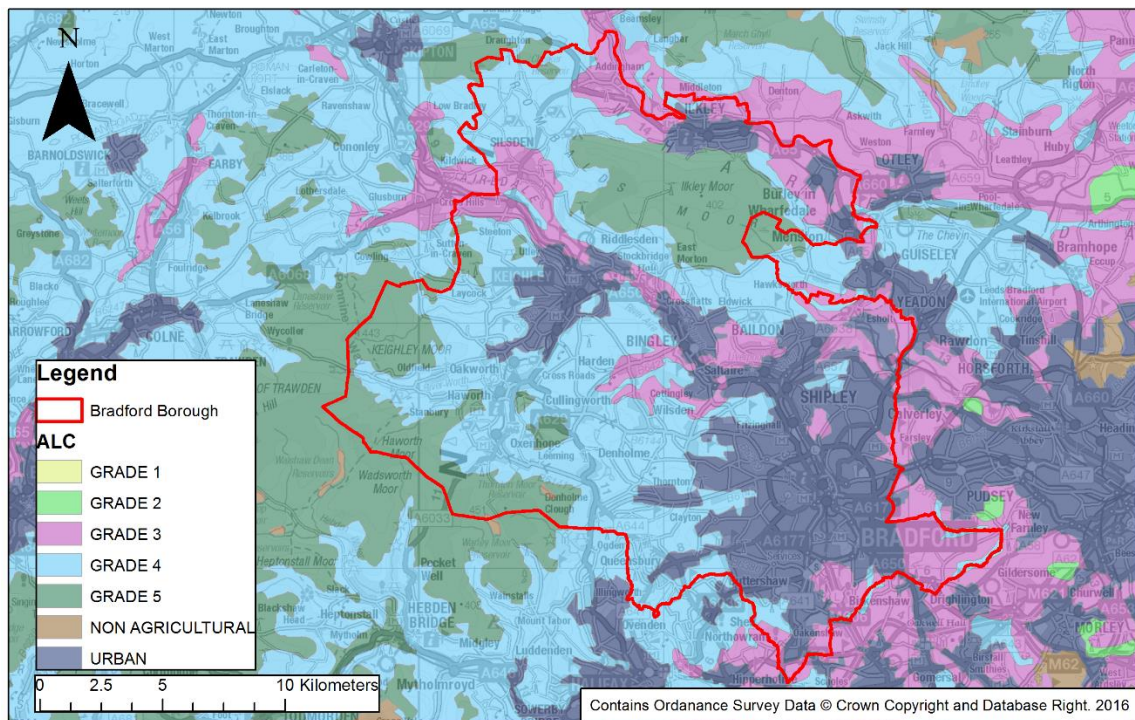


Figure 2-9: Agricultural Land Classification (ALC) of Bradford

The underlying bedrock of the south of the Bradford district is primarily Pennine Lower Coal Measures Formation, as shown in Figure 2-10. The lithological description for Pennine Lower Coal Measure Formation is; interbedded grey mudstone, siltstone and pale grey sandstone, commonly with mudstones containing marine fossils in the lower part, and more numerous and thicker coal seams in the upper part. The underlying bedrock of the south of the Bradford district is primarily Millstone Grit Group, which is; Fine- to very coarse-grained feldspathic sandstones, interbedded with grey siltstones and mudstones, with subordinate marine shaly mudstone, claystone, coals and seatearths.

The superficial geology of the borough is primarily made up of till, peat and alluvium, as shown in Figure 2-11. The superficial geology consists of till in the south of the borough. Alluvium is also present within the floodplain of River Aire; in the northern part of Bradford. Alluvium consists of clays, silts, sands and gravels and the permeability can be highly variable depending on the exact composition of the material.



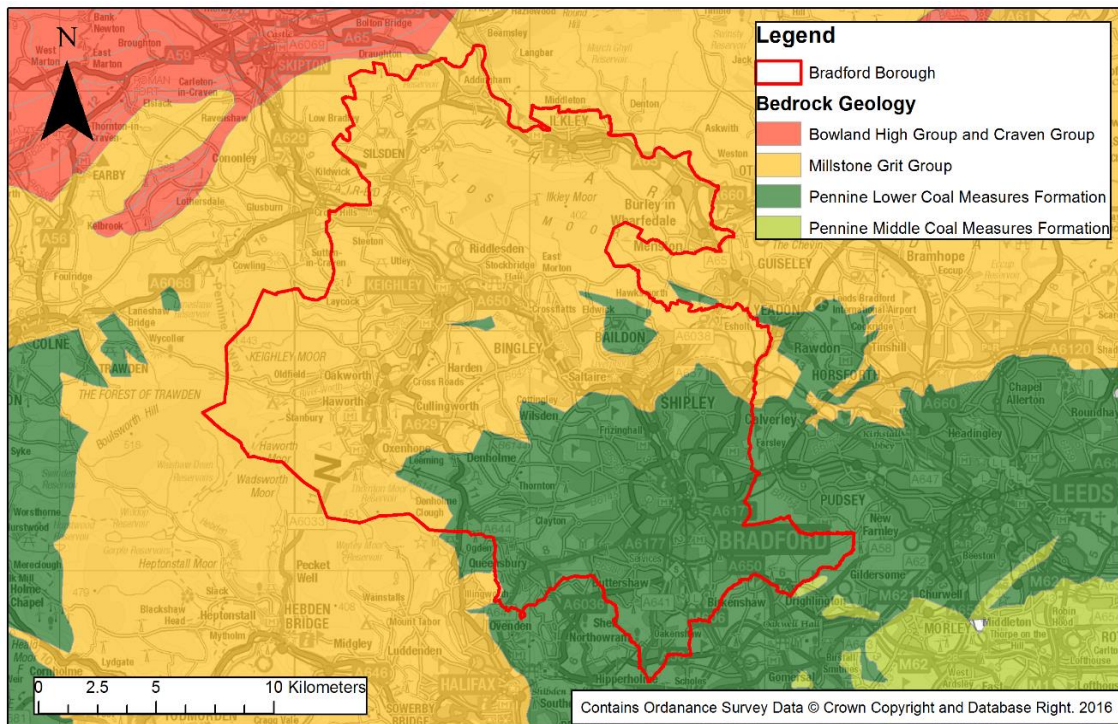


Figure 2-10: Bedrock geology of Bradford

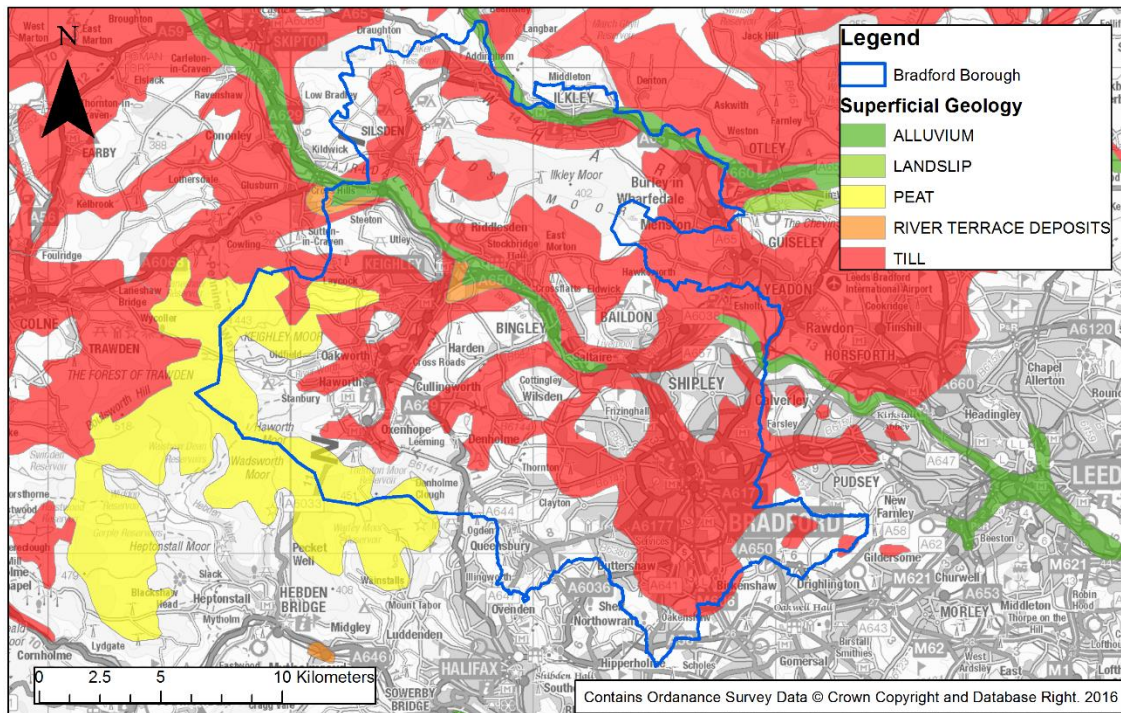


Figure 2-11: Superficial geology of Bradford

Regionally Important Geological Sites (RIGS) have been designated by the West Yorkshire RIGS Group, part of a nation-wide network of groups established by English Nature, to protect and produce a register of geological and geomorphological sites. RIGS are important sites in the West Yorkshire region and therefore have the equivalent protection and status as SEGIs in Bradford’s Unitary Development Plan (UDP). There are in total 69 RIGS in the Bradford district.

**2.7.1 Key environmental issues**

Flood risk management could alter the extent or duration of flooding and impacts and therefore the LFRMS will need to consider implications for soil quality and the underlying geology. Impacts on soil quality could affect other environmental receptors, such as nature conservation sites that are reliant

on the underlying soil characteristics. Impacts on soil quality could affect other environmental receptors, such as nature conservation sites that are reliant on the underlying soil characteristics.

There is a need for the protection and maintenance of the integrity of the designated geological sites.

## 2.8 Historic environment

A settlement grew in Saxon times around the site of Bradford Cathedral. This was recorded as "Bradeford" in 1086. By the middle ages Bradford, had become a small town centred on Kirkgate, Westgate and Ivegate. In 1316 there is mention of a fulling mill, a soke mill and a market. In the reign of Henry VIII Bradford exceeded Leeds as a manufacturing centre. Bradford grew slowly over the next two-hundred years as the woollen trade gained in prominence. The launch of manufacturing in the early 18th century marked the start of the town's development while new canal and turnpike road links encouraged trade. In 1801, Bradford was a rural market town of 6,393 people, where wool spinning and cloth weaving was carried out. Bradford was thus not much bigger than nearby Keighley (5,745) and was significantly smaller than Halifax (8,866) and Huddersfield (7,268). Historic assets in the borough (Figure 2-12 and Figure 2-13) include:

- 195 scheduled monuments: these are historic sites of national importance and include the Roman Fort in Ilkley and the late prehistoric enclosed settlement known as Round Dykes Camp on Addingham Low Moor
- 2,291 listed buildings: these are statutorily designated and include 21 Grade I listed buildings, 76 Grade II\* (particularly important buildings of more than special interest) and the rest are Grade II listed buildings. The Grade I listed buildings are primarily Halls, Churches/Cathedrals and Manor Houses.
- There are 15 registered parks and gardens in the borough, two of which are listed as Grade II\*, the rest of which are listed as Grade II.
- Eight conservation areas; Esholt, Ilkley, Leeds Liverpool Canal, Middleton, Saltaire, Addingham, Bingley, and Burley In Wharfedale
- One World Heritage Site: Saltaire; a complete and well-preserved industrial village of the second half of the 19th century. Its textile mills, public buildings and workers' housing are built in a style of high architectural standards and the urban plan survives intact, giving a vivid impression of Victorian philanthropic paternalism.



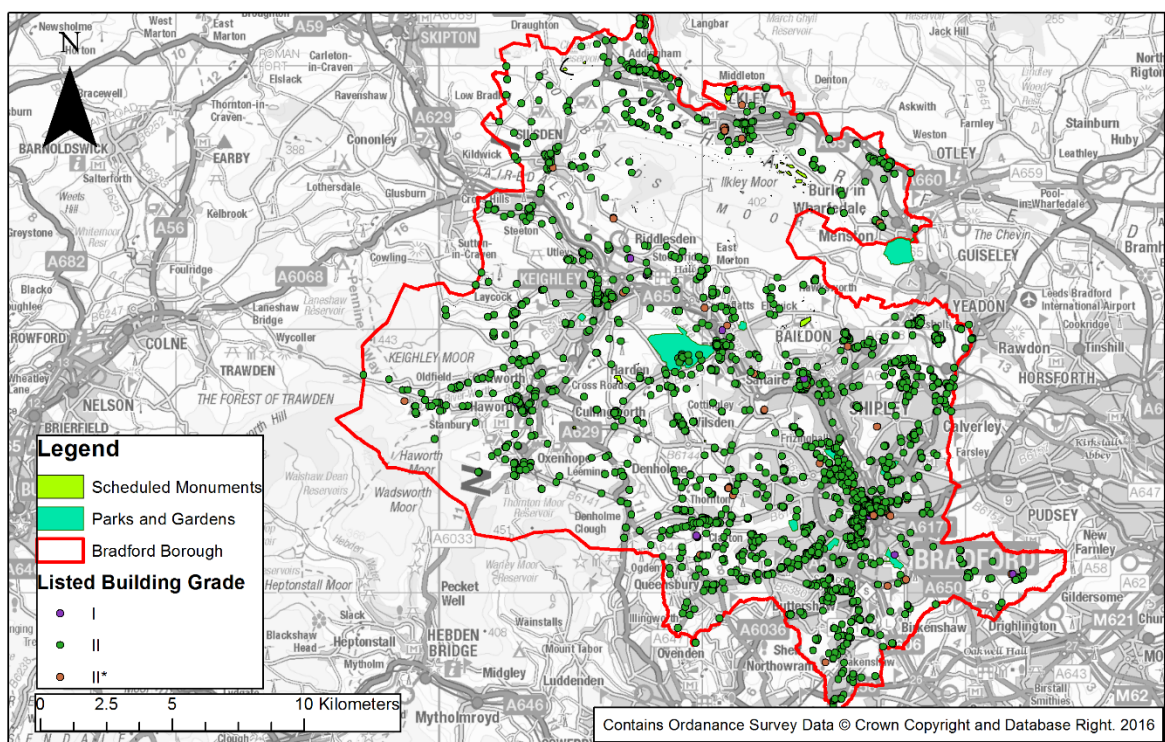


Figure 2-12: Historic assets in Bradford

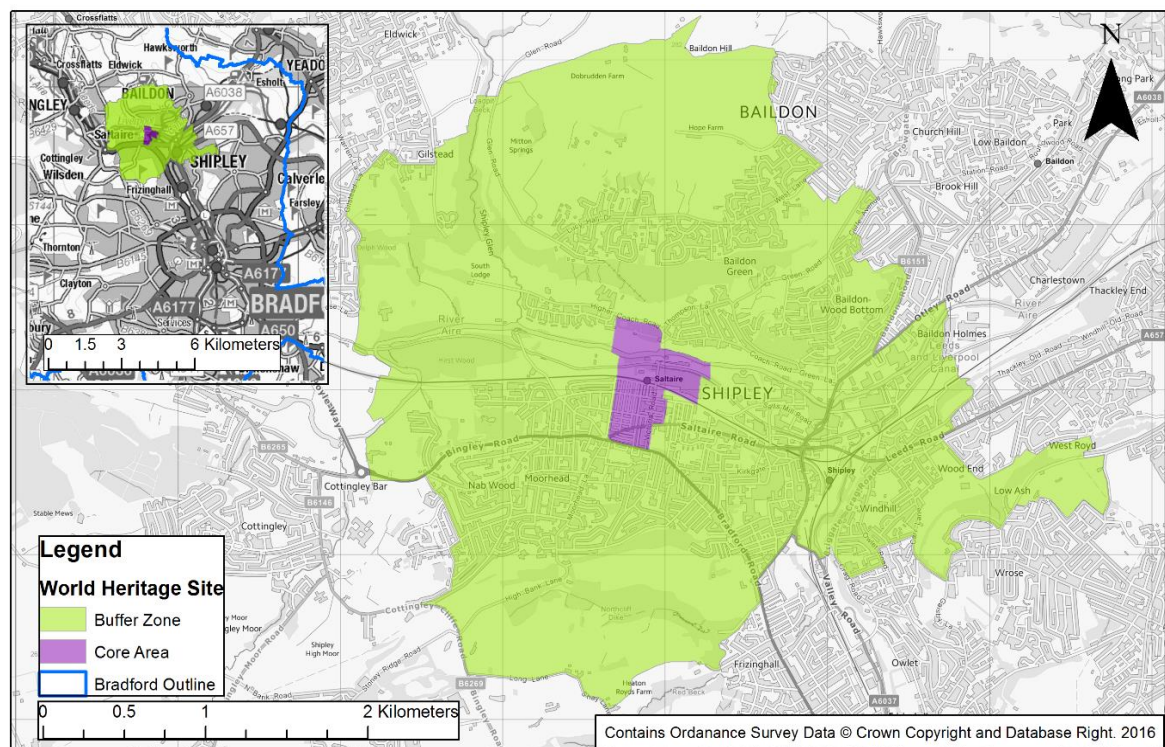


Figure 2-13: World Heritage Site; Saltaire (the designated core area and the surrounding buffer area)

### 2.8.1 Key environmental issues

Bradford contains a wealth of historic assets. However, some of the most important of these sites are currently assessed as being under threat. There is a risk that adverse impacts upon aspects of Bradford's cultural heritage could arise from flooding and increased flood risk in the future, whilst the construction and implementation of the flood risk management options selected by the LFRMS could also have adverse effects. Potential benefits may also arise from reduced flood risk to assets because of implementation of the LFRMS.

## 2.9 Population

The latest population figures produced by the Office for National Statistics (ONS) on 25 June 2015 show that an estimated 528,200 people live in Bradford District.

Bradford District is the fourth largest metropolitan district (in terms of population) in England, after Birmingham, Sheffield and Leeds although the District's population growth is lower than other major cities. In the last three years Bradford's population, has grown at 0.3% which is slower than the regional average of 0.8% and the national average of 1.5% (City of Bradford MDC, 2015).

Bradford is a youthful district with the third highest number of 0 -15 year olds (124,650) in England; only Birmingham and Leeds have higher numbers. Nearly one-quarter (23.6%) of the District's population is aged under 16.

The population of Bradford is ethnically diverse. The largest proportion of the district's population (63.9%) identifies themselves as White British. The district has the largest proportion of people of Pakistani ethnic origin (20.3%) in England (City of Bradford MDC, 2015).

### 2.9.1 Health

Life expectancy is 9.6 years lower for men and 8.0 years lower for women in the most deprived areas of Bradford than in the least deprived areas. 22.3% (1,330) of children are classified as obese, worse than the average for England. The rate of alcohol-specific hospital stays among those under 18 was 32.5 (per 100,000 population), better than the average for England. This represents 45 stays per year. In 2012, 26.7% of adults are classified as obese. The rate of alcohol related harm hospital stays was 787 (per 100,000 population), worse than the average for England. This represents 3,700 stays per year. The rate of self-harm hospital stays was 261.7 (per 100,000 population), worse than the average for England. This represents 1,420 stays per year. The rate of smoking related deaths was 354 (per 100,000 population), worse than the average for England. This represents 825 deaths per year. Estimated levels of adult smoking are worse than the England average (Public Health England, 2015).

This critical social infrastructure such as hospitals and health centres, along with residential and nursing homes, would be put under increased pressure if flood risk increased locally and regionally.

### 2.9.2 Deprivation

The Index of Multiple Deprivation (IMD) provides a measure of relative deprivation across England and was most recently published in 2015. Bradford District ranks 19th most deprived local authority in England (where 1 is the worst deprived local authority and 326 is the least deprived) and 2nd most deprived in the Yorkshire and Humber region (after the City of Kingston upon Hull). This compares to the ranking of 26th most deprived for IMD 2010. Bradford's position relative to other English districts has worsened by 7 places since the last index was published in 2010 (Figure 2-14) (City of Bradford MDC, 2015).

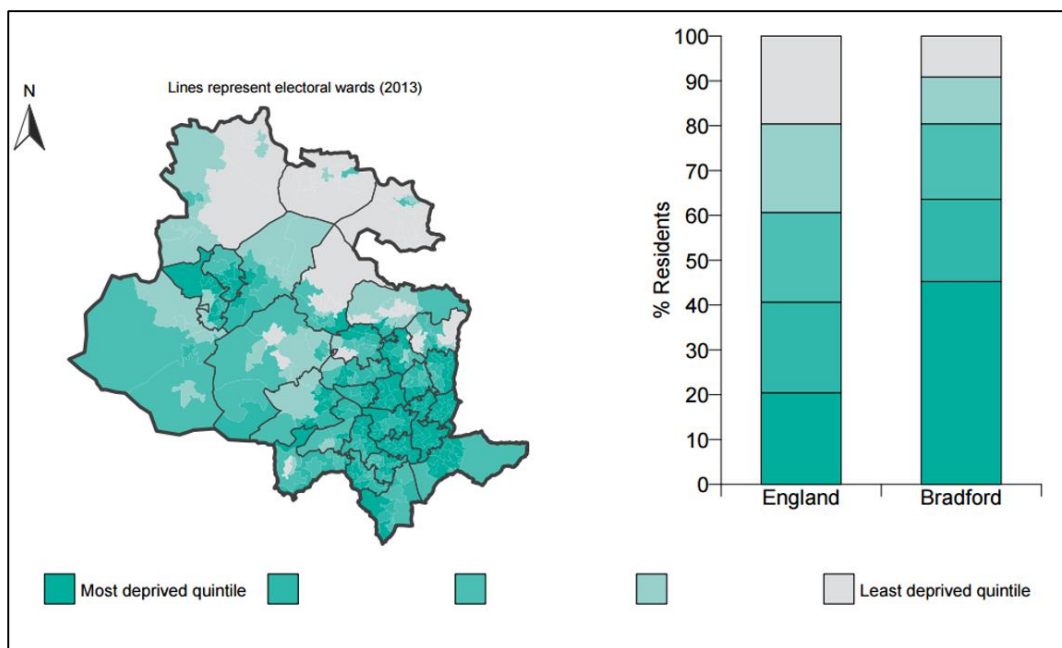


Figure 2-14: Bradford deprivation (source: Public Health England, 2014). The chart shows the percentage of population in England and Bradford who live in each of these quintiles.

### 2.9.3 Key environmental issues

The population of Bradford is set to increase in the future. The general health of the population is generally not good in comparison with national averages. Health levels do vary across the borough, with poorer health linked to areas of higher social deprivation and vulnerability to flood risk will affect the way in which households are aware of risks, it could limit the preparation or adaptation to risk through building resilient measures or uptake of flood insurance and it could affect the time and costs involved in recovery from a flood event.

The growing population will have a substantial need for further housing and improved social, green and transportation infrastructure, as well as increased demand for water. Pressure on this infrastructure also arises from increased flood risk.

This growing population will place increased demand on a range of resources and the borough's water and sewerage infrastructure, which could be exacerbated by the effects of climate change. Linked to this may be increased demands for development and pressure on the existing housing provision, which may result in greater need for development in areas at risk of flooding.

## 2.10 Material assets

### 2.10.1 Economy

The Metropolitan district of Bradford has a large and important economy worth over £8.3bn, the third largest in the Yorkshire region after Leeds and Sheffield. Economic growth since 2008 has outstripped the regional and national averages. Bradford is forecast to contribute 15.4% of the total growth within the Leeds City Region to 2020. There are 15,200 businesses employing 192,200 people in Bradford. Bradford accounts for 15% of the total employment in the Leeds City Region.

Information from the Annual Population Survey (December 2014) found that Bradford has 214,800 people aged 16-64 in employment. At 65.3% this is significantly lower than the national rate (72.4%). 114,300 (around 1 in 3 people) aged 16-64, are not in work. The claimant count rate is 3.3% which is higher than the regional and national averages.

Skill levels are improving with 25.3% of 16 to 74 year olds educated to degree level. 16.5% of the district's employed residents work in retail/wholesale. The percentage of people working in manufacturing has continued to decrease from 13.2% in 2012 to 12.5% in 2013. This is still higher than the average for Great Britain (8.5%) (City of Bradford MDC, 2015).



### 2.10.2 Infrastructure

Bradford is in a strategic location within the Leeds City Region with three rail routes providing public transport connectivity across the District and beyond, access to Leeds Bradford International Airport outside of the District within Leeds, and connections to the strategic highway network via the M606 and M62 (Figure 2-15). The road network in Bradford's urban area is characterised by a radial pattern of routes leading to the City Centre, though there is an outer and an inner ring road. There is also a relatively high level of bus use throughout the urban area. Rail patronage in the District has increased significantly over the years and is expected to continue to be the dominant public transport mode in those corridors where it exists, notably in Airedale, where the rail network is at capacity in peak times. Car ownership in Bradford is also set to rise at a faster rate than nationally, due to a lower baseline level. Air travel to and from Bradford is set to increase as the City is now connected to more frequent and wider national and international destinations through the Leeds-Bradford International Airport and Manchester Airport. The LBIA is expected to play a much more important regional role in the future and thereby directly contributing to the economy of the region (City of Bradford MDC, 2014).

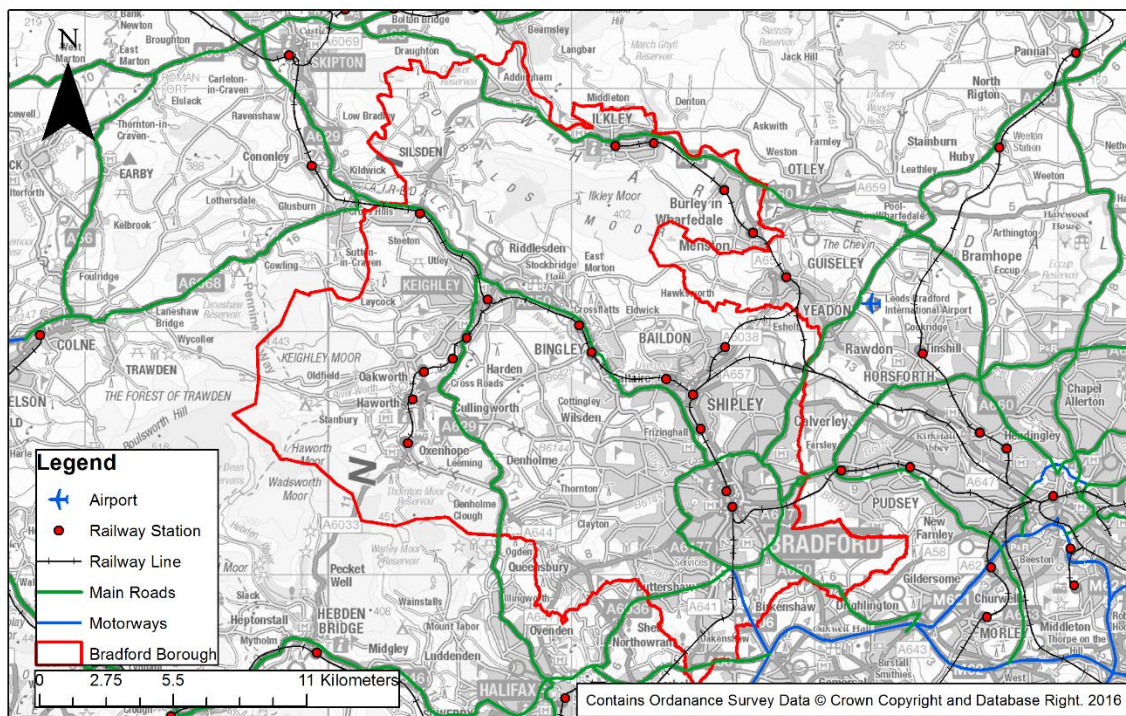


Figure 2-15: Transport infrastructure

### 2.10.3 Green infrastructure

The Bradford district has a wide variety of different types of open space, ranging from parks and gardens, natural and semi-natural green spaces, green corridors, amenity green space, outdoor sports facilities, provision for children and civic spaces, exist within the district and are valued by local communities.

Within the Bradford Core Strategy, Strategic Core Policy 6 (SC6) identifies the importance of green infrastructure. The River Corridors of the Aire and Wharfe and the South Pennine Moors are identified as strategic Green Infrastructure assets due to the opportunities offered to enhance the living landscape as a resource for people and wildlife and to address future needs for flood alleviation, water management, carbon capture and recreation (City of Bradford MDC, 2014).

### 2.10.4 Key environmental issues:

The borough has good internal and external transport links, with further improvements planned. Predicted population increases will place greater pressure on the transport network, which could be exacerbated by an increase in future development pressure. In addition, development and commercial pressures are set to place increased demand on land availability, which will in turn affect the existing transport network.

The effects of a changing climate are predicted to result in increased disruption to transport infrastructure, waste sites and utilities services. Possible impacts include significant deterioration of road surfaces and reduced capacity of rail network due to hot track conditions.

Opportunities to create and enhance green infrastructure assets could be incorporated into flood risk management measures implemented as part of the LFRMS.

## 2.11 Air quality

Bradford has identified areas where air quality objectives are exceeded, which have been designated air quality management areas (AQMA). There are four AQMAs in the Bradford District, where air pollution levels from roads, industry and property is monitored. Traffic emissions, especially those from heavy goods vehicles, are the major contributor to poor air quality in most of these areas, despite the presence of large scale industry (DEFRA, 2016). These are primarily found in the city of Bradford, close to busy roads. These have been declared as a result of heavy traffic, primarily for nitrogen dioxide, with four AQMAs also included for PM<sub>10</sub> as well

Air quality is predicted to improve for in the Manningham Lane and Thornton Road AQMAs under business as usual projections meaning additional local measures to reduce emissions in these AQMAs are of lower priority in terms of local air quality management. However, air quality in the remaining two AQMAs – Mayo Avenue and Shipley Airedale Road is predicted to exceed the objective unless action is taken to reduce pollutant contributions (NO<sub>2</sub> in particular) from road transport by 25-40%.

### 2.11.1 Key environmental issues

Greater pressures on air quality may occur in the future through increases in the population of the borough, greater development and increased traffic congestion. This could lead to the designation of additional AQMAs to address local impacts on air quality. However, the LFRMS is not likely to impact on air quality in the borough, and any impacts, such as through increased flood risk management activity, are unlikely to be significant. Indirect impacts from a strategic approach to green infrastructure and regeneration projects which link locally important wildlife corridors and habitats, through urban tree planting schemes could in the future contribute to improvements to air quality.

## 2.12 Climate

Bradford has a temperate climate, with limited seasonal temperature ranges, and generally moderate rainfall throughout the year. Rainfall averages around 870 mm (34 in) per year with over 1 mm falling on 139 days. Sunshine amounts of 1250 hours per year is low, as one would expect of an inland location in Northern England located amongst upland areas (Met Office, 2016).

The UK Climate Projection (UKCP09) provides probability-based projections of key climate variables, such as temperature and rainfall at a higher geographic resolution than has previously been available. Current projections point to significant and more variable temperature and rainfall levels in future, with greater peak temperatures and prolonged hot periods forecast. In general, warmer weather, wetter winters and hotter and drier summers, with extreme events more frequent. Climate changes can affect local flood risk in several ways with impacts depending on local conditions. Wetter winters may increase river flooding with more intense rainfall leading to more surface runoff, increasing localised flooding and erosion may increase pressure on drains, sewers and water quality. There is also a potential relationship between longer hotter summers and water quality in that the initial runoff during a rain event after a long dry summer can be very heavily polluted. Flood protection measure may have a role to play in minimising this.

With rainfall frequency and intensity set to significantly increase in the coming decades, the likelihood of river flooding and overwhelming of drains and sewers will rise due increased surface runoff. This in turn will lead to localised flood events and increased erosion. To accommodate the increased likelihood of such events, the LFRMS must implement measures aimed at adaptation or resilience to flood risks (City of Bradford MDC, 2014).

More frequent severe storms with higher intensity periods of rainfall will increase run-off from land and buildings, will cause rivers and streams to experience higher than normal flood flows and levels, and sewers and drains to discharge more frequently than at present. Bradford is particularly vulnerable to flooding caused by direct rainfall. Climate change could therefore increase the numbers of properties at risk and the incidence of blockages in watercourses, drains and culverts. It could also cause disruptions to low lying sections of roads and railways.

The LFRMS options, could potentially, both directly and indirectly, lead to an increase in greenhouse gas emissions because of construction and maintenance activities. Emissions could be reduced by selecting, sustainable building practices and materials, sources of materials and methods of construction. Water consumption and flood risk mitigation measures could influence local building regulation standards for range of development types.

### 2.12.1 Key environmental issues

With rainfall frequency and intensity set to significantly increase in the coming decades, the likelihood of river flooding and overwhelming of drains and sewers will rise due increased surface runoff. This in turn will lead to localised flood events and increased erosion. To accommodate the increased likelihood of such events the LFRMS must implement measures aimed at coping with them.

Climate change projections are realised, the adverse risk and impact toward Bradford’s infrastructure, public health and the natural environment has the potential to be great. The natural environment changing climate, and changing temperatures poses the biggest threat. Species and habitat abundance and richness will become threatened because of changing habitats, drier soils and increased competition from non-native invasive species throughout the borough’s watercourses.

Flooding derived from increased rainfall and storm events of greater severity is expected to result in significant adverse impacts on utility, residential and transport infrastructure with subsequent economic consequences. Damage to infrastructure at the forecasted extent will inevitably incur large economic costs as well as social and public health implications because of the distress and risk to disruption caused which could impact on local and regional economy.

The LFRMS options, could potentially, both directly and indirectly, lead to an increase in greenhouse gas emissions because of construction and maintenance activities. Emissions could be reduced by selecting, sustainable building practices and materials that benefit flood risk and carbon emissions.

### 2.13 Scoping conclusion

Following a review of this environmental baseline data it was possible to scope out air quality as an SEA issue as it is unlikely that there will be a significant environmental impact on air quality and only indirect impacts in the borough from implementation of the LFRMS. A summary of the scoping conclusions is given in Table 2-5 below.

Table 2-5: SEA scoping assessment summary

Receptor	Scoped In / Out	Conclusion
<b>Landscape and visual amenity</b>	In	The landscape qualities and integrity of the borough could be affected by changes to flood risk or land use/management, including new development, whilst increased flood risk could impact on locally important urban and rural landscapes and landscape features. Flood risk management could potentially impact on local landscape features, potentially within the rural areas and other locally important landscape areas both positively and negatively.
<b>Biodiversity, flora and fauna</b>	In	National and locally important biodiversity sites and species within the Borough, including SPA, SSSI, LNR and BAP habitats and species may be affected by the water environment and flooding. There is one SPA and two SAC’s, many SSSIs and LNRs within Bradford at risk from flooding or are water dependent. Future incidences of flooding could potentially change the underlying nature of habitats and the LFRMS policies may present opportunities for biodiversity gain. LFRMS measures could improve the river channel by removal of blockages, which would be of benefit to fish passage. Habitat creation or enhancement could also be incorporated into LFRMS measures, for example through the implementation of more natural flood risk management measures.
<b>Water environment</b>	In	Flooding has the potential to impact on water availability, the water quality of the watercourses within the borough and WFD objectives. There is the potential for indirect impacts on water dependent designated sites/species and habitats. Flood risk management measures could potentially affect the water environment both positively and negatively. The LFRMS could give rise to changes in flood risk and water quality, and could affect provision of water resources.
<b>Soils and geology</b>	In	Changes to flood risk could affect soil quality and underlying geology. Subsequent erosion of these lands could give rise to pollution pathways, increasing the risk of an adverse effect on other environmental receptors. Flooding has the potential to erode soils and cause waterlogging impacting on agricultural productivity. Impacts on soil quality could then affect other aspects of the environment such as biodiversity and water quality, protected species and habitats.



Receptor	Scoped In / Out	Conclusion
<b>Historic environment</b>	in	Changes to flood risk could have positive or negative impacts on historic sites including scheduled monuments and listed buildings. This includes damage to the fabric of the structures through waterlogging or drought and impacts on their historic value or setting. There are many historic assets in the borough that could be affected by changes to flooding and flood risk management measures. Opportunities may exist to protect important sites from overland flows and improved permeability of urban areas or negative impacts could occur due to increased flood risk to vulnerable sites.
<b>Population</b>	in	A range of socio-economic characteristics of the Bradford borough including social deprivation levels, health and wellbeing, access and recreation, and employment opportunities influence vulnerability to flooding. Critical social infrastructure, including hospitals, schools, and residential and nursing homes could benefit from reduced flood risk. The LFRMS has the potential to provide significant positive benefits to the population of the borough through reduced levels of flood risk to population generally and also vulnerable groups, and increased community resilience, flood awareness and measures to adapt to changes in flood risk.
<b>Material assets</b>	in	Critical infrastructure including the transport network, waste sites, utilities services and emergency services could benefit from reduced flood risk. Conversely, increased flood risk to these sites could cause significant disruption to the borough, impacting on human and economic activity and the environment both in terms of the regional and local economy. Material assets could benefit from reduced flood risk, but the borough could be significantly affected by increased flood risk to these asset, health and wellbeing and economy.
<b>Air quality</b>	Out	The LFRMS is not likely to have a significant effect on air quality in the borough due to the localised nature of any potential indirect impacts.
<b>Climate</b>	In	Changes in flood risk could affect resilience of existing and future population response to climate change. This could have knock-on effects on a range of environmental aspects including biodiversity, water resources and the local landscape. Flood risk management measures could also result in increased carbon emissions associated with new development or increased management activities. The LFRMS may include mitigation, resilience and adaption responses and measures that could contribute to addressing the future impacts of climate change effects. Opportunities to improve climate change adaptation will be considered in the SEA and proposed monitoring indicators in LFRMS.

## 3 SEA assessment framework

### 3.1 Introduction

The SEA framework is used to identify and evaluate the potential environmental issues associated with the implementation of the LFRMS. The framework comprises a set of SEA objectives that have been developed to reflect the key environmental issues identified from the baseline information review. These objectives are supported by a series of indicators, which are used as a means to measure the potential significance of the environmental issues and can also be used to monitor implementation of the LFRMS objectives. These LFRMS objectives are tested against the SEA framework to identify whether each option will support or inhibit achievement of each objective.

The purpose and requirements of the SEA objectives and indicators are referred to briefly in Table 3-1.

Table 3-1: Definition of SEA objectives, indicators and targets

	Purpose
<b>Objective</b>	Provide a benchmark 'intention' against which environmental effects of the plan can be tested. They need to be fit-for-purpose.
<b>Indicator</b>	Provide a means of measuring the progress towards achieving the environmental objectives over time. They need to be measurable and relevant and ideally rely on existing monitoring networks.

### 3.2 SEA objectives and indicators

SEA objectives and indicators have been compiled for each of the environmental receptors (Table 3-2) (or groups of environmental receptors) scoped into the study during this phase of the project (see Table 2-5). These objectives are currently in draft form and can be refined or revised in response to comments received during the consultation phase on this SEA

Scoping Report and in light of any additional information obtained during the completion of Environmental Report and monitoring indicators of adopted Bradford Council LFRMS.

Table 3-2: SEA objectives and indicators

Receptor	Objective	Indicator
Landscape	1 Protect the integrity of the Borough's urban and rural landscapes, and promote the key characteristics of the NCA's, LCA's, the Green Belt and the World Heritage Site in Saltaire.	Changes in the condition and extent of existing characteristic elements of the landscape. The condition and quality of new characteristics introduced to the environment. Percentage of open countryside, Green Belt or Green Infrastructure.
Biodiversity, flora and fauna	2 Protect and enhance designated and BAP habitats and species in the borough.	Area of designated sites adversely affected by flooding. Monitoring of reported status of designated nature conservation sites.
	3 Maintain and enhance habitat connectivity and wildlife corridors within the borough.	Percentage of land designated as nature conservation sites as a result of LFRMS measures. Area of habitat created as a result of implementation of the LFRMS (e.g. flood storage areas creating wetland habitat).
	4 Maintain existing, and where possible create new, riverine and wetland habitat to benefit migratory and aquatic species and fisheries, and maintain upstream access.	Review of maintenance regimes annually. Number of habitat improvement projects delivered through flood risk management projects.
Water environment	5 Improve the quality and quantity of the water in the borough's rivers.	Water quality of the borough's watercourses. Number of pollution incidents. Number of SuDS schemes installed as part of the LFRMS and registered on the asset register. Number and volume of Environment Agency licensed abstractions. Numbers of sites with high pollution potential (e.g. landfill sites, waste water treatment works) at risk from flooding. Number of ordinary watercourse consents and main river permits within the district.
	6 Do not inhibit achievement of the WFD objectives and contribute to their achievement where possible.	Achievement of WFD objectives. Percentage of water bodies achieving 'Good' ecological status/potential. Number of physical modifications approved by other consent processes Number of enforcement cases on physical modifications affecting land drainage No deterioration in WFD status.
Soils and geology	7 Reduce the risk of soil erosion and pollution.	Area of agricultural, rural and greenfield land affected by flooding or LFRMS measures. Numbers of sites with high pollution potential (e.g. landfill sites, waste water treatment works) at risk from flooding.
Historic environment	8 Preserve and, where appropriate enhance historic, environmental and cultural sites in the borough.	Number of historic assets at risk from flooding, and assessment of impact. Number of vulnerable historic assets protected from flooding by implementation of the LFRMS. Number of heritage assets whose significance has been harmed through flood defence works
Population	9 Minimise the risk of flooding to communities and social infrastructure.	Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Number of property level protections schemes per year. Number of community flood plans in place. Number of exercises completed annually on flood response plans.
	10 Increase the use of SuDS, particularly in all new developments.	Number of SuDS schemes installed as part of the LFRMS.
Material assets	11 Minimise the impacts of flooding to the borough's transport network and key critical infrastructure.	Length of road and rail infrastructure at risk from flooding. Number of key infrastructure assets at risk from flooding. Number of reviewed and existing flood warning systems in the district.
Climate	12 Reduce vulnerability to climate	Number of residential properties at risk of flooding.

Receptor	Objective	Indicator
	change impacts and promote measures to enable adaptation to climate change impacts.	Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Area of habitat created as a result of implementation of the LFRMS (e.g. flood storage areas creating wetland habitat).

## 4 Strategy alternatives

### 4.1 Developing alternatives

The SEA Directive requires an assessment of the plan and its 'reasonable alternatives'. To assess reasonable alternatives, different strategy options for delivering the LFRMS have been assessed at a strategic level against the SEA objectives, and the environmental baseline as detailed in Section 2. The results of this assessment will be used to inform the decision-making process in choosing a preferred way of delivering the LFRMS.

### 4.2 Appraisal of actions to improve flood risk

The LFRMS has the purpose of managing and reducing local flood risk in the Bradford Borough. The strategy objectives have been assessed against the SEA objectives for each of the following options as shown in Table 4-1.

1. **Do nothing:** where no action is taken and existing assets and ordinary watercourses are abandoned.
2. **Maintain current FRM regime:** where existing assets and watercourses are maintained as present in line with current levels of flood risk. Existing infrastructure is not improved over time and the effects of climate change are not taken into account; and
3. **Manage and reduce local flood risk:** take action to reduce the social, economic and environmental impact due to flooding.

Table 4-1: Assessment of the strategy and alternative options against the SEA objectives

SEA Objectives		Options and Effects		
		Do Nothing	Maintain current FRM regime	Manage and reduce local flood risk
1	Protect the integrity of the Borough's urban and rural landscapes, and promote the key characteristics of the NCA's, LCA's, the Green Belt and the World Heritage Site in Saltaire.	Potential negative effect resulting from no management that could adversely impact on sensitive urban landscape character. However, abandonment of assets may allow for the development of a more natural watercourse which may enhance the local landscape character of the Borough, particularly in rural areas.	No change to the baseline in the short to medium term. However, with increasing flood risk, negative effects could occur on sensitive urban landscape character, whilst positive effects may occur in rural areas as the Borough's watercourses increasingly reconnect to their floodplain.	Potential for managing and promoting this objective through sensitively designed FRM schemes, which enhance local landscape character, historic assets and open land. Conversely, inappropriate management schemes could damage key landscape features and characteristics.
2	Protect and enhance designated and BAP habitats and species in the borough.	Potential for both adverse and beneficial impacts. For example, abandonment of assets may allow for the development of a more natural watercourse (enhancing certain notable species and habitats). However, there would be an increased risk of spreading non-native invasive species and potential impacts on water quality through increased flooding.	No change to baseline in the short to medium term. Increased flooding in the future may provide opportunities for new habitat creation, but may also result in the spread non-native invasive species or adversely impact on habitats intolerant of increased inundation or changes in water quality.	Potential for both adverse and beneficial impacts because of active management. Opportunities may arise to enhance habitats and species through the implementation of multi-functional FRM measures, such as the provision of new green infrastructure.
3	Maintain and enhance habitat connectivity and wildlife corridors within the borough.	Potential for both adverse and beneficial impacts. Abandonment of assets would allow for corridors to develop that would be unrestricted by flood risk assets. However, the increased risk of spreading non-native invasive species would inhibit the biodiversity.	No change to baseline in the short to medium term. Increased flooding in the future may provide opportunities for new habitat creation, but may also result in the spread non-native invasive species or adversely impact on habitats	Potential for both adverse and beneficial impacts because of active management. Opportunities may arise to enhance habitats and species through the implementation of multi-functional FRM measures, such as the provision of new green infrastructure.

SEA Objectives		Options and Effects		
		Do Nothing	Maintain current FRM regime	Manage and reduce local flood risk
		value of wildlife corridors.	intolerant of increased inundation or changes in water quality.	
4	Maintain existing, and where possible create new, riverine and wetland habitat to benefit migratory and aquatic species and fisheries, and maintain upstream access.	Potential for both adverse and beneficial impacts. For example, existing habitat may deteriorate because of increased flooding (however, this will often depend on what the site is designated for) and blockages may occur due to the movement of sediment. However, abandonment of assets may allow a more natural riverine system to develop.	No change to baseline. However, because of increased flooding in the future due to climate change new habitats may be created or existing wetland habitats enhanced. However, habitats intolerant of increased inundation or changes in water quality may be adversely affected.	Potential for both adverse and beneficial impacts because of active management. Significant opportunities may exist for habitat creation because of implementing measures to reduce local flood risk. Conversely, the introduction of new assets may damage riverine habitat and introduce blockages for fish access to upstream watercourses if not implemented appropriately.
5	Improve the quality and quantity of the water in the borough's rivers.	Potential for both adverse and beneficial impacts. For example, abandonment of assets may allow for the development of a more natural watercourse and fewer assets are likely to reduce constrictions on water flow and hence water availability and quantity. However, there would be no management of water quality issues such as runoff, whilst flood risk to contaminated sites may increase, leading to increased surface and groundwater contamination.	No change to baseline levels in the short to medium term. However, increased flood risk in the future may result in a reduction in surface water and groundwater quality due to contamination from surface water runoff or from contaminated sites.	Management of watercourses allows water quality to be monitored and potentially improved. Taking further action to reduce local flood risk may also improve water quality through reduced flood risk to potentially contaminated sites. However, the introduction of further flood risk assets to watercourses may result in constrictions to water flow, reducing water availability. Careful management of the implementation of such assets can prevent these adverse effects.
6	Do not inhibit achievement of the WFD objectives and contribute to their achievement where possible.	Potential for both adverse and beneficial impacts. For example, abandonment of assets may allow for the development of more natural watercourses. However, there would be an increased risk of spreading non-native, invasive species through flooding and pollution to watercourses could become more widespread.	No change to current measures to meet WFD objectives.	Potential for both adverse and beneficial impacts depending upon the specific statuses and objectives of the waterbody as identified in the RBMP. Opportunities for achieving WFD objectives may arise through the implementation of measures to reduce local flood risk.
7	Reduce the risk of soil erosion and pollution.	Potential negative effect on soil quality, particularly in areas of high land quality, resulting from increased erosion of soils from flooding and no management of land contamination risks and subsequent effects.	No change to baseline. However, in the future, because of climate change, adverse impacts may arise through erosion and land contamination from increased flooding.	Potential for managing and promoting this objective through reduced flood risk.
8	Preserve and, where appropriate enhance historic, environment and cultural sites in the borough.	Potential for both adverse and beneficial impacts. Historic, environment assets and cultural heritage assets may be exposed to greater damage and deterioration through increased flood risk. Conversely, increased water inundation may help preserve some assets dependent on waterlogging, whilst the declining condition of FRM assets from no management and greater connectivity to the floodplain	No change to baseline. However, in the future historic environment assets and cultural heritage may be exposed to increased flooding and damage due to climate change.	Potential for both adverse and beneficial impacts because of active management, for example through increased protection to vulnerable historic environment assets or improvements to their settings.



SEA Objectives		Options and Effects		
		Do Nothing	Maintain current FRM regime	Manage and reduce local flood risk
		could improve the setting of historic assets.		
9	Minimise the risk of flooding to communities and social infrastructure.	Increased exposure to flood risk from a combination of no management and climate change. This could lead to a greater number of people and their properties at risk of flooding, causing greater damage and disruption, and increases in social exclusion, deprivation and health risks.	No improvements to health and well-being as existing risk maintained and risk may increase in the future as a result of climate change.	Active management to reduce local flood risk should help to protect residential properties and key social infrastructure services from flooding. This has the potential to create a range of social benefits including reducing associated health impacts and social deprivation.
10	Increase the use of SuDS, particularly in all new developments.	This option would result in no increase in the use of SuDS in the future. Surface runoff volumes would be likely to increase, further exacerbating flood risk events. In addition, the declining condition from no management of existing SuDS schemes and lack of additional schemes may reduce the ability to manage future impacts of climate change.	No change to the baseline in the short to medium term. However, with increasing flood risk, the lack of additional SuDS schemes may reduce the ability to manage future impacts of climate change.	Active management to reduce flood risk would incorporate the greater use of SuDS schemes to reduce the rate and volume of surface water runoff, particularly in new developments. This will contribute to climate change mitigation and adaptation initiatives and can provide a range of other environmental benefits, including biodiversity enhancements and the provision of new recreation and amenity opportunities.
11	Minimise the impacts of flooding to the borough's transport network and key critical infrastructure.	This option is likely to result in increased flood risk to key infrastructure, which would cause significant disruption to the Borough, impacting on human and economic activity and the environment.	This option would maintain the current risk levels, although risk may increase in the future because of climate change.	FRM options may reduce flood risk to key critical infrastructure, reducing disruption during flood events and enabling a more effective response.
12	Reduce vulnerability to climate change impacts and promote measures to enable adaptation to climate change impacts.	This option would result in no active adaptation or response to climate change (specifically, FRM). This would lead to a risk of adverse impacts to all receptors in the short, medium and long-term. However, the loss of existing FRM assets may result in a greater reconnection of the river to its floodplain, which could benefit a range of habitats and species.	No adaptation or response to climate change in terms of FRM. High risk for adverse impacts to all receptors in the short, medium and long-term.	The LFRMS includes full consideration of climate change adaptation in terms of FRM. This will reduce the overall risk of flooding and the potential for flood damages in the short, medium and long-term future, benefiting both people and property.

The assessment described in Table 4-1 indicates that Option 1 (do nothing) is likely to result in several significant adverse impacts, particularly in relation to people and property, and other environmental assets including historic assets and biodiversity, where increased flooding may create new pathways for the spread of invasive non-native species. Surface water and groundwater quality could also be adversely affected, with increased flooding of contaminated sites leading to greater impacts on water resources. Conversely, increased flood risk may result in greater connectivity between watercourse and their floodplains, offering opportunities for habitat creation of benefit to a range of protected and notable species.

Option 2 (maintain current FRM regime) is likely to result in little or no change in the environmental baseline in the short to medium term as the existing FRM regime continues to maintain existing levels of flood protection. However, because of future climate change, flood risk will increase, resulting in many of the impacts identified under Option 1, although potentially to a lesser extent and significance.

Option 3 (manage and reduce local flood risk) has the potential to provide a range of environmental benefits. FRM initiatives, if designed and implemented in an appropriate manner, could have multiple benefits. This could include reducing flood risk to people and property, contributing to the protection of heritage assets and improvements in water quality, and providing new opportunities for habitat creation and the provision of recreation and amenity assets. Conversely, FRM measures, if implemented in an inappropriate manner, could result in adverse effects on a range of environmental features. However, this risk is managed through the preparation of this SEA and through the planning and consenting process, which is likely to require consideration of the sustainability of a project prior to its implementation. Therefore, it is evident that by doing nothing or maintaining current levels of management, there are likely to be detrimental effects on the SEA objectives, which are likely to be prevented by carrying out active FRM as proposed by the LFRMS.

### 4.3 Strategy objectives and measures

The following LFRMS objectives and delivery actions ('measures') have been developed. The SEA appraises these objectives (Table 4-2) and measures (Table 4-3) to determine whether they would inhibit achievement of the SEA objectives, or conversely, contribute to their delivery.

Table 4-2: LFRMS objectives

Objective ID	LFRMS objective
1	Improve Understanding of Flood Risk within Bradford District (Section 8.1)
2	Reduce the Impact of Flooding (Subject to Available Resources) (Section 8.2)
3	Communicate Flood Risk to Partners and Stakeholders (Section 8.3)
4	Targeted Maintenance (Section 8.4)
5	Ensure Appropriate Development in Bradford District (Section 8.5)
6	Improve Flood Response and Post Flood Recovery (Section 8.6)

Table 4-3: LFRMS Measures

Objective ID	Measure ID	Measure
1	BD1	Maintain a statutory register of significant obstructions to flow within Districts watercourse, based on flood risk (recording location, capacity, condition, ownership etc. Significant obstructions to flow include bridges, culverts, trash screens, flumes, weirs etc.
	BD2	Maintain a statutory register of other watercourses structures and features (Walls and embankments etc.) that are deemed to act as flood defences.
	BD3	Ensure that future reports of watercourse, surface water and groundwater flooding are responded to by carrying out appropriate site investigations to capture relevant flood detail, including the mechanisms of flooding and resulting impact.
	BD4	Maintain effective communication links with external and flood risk management authorities to share information on flood risk and arrive at effective flood responses. Maintain open communication with internal risk management teams and ensure that relevant flooding records are held in order to improve overall understanding of flood risk.
	BD5	Capture all available recorded and reported information on significant flooding incidents caused by watercourse, surface water runoff and groundwater. Ensure relevant records are held and complete and publish SFRA.
2	BD6	Utilise potential funding sources to undertake necessary investigations, which will identify risk areas where there are capital needs. Investigations will utilise local flood risk information and where appropriate employing computer modelling analysis to assess flood mechanisms within each of these areas to arrive at cost effective flood management solutions, subject to available resources.
	BD7	Maintain engagement with riparian owners and significant land owners to negotiate the effective use of watercourses and open land for flood storage, subject to available resources.
3	BD8	To effectively communicate information on managing flood risk in the CBMDC required to publish the summary of the LFRMS and maintain open communication with other flood risk management authorities, including neighbouring LLFA's. The

		Council will continue to liaise with West Yorkshire Flood Risk Management Partnership (WYFRMP) and attend and hold LLFA meetings.
	BD9	To communicate directly with communities, businesses and organisations, landowners and the general public to contribute to community forums in identified risk areas to raise awareness and provide guidance on flood risk management.
	BD15	Produce community flood and emergency plans. Ensure ongoing communication with all internal and external RMA's. Plan and attend community forums to raise awareness. Apply legislation to guide residents regarding their flood risk.
4	BD10	Continue to target investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by CBMDC. The frequency of works based on flood risk and available resources. Ensure private riparian owners are contacted when maintenance works are required to maintain unimpeded flow within privately managed watercourses.
5	BD11	To ensure future developments are sustainable and do not increase flood risk and contribute towards sustainable development. LLFA acting as a statutory consultee to the planning authority on major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop a robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset the environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.
	BD12	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.
6	BD13	13 Maintain effective communication links with the Met office and the EA to ensure the most accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via an internal indicative flood forecast and the media.
	BD14	Maintain the use of on the ground observers to feedback and record information on flood extents and impact during the post event. Investigate opportunities to establish volunteer flood wardens within the district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans for Parish and Town Councils within Bradford District.

## 5 Appraisal of LFRMS objectives to improve flood risk

### 5.1 Impact significance

The unmitigated impacts of the LFRMS objectives on achieving the SEA objectives were identified through the analysis of the baseline environmental conditions and use of professional judgement. The significance of effects was scored using the five-point scale summarised in Table 5-1. If a high level of uncertainty regarding the likelihood and potential significance of an impact (either positive or negative) was identified, it was scored as uncertain.

Table 5-1: SEA appraisal codes

Impact significance	Impact symbol
Significant positive impact	++
Minor positive impact	+
Neutral impact	0
Minor negative impact	-
Significant negative impact	--
Uncertain impact	?

Throughout the assessment the following approach was applied:

- Positive, neutral and negative impacts are assessed, with uncertain impacts highlighted.
- The duration of the impact is considered over the short, medium and long term.
- The reversibility and permanence of the impact are assessed (e.g. temporary construction impacts, impacts which can be mitigated against/restored over time or completely irreversible changes to the environment).
- In-combination effects are also considered.

### 5.2 LFRMS impacts assessment

Table 5-2 and Table 5-4 provides a summary of the outcomes of the environmental assessment of the draft LFRMS objectives and measures respectively. Table 5-3 shows the results of the assessment of cumulative effects of the LFRMS objectives on achievement of the SEA objectives, whilst Table 5-5 assesses the cumulative effects associated with the LFRMS measures.

These are qualitative assessments that identify the range of potential effects that the LFRMS may have on delivering the SEA objectives. Where an LFRMS objective is underpinned by a series of actions, each of which may give rise to a range of environmental effects, an overall impact has been identified for each SEA objective

Table 5-2: Assessment of LFRMS objectives against SEA objectives

LFRMS objective reference	LFRMS objectives	SEA objectives												Comments
		1	2	3	4	5	6	7	8	9	10	11	12	
1	Improve Understanding of Flood Risk within Bradford District (Section 8.1 of the LFRMS)	0	0	0	0	0	0	+	+	+	0	+	+	Improving the understanding of flood risk within Bradford District has the potential to contribute to objectives 7 8, 9, 11 and 12 which focus on the reduction of flood risk to soil and geology, the built environment and communities, and adaptation to climate change effects. All of these SEA objectives would require a strong understanding of flood risk to be achieved properly. There is likely to be a neutral impact in relation to all other SEA objectives.
2	Reduce the Impact of Flooding (Subject to Available Resources) (Section 8.2 of the LFRMS)	+	+	+	+	+	+	+	+	+	++	++	+	This objective seeks to reduce the impact of flooding in the borough through investigation where there are capital needs, assessing flood risk mechanisms and by negotiating the effective use of watercourses and open land for flood storage. As such, this objective seeks to reduce flood risk and therefore could benefit people, historic environment and property (SEA objectives 8 to 12). Engagement with riparian owners and significant land owners will protect the rural landscape (SEA objective 1) and is likely to have some beneficial impacts on biodiversity and the water environment (SEA objective 2 to 6). However, conducting cost-effective flood management solutions could mean that some communities are favoured over others, the LFRMS must ensure that consideration is given to all communities and social infrastructure.
3	Communicate Flood Risk to Partners and Stakeholders (Section 8.3 of the LFRMS)	+	+	+	+	+	+	+	+	+	0	+	+	This LFRMS objective seeks to communicate flood risk information to authorities, communities, businesses, organisations, landowners and the public. It also aims to produce community flood and emergency plans. This objective will directly benefit communities and social infrastructure (SEA Objective 9). Through adequate planning there will also be indirect benefits to the landscape, material assets, historic environment and critical infrastructure. This should be conducted through communication with key stakeholders and effective emergency planning which considered future climate change. There is likely to be a neutral impact to SEA objective 10, as there is no direct link to the increased use of SuDS.
4	Targeted Maintenance (Section 8.4 of the LFRMS)	+	+	+	+	+	+	+	+	+	0	++	0	This objective aims to continue to target investigation and clearance works of watercourses and associated assets. This objective will benefit the boroughs transport network and critical infrastructure (SEA objective 11). There is also opportunity to have indirect benefits to SEA objectives 5 to 7. If the waterways are being maintained regularly this will reduce the likelihood of soil erosion, pollution and contamination. There is likely to be a neutral impact to SEA objective 10, as there is no direct link to the increased use of SuDS or to climate change vulnerability.
5	Ensure Appropriate Development in Bradford District (Section 8.5 of the LFRMS)	0	+	+	+	+	+	+	0	+	++	+	++	This objective has the potential to have many benefits to several SEA objectives. The objective aims to ensure appropriate development in the Bradford District and to offset the environmental impact of development by enhancing biodiversity and water

LFRMS objective reference	LFRMS objectives	SEA objectives												Comments	
		1	2	3	4	5	6	7	8	9	10	11	12		
	LFRMS)														quality within the areas designated for flood storage. This will directly benefit SEA objectives 2 to 6. The objective also aims to ensure robust sustainable drainage systems are provided wherever appropriate, which is in accordance with SEA objective 10. Furthermore, the objective will reduce climate change vulnerability (SEA objective 12) by utilising all available flood risk climate change information to deliver sustainable drainage outcomes. There is likely to be a neutral impact to SEA objective 1 and 8 as any development may affect the integrity of the borough's urban and rural landscape, including its historic environment, if the development is not appropriate for the area.
6	Improve Flood Response and Post Flood Recovery (Section 8.6 of the LFRMS)	0	0	0	0	0	0	0	+	+	0	++	++	This LFRMS objective will strongly benefit SEA objectives 9 and 11 because it aims to provide clear and regular updates on flood risk to the public, flood risk partners and emergency services thereby minimising the risk of flooding to communities, social infrastructure and critical infrastructure. The objective also aims to use ground observers to feedback and record information on flood extents which will reduce the vulnerability to climate change impacts (SEA objective 12). The objective will have mostly neutral effects for the rest for the SEA objectives as there is no direct links with landscape, biodiversity, water environment, soils or geology.	



Table 5-3: Cumulative effects of the LFRMS objectives on SEA objectives

Receptor	SEA objective	Assessment score	Justification	Timescale, probability and permanence of effects	
<b>Landscape</b>	1	+	Overall, the LFRMS objectives are likely to have a positive effect in relation to this SEA objective as the LFRMS includes several objectives that seek to deliver improvements to the environmental quality of the Borough or avoid inappropriate development. Objectives H5 in aims to improve the standard of design and promote environmental protection, by promoting sustainable solutions. No adverse effects on this SEA objective were identified.	Whilst several LFRMS objectives promote protection of the environment through FRM activities it is unclear what the outcomes of this are likely to be. This will depend upon the type and scale of interventions and the specific locations in which they are delivered. However, the LFRMS aims to achieve long term flood risk benefits by influencing the location and quality of development proposals. It is therefore likely that any wider environmental benefits could also be delivered for the long term, although it is equally possible that such benefits would be delivered over a variety of timescales. In addition, the permanence of any wider environmental effects are likely to be dependent upon many other factors and influenced by a range of other proposals.	
	2				Protect the integrity of the Borough's urban and rural landscapes, and promote the key characteristics of the NCA's, LCA's, the Green Belt and the World Heritage Site in Saltaire.
<b>Biodiversity, flora and fauna</b>	3	+	The LFRMS includes several objectives that have the potential to deliver benefits to the wider environment. These benefits will be achieved by discouraging development in areas at risk of flooding, such as river floodplains, and influencing new development to deliver wider environmental gains, particularly by promoting sustainable solutions.  In general, actions to reduce flood risk and promote sustainable solutions are likely to benefit water quality and water resources in the Borough, by reducing the risk of contaminated materials, fuels, chemical and sediments from entering local watercourses.	The positive effects are likely to occur over a range of timescales. The LFRMS may influence development proposals in the short term and in the longer term, and the outcomes of this may be both temporary and permanent depending upon the location and scale of effects that are achieved.  At this stage, the scale and permanence of any effects is generally uncertain as the LFRMS objectives encourage sustainable design rather than expressly inhibiting bad design. This means that development could be consented that does not improve environmental quality. There are also many variables on the type of development, from geographic scale and location to the type of environmental receptors of the development. For positive effects to be more certain, a robust planning process that considers the LFRMS objectives is required.	
	4				Protect and enhance designated and BAP habitats and species in the borough.
	5				Maintain and enhance habitat connectivity and wildlife corridors within the borough.
<b>Water environment</b>	6	+			
	7				Improve the quality and quantity of the water in the borough's rivers.
<b>Soils and geology</b>	8	+			
	9				Do not inhibit achievement of the WFD objectives and contribute to their achievement where possible.
<b>Historic environment</b>	10	+			
	11				Reduce the risk of soil erosion and pollution.
<b>Historic environment</b>	12	+	The LFRMS objectives have a generally positive impact on this SEA objective as the LFRMS aims to reduce risk of flooding to the Borough. A reduction in risk of flooding within the Borough generally will reduce the risk of flooding to important historic and cultural sites, now and in	The effects of the LFRMS are likely to occur over a range of timescales. However, the LFRMS seeks to deliver long-term flood risk benefits and so any historic assets protected may benefit in the longer term. The permanence of any effects will depend upon the specific	
	13				Preserve and, where appropriate enhance historic, environment and cultural sites in the borough.

				the future. There are no LFRMS objectives that specifically aim to protect and enhance historical and cultural assets, which lessens the positive impact on this SEA objective, and therefore an overall minor positive effect has been identified. However, any FRM measure that is likely to impact on a historic or cultural asset should be fully assessed, as some assets may require waterlogged conditions for protection. Any development proposed should also be assessed individually as the development itself could affect the fabric or setting of a known or unknown historic asset.	details of the FRM measure being implemented and the nature, scale and location of this intervention.
<b>Population</b>	9	Minimise the risk of flooding to communities and social infrastructure.	++	The LFRMS is likely to provide a significant positive effect in relation to this SEA objective. Most objectives seek to deliver improved FRM for local people, with objective 5 perhaps the objective most focused on achieving this. Improving FRM and reducing flood risk across the Borough could deliver a range of benefits to the local community including alleviating the cost and disruption associated with flooding, whilst reducing stress and anxiety associated with the risk of flooding. In addition, wider societal benefits could be achieved by reducing flood risk and improving the environmental quality of the Borough. Benefits could include reduced social deprivation and greater community cohesion.	Most of the LFRMS objectives directly seek to reduce flood risk and therefore it is very likely that positive effects will occur. Given the range of objectives, it is also likely that effects will occur over a range of timescales and will include both temporary and permanent effects.
	10	Increase the use of SuDS, particularly in all new developments.	+	Although not specifically addressed within the LFRMS objectives, SuDS is likely to play an important role in achieving several of the objectives to reduce flood risk, promote better land management and influence the quality of new development. Objective 5 may increase the use of SuDS by ensuring robust sustainable drainage systems are provided wherever appropriate.	SuDS may play a role in the delivery of some of the LFRMS objectives, particularly in relation to influencing the design and new development, and therefore it is likely that the LFRMS will contribute towards achieving this SEA objective. The timescale for achieving this is likely to vary depending upon the scale of development proposals and the resources available to deliver the LFRMS actions. The effects are likely to be permanent if SuDS schemes can be successfully incorporated into these new development proposals.
<b>Material assets</b>	11	Minimise the impacts of flooding to the borough's transport network and key critical infrastructure.	++	The LFRMS objectives are likely to have a significant positive effect on this SEA objective as many of the LFRMS objectives are aimed at reducing the risk of flooding to people and property, particularly LFRMS objectives 2 and 4. Implementing FRM measures will reduce the risk of flooding to the Borough, which will include a reduction in the risk of flooding to the Borough's transport networks.	The LFRMS includes several objectives to reduce flood risk and therefore it is very likely that the positive effects will occur. Given the range of relevant LFRMS objectives, it is likely that effects will occur over a range of timescales.



<b>Climate</b>	12	Reduce vulnerability to climate change impacts and promote measures to enable adaptation to climate change impacts.	+	FRM measures that are introduced because of this LFRMS will consider climate change in their design, providing a positive effect on this SEA objective. However, measures to enable adaptation to climate change could be more expressly promoted within the LFRMS. Therefore, the LFRMS only has a minor positive effect on this SEA objective.	The nature of the effects will be influenced by a wide range of factors outside the direct control of the LFRMS. Therefore, it is difficult to predict at this stage the likely timescale, probability or permanence of effects. It is likely that effects will be achieved over a variety of timescales and their significance will be linked to the scale and nature at which climate change occurs. However, the LFRMS will promote better FRM and will reduce flood risk across the Borough and there are significant drivers requiring climate change considerations to be built into these FRM actions. Therefore, it is likely that the LFRMS will provide an important means for monitoring the flood risk effects of climate change and implementing actions to address these effects.
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Table 5-4: Assessment of LFRMS measures against SEA objectives

LFRMS Objective Reference	Measure ID	Measure	SEA objectives												Comments
			1	2	3	4	5	6	7	8	9	10	11	12	
1	BD1	Maintain a statutory register of significant obstructions to flow within Districts watercourse, based on flood risk (recording location, capacity, condition, ownership etc. Significant obstructions to flow include bridges, culverts, trash screens, flumes, weirs etc.	0	+	+	0	+	+	+	+	++	0	+	+	Up-to-date information about obstructions to flow, watercourse structures and flood risk (BD1 and BD2) are important to reduce the risk of soil erosion, water contamination and pollution, preserve the historic environment, minimise risk of flooding and reduce climate change vulnerability. It is also important to carry out appropriate site visits to be fully aware of the flood risk to the borough (BD3). This is because the register will allow the acting body to see which defences need maintenance before a flood event occurs. These measures are unlikely to have a significant effect on the integrity of the boroughs urban and rural landscape, and there is no mention of SuDS or creating new riverine habitats. These measures are expected to reduce the impact of flooding in the community. This will have a positive effect on SEA objectives 7, 8, 9, 11 and 12. As these measures are primarily focused on communication it is unlikely that they will have a positive or negative impact on SEA objectives 1 to 7 and 10.
	BD2	Maintain a statutory register of other watercourses structures and features (Walls and embankments etc.) that are deemed to act as flood defences.	0	+	+	0	+	+	+	+	++	0	+	+	
	BD3	Ensure that future reports of watercourse, surface water and groundwater flooding are responded to by carrying out appropriate site investigations to capture relevant flood detail, including the mechanisms of flooding and resulting impact.	0	+	+	0	+	+	+	+	++	0	+	+	
	BD4	Maintain effective communication links with external and flood risk management authorities to share information on flood risk and arrive at effective flood responses. Maintain open communication with internal risk management teams and ensure that relevant flooding records are held in order to improve overall understanding of flood risk.	0	0	0	0	0	0	+	+	+	0	+	+	
	BD5	Capture all available recorded and reported information on significant flooding incidents caused by watercourse, surface water runoff and groundwater. Ensure relevant records are held and complete and publish SFRA.	0	0	0	0	0	0	+	+	+	0	+	+	
2	BD6	Utilise potential funding sources to undertake necessary investigations, which will identify risk areas where there are capital needs. Investigations will utilise local flood risk information and where appropriate employing computer modelling analysis to assess flood mechanisms within each of these areas to arrive at cost effective flood management solutions, subject to available resources	++	+	+	+	+	+	+	+	+	+	++	+	These measures seek to reduce the impact of flooding in the borough through investigation where there are capital needs, assessing flood risk mechanisms and by negotiating the effective use of watercourses and open land for flood storage. As such, these measures seek to reduce flood risk and therefore could benefit people, historic environment and property (SEA objectives 8 to 12). Engagement with riparian owners and significant land owners will protect the rural landscape (SEA objective 1) and is likely to have some beneficial impacts on biodiversity and the water environment (SEA objective 2 to 6). However, conducting cost-effective flood management solutions could mean that some communities are favoured over others, the LFRMS must ensure that consideration is given to all communities and social infrastructure.
	BD7	Maintain engagement with riparian owners and significant land owners to negotiate the effective use of watercourses and open land for flood storage, subject to available resources.	++	+	+	+	+	+	+	+	+	+	++	+	
3	BD8	To effectively communicate information on managing flood risk in the CBMDC required to publish the summary of the LFRMS and maintain open communication with other flood risk management authorities, including neighbouring LLFA's. The Council will continue to liaise with West Yorkshire Flood Risk Management Partnership (WYFRMP) and attend and hold LLFA meetings.	+	+	+	+	+	+	+	+	++	0	+	+	This LFRMS measures seek to communicate flood risk information to authorities, communities, businesses, organisations, landowners and the public. They also aim to produce community flood and emergency plans. This objective will directly benefit communities and social infrastructure (SEA Objective 9). Through adequate planning there will also be indirect benefits to the landscape, material assets, historic environment and critical infrastructure. This should be conducted through communication with key stakeholders and effective emergency planning which considered future climate change. There is likely to be a neutral impact to SEA objective 10, as there is no direct link to the increased use of SuDS. Furthermore, community flood and emergency plans are unlikely to have positive or negative effects in the natural environment (SEA objectives 1 to 7).
	BD9	To communicate directly with communities, businesses and organisations, landowners and the general public to contribute to community forums in identified risk areas to raise awareness and provide guidance on flood risk management.	+	+	+	+	+	+	+	+	++	0	+	+	
	BD15	Produce community flood and emergency plans. Ensure ongoing communication with all internal and external RMA's. Plan and attend	0	0	0	0	0	0	0	+	++	0	+	+	

LFRMS Objective Reference	Measure ID	Measure	SEA objectives												Comments				
			1	2	3	4	5	6	7	8	9	10	11	12					
		community forums to raise awareness. Apply legislation to guide residents regarding their flood risk.																	
4	BD10	Continue to target investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by CBMDC. The frequency of works based on flood risk and available resources. Ensure private riparian owners are contacted when maintenance works are required to maintain unimpeded flow within privately managed watercourses.	+	+	+	+	++	++	++	+	+	0	++	0					This measure aims to continue to target investigation and clearance works of watercourses and associated assets. This objective will benefit the boroughs transport network and critical infrastructure (SEA objective 11). There is also opportunity to have indirect benefits to SEA objectives 5 to 7. If the waterways are being maintained regularly this will reduce the likelihood of soil erosion, pollution and contamination. There is likely to be a neutral impact to SEA objective 10, as there is no direct link to the increased use of SuDS or to climate change vulnerability.
5	BD11	To ensure future developments are sustainable and do not increase flood risk and contribute towards sustainable development. LLFA acting as a statutory consultee to the planning authority on major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop a robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset the environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.	0	++	+	+	++	++	+	0	++	++	+	++					The measures aim to offset the environmental impact of development by enhancing biodiversity and water quality within the areas designated for flood storage, this will directly benefit SEA objectives 2 to 6. The objective also aims to ensure robust sustainable drainage systems are provided wherever appropriate, which is in accordance with SEA objective 10. Furthermore, the objective will reduce climate change vulnerability (SEA objective 12) by utilising all available flood risk climate change information to deliver sustainable drainage outcomes. There is likely to be a neutral impact to SEA objective 1 and 8 as any development may affect the integrity of the borough's urban and rural landscape, including its historic environment, if the development is not appropriate for the area.
	BD12	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.	0	++	+	+	++	++	+	0	++	+	+	+					
6	BD13	Maintain effective communication links with the Met office and the EA to ensure the most accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via an internal indicative flood forecast and the media.	0	0	0	0	0	0	0	+	++	0	++	++					These measures will strongly benefit SEA objectives 9 and 11 because they aim to provide clear and regular updates on flood risk to the public, flood risk partners and emergency services thereby minimising the risk of flooding to communities, social infrastructure and critical infrastructure. The measures also aim to use ground observers to feedback and record information on flood extents which will reduce the vulnerability to climate change impacts (SEA objective 12). These measures will have mostly neutral effects for the rest for the SEA objectives as there is no direct links with landscape, biodiversity, water environment, soils or geology.
	BD14	Maintain the use of on the ground observers to feedback and record information on flood extents and impact during the post event. Investigate opportunities to establish volunteer flood wardens within the district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans for Parish and Town Councils within Bradford District.	0	0	0	0	0	0	0	+	++	0	++	++					

Table 5-5: Summary of impacts of LFRMS measures on SEA objectives

Receptor	SEA Objective	Summary of impacts	Timescale, probability and permanence of effects	
<b>Landscape</b>	1	Protect the integrity of the Borough's urban and rural landscapes, and promote the key characteristics of the NCA's, LCA's, the Green Belt and the World Heritage Site in Saltaire.	<p>There is a general lack of information at this stage to identify the types of effects that are likely to occur. Therefore, it is not possible to make a judgement as to the timescale over which they might occur or their likely probability or permanence. It is reasonable to assume that any environmental effects might occur over a range of timescales and will comprise both temporary and permanent effects. It is important that individual actions are assessed at the project stage to determine their potential environmental impacts and that due regard is made to the LFRMS objectives that seek to protect and enhance the environment.</p>	
	<b>Biodiversity, flora and fauna</b>	2		Protect and enhance designated and BAP habitats and species in the borough.
		3		Maintain and enhance habitat connectivity and wildlife corridors within the borough.
<b>Water environment</b>	4	Maintain existing, and where possible create new, riverine and wetland habitat to benefit migratory and aquatic species and fisheries, and maintain upstream access.		
	5	Improve the quality and quantity of the water in the borough's rivers.		
<b>Soils and geology</b>	6	Do not inhibit achievement of the WFD objectives and contribute to their achievement where possible.		
	7	Reduce the risk of soil erosion and pollution.		
<b>Historic environment</b>	8	Preserve and, where appropriate enhance historic, environment and cultural sites in the borough.		
<b>Population</b>	9	Minimise the risk of flooding to communities and social infrastructure.		
<b>Material assets</b>	10	Increase the use of SuDS, particularly in all new developments.		
	11	Minimise the impacts of flooding to the borough's transport network and key critical infrastructure.		
<b>Climate</b>	12	Reduce vulnerability to climate change impacts and promote measures to enable adaptation to climate change impacts.		

## 6 Conclusion and recommendations

### 6.1 Conclusions

The LFRMS aims to promote objectives and measures that reduce flood risk within the Borough, while understanding the costs and resources available. The LFRMS objectives aim to provide a mechanism through which appropriate FRM activities can be delivered, such as enabling people and public bodies to work together. The LFRMS is an important tool to protect vulnerable communities and help deliver sustainable regeneration and growth.

This SEA has been undertaken to identify the likely significant environmental effects of implementation of the LFRMS. A proportionate approach was adopted towards establishing the scope of the SEA, reflecting the high-level nature of the LFRMS.

A range of different strategy options for delivering the LFRMS have been assessed at a strategic level against the SEA objectives. These alternatives include the 'do nothing' scenario, where no action is taken and existing assets and ordinary watercourses are abandoned, and the 'maintain current flood risk' scenario, where existing assets and watercourses are maintained as present in line with current levels of flood risk.

The assessment indicates that the 'do nothing' approach is likely to result in a number of significant adverse effects, particularly due to increased flood risk to people and property, and effects on other environmental assets including water quality, historic assets and biodiversity, where increased flooding may create new pathways for the spread of invasive non-native species. These impacts would be likely to increase over time, as responsible bodies will be unable to incorporate precautionary measures in existing or new developments in a response to climate change pressures. Conversely, increased flood risk may result in greater connectivity between watercourses and their floodplains, offering opportunities for habitat creation/enhancement of benefit to a range of protected and notable species.

The option to 'maintain current flood risk' is likely to result in little or no additional impact on the environment in the short to medium term as the existing FRM regime continues to maintain existing levels of flood protection. However, in the future, as a result of climate change, flood risk will increase, resulting in many of the impacts identified under the 'do nothing' scenario, although potentially to a lesser extent and significance.

Therefore, the SEA identifies that implementation of the LFRMS to 'understand and manage flood risk from localised sources' is the only realistic approach to be employed by Bradford Council as it has the potential to provide a range of environmental benefits and offers a pro-active approach to managing flood risk.

#### 6.1.1 LFRMS objectives

Assessment of the LFRMS objectives against the SEA objectives was undertaken (see Table 5-2). No negative environmental effects have been identified. Many of the proposed LFRMS objectives have the potential for both direct and indirect environmental benefits. LFRMS objective 5 in particular has potential to provide a positive contribution to all the SEA objectives and make a significant positive contribution to many of them, as it seeks to promote sustainable solutions that not only reduces flood risk but will also seek to reduce climate change vulnerability. However, the LFRMS objectives could improve; none of the objectives aim to directly benefit the landscape, biodiversity or the soil and geology (SEA objectives 1, 2, 3, 4, and 7) in Bradford. These SEA objectives will have marginal benefits from some of the LFRMS objectives, however these are not direct benefits. The LFRMS could achieve a range of biodiversity benefits, including new habitat creation, enhancement of existing habitats and greater habitat connectivity.



Assessment of LFRMS objective 5 against the SEA objectives has highlighted a risk in avoiding inappropriate development in areas of flood and coastal risk, which could lead to increased development pressure on rural and greenfield land. This risk is likely to be mitigated due to existing planning laws.

In addition, as expected of a strategy for managing flood risk, all of objectives within the strategy will contribute to achievement of the SEA objectives that seek to reduce flood risk to people, property and infrastructure. Significant positive effects to SEA objective 9 result from LFRMS objectives 2, 3, 5 and 6. As a result, the LFRMS is likely to have a significant positive effect on reducing flood risk to local communities.

Some of the LFRMS objectives are likely to assist with climate change adaptation. In particular, measures that reduce flood risk, promote better use of water resources, seek to deliver new habitat creation and better connection between existing habitats (such as de-culverting), could make a significant positive contribution to achievement of SEA objective 12.

At present, the potential effects associated with several of the LFRMS measures are neutral. LFRMS objectives 1 and 6 are largely neutral as they are principally focused on social and flood risk benefits rather than delivering environmental objectives. There is a potential that to achieve these LFRMS objectives it may result in physical interventions that could affect achievement of several of the SEA objectives, depending upon how they are implemented. These risks are directly associated with the type and scale of development or measures to achieve the objectives, and their location in relation to important or sensitive environmental features. However, given that the LFRMS includes objectives to deliver sustainable solutions, such interventions, if delivered in an inappropriate manner, would be likely to conflict with delivery of the LFRMS. Therefore, the LFRMS should ensure integration of its objectives across all underpinning actions so that delivery of individual measures does not conflict with achievement of the wider strategy objectives, but instead seeks to contribute towards these objectives at all stages of the strategy's implementation. Achievement of reducing flood risk can also help to achieve the LFRMS's social objectives, as it would alleviate the cost and disruption associated with flooding, while also reducing the stress and anxiety associated with the risk of flooding.

A detailed assessment of the potential cumulative effects of the LFRMS measures should be undertaken when further details regarding specific project level measures and their implementation are known.

### 6.1.2 LFRMS measures

Assessment of the LFRMS measures against the SEA objectives was undertaken (Table 5-4). No negative environmental effects have been identified, with the majority having a neutral effect.

As expected of a strategy for managing flood risk, the majority of the LFRMS measures have a positive effect on SEA objective 9, which seeks to reduce flood risk in the Borough. The measures mainly relate to maintaining existing FRM structures and managing surface water flows. As a result, the LFRMS is likely to have a significant positive effect on reducing flood risk to local communities. Many of the LFRMS actions have a neutral effect on the remaining objectives as they are focused on flood risk reduction and understanding costs rather than implementation of new FRM measures. Measures to reduce flood risk could have a range of effects on the natural environment, and have the potential for indirect environmental benefits. LFRMS measure BD11 that includes offsetting the environmental impact of development by enhancing biodiversity has the potential to provide a positive contribution to the SEA objectives concerned with biodiversity.

The reduction of flood risk that many of the LFRMS measures will provide will contribute towards SEA objective 12 by increasing resilience to the effects of climate change. Measure BD11 particularly aims to understand the change and impacts of climate change. This increased understanding has the potential to lead to development and implementation of management measures that will reduce vulnerability to climate change.

The physical interventions that could come as a result of the LFRMS actions could affect the achievement of the SEA objectives, depending on how the actual FRM measures are implemented. These risks are directly associated with the type and scale of the FRM and their location in relation to environmental features. Therefore, the LFRMS should ensure that delivery of these measures does not adversely affect the achievement of the SEA objectives. These physical interventions should be subject to a thorough environmental assessment at the project stage to ensure they are sustainable and are delivered in accordance with the LFRMS objectives.

## 6.2 Recommendations

The assessment of the LFRMS objectives and measures has identified a number of areas where the LFRMS could be strengthened to ensure delivery of a sustainable approach. These areas are associated with social and financial aspects to managing flood risk within the Borough, and not directly aiming to implement FRM measures. Specifically, these apply to the following LFRMS objectives:

- Objective 1 – *Improve Understanding of Flood Risk within Bradford District*
- Objective 3 – *Communicate Flood Risk to Partners and Stakeholders*
- Objective 6 – *Improve Flood Response and Post Flood Recovery*

The LFRMS primarily benefits SEA objectives 9 and 11, but could also include a wider environmental focus that could help to deliver multiple benefits including improvements to the natural and historic environment, which may also help secure FRM funding.

In order to ensure that the LFRMS does not result in adverse effects, all strategy objectives should be integrated so that delivery of individual actions does not conflict with achievement of the wider strategy objectives. In addition, development and implementation of these actions should be effectively managed by ensuring that, where necessary, proposals are assessed to determine their potential environmental effects (positive and negative) in advance of their implementation and that appropriate mitigation measures are built into their delivery as required.

The LFRMS should seek to maximise the potential environmental benefits associated with delivery of these objectives and measures. This can be best achieved through the integration of LFRMS objectives and through close partnership working, so that appropriate resources and funding are effectively allocated.

Table 6-1 summarises the recommendations made by the SEA and shows how the recommendations have been responded to in the LFRMS. The table will be completed following review of the draft Environmental Report, during production of the final Environmental Report.

Table 6-1: How the environmental report has been taken into account in the LFRMS

SEA recommendation	Final decision
LFRMS to be strengthened by considering the SEA objectives as a whole to ensure delivery of a sustainable approach.	The LFRMS has been updated to take account of the SEA objectives to ensure that LFRMS actions will be delivered in a sustainable way.
LFRMS objectives should be integrated so that delivery of individual measures do not conflict with achievement of the wider strategy objectives.	LFRMS actions will be undertaken with consideration of the wider Strategy objectives.

SEA recommendation	Final decision
Proposals should be assessed to determine their potential environmental effects (positive and negative) in advance of implementation and appropriate mitigation measures are built into their delivery as required.	As actions identified in the strategy are investigated in more detail, further environmental assessment will be undertaken during the feasibility stages to identify what appropriate mitigation measures may be required for their delivery.
LFRMS should seek to maximise the potential environmental benefits associated with delivery of the objectives and actions.	LFRMS has been updated to include more explicit reference to WFD and the environment and how the Strategy will seek to maximise environmental benefits during deliver of the objectives and actions.

### 6.3 Monitoring

The SEA Regulations require Bradford Council to monitor the significant environmental effects (positive and negative) upon the implementation of the LFRMS. Key potential environmental effects that require monitoring are listed in Table 6-2. Several of these monitoring requirements are likely to require a partnership approach to effectively track the effects of the strategy. Possible partners for monitoring responsibility are therefore highlighted.

The monitoring indicators will enable the LFRMS to be monitored and any problems or shortfalls to be highlighted and remedied at an early stage. If failings are evident, it will be necessary for the LFRMS to be revised so that the achievement of the SEA objectives is not compromised. Of note, it is unlikely that any effects negative or otherwise will be seen immediately and that the relative time scale for monitoring will vary for each indicator/target.

Table 6-2: SEA monitoring framework

LFRMS objective or measure	SEA objective(s)	Potential significant effects	Monitoring indicator	Possible monitoring and/or delivery partners
Objective 2: Reduce the impact of flooding	9 and 11	Managing flood risk will increase the Borough's resilience to flooding.	Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Length of road and rail infrastructure at risk from flooding. Number of key infrastructure assets at risk from flooding.	Bradford MDC, Yorkshire Water Environment Agency
Objective 4: <i>Targeted maintenance</i>	9 and 11	Improving FCERM systems with the objectives of also reducing harm to people, economy, environment and society assists with the achievement of all the SEA objectives.	Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Length of road and rail infrastructure at risk from flooding. Number of key infrastructure assets at risk from flooding.	Bradford MDC, Yorkshire Water Environment Agency
Objective 5: <i>Ensure appropriate development in Bradford District</i>	9 and 12	Promoting better land management to avoid development in areas at risk of flooding, and as	Number of residential properties at risk of flooding. Number of key services	Bradford MDC, Yorkshire Water



LF RMS objective or measure	SEA objective(s)	Potential significant effects	Monitoring indicator	Possible monitoring and/or delivery partners
		such, reducing flood risk to communities and reducing vulnerability to climate change.	(e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Area of habitat created as a result of implementation of the LFRMS (e.g. flood storage areas creating wetland habitat).	Environment Agency
Measure BD11: <i>Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the SFRA and Bradford Core Strategy.</i>	10	Increase of SuDS schemes within the Borough through introducing ways to manage runoff.	Number of SuDS schemes installed as part of the LFRMS. Area/type of green infrastructure created/enhanced.	Bradford MDC, Yorkshire Water Environment Agency
Measure BD6: <i>Investigations will utilise local flood risk information and where appropriate employing computer modelling analysis to assess flood mechanisms within each of these areas to arrive at cost effective flood management solutions, subject to available resources.</i>	9 and 11	Co-ordination will lead to an effective approach to FRM.	Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Length of road and rail infrastructure at risk from flooding. Number of key infrastructure assets at risk from flooding.	Bradford MDC, Yorkshire Water Environment Agency
Measure BD10: Continue to target investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by CBMDC.	9 and 10	There will be a reduction in flood risk to the population while clearance of waterways continues.	Number of residential properties at risk of flooding. Number of key services (e.g. hospitals, health centres, residential/care homes, schools etc.) at risk from flooding. Number of SuDS schemes installed as part of the LFRMS. Area/type of green infrastructure created/enhanced.	Bradford MDC, Yorkshire Water Environment Agency

## 6.4 Habitats Regulations Assessment

A Test of Likely Significant Effect (screening assessment) has been prepared in accordance with the requirements of the Habitats Regulations to determine whether the LFRMS is likely to have a significant effect on a European site (alone or in combination). This is summarised in Section 1.6 and described in Appendix A. The screening assessment concluded that the LFRMS is not likely to have a significant effect on any of the European sites.

Consultation with Natural England on the outcomes of the screening assessment was undertaken as part of the SEA scoping consultation exercise. Natural England confirmed that a TLSE is required.

Following development of the draft strategy objectives and measures, the screening assessment was reviewed to determine whether the LFRMS would be likely to have a significant effect on the European sites. The outcomes of this screening assessment are documented in Appendix A of this report. The screening assessment concludes that the LFRMS is not likely to have a significant adverse effect on a European site.

Consultation with Natural England on the outcomes of this assessment will be undertaken as part of the consultation process outlined in Section 7.

## 7 Next Steps

The next stage of the SEA process (Stage D) involves consulting on the draft SEA Environmental Report, alongside previously consulted draft LFRMS. This consultation will be with statutory consultees, stakeholders and the public, to help identify any necessary amendments and updates to the documents. All consultation responses received will be reviewed and taken into consideration for the next stage of appraisal process. This will involve the preparation of a Post-Adoption Statement, which will set out how the findings of the Environmental Report and the views expressed during the consultation period have been taken into account as the LFRMS has been finalised and formally approved. The Post-Adoption Statement will also set out any additional monitoring requirements needed to track the significant environmental effects of the strategy.

### 7.1 Consultation

This Environmental Report will be subject to public consultation for five weeks alongside the previously consulted LFRMS. All public consultation comments on the content of this Environmental Report should be sent to:

On the Web [www.bradford.gov.uk](http://www.bradford.gov.uk)

Email: [drainage@bradford.gov.uk](mailto:drainage@bradford.gov.uk)

By Post:

**Land Drainage,  
4th Floor,  
Britannia House,  
Bradford  
BD1 1HX**

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# A Appendix A: Habitats Regulations Assessment Test of Likely Significant Effect

## A.1 Record of Assessment of Likely Significant Effect on a European/International Site(SAC/SPA/Ramsar)

This assessment identifies and considers the likely adverse effects of the LFRMS, either individually or in combination with other plans or projects, upon a European site and considers whether these impacts are likely to be significant. It comprises a series of tables that identify the European sites of relevance to this assessment (Table A-1); the potential hazards associated with the LFRMS objectives and measures and their relevance to these European sites (Tables A-2 and A-3); and the likelihood that these hazards would cause a significant adverse effect on a European site (Table A-4, A-5).

Table A-1: Details of European Sites Within and Adjacent to Bradford Borough

<b>Type of Activity</b>	Local Flood Risk Management Strategy (LFRMS)
<b>Project Area</b>	Bradford Borough
<b>Brief Description of the project</b>	<p>The LFRMS is a requirement under the Flood and Water Management Act (2010). The Act outlines the responsibility of the lead local flood authority to 'develop, maintain, apply and monitor' a strategy for local flood risk management. It notes that the strategy must identify or outline the following:</p> <ul style="list-style-type: none"> <li>• The risk management authorities in the area;</li> <li>• The flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area;</li> <li>• The objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009;</li> <li>• The measures proposed to achieve those objectives;</li> <li>• How and when the measures are expected to be implemented;</li> <li>• The costs and benefits of those measures, and how they are to be paid for;</li> <li>• The assessment of local flood risk for the purpose of the strategy;</li> <li>• How and when the strategy is to be reviewed; and</li> <li>• How the strategy contributes to the achievement of wider environmental objectives.</li> </ul>
<b>European Site Name and Status</b>	<b>North Pennine Moors SAC</b>
<b>Distance to European/International Site</b>	1.6km north
<b>Site EU Reference Number</b>	UK0030033
<b>Site Centre NGR</b>	SE137749
<b>List of Site Interest Features</b>	<p><b>Designated primarily for the following Annex 1 habitats:</b></p> <p>4030 European dry heaths  5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands  7130 Blanket bogs (an extensive area of which is active)  7220 Petrifying springs with tufa formation (<i>Cratoneurion</i>)  8220 Siliceous rocky slopes with chasmophytic vegetation  91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p><b>Other qualifying Annex 1 habitats within the SAC:</b></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>  6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i>  6150 Siliceous alpine and boreal grasslands</p>

	<p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)</p> <p>7230 Alkaline fens</p> <p>8110 Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p> <p><b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b></p> <p><b>1528 Marsh saxifrage <i>Saxifraga hirculus</i></b></p>
<b>European Site Name and Status</b>	<b>North Pennine Moors SPA</b>
<b>Distance to European/International Site</b>	1.6km north
<b>Site EU Reference Number</b>	UK9006272
<b>Site Centre NGR</b>	SE137749
<b>List of Site Interest Features</b>	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During breeding season:</p> <ul style="list-style-type: none"> <li>- Golden Plover <i>Pluvialis apricaria</i>, 1,400 pairs representing at least 6.2% of the breeding population in Great Britain</li> <li>- Hen Harrier <i>Circus cyaneus</i>, 11 pairs representing at least 2.2% of the breeding population in Great Britain (Estimated population)</li> <li>- Merlin <i>Falco columbarius</i>, 136 pairs representing at least 10.5% of the breeding population in Great Britain</li> <li>- Peregrine <i>Falco peregrinus</i>, 15 pairs representing at least 1.3% of the breeding population in Great Britain</li> </ul> <p>This site also qualifies under <b>Article 4.2</b> of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>During breeding season:</p> <ul style="list-style-type: none"> <li>- Curlew <i>Numenius arquata</i>, 3,930 pairs representing at least 3.3% of the breeding Europe - breeding population (1992/3/4 survey)</li> <li>- Dunlin <i>Calidris alpina schinzii</i>, 330 pairs representing at least 3.0% of the breeding Baltic/UK/Ireland population (Estimate based on 92-94 counts)</li> </ul>
<b>European Site Name and Status</b>	<b>Denby Grange Colliery Ponds SAC</b>
<b>Distance to European/International Site</b>	14.4km south-east
<b>Site EU Reference Number</b>	UK0030036
<b>Site Centre NGR</b>	SE271153
<b>List of Site Interest Features</b>	<p><b>Designated primarily for the following Annex 2 species:</b></p> <p><b>1166 Great crested newt <i>Triturus cristatus</i></b></p>
<b>European Site Name and Status</b>	<b>Craven Limestone Complex SAC</b>
<b>Distance to European/International Site</b>	14.6km north-west
<b>Site EU Reference Number</b>	UK0014776
<b>Site Centre NGR</b>	SD924673
<b>List of Site Interest Features</b>	<p><b>Designated for the following Annex 1 habitats:</b></p> <p>3140 Hard oligo-mesotrophic waters with benthic vegetation of</p>



	<p><i>Chara</i> spp. 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites) 6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) 7230 Alkaline fens 7110 Active raised bogs 7220 Petrifying springs with tufa formation (<i>Cratoneurion</i>) 8240 Limestone pavements</p> <p><b>Other qualifying Annex 1 habitats within the SAC:</b></p> <p>6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i> 9180 <i>Tilio-Acerion</i> forests of slopes, screes and ravines</p> <p><b>Designated for the following Annex 2 species:</b></p> <p>1092 White-clawed (or Atlantic stream) crayfish <i>Austropotamobius pallipes</i> 1163 Bullhead <i>Cottus gobio</i> 1902 Lady's-slipper orchid <i>Cypripedium calceolus</i></p>
<b>European Site Name and Status</b>	<b>North Pennine Dales Meadows SAC</b>
<b>Distance to European/International Site</b>	Within
<b>Site EU Reference Number</b>	UK0014775
<b>Site Centre NGR</b>	NY931256
<b>List of Site Interest Features</b>	<p><b>Designated for the following Annex 1 habitats:</b></p> <p>6520 Mountain hay meadows</p> <p><b>Other qualifying Annex 1 habitats within the SAC:</b></p> <p>6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p>
<b>European Site Name and Status</b>	<b>South Pennine Moors Phase 2 SPA</b>
<b>Distance to European/International Site</b>	Within
<b>Site EU Reference Number</b>	UK9007022
<b>Site Centre NGR</b>	SE137749
<b>List of Site Interest Features</b>	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p><b>During the breeding season:</b></p> <ul style="list-style-type: none"> <li>- Golden Plover <b>Pluvialis apricaria</b>, 752 pairs representing at least 3.3% of the breeding population in Great Britain (Count as at 1990)</li> <li>- Merlin <b>Falco columbarius</b>, 77 pairs representing at least 5.9% of the breeding population in Great Britain</li> <li>- Peregrine <b>Falco peregrinus</b>, 16 pairs representing at least 1.4% of the breeding population in Great Britain</li> <li>- Short-eared Owl <b>Asio flammeus</b>, 25 pairs representing at least 2.5% of the breeding population in Great Britain</li> </ul> <p>This site also qualifies under <b>Article 4.2</b> of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>During the breeding season: Dunlin <b>Calidris alpina schinzii</b>, 140 pairs representing at least 1.3% of the breeding Baltic/UK/Ireland population</p>
<b>European Site Name and Status</b>	<b>South Pennine Moors SAC</b>

<b>Distance to European/International Site</b>	Within
<b>Site EU Reference Number</b>	UK0030280
<b>Site Centre NGR</b>	SK144960
<b>List of Site Interest Features</b>	<p><b>Designated for the following Annex 1 habitats:</b></p> <p>4030 European dry heaths 7130 Blanket bogs 91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p><b>Other qualifying Annex 1 habitats within the SAC:</b></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 7140 Transition mires and quaking bogs</p>

Table A-2: Potential Hazards and Effects to European Sites Associated with the LFRMS

Sensitive Interest Features (grouped based on their sensitivity to similar hazards)	Potential Hazard(s)	Potential Exposure to hazard and mechanism of effect/impact if known
<p><b>Fens and wet habitats (not sensitive to acidification)</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p> <p>North Pennine Dales Meadows SAC</p>	<p>Habitat loss</p> <p>Physical damage</p> <p>Changes in water levels or table</p> <p>Surface water flooding changes</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p> <p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough. North Pennine Dales Meadows SAC is located within Bradford Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>Flood events, or flood risk management measures such as defence construction, result in the loss or separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> <li>Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on North Pennine Dales Meadows SAC and North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Bogs and wet habitats (sensitive to acidification)</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p> <p>South Pennine Moors SAC</p>	<p>Habitat loss</p> <p>Physical damage</p> <p>Changes in water levels or table</p> <p>Changes in water chemistry</p> <p>Surface water flooding changes</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p> <p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough. South Pennine Moors SAC is located within Bradford Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>Flood events, or flood risk management measures such as defence construction, result in the loss or separation of available habitats or split</li> </ul>

		<p>extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</p> <ul style="list-style-type: none"> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> <li>• Physical modifications to watercourses in the Borough or changes in surface runoff from land that could affect water quality in the SAC.</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on South Pennine Moors SAC and North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Riverine habitats and running waters</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p>	<p>Physical damage</p> <p>Changes in water levels or table</p> <p>Changes in water chemistry</p> <p>Toxic contamination</p> <p>Changes in flow regime</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p> <p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Flood events, or flood risk management measures such as defence construction, result in the separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> <li>• Physical modifications to watercourses in the Borough or changes in surface runoff from land that could affect water quality in the SAC.</li> <li>• Toxic contamination as a result of construction activities.</li> <li>• Physical modifications to watercourses that may cause changes in river flow velocities and overall hydrological regime.</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Standing waters (not sensitive to acidification)</b></p> <p>Craven Limestone Complex SAC</p>	<p>None</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p>
<p><b>Dry woodlands and scrub</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p> <p>South Pennine Moors SAC</p>	<p>Habitat loss</p> <p>Physical damage</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to implement flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC and North Pennine Moors SAC.</b></p> <p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough. South Pennine Moors SAC is located within Bradford Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Flooding may cause introduction or spread of non-native species, particularly plants, which could result in changes to community composition and even to the complete loss of native communities</li> <li>• Flood risk management measures such as defence construction, result in the separation of available habitats or split extensive areas of suitable</li> </ul>

		<p>habitat. This hazard is most likely to affect species and could result in community simplification.</p> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on South Pennine Moors SAC and North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Dry grassland</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p>	<p>Change in water levels or table</p> <p>Habitat loss</p> <p>Physical damage</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p> <p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> <li>• Flooding may cause introduction or spread of non-native species, particularly plants, which could result in changes to community composition and even to the complete loss of native communities</li> <li>• Flood events, or flood risk management measures such as defence construction, result in the loss, separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Dry heathland habitats</b></p> <p>North Pennine Moors SAC</p> <p>South Pennine Moors SAC</p>	<p>Change in water levels or water table</p> <p>Habitat loss</p> <p>Physical damage</p>	<p>North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough. South Pennine Moors SAC is located within Bradford Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> <li>• Flooding may cause introduction or spread of non-native species, particularly plants, which could result in changes to community composition and even to the complete loss of native communities</li> <li>• Flood events, or flood risk management measures such as defence construction, result in the loss, separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on South Pennine Moors SAC and North Pennine Moors SAC in Tables A-3, A-4 and A-5.</p>
<p><b>Upland</b></p> <p>North Pennine Moors SAC</p> <p>Craven Limestone Complex SAC</p> <p>North Pennines Dales Meadows SAC</p>	<p>Habitat loss</p> <p>Physical damage</p>	<p>Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough.</p> <p>The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough.</p> <p>No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p><b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b></p> <p>North Pennines Dales Meadows SAC is located within Bradford Borough. North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Flood events, or flood risk management measures such as defence construction, result in the loss, separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> </ul>

		Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on North Pennines Dales Meadows SAC and North Pennine Moors SAC in Tables A-3, A-4 and A-5.
<b>Vascular plants, lower plants and invertebrates of wet habitats</b>  North Pennine Moors SAC	Change in water levels or water table  Habitat loss  Physical damage  Surface water flooding changes	North Pennine Moors SAC is located 1.6km outside of the boundary, but is hydrologically linked to the Borough. Potential effects linked to the hazards identified associated with the LFRMS comprise the following: <ul style="list-style-type: none"> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SAC</li> <li>• Flooding may cause introduction or spread of non-native species, particularly plants, which could result in changes to community composition and even to the complete loss of native communities</li> <li>• Flood events, or flood risk management measures such as defence construction, result in the loss, separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> </ul> Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects on North Pennine Moors SAC in Tables A-3, A-4 and A-5.
<b>Vascular plants of grassland</b>  Craven Limestone Complex SAC	None	Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough. The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough. No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS. <b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b>
<b>Non-migratory fish and invertebrates of rivers</b>  Craven Limestone Complex SAC	None	Craven Limestone Complex SAC is located a significant distance (14.6km) from the boundary of Bradford Borough. The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough. No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS. <b>Therefore, no likely significant effects are predicted on Craven Limestone Complex SAC.</b>
<b>Amphibia</b>  Denby Grange Colliery Ponds SAC	None	Denby Grange Colliery Ponds SAC is located a significant distance (14.4km) from the boundary of Bradford Borough. The LFRMS seeks to implement flood risk management measures in the district and does not aim to influence flood risk or flood risk management activities at a wider regional level. Flood risk management activities introduced by the LFRMS will therefore have a local impact and will not extend a significant distance beyond the boundary of the Borough. No hazards will arise on the sensitive interest features as a result of implementation of the LFRMS. <b>Therefore, no likely significant effects are predicted on Denby Grange Colliery Ponds SAC.</b>
<b>Birds of Uplands</b>  North Pennine Moors SPA  South Pennine Moors Phase 2 SPA	Disturbance (noise or visual)  Habitat loss	South Pennine Moors Phase 2 SPA is located within Bradford Borough. North Pennine Moors SPA is located 1.6km outside of the boundary and is hydrologically linked to the Borough. Potential effects linked to the hazards identified associated with the LFRMS comprise the following: <ul style="list-style-type: none"> <li>• Human activity (construction or other) may adversely impact on the qualifying features of the site directly (physical disturbance) or indirectly (visual or noise) associated with flood management activities.</li> <li>• Flood risk management measures such as defence construction, result in the separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> </ul> Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects South Pennine Moors Phase 2 SPA and North Pennine Moors SPA in Tables A-3, A-4 and A-5.

<p><b>Birds of lowland wet grasslands</b></p> <p>North Pennine Moors SPA</p> <p>South Pennine Moors Phase 2 SPA</p>	<p>Change in water levels or table</p> <p>Disturbance</p> <p>Habitat loss</p> <p>Toxic contamination</p>	<p>South Pennine Moors Phase 2 SPA is located within Bradford Borough. North Pennine Moors SPA is located 1.6km outside of the boundary and is hydrologically linked to the Borough.</p> <p>Potential effects linked to the hazards identified associated with the LFRMS comprise the following:</p> <ul style="list-style-type: none"> <li>• Changes to surface and groundwater flow in the Borough, which could impact water availability in the SPA and therefore foraging activities.</li> <li>• Human activity (construction or other) may adversely impact on the qualifying features of the site directly (physical disturbance) or indirectly (visual or noise) associated with flood management activities.</li> <li>• Flood risk management measures such as defence construction, result in the separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species and could result in community simplification.</li> <li>• Toxic contamination may result from construction activities.</li> </ul> <p>Assessment of each LFRMS objective and its underpinning actions has been undertaken to identify any potential likely significant effects South Pennine Moors Phase 2 SPA and North Pennine Moors SPA in Tables A-3, A-4 and A-5.</p>
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Table A-2: Potential hazards to the European sites associated with the LFRMS objectives and actions (Key: X = no potential hazard; ✓ = potential hazard)

LFRMS Objectives	LFRMS Actions	Potential Hazards							
		Habitat loss	Physical damage	Disturbance (noise and visual)	Changes in water levels or table	Changes in water chemistry	Surface water flooding changes	Toxic contamination	Changes in flow regime
1 – Improve understanding of flood risk within Bradford District	Maintain a statutory register of significant obstructions to flow within Districts watercourse, based on flood risk (recording location, capacity, condition, ownership etc. Significant obstructions to flow include bridges, culverts, trash screens, flumes, weirs etc.	X	X	X	X	X	X	X	X
	Maintain a statutory register of other watercourses structures and features (Walls and embankments etc.) that are deemed to act as flood defences.	X	X	X	X	X	X	X	X
	Ensure that future reports of watercourse, surface water and groundwater flooding are responded to by carrying out appropriate site investigations to capture relevant flood detail, including the mechanisms of flooding and resulting impact.	X	X	X	X	X	X	X	X
	Maintain effective communication links with external and flood risk management authorities to share information on flood risk and arrive at effective flood responses. Maintain open communication with internal risk management teams and ensure that relevant flooding records are held in order to improve overall understanding of flood risk.	X	X	X	X	X	X	X	X
	Capture all available recorded and reported information on significant flooding incidents caused by watercourse, surface water runoff and groundwater. Ensure relevant records are held and complete and publish SFRA.	X	X	X	X	X	X	X	X



2 – Reduce the impact of flooding	Utilise potential funding sources to undertake necessary investigations, which will identify risk areas where there are capital needs. Investigations will utilise local flood risk information and where appropriate employing computer modelling analysis to assess flood mechanisms within each of these areas to arrive at cost effective flood management solutions, subject to available resources	X	X	X	X	X	X	X	X
	Maintain engagement with riparian owners and significant land owners to negotiate the effective use of watercourses and open land for flood storage, subject to available resources.	✓	✓	X	✓	X	✓	X	✓
3 - Communicate flood risk to partners and stakeholders	To effectively communicate information on managing flood risk in the CBMDC required to publish the summary of the LFRMS and maintain open communication with other flood risk management authorities, including neighbouring LLFA's. The Council will continue to liaise with West Yorkshire Flood Risk Management Partnership (WYFRMP) and attend and hold LLFA meetings.	X	X	X	X	X	X	X	X
	To communicate directly with communities, businesses and organisations, landowners and the general public to contribute to community forums in identified risk areas to raise awareness and provide guidance on flood risk management.	X	X	X	X	X	X	X	X
	Produce community flood and emergency plans. Ensure ongoing communication with all internal and external RMA's. Plan and attend community forums to raise awareness. Apply legislation to guide residents regarding their flood risk.	X	X	X	X	X	X	X	X
4 – Targeted maintenance	Continue to target investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by CBMDC. Frequency of works based on flood risk and available resources. Ensure private riparian owners are contacted when maintenance works are required to maintain unimpeded flow within privately managed watercourses.	✓	✓	✓	✓	X	✓	X	✓



5 – Ensure appropriate development in Bradford District	To ensure future developments are sustainable and do not increase flood risk and contribute towards sustainable development. LLFA acting as a statutory consultee to the planning authority on major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.	X.	X	X	x	x	x	X	X
	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.	X	X	X	X	X	X	X	X
6 – Improve flood response and post flood recovery	Maintain communication links with the Met office and the EA to ensure accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via internal indicative flood forecast and media.	X	X	X	X	X	X	X	X
	Maintain use of on the ground observers to feedback and record information on flood extents and impact during post event. Investigate opportunities to establish volunteer flood wardens within district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans.	X	X	X	X	X	X	X	X

5 – Ensure appropriate development in Bradford District	To ensure future developments are sustainable and do not increase flood risk and contribute towards sustainable development. LLFA acting as a statutory consultee to the planning authority on major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.	X.	X	X	x	x	x	X	X
	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.	X	X	X	X	X	X	X	X
6 – Improve flood response and post flood recovery	Maintain communication links with the Met office and the EA to ensure accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via internal indicative flood forecast and media.	X	X	X	X	X	X	X	X
	Maintain use of on the ground observers to feedback and record information on flood extents and impact during post event. Investigate opportunities to establish volunteer flood wardens within district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans.	X	X	X	X	X	X	X	X
5 – Ensure appropriate	To ensure future developments are sustainable and do not increase flood risk and contribute	X.	X	X	x	x	x	X	X

development in Bradford District	towards sustainable development. LLFA acting as a statutory consultee to the planning authority on major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.								
	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.	X	X	X	X	X	X	X	X
6 – Improve flood response and post flood recovery	Maintain communication links with the Met office and the EA to ensure accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via internal indicative flood forecast and media.	X	X	X	X	X	X	X	X
	Maintain use of on the ground observers to feedback and record information on flood extents and impact during post event. Investigate opportunities to establish volunteer flood wardens within district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans.	X	X	X	X	X	X	X	X
5 – Ensure appropriate development in Bradford	To ensure future developments are sustainable and do not increase flood risk and contribute towards sustainable development. LLFA acting as a statutory consultee to the planning authority on	X.	X	X	x	x	x	X	X

District	major developments (greater than ten units) and other developments (less than ten units) to ensure robust sustainable drainage systems are provided wherever appropriate and develop robust local policy and clear guidance on consenting for works in watercourse. Utilise all available flood risk and climate change information to deliver sustainable drainage outcomes for the sites that become development through the local plan process through the Strategic Flood Risk Assessment and Bradford Core Strategy. Securing developer contributions where appropriate to mitigate increased flood risk resulting from development. Providing advice or mitigation measures to offset environmental impact of development by enhancing biodiversity and water quality within areas designated for flood storage.								
	Engage with significant developers to raise awareness of catchment wide flood risk management initiatives and potentials for aligning with benefits from them. Manage applications for consents of ordinary watercourses and local consents policy.	X	X	X	X	X	X	X	X
6 – Improve flood response and post flood recovery	Maintain communication links with the Met office and the EA to ensure accurate forecast information on rainfall and anticipated flood impact is received. Maintain regular liaison with flood risk partners, emergency services, Bradford Council Emergency Planning Team, other service areas and Bradford Council contact centre before during and after significant rainfall events. Provide clear messages and regular updates via internal indicative flood forecast and media.	X	X	X	X	X	X	X	X
	Maintain use of on the ground observers to feedback and record information on flood extents and impact during post event. Investigate opportunities to establish volunteer flood wardens within district. In conjunction with other Council departments and EA to develop Community Emergency and Flood Plans.	X	X	X	X	X	X	X	X

Table A-4: Assessment of likely significant effects on the European sites associated with relevant LFRMS actions

Relevant LFRMS actions	Potential hazards	Potential for likely significant effect
Maintain engagement with riparian owners and significant land owners to negotiate the effective use of watercourses and open land for flood storage, subject to available resources.	<ul style="list-style-type: none"> <li>• Habitat loss</li> <li>• Physical damage</li> <li>• Changes in water levels or table</li> <li>• Changes in surface water flooding</li> <li>• Changes in flow regime</li> </ul>	<p>This action aims to decrease the regularity of flooding and reduce the impact of flooding to highways and properties. The risk and extent to which potential adverse effects are likely to occur is directly linked to the implementation of this action; in particular, the scale and location of any proposed works or changes in water management practices. It is likely that any planned works on private land will be relatively small-scale and local in impact. Therefore, it is unlikely that hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p>On implementation, flood storage schemes are likely to be subject to further authorisations, either through the planning process and/or another consenting process. Before any physical works or water management actions are implemented, they will be subject to the requirements of the Habitats Regulations as a matter of law and government policy. An Appropriate Assessment would be required where such works/actions are likely to have a significant adverse effect on the integrity of a European site. Therefore, it can be reasonably concluded at this stage that implementation of this measure is not likely to have a significant adverse effect on the interest features of the European sites.</p> <p><b>Conclusion: No likely significant effect on the European sites</b></p>
Continue to target investigation and clearance works of watercourses and associated assets (highway trash screens, bridges and culverts) managed by CBMDC. The frequency of works based on flood risk and available resources. Ensure private riparian owners are contacted when maintenance works are required to maintain unimpeded flow within privately managed watercourses.	<ul style="list-style-type: none"> <li>• Habitat loss</li> <li>• Physical damage</li> <li>• Disturbance (noise or visual)</li> <li>• Changes in water levels or table</li> <li>• Surface water flooding changes</li> <li>• Changes in flow regime</li> </ul>	<p>This action aims to reduce flood risk to properties and highways by ensuring the maintenance of unimpeded flow in watercourses. This action will maintain natural flow within watercourses by removing temporary obstructions and so is not likely to have a significant adverse effect on the interest features of the European sites.</p> <p>However, on implementation, these works are likely to be subject to further authorisations, through the consenting process. Before any physical works or water management actions are implemented, they will be subject to the requirements of the Habitats Regulations as a matter of law and government policy. An Appropriate Assessment would be required where such works/actions are likely to have a significant adverse effect on the integrity of a European site. Therefore, it can be reasonably concluded at this stage that implementation of this measure is not likely to have a significant adverse effect on the interest features of the European sites.</p> <p><b>Conclusion: No likely significant effect on the European sites</b></p>

Table A-5: Assessment Conclusions

<p><b>In reference to the site interest features and their conservation objectives, describe any likely direct, indirect or secondary effects from the uncompleted and/or continuing consented activities of the project (either alone or in combination with other plans or projects) likely to give rise to significant effects on the European/Ramsar Site.</b></p>	<p>The LFRMS seeks to promote more sustainable flood risk management and includes objectives that aim to reduce the impacts of surface water flooding, promote better management of water resources and deliver a range of wider environmental benefits.</p> <p>Only a small number of LFRMS actions could potentially result in physical interventions or construction work, or directly affect water management practices.</p> <p>At this stage, the works are still under investigation and are relatively small-scale and local in impact. Therefore, it is unlikely that hazards will arise on the sensitive interest features as a result of implementation of the LFRMS.</p> <p>Until these measures are developed further, it is not possible to reasonably predict whether any potential adverse effects are likely to occur. Nonetheless, implementation of any measures that could result in significant adverse effects on a European site would therefore conflict with the objectives of the LFRMS. Therefore, it can be reasonably concluded at this stage that the LFRMS is not likely to have a significant adverse effect on the European sites. This conclusion does not preclude the need for further HRA at subsequent stages of the development and implementation of the LFRMS.</p>
<p><b>Is the project likely to have a significant effect 'alone'?</b></p>	<p><b>No</b></p>
<p><b>If there is no likely significant effect 'alone', are there other projects or plans that in-combination with the project being assessed could affect the site?</b></p>	<p><b>No</b></p>
<p><b>Is the project likely to have a significant effect 'in-combination'?</b></p>	<p><b>No</b></p>

## Appendix B: Review of policies, plans and programmes

Table B-1 Review of plan policy and programme against LFRMS objectives and measures and relevant SEA topic

Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
<b>International</b>				
EU Sustainable Development Strategy (revised 2006)	Outlines the need for economic growth to support social progress and respect the environment to achieve sustainable development.	The strategy aims to limit climate change and manage natural resources more responsibly, issues which are directly relevant to flood risk. Provides direction for the LFRMS in the managing of natural resources for flood risk	The LFRMS should seek to promote objectives that deliver sustainable FRM and sustainable development.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
European Biodiversity Strategy to 2020	Outlines strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020.	Aims include the provision of better protection for ecosystems and fish stocks, promotion of green infrastructure and tighter controls on invasive alien species.	The LFRMS may contribute to the aims of the strategy through the provision of new green infrastructure to manage flood risk. In contrast, the strategy may limit certain FRM objectives if they are shown to be likely to adversely affect biodiversity or ecosystem services.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> </ul>
EU Birds Directive – Council Directive 2009/147/EEC on the conservation of wild birds	Provides for protection of all naturally occurring wild bird species and their habitats, with particular protection of rare species.	Designates Special Protection Areas (SPAs) to protect birds and their habitats. The LFRMS objectives should avoid any significant adverse effect on these sites and supporting features. Requires LFRMS to be assessed for potential impact.	May restrict certain FRM objectives if they are shown to be likely to have a significant effect on a SPA.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> </ul>
EU Floods Directive – Directive 2007/60/EC on the assessment and management of flood risks	Aims to reduce and manage the risk of flooding and associated impacts on the environment, human health, heritage and economy. Principle requirement is the preparation of FRM plans at River Basin District level, together with preliminary flood risk assessments and hazard/risk maps.	Provides strategic direction to reduce impacts of flooding and promote enhanced FRM. The LFRMS will need to demonstrate compliance with the requirements of the Directive.	None likely as the LFRMS will seek to contribute to achieving the Directive.	<ul style="list-style-type: none"> <li>• Water environment</li> <li>• Climate</li> </ul>
EU Groundwater Directive – Directive 2006/118/EC on the protection of groundwater against pollution and deterioration	Establishes a regime that sets underground water quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater. Implemented in the UK through the Environmental Permitting Regulations (2010).	Water quality is relevant to the LFRM as flooding is linked to water pollution and a reduction in surface water and groundwater quality.	Improved FRM may benefit groundwater quality by reducing the risk of water pollution during a flood event. LFRMS objectives would need to consider potential impacts on groundwater and may be restricted if they contribute to an adverse impact.	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>

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Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
EC Habitats Directive – Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Principle aim is to promote the maintenance of biodiversity by requiring Member States to take measures to restore habitats and species to favourable conservation status. Introduces robust protection for habitats and species of European importance. Enables the creation of Special Areas of Conservation (SACs) in order to establish a coherent ecological network of protected sites. Encourages protection and management of flora and fauna and supporting landscapes through planning and development policies.	Designates SACs to protect and promote biodiversity. The LFRMS objectives should avoid any significant adverse effect on these sites and supporting features. Requires LFRMS to be assessed for potential impact.	May restrict certain FRM objectives if they are shown to be likely to have a significant effect on a SAC.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> </ul>
Urban Wastewater Treatment Directive – Directive 91/271/EEC concerning urban waste water treatment	Aims to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors.	Defines requirements for the collection and treatment of waste water in line with the population equivalent. LFRMS would need to consider potential impact of FRM objectives on water treatment sites.	The LFRMS could support the aims of the Directive by reducing the risk of flooding to water treatment sites. However, LFRMS objectives may be restricted if they are shown to be likely to effect on wastewater discharges during flood events.	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>
EU Water Framework Directive – Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy	Establishes framework for protection of inland surface waters, transitional waters, coastal waters and groundwater to prevent pollution, promote sustainable water use, protect the aquatic environment, improve the status of aquatic ecosystems and mitigate the effects of floods and droughts.	Member states must prepare River Basin Management Plans and programme of measures for each River Basin District that sets out a timetable approach to achieving the WFD objectives. Places requirements on all relevant authorities to ensure their actions do not contravene the objectives of the Directive.	May restrict certain FRM options if likely to inhibit achievement of WFD objectives and detailed programme of measures. FRM options may be strengthened if they actively contribute to meeting the WFD requirements.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
<b>National</b>				
Securing the Future – the UK Government Sustainable Development Strategy (2005)	Establishes a broad set of actions and priorities to support the achievement of sustainable development. It includes measures to enable and encourage behaviour change, measures to engage people, and ways in which the Government can promote sustainability.	Includes high level aims to promote sustainable development and sets out how local authorities can contribute to delivering this and the improvement of the local environment.	The LFRMS can contribute to sustainable development through the promotion of better FRM to benefit people, the economy and the environment.	<ul style="list-style-type: none"> <li>• Population</li> <li>• Material assets</li> </ul>
Flood and Water Management Act (2010)	Designates Lead Local Flood Authorities (LLFAs) who <i>‘must develop, maintain, apply and monitor a strategy for flood risk management in its area’</i> . Applies to ordinary watercourses, surface runoff and groundwater.	Provides key driver for production of LFRMS and sets strategic direction.	None	<ul style="list-style-type: none"> <li>• Water environment</li> <li>• Climate</li> </ul>
Flood Risk Regulations (2009)	Implements the requirements of the EU Floods Directive, which aims to manage the risk of flooding and associated socio-economic and environmental impacts. Requires LLFAs to manage flooding from surface runoff.	Key driver for implementing FRM strategies at the local level.	None	<ul style="list-style-type: none"> <li>• Water environment</li> <li>• Climate</li> </ul>

Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
Water for People and the Environment, Water Resources Strategy for England and Wales (2009)	Sets out the approach to sustainable water resources management throughout England and Wales to 2050 and beyond to ensure that there will be sufficient water for people and the environment.	FRM measures are linked to wider water resources management issues and both aspects can actively contribute to achieving corresponding objectives.	None	<ul style="list-style-type: none"> <li>• Water environment</li> <li>• Population</li> <li>• Climate</li> </ul>
Future Water, The Government's water strategy for England (2008)	Future Water defines future objectives for the water sector by 2030 and implementation steps on achieving the objectives. It includes objectives to reduce flood risk from rivers and the coast; improve the sustainable delivery of water supplies; improve the quality of the water environment through greater protection; and more effective management of surface water, which includes the promotion of SuDS, water reuse and above-ground storage;	The strategy includes provisions that seek to better manage surface water drainage and reduce flood risk, and the LFRMS could actively contribute to achieving these objectives.	The strategy promotes greater protection of the water environment, reduced water pollution and enhanced ecological quality of watercourses. The strategy may restrict certain FRM options if they are likely to inhibit achievement of these wider environmental objectives.	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>
Water Act (2003)	Sets out the framework for abstraction licensing, impoundments, water quality standards and pollution control measures, and includes measures for drought management and flood defence work in England and Wales.	FRM is one of the themes addressed by the LFRMS.	The strategy promotes greater protection of water resources and may restrict LFRMS objectives if they are likely to adversely affect water quality or sustainable resource management.	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>
Draft Water Bill (2012)	Emerging national strategy aimed at improved regulation of the water industry, whilst increasing its resilience to natural hazards such as drought and floods. It includes provisions to better manage sustainable water abstraction and encourage the use of SuDS.	Aims to promote better management of water resources and reduce the risks of flooding.	The strategy promotes greater protection of water resources and may restrict LFRMS objectives if they are likely to adversely affect water quality or sustainable resource management.	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>
The National Flood Emergency Framework for England (2011)	Sets out a strategic approach to emergency response planning to reduce the impacts of flooding and improve resilience.	The framework sets out organisational responsibilities and promotes a multi-agency approach to managing flooding events.	None	<ul style="list-style-type: none"> <li>• Water environment</li> </ul>
The Carbon Plan (2011)	The carbon plan sets out a vision for Britain powered by cleaner energy used more efficiently, with more secure energy supplies and stable energy prices and benefits from jobs and growth that a low carbon economy will bring. Key areas are electricity generation, eating homes and businesses and travel.	Carbon emissions, and the resulting climate change impacts, are highly relevant to the issue of FRM due to the likely increased flood risk resulting from climate change.	None	<ul style="list-style-type: none"> <li>• Climate change</li> </ul>
Building a Low Carbon Economy – the UK's Contribution to Tackling Climate Change (2008)	Puts forward a framework for adapting to climate change and associated threats as well as a case for increased resilience to climate change.	Emphasises the commitment to sustainable development and consideration of the potential impacts of climate change, including increased flooding.	The LFRMS may contribute to the aims of the strategy through the provision of measures to adapt to an increase in flood risk due to future climate change.	<ul style="list-style-type: none"> <li>• Climate change</li> </ul>
Climate Change Act (2008)	Establishes a definite target to reduce UK national carbon emissions by 80% by 2050, relative to a 1990 baseline. Requires the government to publish five yearly carbon budgets starting with the period 2008-2012. Sets targets to reduce	Emphasises the commitment to sustainable development.	The LFRMS will need to consider the carbon implications of its objectives and should seek to minimise emissions whilst promoting sustainable FRM.	<ul style="list-style-type: none"> <li>• Climate change</li> </ul>

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Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
	greenhouse gases, and puts in place funding and mechanisms to reduce and alter activities which contribute to the emission of these gasses.			
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems (2011)	Sets out the Government's strategy for improving biodiversity in England up to 2020.	Flooding can have adverse impacts on biodiversity. However, there may be opportunities for the LFRMS to provide for biodiversity enhancements, as well as reducing risks to habitats and species from flood events.	The strategy could restrict LFRMS objectives if they are shown to have a significant adverse impact on water quality or local biodiversity.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
England Biodiversity Framework (2008)	The framework encourages a number of conservation aspects including the adoption of an ecosystem approach and to embed climate change adaptation principles in conservation action.	The LFRMS may include measures that would result in biodiversity enhancements across landscapes and restoring / improving habitats.	The strategy could restrict LFRMS objectives if they are shown to have a significant adverse impact on water quality or local biodiversity.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
UK Biodiversity Action Plan (1994)	The UK BAP aims to maintain and enhance biological diversity within the UK and contribute to the conservation and enhancement of global diversity.	The LFRMS will need to consider the potential impacts of measures within it on important species and habitats that are within the District, including the various Sites of Special Scientific Interest.	The strategy could restrict LFRMS objectives if they are shown to have a significant adverse impact on water quality or local biodiversity.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
National Wetland Vision (2008)	The Wetland Vision is of a future where wetlands are a significant feature of the landscape in which wildlife can flourish. It will be a future in which wetland heritage is recognised and safeguarded; where everyone can enjoy wetlands for quiet recreation and tranquillity. Vtally, it will be a future where wetlands are valued both for the roles they play in helping us deal with some of the challenges of the 21st century and in improving and sustaining our quality of life.	Preserving and restoring wetlands such as peatlands, rivers and lakes will help regulate surface water run-off, store flood water and recharge groundwater. These actions that are part of the wetland vision could potentially link with measures within the LFRMS.	May restrict certain FRM objectives if they are shown to be likely to have a significant effect on wetland habitats within the Borough.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
Wildlife and Countryside Act (as amended) (1981)	The Act is the principle mechanism for legislative protect of wildlife in Great Britain. The Act deals with the protection of birds, other animals and plants.	The Act provides for the notification of Sites of Special Scientific Interest and their protection and management. Any potential impacts of the LFRMS, including on SSSIs, will need to be considered through the SEA.	May restrict certain FRM objectives if they are shown to be likely to have a significant effect on a SSSI.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
Natural Environment and Rural Communities (NERC) Act (2006)	Provides guidance for the protection and enhancement of important habitat and species.	Requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England.	May restrict certain FRM objectives if they are shown to be likely to have a significant effect on priority species or habitats.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>

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Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
Salmon and Freshwater Fisheries Act (1975)	Aims to regulate practice relating to freshwater fisheries and salmon fishing.	The Act's main purpose is to protect fish species. However, it does indirectly affect flood risk. Restricting the obstruction to passage of fish may have implications for flood risk, as this will prohibit the use of fish weirs and mill dams.	May restrict certain FRM objectives if they are shown to be likely to have an adverse effect on fish passage or compromise a waterbody from achieving Good status under the WFD.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> </ul>
Contaminated Land (England) Regulations (2006)	Sets out provisions relating to the identification and remediation of contaminated land. The regulations identify contaminated land issues and pathways to pollution of surface, ground, estuarine and coastal water environments.	Although there is no heavy industry in Bromley, other light industries may have contaminated the land.	Flooding of contaminated land can have adverse impacts on factors such as biodiversity, water and soils	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> <li>• Soils</li> </ul>
National Planning Policy Framework (2012)	The National Planning Policy Framework (NPPF) has replaced the set of national planning policy statements and national planning policy guidance notes, bringing them into one document. It sets high level national economic, environmental and social planning policy and includes a new presumption in favour of sustainable development.	The NPPF has replaced PPS25 along with the other PPSs and PPGs, and so comprises the national policy framework in relation to planning in areas of higher flood risk. The NPPF restricts development that would adversely affect sites European sites, designated sites, including Green Belt, Sites of Special Scientific Interest (SSSIs) and Areas of Outstanding Natural Beauty (AONB), as well as locations at risk of flooding or coastal erosion.	The strategy could restrict LFRMS objectives if they are shown to have a significant adverse effect on sensitive ecological and landscape sites in the Borough.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> <li>• Water environment</li> <li>• Landscape</li> <li>• Historic environment</li> <li>• Population</li> <li>• Soils</li> </ul>
PPS5: Planning for the Historic Environment Practice Guide (2010)	The guide assists local authorities, owners, applicants and other interested parties in implementing the policy <i>Planning Policy Statement 5 (Planning for the Historic Environment)</i> .	Provides guidance on how to conserve historic assets. This will provide advice on how to develop around historic assets, as well as ways best to conserve them from flooding.	May restrict certain FRM objectives if they are shown to be likely to have an adverse effect on historic assets in the Borough.	<ul style="list-style-type: none"> <li>• Historic environment.</li> </ul>
Historic Environment Good Practice Advice in Planning: Historic Environment Records (2014)	Provides information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF. Assists with access to Historic Environment Records.	Guide helps to assist in sustainable development, in helping with access to Historic Environment Records which has information about various historic assets.	None.	<ul style="list-style-type: none"> <li>• Historic environment</li> </ul>

Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
Historic Environment Good Practice Advice Guide in Planning: Note 3: The Setting of Heritage Assets.	Provides information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF. Provides advice on the setting of historic assets, and how to understand the setting.	Understanding the setting of a historic assets will assist in design development of FRM measures.	May restrict certain FRM objectives if they are shown to be likely to have an adverse effect on historic assets in the Borough.	<ul style="list-style-type: none"> <li>Historic environment</li> </ul>
<b>Regional / Local</b>				
Ouse Catchment Flood Management Plan (2010) and Aire Catchment Flood Management Plan (2010)	The CFMP provides an overview of the flood risk in these catchments and set out the preferred surface water management strategy for future years. They outline the wider context for managing flood risk in Yorkshire.	The CFMP provides important context for the LFRMS and set the strategic direction for managing flood risk from main rivers.	None	<ul style="list-style-type: none"> <li>Water environment</li> </ul>
Managing Drought in the North West (2011)	Provides levels of strategic assessment of drought risk across the region.	Provide broad context for the LFRMS.	None	<ul style="list-style-type: none"> <li>Water environment</li> </ul>
Humber River Basin Management Plan (2005)	The Humber River Basin Management Plan (RBMP) has been prepared to meet the requirements of the EU Water Framework Directive. It focuses on actions to address the protection, improvement, sustainable use of water and other pressures facing the water environment in the Humber River Basin.	Water quality and quantity is linked to the LFRMS as flooding events can lead to water pollution and changes in water levels.	May restrict certain FRM options if likely to inhibit achievement of WFD objectives and detailed programme of measures. FRM options may be strengthened if they actively contribute to meeting the WFD requirements.	<ul style="list-style-type: none"> <li>Water environment</li> </ul>
Bradford Air Quality Action Plan (2009)	Details how Bradford Council intends to improve air quality within its four AQMAs.	Provides information on regional policies to improve air quality in the borough.	None	<ul style="list-style-type: none"> <li>Air quality</li> </ul>
City of Bradford Metropolitan District Council Preliminary Flood Risk Assessment (2011)	Provides a high level review of flood risk from surface water, groundwater and ordinary watercourses across the county.	The flood risk assessment provides an important local context for the LFRMS.	None	<ul style="list-style-type: none"> <li>Water environment</li> </ul>
Bradford Strategic Flood Risk Assessment Level 1 Report (2014)	Provides a review of flood risk across the borough, steering all development towards areas of lowest risk.	The flood risk assessment provides an important local context for the LFRMS.	None	<ul style="list-style-type: none"> <li>Water environment</li> </ul>
West Yorkshire Local transport plan 2011 – 2026 (2011)	Sets out the aims, objectives and a series of policies for delivering transport improvements in West Yorkshire.	Important transport infrastructure may be at risk of flooding and the LFRMS offers potential benefits through better FRM.	None	<ul style="list-style-type: none"> <li>Material assets</li> <li>Population</li> <li>Air quality</li> </ul>
Bradford Local Development Framework Core Strategy and Policies for Management of Development (2014)	The policies cover spatial development issues in relation to education, health, community safety, energy management, sustainable development, climate change and flood management.	The strategy provides direction for the future development of the Borough, and includes policies relating to flooding.	The LFRMS will need to consider development policies set out in the strategy. May restrict certain FRM options if likely to inhibit achievement of the strategy objectives.	<ul style="list-style-type: none"> <li>All</li> </ul>

Plan/Policy/Programme	Overview	Relevance to LFRMS	Conflict with LFRMS	Primary SEA topic
City of Bradford Metropolitan District Council Local Biodiversity Action Plan (2011)	Details the priorities for habitats and species and offers practical measures which can be implemented to achieve the conservation of the areas biodiversity heritage. The content of the plan is informed and guided by national and international targets so that its implementation is firmly linked to national priorities and local objectives of Plan, Protection, Policy, Partnerships and Public Awareness.	Objectives include the improvement of water quality, removal of barriers to aquatic species and enhancement of wetland and riverine habitats and connectivity and the issue of invasive species.	Objectives of the City of Bradford District Council LBAP are linked to those of the WFD to enhance biodiversity and improve water quality status.	<ul style="list-style-type: none"> <li>• Biodiversity, flora and fauna</li> </ul>
Bradford Local Climate Impact Profile (2010)	Highlights the types of severe climatic events possible in the future and the impact these could have on services. Sets out measures to adapt and build resilience to these types of events.	FRM actions can contribute to the provision of adaptation measures to benefit people and biodiversity. FRM activities will generate carbon emissions.	The LFRMS will need to demonstrate that it can deliver improved FRM whilst minimising the level of associated carbon dioxide emissions.	<ul style="list-style-type: none"> <li>• Climate</li> </ul>

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