



**Agenda for a meeting of the Executive to be held on
Tuesday, 12 September 2017 at 10.30 am in Committee
Room 1 - City Hall, Bradford**

Members of the Executive – Councillors

LABOUR
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.
- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- 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:

Parveen Akhtar

City Solicitor

Agenda Contact: Jill Bell / Yusuf Patel

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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 meeting held on 20 June and 11 July 2017 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)

<p style="text-align: center;">REGENERATION, PLANNING & TRANSPORT PORTFOLIO</p>
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(Councillor Ross-Shaw)

5. **CITYCONNECT 2 - BRADFORD CANAL ROAD CORRIDOR CYCLEWAY SCHEME (MOVING TRAFFIC) ORDER AND (WAITING LOADING AND PARKING) ORDER - OBJECTIONS**

1 - 20

The report of the Strategic Director Place (**Document "M"**) considers objections to the advertised Traffic Regulation Orders associated with the proposed CityConnect 2 - Bradford Canal Road Corridor Cycleway scheme.

Recommended –

- (1) That the objections be overruled and the (moving traffic) Traffic Regulation Order be sealed and implemented as advertised for the reasons stated in Paragraph 2.8.1 of this Report.**
- (2) That the objections be overruled and the (waiting loading and parking) Traffic Regulation Order be sealed and implemented as advertised for the reasons stated Paragraph 2.8.2 of this Report**
- (3) That the objectors be informed accordingly.**

(Environment & Waste Management Overview & Scrutiny Committee)
(Richard Gelder – 01274 437603)

**ENVIRONMENT, SPORT & CULTURE
PORTFOLIO**

(Councillor Ferriby)

6. OUTCOME OF THE PROCUREMENT FOR WASTE TREATMENT SERVICES

21 - 32

The Strategic Director Place will submit a report (**Document “N”**) the purpose of which is to inform the Executive of the outcome of the procurement for waste treatment services, following a detailed evaluation of bid submissions by the project team.

Recommended -

The outcome of the procurement for waste treatment services be noted for information.

(Environment and Waste Management Overview & Scrutiny
Committee)
(Richard Longcake – 01274 432855)

B. STRATEGIC ITEMS

LEADER OF COUNCIL & CORPORATE

(Councillor Hinchcliffe)

7. UPDATED 2017-18 BUDGET ASSESSMENT

33 - 40

Following the 1st Quarter Financial Position update to the Executive on 11 July 2017, the joint report of the Chief Executive and the Strategic Director corporate Services (**Document “O”**) details the steps being taken to get the budget back on plan.

Recommended-

That the Executive note the contents of Document “O” and the actions taken to manage the forecast overspend.

(Corporate Overview & Scrutiny Committee)
(Stuart McKinnon-Evans 01274 432800)

8. **LOCAL GOVERNMENT ASSOCIATION CORPORATE PEER CHALLENGE REVIEW FINDINGS AND IMPROVEMENT ACTION PLAN 2017**

41 - 66

Bradford Council invited the Local Government Association (LGA) to undertake an independent Corporate Peer Challenge review, which took place in March 2017. The report of the Chief Executive (**Document “P”**) details the areas the review looked at, its findings and the Council’s response in the form of an Improvement Action Plan.

Recommended -

- (1) That the Corporate Peer Challenge review Improvement Action Plan be agreed.**
- (2) That Governance arrangements through the Council Plan Outcome Delivery Board be approved.**

(Corporate Overview & Scrutiny Committee)

(Alison Milner – 01274 432131)

C. PORTFOLIO ITEMS

**REGENERATION, PLANNING & TRANSPORT
PORTFOLIO**

(Councillor Ross-Shaw)

9. **LOCAL PLAN - BRADFORD DISTRICT WASTE MANAGEMENT PLAN DEVELOPMENT PLAN DOCUMENT - PLANNING INSPECTORS REPORT & ADOPTION**

67 - 122

The Strategic Director Place will submit a report (**Document “Q”**) which presents the Planning Inspector’s Final Report and recommendations on the Bradford district Waste Management DPD, which forms part of the Local Plan. The purpose of this report is for the Executive to note the contents of the Inspector’s report and to seek authority to proceed to Full Council to request the legal adoption of the modified Bradford District Waste Management Plan in line with the Inspector’s recommendation.

Recommended -

- (1) **The Executive is recommended to note the contents of this report and contents of the Inspector’s Report (Appendix 1 to Document “Q”) and recommend that Full Council formally adopt the Bradford District Waste Management Development Plan as approved by Full Council on 20th October 2015 and submitted to the government for examination with the Main Modifications contained in Appendix 2, as proposed by the Inspector pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004.**
- (2) **That the Assistant Director (Planning Transportation and Highways) in consultation with the relevant Portfolio Holder be authorised to make other minor amendments of redrafting or of a similar nature as may be necessary prior to formal publication.**

(Environment & Waste Management Overview & Scrutiny Committee)
(Bhupinder Dev – 01274 432012)

**ENVIRONMENT, SPORT & CULTURE
PORTFOLIO**

(Councillor Ferriby)

10. THE DESTINATION MANAGEMENT PLAN AND FUTURE DELIVERY OF THE FRONTLINE VISITOR INFORMATION

123 -
156

This report of the Strategic Director Place (**Document “R”**) is to inform the Executive of the Destination Management Plan (DMP) and Tourism Review reports and consider that the new approach to destination management is the right way forward and agree the delivery model for the Tourism frontline service.

Recommended –

- (1) **That the strategic approach to Destination Management outlined in the DMP report be implemented.**
- (2) **That Bradford Visitor Information Centre be kept in its current location until 2019 and partnership opportunities be identified to find future resourcing and delivery options for frontline visitor information, including professional Welcome Ambassadors in Bradford.**

- (3) That a team of Pop up volunteers be developed to meet and greet at key events across the district.
- (4) That the Bronte Society takes over the lease of the Haworth Visitor Information Centre building and provides a frontline Tourist Information provision for Haworth and Bradford District. The Council consults with them on the TUPE Transfer of current staff.
- (5) That Ilkley Parish Council fund Ilkley Visitor Information Centre and the service moves from the Town Hall into Ilkley Library.
- (6) That Shipley College have a Visitor Information Point in Victoria Hall and direct all emails and phone calls to Bradford Visitor Information Centre.
- (7) That the remaining budget be invested into Tourism development and marketing creating 2 new posts of a Tourism Digital Media Officer and Tourism Officer.

(Regeneration & Economy Overview & Scrutiny Committee)
(Pete Massey – 01274 432616)

**REGENERATION, PLANNING & TRANSPORT
PORTFOLIO**

(Councillor Ross-Shaw)

11. BRADFORD DISTRICT HOUSING ALLOCATIONS POLICY 2017

157 -
174

The Housing Act 1996 requires local authorities to maintain and publish a formal social housing allocations policy. The report of the Strategic Director Place (**Document “S”**) presents a revised policy for the District of Bradford.

Recommended that:

- (1) The Executive approves the Housing Allocations Policy as set out in the Appendix.
- (2) The Executive gives delegated authority to the Strategic Director of Place in consultation with the relevant Portfolio holder to implement and monitor the Housing Allocations Policy, including agreeing the ‘Go Live’ Date, and, during the lifetime of the policy, to make any necessary amendments as required at the appropriate time, provided such changes do not fundamentally alter the policy

principles on which this policy is based.

- (3) That Executive gives delegated authority to the Strategic Director of Place in consultation with the Portfolio Holder to consider and introduce any changes to the IT system and methodology to improve the allocation of housing within the District.

(Regeneration & Economy Overview & Scrutiny Committee)
(Yusuf Karolia – 01274 434362)

**ENVIRONMENT, SPORT & CULTURE
PORTFOLIO**

(Councillor Ferriby)

12. **BRADFORD CULTURE UPDATE INCLUDING SUPPORT TO LEEDS BID TO BE EUROPEAN CAPITAL OF CULTURE 2023.** 175 - 188

The report of the Strategic Director Place (**Document “T”**) provides an update on Bradford’s Strategic framework for Culture, this includes information on the investment into the district from Arts Council England.

Approval is also sought from Bradford District Metropolitan Council to provide a letter of support to Leeds City Council as they bid to be European Capital of Culture in 2023, this will form part of the submission and deadline in October 2017.

Recommended -

- (1) That arts and culture progress to date, the level of external funding through Arts Council England over the next four years into the district and next steps going forward be noted.
- (2) That Leeds’ bid to be European Capital of Culture 2023 be supported and a letter of support be provided to be included in the submission. That it be noted that the Leeds’ bid presents a significant opportunity for Leeds and the wider region, including Bradford, in terms of cultural, social and economic benefits.
- (3) That cultural organisations from Bradford be encouraged to be involved in the bid. That it be noted that this bid provides an opportunity to develop a regional brand for the cultural offer and should stimulate more joined up ways of working between local authorities and cultural organisations across the region.

- (4) That the potential call on regional funds to invest in the delivery of the bid if it is successful be noted.**

(Regeneration & Economy Overview & Scrutiny Committee)
(Bobsie Robinson – 01274431922)

13. MINUTES OF THE WEST YORKSHIRE COMBINED AUTHORITY

To receive the minutes of the meeting(s) of the West Yorkshire Combined Authority (attached).

THIS AGENDA AND ACCOMPANYING DOCUMENTS HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER

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Report of the Strategic Director (Place) to the meeting of the Executive to be held on 12th September 2017.

M

Subject:

**CITYCONNECT 2 – BRADFORD CANAL ROAD CORRIDOR CYCLEWAY SCHEME
(MOVING TRAFFIC) ORDER AND (WAITING LOADING AND PARKING) ORDER -
OBJECTIONS**

Summary statement:

This report considers objections to the advertised Traffic Regulation Orders associated with the proposed CityConnect 2 - Bradford Canal Road Corridor Cycleway scheme.

Wards: 04 Bolton and Undercliffe

Steve Hartley
Strategic Director Place

Portfolio:
Regeneration, Planning and Transport

Report Contact: Richard Gelder
Phone: (01274) 437603
E-mail: richard.gelder@bradford.gov.uk

Overview & Scrutiny Area:
Environment and Waste Management



1. SUMMARY

- 1.1 The CityConnect 2, Bradford Canal Road Corridor Cycleway Scheme, in order to be implemented, requires changes to be made to the way in which the highways along the route are used. A number of Traffic Regulation Orders (TRO's) have been advertised for public consultation on the proposed changes and to consider if any amendments to the Orders can be made without unduly compromising the design and quality of the scheme. The proposed changes to the existing highway network aim to maintain or improve safety for all road users and to aid the flow of traffic.
- 1.2 This report considers objections to the advertised (moving traffic) Traffic Regulation Order and to the (waiting loading and parking) Traffic Regulation Order. It identifies factors and options to be considered and makes recommendations.

2. BACKGROUND

- 2.1 After successfully securing £22m of funding for Phase 2 of the Department for Transport's Cycle City Ambition Grant, Bradford Council along with the West Yorkshire Combined Authority have been working on plans for a new continuous high quality segregated cycle route between Bradford and Shipley.
- 2.2 The Bradford Canal Road Corridor Scheme valued at £2.5m is one of several proposed across West Yorkshire that are part of Phase 2 of the CityConnect Programme. The scheme is for a segregated cycle route to provide a safe link for cyclists between the growing residential areas along Canal Road and the employment and training opportunities in Bradford City Centre. It would also provide a connection to the Canal Road Greenway leading to Shipley and thence to the Airedale Greenway, and it would connect to the Cycle Superhighway between Leeds and Bradford, which constituted Phase 1 of the CityConnect programme.
- 2.3. The scheme is intended to inspire more people to cycle and walk more regularly, and to make cycling a natural and popular choice for short journeys. By developing and improving cycle routes and engaging with local populations through activity based projects the WYCA CityConnect team is working towards the vision of West Yorkshire being recognised as a great region for safe cycling. Increasing the level of cycling will reduce carbon emissions and improve air quality, lead to a healthier population, create a safer more attractive urban environment and improve the potential for economic growth through further access to employment and training.
- 2.4 This scheme, which will significantly enhance cycling infrastructure in the District, will help deliver the objectives and outcomes in the West Yorkshire Local Emissions Strategy (WYLES) 2016 - 2021 which was adopted in December 2016. The scheme fully supports and accords with Strategic Objective 7 of the WYLES which states that "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". The Bradford District Low Emissions Strategy (LES) which was adopted in 2013, seeks



to promote and further develop cycling infrastructure in order to reduce emissions. The Canal Road Corridor Cycle Route is referenced in Appendix 1 of the Bradford District LES.

- 2.5 The proposed cycle route is included in the Shipley and Canal Road AAP dated May 2015. The report “Transport Study in Support of the Shipley and Canal Road Corridor AAP” refers to The CityConnect2 project and identifies the alignment of the route, it also refers to “The Cycle Route Study” carried out by Steer Davies Gleave in July 2014. The Project Brief was produced in December 2015 and as part of that process an assessment of all potential alternative routes was undertaken to ensure the option that could best deliver the objectives, desired outcomes and meet the constraints was developed and taken forward for consultation. The proposed route of the preferred advertised scheme follows the route identified in the Transport Study in Support of the Shipley and Canal Road Area Action Plan produced by consultant Steer Davies Gleave and is shown in Appendix 1.
- 2.6 The National Cycling Conference, Cycle City Active City Bradford, was held in May 2017. Bradford was chosen as the location to hold this event this year because 2017 is seen as a pivotal year for cycling in Bradford. The recently opened CityConnect Cycle Superhighway from Bradford to Leeds, the stunning new public space in the heart of the city and the Tour de Yorkshire were all factors in bringing this event to Bradford and there are plans for more cycling related activity to come during the year.
- 2.7 At its meeting of 20 September 2016 the Executive approved the principles of the scheme. It delegated authority to the Strategic Director and the Portfolio Holder to:
- a) progress and approve the detail design of the scheme;
 - b) approve the processing and advertising of any Traffic Regulation Orders or other legal process linked to traffic calming measures, pedestrian and cycle crossings and converting footways to cycle tracks;
 - c) approve the implementation of the works.
- Any valid objections to the advertised Traffic Regulation Orders were to be submitted to the Executive and the Bradford East Area Committee for consideration.
- 2.8 The following Traffic Regulation Orders were formally advertised between 17 February 2017 and 10 March 2017 under powers contained in the Road Traffic Regulation Act 1984:
- 2.8.1 City of Bradford Metropolitan District Council (Moving Traffic) (Consolidation) (Amendment No.***) Order 20** - Cycle Superhighway Bradford.

The general effect of which will be to introduce:-

1. “prohibited left-turns” from Valley Road into Hamm Strasse and from Queen’s Road into Valley Road;
2. “prohibited right-turn” from Queen’s Road into Valley Road;
3. “prohibited entries” from Valley Road (northern section) into Valley Road (242 metres south of its junction with Queen’s Road) and also from Queen’s Road into Valley Road;



4. "one-way traffic flows in a northerly direction" on a length of Valley Road (North/South) at a point 170 metres north of its junction with Valley Road (North/East) and on a further length of Valley Road (North/South) from its junction with Queen's Road for a distance of 78 metres; and
5. "prohibition of driving (road closure)" of a part of Leeming Street – for a distance of 15 metres from its junction with Valley Road.

There has been one objection to this TRO regarding prohibiting vehicles turning from Queen's Road into Valley Road, prohibiting entry from Queen's Road into Valley Road and restricting the one-way flow of traffic to a northerly direction on Valley Road. A summary of the objector's concerns and officer comments is described in the following table:

Objector's concerns	Officer comments
<p><u>Access to the builders merchants on Valley Road.</u></p> <p><u>Number of objectors 1.</u></p> <p>Prohibiting vehicles from turning into Valley Road from Queen's Road and prohibiting vehicles from travelling in a southerly direction along Valley Road will adversely affect business at the builders merchants. There are two vehicular accesses on Valley Road and one on Canal Road serving the main site and a further vehicular access on Valley Road serving a developing site. Most customers, suppliers and deliveries that use the Valley Road accesses arrive travelling in a southerly direction from Queen's Road and also leave in a southerly direction along Valley Road.</p> <p>The Order, if implemented, will cause customers and suppliers to use longer alternative routes via either Manningham Lane and Hamm Strasse or Canal Road. They will incur longer journey times and greater fuel costs and will result in some people taking their business elsewhere. The business will incur greater delivery times and greater fuel and staff costs. The business will suffer and future plans to expand the business on the new adjacent site will be adversely</p>	<p><u>Valley Road one-way system and prohibited entry from Queen's Road</u></p> <p>The TRO is necessary:</p> <p>a) to avoid causing traffic congestion and endangering road users on Valley Road due to narrowing the carriageway from two lanes to one lane. The Order removes through traffic from one direction in order to allow the remaining traffic to flow freely in the opposite direction in the road width that will be available after the construction of the segregated cycle track.</p> <p>b) to avoid causing traffic congestion and endangering road users on Queen's Road due to the introduction of new traffic signals` at the junction with Valley Road. The Order will prevent the forming of a queue of traffic waiting to turn right into Valley Road from obstructing the main stream of traffic on the ring road.</p> <p>Narrowing the carriageway of Valley Road is necessary to provide adequate space within the highway for the segregated cycle track.</p> <p>The traffic signals at the junction of Queen's Road and Valley Road are necessary to provide a safe and convenient crossing for the cycle route across Queen's Road. They will also bring benefits for pedestrians and drivers by improving their safety and convenience when joining or crossing the ring road at Valley Road. The improved</p>



<p>affected.</p>	<p>junction will help to address most of the safety issues at the Valley Road / Queen's Road / Bolton Lane junction, currently ranked 23rd in the list of Bradford Road Accidents Sites for Concern 2011 – 2015 report. In the last 5 years at this junction there have been 20 personal injuries recorded.</p> <p>A recent traffic survey carried out on a week day between 7 am and 5:30 pm recorded 1570 vehicles travelling south along Valley Road and 1772 vehicles travelling north. Of these, 136 vehicles arrived at the builders merchants, 82 coming from the north and 54 from the south. 126 vehicles left the premises, 52 heading north and 74 heading south. 10 Light Goods Vehicles (LGV's) arrived at the premises, 6 from the north and 4 from the south. 9 LGV's left the premises, 2 headed north and 7 headed south.</p> <p>The joinery workshop adjacent to the builders' merchants would also be affected by the Order for the one-way system. LGV's currently tend to arrive at this site from the direction of Queens Road and leave heading south as this is the easiest way to access the oblique entrance to the premises. The Order will make accessing the premises more difficult, but the scheme proposals have allowed for improvements to the vehicular entrance on Valley Road which would assist the approach from the other direction.</p> <p>Without the TRO the flow of traffic would be more than the capacity of the road could accommodate and congestion would occur. There would also be dangers to all road users if vehicles mounted the footway and cycle track in order to pass one another.</p>
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2.8.2 City of Bradford Metropolitan District Council (Waiting Loading and Parking) (Consolidation) (Amendment No.***) Order

The general effect of which will be to introduce restrictions of:-



1. "no waiting and no loading/unloading at any time" along the full length of the Cycle Superhighway comprising lengths of Hillam Road, Valley Road, Bolton Lane, Queen's Road, Canal Road, Stanley Road and Lower Kirkgate, Bradford, and
2. "no waiting at any time" on lengths of Hillam Road, Valley Road, Bolton Lane, Queen's Road, North Holme Street and Canal Road, Bradford.

There have been two objections to this TRO. A summary of the objectors concerns and officer comments is described in the following table:

Objectors concerns	Officer comments
<p><u>Safe access to the freight depot, free flow of traffic and loss of on-street parking along Hillam Road.</u></p> <p><u>Number of objectors 2.</u></p> <p>In summary the objections concern:</p> <p>Danger to cyclists;</p> <p>Hindering the safe movement of traffic along Hillam road;</p> <p>Undermining the provision of suitable adequate parking facilities;</p> <p>Loss in the number of on-street parking spaces required;</p> <p>Impact on the amenities of the locality including air quality.</p> <p>Suggestions for alternative routes to consider have been made.</p> <p>Danger to cyclists: The proposed cycle track will cross the busy access to the company's depot and will bring cyclists into conflict with LGV's entering the depot. Cyclists will have priority and drivers may not see the cyclist crossing in front of them or behind them when vehicles are reversing into the depot. A collision</p>	<p><u>Hillam Road – No parking on Footways and Cycle Track</u></p> <p>The Order prevents parking on the new footways and cycle track.</p> <p>The TRO is necessary to remove dangers and obstructions to pedestrians and cyclists from vehicles parking on the footways and cycle track. Vehicles that park on footways can also cause damage to the walking surface and underground services and subsequent repairs can be a maintenance cost to the Council.</p> <p><u>Hillam Road – No parking on the west side of Hillam Road</u></p> <p>The Order prevents parking on the west side of the carriageway of Hillam Road alongside the new cycle track.</p> <p>The TRO is necessary:</p> <p>a) to maintain two lane widths for the movement of traffic thereby avoiding traffic congestion on Hillam Road due to parked vehicles that, if uncontrolled and allowed to park on both sides of the road, would narrow the available carriageway width for moving traffic down to one lane width.</p> <p>b) to remove the danger to cyclists and pedestrians due to vehicles parking alongside the cycle track and obscuring visibility between cyclists and drivers of vehicles turning to cross the cycle track.</p> <p>LGV's currently access the depot by crossing the footway where pedestrians have priority over crossing vehicles. Those dangers already exist for pedestrians and will remain. The same dangers also exist for cyclists using the road. The proposals will result in an additional segregated cycle track alongside the footway and so cyclists</p>



<p>may occur resulting in serious or fatal injuries.</p> <p>Safe movement of traffic and loss of on-street parking: There is currently insufficient off-street parking at the depot to accommodate employees' vehicles and LGV's that the business generates. Employees therefore park on-street and LGV's wait on-street for space in the depot to become available. Because there are no restrictions vehicles can park on both sides of the street and, <i>when parked on the footways</i>, there is enough room for other vehicles to pass and the road not to be obstructed. If no parking is available (<i>on the footways</i>) LGV's waiting to enter the Depot will have to wait in the carriageway and other LGV's may not be able to pass.</p> <p>Air quality: Without the free flow of traffic more vehicles will have to wait in the carriageway with their engines running adversely affecting air quality.</p> <p>Alternative routes: It is suggested that taking the cycle route along North Avenue or Canal Road would allow the cycle track to be delivered without the need for the TRO's that would otherwise affect Hillam Road.</p>	<p>will be in a defined area that will be conspicuous with improved visibility between drivers and cyclists. Warning signs and road markings will be provided to emphasise to both cyclists and drivers the areas of increased risk. There is a duty on all road users, including lorry drivers and cyclists, to take care and drive / ride responsibly and not be a danger to themselves or others.</p> <p>The proposals will narrow the footways and thereby remove space that some drivers use to park. The space recovered will then be used for the segregated 3 m wide cycle track. There are no proposals to reduce the existing width of the carriageway below its current 9 metres and so the width already allocated for motor vehicle use will not be changed. Safe two-way movement of traffic will be achieved by preventing parking on one side of Hillam Road. Without this TRO the two-way flow of traffic would be impeded and also the inter-visibility between cyclist and drivers would be obstructed by parked vehicles alongside the cycle track. The danger to cyclists would be increased and their safety compromised.</p> <p>The TRO, if implemented will ensure the free flow of traffic.</p> <p>Taking the route along North Avenue would lead cyclists on to Manningham Lane and away from the Bolton Woods area. This would significantly increase the length and cost of the scheme and introduce steep gradients that are otherwise avoidable. It would not be feasible to construct a segregated cycle track along Manningham Lane, and this would result in taking space from the carriageway and as a consequence reducing traffic capacity. It would also take cyclists alongside a major road where the air quality would be a concern.</p>
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<p>If Hillam Road could not be avoided then positioning the cycle track on the east side of Hillam Road would be less harmful to business and less risky for cyclists.</p>	<p>Taking the route along Canal Road would have some advantages in terms of directness and gradient however, it would require taking space from the carriageway resulting in a reduction in the traffic capacity of this major road. There would also be a significant expense in providing a suitable crossing of Hillam Road at its junction with Canal Road. This route would also be adjacent to a very busy road where the air quality would be a concern.</p> <p>Positioning the cycle route along the east side of Hillam Road would necessitate narrowing the carriageway on the east side and widening the carriageway on the west side to maintain the width for vehicles. All the underground services are located in the footway on the west side of Hillam Road and these would require costly diversions to build the widened carriageway over the top of them. There would be fewer accesses to premises to cross but Hillam Road itself would need to be crossed near its junction with Canal Road. The cost of service diversions and a new crossing of Hillam Road at its junction with Canal Road would put the scheme outside the budget allocated for the scheme.</p>
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- 2.9 Notices were formally advertised between 17 February 2017 and 10 March 2017 under powers contained in the Highways Act 1980 and the Road Traffic Regulation Act 1984 informing of the proposal to construct road humps and raised pedestrian and cyclists crossings along Valley Road, Holdsworth Street and Hillam Road. There were no objections to this Order.
- 2.10 An objections Report was taken to the Bradford East Area Committee meeting on 11 July 2017 where it was resolved:-
- i) that the Committee recognises and welcomes the cycle link
 - ii) that the Committee is not content that the solution offered is a safer, more attractive urban environment that will make the positive contribution to Bradford's cycling ambition. The Committee also recognises the challenges of the current site.
 - iii) that officers are asked to fully investigate an alternative scheme in the urban green space alongside Valley Road, Bradford.
 - iv) that the consultation be extended to include people who work along Valley Road, Bradford, and whether they had access to the Cycle to Work scheme.
 - v) that the decision to overrule the objections be delayed until the above work is



undertaken and presented to the Committee.

- 2.11 On 13 July 2017, in accordance with Paragraph 8.6.2 (Part 3E of the Constitution) the decision of the Bradford East Area Committee was called-in by the Chair of the Corporate Overview and Scrutiny Committee as requested to do so by the Chair of the Environment and Waste Committee *“on the grounds that the Area Committee’s decision to defer approval of the project proposals puts the entire scheme at risk. The decision jeopardises a cycleway project that is a key element of our District Cycling Strategy and which is backed by the Bradford Cycling Campaign; and-crucially- risks losing altogether WYCA investment of £2.5 million that will benefit Bradford District as a whole for years to come”*. The decision was then referred to the Environment and Waste Management Overview and Scrutiny Committee for consideration.
- 2.12 At the meeting of the Environment and Waste Management Overview and Scrutiny Committee held on 25 July 2017 it was resolved:-
- i) that this Committee notes a) Paragraph 12.14 of Part 3E of the Constitution of the Council, which states that “area committees may not make a decision which affects, in a significant way, another area without first obtaining the agreement of the area committee for that area”, b) that part of the Bradford Canal Road Corridor Cycleway Scheme is located in the City Ward and therefore falls under the purview of the Bradford West Area Committee; and c) that the Bradford West Area Committee has not been involved in this decision-making decision process so far.
 - ii) that this Committee notes that the Executive resolved on 20 September 2016 that “any valid objections to the advertised Traffic Regulation Orders, traffic calming, crossing facilities and cycle tracks be submitted to the Executive” and that this action has not yet been implemented as required.
 - iii) that this Committee refers the decision back to the Bradford East Area Committee for further consideration of the advertised Traffic Regulation Orders in accordance with the resolution of the Executive dated 20 September 2016.
 - iv) that this Committee recommends that the Bradford East Area Committee refers this matter with its comments to the Executive for decision when it meets on 14 September 2017, according to the provisions of Paragraph 12.15 of Part E of the Constitution of the Council (which states that “an area committee or two or more area committees jointly may refer a matter in relation to an executive function to the Executive for decision”).
 - v) that, in the event that the Bradford East Area Committee does not refer this matter to the Executive for decision on 14 September 2017, this Committee recommends that the Executive determines this matter instead in accordance with Paragraph 12.16 of Part 3E of the Constitution of the Council (which states that “the Executive may require a matter in relation to an executive function due to be considered by an area committee to be determined by itself, in which case the delegation of that matter to the area committee shall cease to apply”).
 - vi) that this Committee notes, in any case, that the Executive has the option of determining this matter when it next meets on 12 September 2017 in accordance with Paragraph 12.16 of Part 3E of the Constitution of the Council and the Executive’s own resolution of 20 September 2016.
- 2.13 A meeting was held in City Hall on 10th August 2017 attended by the Portfolio



Holder (Regeneration, Housing, Planning and Transport), officers from the City Connect2 design team and representatives from some of the businesses located on Valley Road, namely Uriah Woodhead, West Yorkshire Fellmongers, Trevor Isles and P.F.Farnish. The businesses voiced their concerns regarding the proposals to make sections of Valley Road one-way to vehicular traffic and the problems that this would cause them, particularly in terms of deliveries, customer access, potential loss of trade and the potential negative effect that the scheme would have on future development plans. The businesses requested that the proposed route of the cycleway be re-considered with particular emphasis on the option of using Midland Road instead of Valley Road. The issues raised at the meeting have been further investigated and relevant points are included within Other Considerations in section 3 below.

3. OTHER CONSIDERATIONS

- 3.1 Prior to advertising the TRO's a consultation exercise was held for residents, businesses and the general public. Businesses were also contacted individually and offered one to one meetings to discuss any issues and concerns. Following these meetings, design modifications were made to the proposals and a revised scheme was presented to the Executive on 20 September 2016.
- 3.2 Since objections have been received consideration has been given to amending the Moving Traffic TRO in order to reduce the length of the restriction for one-way traffic flow on Valley Road. The aim would be prevent vehicles entering Valley Road from Queens Road whilst still allowing two way flow of traffic along a section of Valley Road for local traffic between business premises. Traffic could still enter Valley Road from the south only but would be able to leave in either direction. The carriageway could be widened to enable a car and an HGV to pass each other and some passing places could be provided to enable two HGV's to pass. However, this option would result in the cycle track width being less than the recommended width for a two- way cycle track and would compromise safety for cyclists. A high wall on one side and moving traffic on the other side would increase the danger to cyclists as the risk of cyclists catching their handlebars on the wall or with another cyclist whilst shying away from the edge of the cycle track nearest to passing motor traffic. This option would therefore not be recommended.
- 3.3 Consideration has been given to acquiring some land between Valley Road and the railway in order to construct the cycle track adjacent to Valley Road, which would allow existing traffic flows on Valley Road to remain unchanged. During the initial design stage enquiries were made with the landowner about purchasing a strip of land to enable the construction of the cycleway, but the landowner was not prepared to sell a strip as this would render the remainder of the land unusable for development. However, he was prepared to negotiate selling the whole of the plot with a suggested price circa £500K. No sources of additional funding could be found for the acquisition of this land and so this option could not be advanced.
- 3.4 Since the Bradford East Area Committee meeting on 11 July 2017 a review has been carried out to reassess the potential for alternative routes a) through the land



between Valley Road and the railway; b) along Canal Road and c) along Midland Road. In addition, a survey to determine the structural integrity of the wall alongside Valley Road has been carried out.

- 3.5 A review of the land situation has been undertaken in July/ August 2017. Enquiries have found that the land has recently been advertised for sale with an asking price of £475K and negotiations between a third party and the current owner are now at an advanced stage. The purchaser has confirmed that they would not be willing to dispose of all or part of the site to Bradford Council, as to do so would render the site unusable for future development proposals.
- 3.6 A structural survey has recently been carried out on the existing stone wall located on Valley Road to assess its condition. Although the report has still to be finalised, indications are that a substantial cost will be involved in returning the wall to a sound condition. In the short term, relatively low cost measures could be carried out to protect cyclists from falling masonry, and these could be financed from the scheme budget. However, the responsibility for the safety and repair of the wall rests with the landowner, although the highway authority has powers to compel the landowner to carry out repairs or do the repairs itself and then re-charge the landowner when it is deemed that the hazard is a danger to the public. Due to the current situation regarding the land being subject to sale, it is unknown what the future plans are for dealing with the wall, but discussions will take place in due course.
- 3.7 Consideration has been given to an alternative route via Midland Road and Hamm Strasse. Although the geometry and width of Midland Road itself would enable a segregated cycleway to be constructed, this option would result in a longer, indirect route and introduce a steep hill in an otherwise level route. In addition, a segregated cycle track along Hamm Strasse would require space to be taken from the carriageway, thereby reducing the traffic capacity of this major road as the footway alongside Hamm Strasse is too narrow to convert into either a segregated footway and cycle track or enable a safe shared space for cyclists and pedestrians to be created because of constraints caused by the bridge and associated parapet walls. The higher level of air pollution along Hamm Strasse would also be a concern for cyclist's health. This route, therefore, is not considered to be a feasible option.
- 3.8 Consideration has been given to the possibility of an alternative route along Canal Road. Although this route is the most direct and level in terms of gradient, it was discarded due to the adverse effect on the traffic capacity of Canal Road and the lack of feasible solutions for crossing numerous side roads and accesses along the route. The footway on the west side of Canal Road is not wide enough to convert into a segregated footway and cycle track and as such, land adjacent to the back of the footway belonging to third parties would have to be acquired or the carriageway would need to be narrowed in order that all the changes could be made within the limits of the highway. The cost and timescale of acquiring any land is beyond the scope of the funding requirements and so the only option remaining would be to reduce carriageway space, resulting in a reduction of highway capacity. Since Canal Road is a strategic corridor on the highway network of the district the idea of reducing capacity was enough to discount this option. For comparison, Canal Road



carries 35,000 v.p.d. (vehicles per day) whereas Valley Road carries 3,000 v.p.d.

- 3.9 The CityConnect Advisory Group which comprises mainly cyclists experienced in similar schemes have commented and provided advice throughout the scheme development process. The group support the current scheme proposals and the advertised TRO's.
- 3.10 Local ward members and the emergency services have been consulted on the advertised TRO's and they have not raised any objections.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 Funding for the scheme will be provided by the West Yorkshire Combined Authority, as part of the £22.107 million Government funding for Phase 2 of the Cycle City Ambition Fund. The WYCA Transport Committee approved funding for the scheme at a meeting on 14 July 2017.
- 4.2 City of Bradford MDC staff resources and specialist technical services required to deliver and develop the programme in accordance with this report are funded through the programme budget.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1 The governance of this project is the responsibility of the WYCA and is controlled under their Assurance Framework. A rigorous project management system is in place for all West Yorkshire Transport Fund projects based around the OGC PRINCE2 (Projects in Controlled Environments) and MSP (Managing Successful Programmes) methodologies. The scheme described in this report will be subject to these processes.
- 5.2 Tenders have been invited and can be held until 15 August 2017 by which time a contract should have been entered into. The preferred Tenderer has agreed to extend this deadline but this relies on goodwill and may be withdrawn at any time. The risks of the Tenderer withdrawing their offer and the Council having to repeat the tender process increase as time goes on. If this was to happen then the Council and the Tenderers would have incurred abortive costs and there would be a further demand on the budget.
- 5.3 Discussions with the DfT have been held regarding extending the deadline for spending the grant money. They have agreed to extend the deadline as long as there is a commitment to delivering the scheme but again this depends on goodwill and may be withdrawn if that commitment cannot demonstrated.
- 5.4. If the scheme is not delivered on time and to budget there would be a risk of damage to the Council's reputation with the Government, WYCA and the general public in its ability to deliver major infrastructure projects.

6. LEGAL APPRAISAL



- 6.1 The Council has powers under Section 65 of the Highways Act 1980 to implement cycling infrastructure programmes of this nature. The Council may also use TRO's to secure the expeditious, convenient and safe movement of all traffic including cyclists. Members must consider the objections to each of the TRO's on their merits and properly balance the weight to be given to those objections and to the Officer comments in deciding whether or not to overrule the objections

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

The programme provides facilities for active travel, supporting equality and diversity.

7.2 SUSTAINABILITY IMPLICATIONS

This significant cycling programme has multiple benefits in terms of sustainability. It offers positive contributions to environmental, personal and community well being and because this is a significant piece of capital infrastructure its benefits and values continue to be generated over the long term.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

The programme focuses on accelerating the delivery of the LTP's target of increasing journeys by cycle, reducing CO2 and improving air quality. It should aid a reduction of the Council's own and the wider District's carbon footprint and emissions from other greenhouse gasses.

7.4 COMMUNITY SAFETY IMPLICATIONS

The scheme will offer improved safety for cyclists and maintain facilities for pedestrians.

7.5 HUMAN RIGHTS ACT

Part II of The First Protocol of the Human Rights Act provides that every person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law. This provisions does not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest. On balance Members are entitled to conclude that the general interest



prevails over any interference with private interests which might arise by the future implementation of the TROs

7.6 TRADE UNION

There are no Trade Union implications arising from this report.

7.7 WARD IMPLICATIONS

The scheme lies substantially within the Bolton and Undercliffe Ward and the City Ward. Members and the local community and businesses have been consulted on the proposals to date.

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

- 9.1 The Executive could choose to overrule the objections to the (moving traffic) Order and confirm that the Orders be implemented as advertised. This would ensure that the scheme can be delivered within the timescale and budgetary constraints set by the Department for Transport (DfT) in order to receive grant funding, and reduce the risk and avoid the consequences of having to retender the scheme if the preferred Tenderer withdraws their offer. This option is supported by the City Connect Advisory Group and will enable the objectives of the design brief agreed with WYCA to be achieved.
- 9.2 The Executive could choose to overrule the objections to the (moving traffic) Order and confirm that a modified (moving traffic) Order as shown in Appendix 2 be implemented. The scheme could be delivered within the timescale and budgetary constraints set by the Department for Transport (DfT) in order to receive grant funding although it would result in compromising the safety benefits for cyclists and the aims of the project would not be fully realised. This option is not supported by the City Connect Advisory Group and the objectives of the brief agreed with WYCA would not be achieved. This option is not supported by the objectors. The Council may also receive adverse criticism from groups and individuals wanting to see the road network made safer for cycling.
- 9.3 The Executive could choose to uphold the objections to the (moving traffic) Order and the scheme proposals would be abandoned. There would be no realistic prospect of bringing back this scheme in the future as a portion of land at Royal Mail House that has been safeguarded for the scheme under a S106 agreement could not be held.



- 9.4 The Executive could choose to overrule the objections to the (waiting loading and parking) Order and confirm that it be implemented as advertised. This would ensure that the programme can be delivered within the timescale and budgetary constraints and that the objectives of the programme can be achieved. This option is supported by the City Connect Advisory Group and will enable the objectives of the design brief agreed with WYCA to be achieved.
- 9.5 The Executive could choose to uphold the objections to the proposed (waiting loading and parking) Order and that a modified (waiting loading and parking) Order be implemented to remove the restriction to on-street parking along Hillam Road. This gives priority to parking over the traffic movements and is likely to result in some congestion and road danger and raise concerns from other businesses on Hillam Road that did not object to the advertised Order. This option is not supported by the City Connect Advisory group and the objectives of the brief agreed with WYCA would not be achieved. The Council may receive adverse criticism from groups and individuals wanting the see the road network made safer for cycling.
- 9.6 In considering the above Options Members may also wish to consider whether its decision is urgent, for reasons to be recorded in the published decision, where any delay which may result from calling-in the decision may be prejudicial to the interests of the Council or a third party in accordance with Paragraph 8.7.4 of Part 3E of the Council's Constitution. This may include such issues as the timeframe which is such that the Contract for CC2 will need to be awarded in September 2017 to have any realistic prospects of completing the works by March 2018. A delay in approving the TRO's (if that were the decision) increases the risks of not delivering this scheme within the financial and timeframe constraints. Not delivering this scheme will have the consequences of increased costs to the Council and potential tenderers; Damage to the Council's reputation with Government, WYCA and the general public regarding its ability to deliver a programme of schemes on budget and on programmes which may also affect applications for future grants and devolved funding for major infrastructure projects; not delivering the tangible benefits that the scheme will bring to the general public, namely increased safety, fitness, air quality and an increase in sustainable and inexpensive modes of transport. The strategic cycle route link between Bradford and Shipley within Bradford's priority growth area would remain incomplete leaving the Canal Road Greenway disconnected; and there would be extra costs in carrying out any further investigation of alternative routes. It must be stressed that these are potential reasons for Members to consider a decision urgent for the purposes of Paragraph 8.7.4 but cannot influence members decision on the merits of the objections to the TRO's

10. RECOMMENDATIONS

- 10.1 That the objections be overruled and the (moving traffic) Traffic Regulation Order be sealed and implemented as advertised for the reasons stated in Paragraph 2.8.1 of this Report.
- 10.2 That the objections be overruled and the (waiting loading and parking) Traffic



Regulation Order be sealed and implemented as advertised for the reasons stated Paragraph 2.8.2 of this Report

10.3 That the objectors be informed accordingly.

11. APPENDICES

11.1 Appendix 1 – Drawing showing the proposed route of the scheme and the general effect of the Orders.

11.2 Appendix 2 – Drawing showing the general effect of a modified (moving traffic) Order to reduce the extent of the one-way street restriction on Valley Road.

12. BACKGROUND DOCUMENTS

12.1 Scheme file number 103116.

12.2 Transport Study in Support of the Shipley and Canal Road Corridor AAP May 2015.

12.3 Report of the Strategic Director (Regeneration) to the meeting of Executive held on 20 September 2016.

12.4 Report of the Strategic Director (Place) to the meeting of the Bradford East Area Committee held on 11 July 2017.

12.5 Report of the Strategic Director (Place) to the meeting of the Overview and Scrutiny Committee held on 25 July 2017.

12.6 Highways Act 1980.

12.7 Road Traffic Regulations Act 1984.



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Report of the Director of Place to the meeting of Executive to be held on 12 September 2017

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Subject:

Outcome of the Procurement for Waste Treatment Services

Summary statement:

The purpose of the report is to inform the Executive of the outcome of the procurement for waste treatment services, following a detailed evaluation of bid submissions by the project team.

Steve Hartley
Strategic Director of Place

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Portfolio:
Environment, Sport & Culture

Overview & Scrutiny Area:
Environment and Waste Management

1. SUMMARY

The purpose of the report is to inform the Executive of the outcome of the procurement for waste treatment services, and the Officer decision taken at Project Board on 31st March 2017 to select a Preferred Bidder, namely Associated Waste Management (AWM), a regional waste management company with operations in both Bradford and Leeds, following a detailed evaluation of bid submissions by the project team.

The new contract will be formally signed by the Council and AWM on 21st September 2017, and will commence on 1st April 2018.

No decision is required other than for Executive to acknowledge the report.

2. BACKGROUND

The withdrawal by DEFRA in February 2013 of financial credit support for the Waste PFI procurement resulted in the Executive decision on 4th February 2014 to cancel the PFI procurement, and for a new waste strategy to be developed which would lead to a new procurement. This new waste strategy (Municipal Waste Minimisation and Management Strategy) was developed and subsequently adopted by the Executive on 13th January 2015. This strategy included the nature and scope of a new procurement to secure affordable, dependable and sustainable waste treatment and disposal services for the district's residual waste from 2017/18, when the present interim contract ends. A new procurement (this procurement) commenced in April 2015, and has concluded in September 2017, with a contract start date of April 2018.

Procurement Vehicle

The procurement has followed the EU Procurement Rules using the Competitive Dialogue Procedure.

Governance

In line with policy for major projects within the Council, this procurement has an established governance structure. The project team report to a Project Board chaired by the Strategic Director of Place, and comprises of the Assistant Director for Waste, Fleet and Transport Services along with senior officers from Waste, Procurement, Legal, Finance and HR. Regular updates on procurement progress have been provided to the Environment and Waste Overview and Scrutiny Committee.

Procurement Team

The Procurement Team sits within Waste Services, and comprises x 1 Project Manager, x 1 Executive Officer and is supported by internal specialists from Legal, Human Resources, Procurement, Finance, Health and Safety, Strategic Support, Planning and Communications. Further support is provided by external Technical, Financial and Legal Advisors (Jacobs, Grant Thornton and DLA Piper respectively).

Scope

The scope of the procurement is for the reception, treatment and disposal of local authority collected waste (municipal waste), predominantly residual household waste from kerbside collections, to consist of facilities offering diversion of waste from landfill with energy recovery and further recycling contribution to assist the Council's long term aim of minimising waste, boosting recycling and obtaining value from its residual waste.

Key elements are:

- The contract is for the waste treatment and disposal of the Council's collected residual waste
- The contract period is for 12 years (to 2030) with an option for a further 3 years
- The annual maximum tonnages under the contract which the Contractor is obliged to accept is set at 164,000 tonnes for the life of the contract
- The annual minimum tonnages that the Council will be obliged to deliver to the Contractor (guaranteed minimum tonnage) is set at 100,000 tonnes for the life of the contract
- The Contractor performance will guarantee to:
 - accept our waste
 - divert from landfill over 90%
 - recycle a minimum of 6%
 - recover 95% value from the waste (energy)
 - The Contractor will be subject to penalties should there be a failure to meet performance targets

Shape of the Waste Treatment Solution

The solution offer from AWM will see the Council deliver its waste to two sites, the primary site, and the one which will accept the vast majority of our waste is located at Valley Farm Road in south Leeds. The secondary site is located at Canal Road, Bradford. This site will not accept any kerbside residual waste from the Council save for a contingency need. The main contingency site is located at Gelderd Road Leeds. The waste reception sites will process the waste to capture recyclates and prepare the waste as a fuel (known as Refuse Derived Fuel - RDF) for onward shipment to energy recovery. From September 2019 the energy recovery site will be the newly opened FM2 facility operated by the energy company SSE at their Ferrybridge site close to the A1/M62 junction (SSE are AWMs main sub-contractor). Prior to this arrangement, to cover the first 2 years of the contract will see the RDF exported to energy recovery facilities in Europe. All these facilities will generate power from the waste, with less than 10% going to landfill.

Contract Management

Following the commencement of the contract, contract management will be undertaken by Waste Services to monitor and manage the contract to ensure the contractor AWM meets the required levels of performance under the contract. Appendix 2 provides some details as to the performance management elements.

3. OTHER CONSIDERATIONS

Waste Growth and Composition

The procurement has modelled both the likely impacts of increased housing (estimated at 1% or 2000 new houses per year) and population, and the effects of the waste collection policy and Alternate Weekly Collections would have on waste tonnages and composition over the life of the contract.

Climate Change

Climate Change Legislation aims to reduce carbon emissions. The waste treatment solution offer has been subjected to a WRATE analysis (Waste and Resources Assessment Tool for the Environment), which shows it provides a positive carbon saving of 49,000 tonnes of CO2 equivalent.

National Waste Targets

- EU Landfill Directive

The 2020 target requires that municipal waste sent for landfill disposal must reduce to no more than 35%. The guaranteed landfill disposal performance will see the Council exceed this target with less than 10% going to landfill.

- Value Recovery

The guaranteed recovery performance will see the Council exceed the 75% value recovery target for municipal waste in 2020 by achieving 95%.

- Recycling

A combination of the waste collection policies and Alternate Weekly Collections, together with the recycling guarantees under this contract, it is anticipated the Council will exceed the 50% target for household waste set for 2020 as measured by National Indicator NI 192.

Evaluation

Details of the bid evaluation are given in Appendix 1. The outcome of the Evaluation and thus the Procurement is to award the contract to AWM Ltd as the Preferred Bidder.

4. FINANCIAL & RESOURCE APPRAISAL

The bid price falls within the financial affordability envelope set for this procurement as agreed with the Strategic Director of Corporate Services, and is considered to be a competitive price, which offers a fixed price subject to annual indexation. However the Council will take the risk on Exchange Rate fluctuations in the first two years of the contract prior to the Ferrybridge FM2 facility coming on line in September 2019, owing to

the need to export RDF into Europe prior to that date. Steps will be taken to manage this risk.

The new contract will cost more than is currently budgeted, and the impact has been built into the Council's medium term financial plan.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

The procurement for waste treatment services is a major project which has its own governance structure in line with Council policy for major projects, including the management of risks which are reported to Project Board via a risk register that is regularly updated and reviewed by the project team.

The legal contract has been drafted to achieve an acceptable risk transfer to the contractor AWM. There are no significant risks to the Council beyond delivering the guaranteed minimum tonnage of municipal waste to the contractor for the duration of the contract period. Should the Council during contract wish to break it, there will be breakage costs for the Council as is standard with any such contract.

6. LEGAL APPRAISAL

The contract has been developed by the legal firm DLA Piper based on a standard PPP type contract. AWM have accepted the contract drafting with only minor amendments, and overall meets that Council's required risk allocation position. The contract structure itself is relatively straight forward, with AWM as the contracting party (no Special Purpose Vehicle) and only one proposed subcontractor which is SSE relating to Ferrybridge FM2.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

N/A

7.2 SUSTAINABILITY IMPLICATIONS

The management and operation of waste treatment services has sustainability implications. Sustainability is a key evaluation criteria for the project, an example of this is given in Appendix 1.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

The treatment and disposal of waste will create greenhouse gas emissions, it is important to minimise these, or mitigate their impact. The procurement key criteria is to reduce deposit of waste to landfill in favour of more sustainable means, which will have positive impacts over alternatives, again Appendix 1 is an example of how impacts are to be assessed and measured and thus evaluated.

7.4 COMMUNITY SAFETY IMPLICATIONS

N/A

7.5 HUMAN RIGHTS ACT

N/A

7.6 TRADE UNION

Since that start of the procurement, this topic has been a standard item on the waste services level 3, with regular updates provided. It is the position that there are no known TUPE implications for Council staff, or job losses arising from this contract.

7.7 WARD IMPLICATIONS

The Council will utilise its existing operational waste transfer stations in Bradford and Keighley to deliver waste under this contract, located in Bowling and Barkerend, and Keighley Central wards respectively. Further the existing AWM facility at Canal Road will also see some deliveries of waste (not including kerbside residual waste), and is located in Windhill and Wrose ward close to the boundary with Heaton ward.

7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

N/A

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

N/A

10. RECOMMENDATIONS

The outcome of the procurement for waste treatment services be noted for information.

11. APPENDICES

Appendix 1 - Evaluation

Appendix 2 – Performance Management

12. BACKGROUND DOCUMENTS

1. Exec Report 4th Feb 2014 Waste PFI
2. Exec Report Jan 2015 new MWM&MS

APPENDIX 1

EVALUATION

The evaluation is structured with a set of overarching criteria, as shown below:

Summary Evaluation criteria	score
Cost	50
Financial Robustness, Transparency and Payment Mechanism	10
Technical and Sustainability	30
Insurance	Pass/Fail
Legal	10
Total Points	100.00

Cost Evaluation

Cost Evaluation is the “whole system cost” of the submission.

The whole system cost is the aggregate cost value of the bid submission plus any additional haulage costs that the Council may have in relation to the submission. The whole system cost is evaluated on a net present value basis.

Financial Robustness Evaluation

The financial robustness evaluation assesses the quality of the bid in terms of being able to demonstrate the process by which the bid costs have been developed. This will require the bidders to produce a Financial Model, plus a qualitative assessment of the extent to which the Payment Mechanism (produced by the Council) is accepted by the bidder.

Technical and Sustainability Evaluation

Given below is the technical and Sustainability criteria.

Ref. No.	Headline Criteria	Sub Reference	Technical Sub-Criterion	Overall weighting	Relevant Submission Documents
T1	Performance	T1.1	Waste treatment solution accepts the whole contract waste tonnage over the entire contract period	PASS/FAIL	<ul style="list-style-type: none"> Waste Flow Model (for the entire contract period of 12 years)
		T1.2	Landfill Diversion Performance	[20%]	<ul style="list-style-type: none"> Schedule of Guaranteed Performance Levels Waste Flow Model
		T1.3	Recycling Performance	[10%]	<ul style="list-style-type: none"> Schedule of Guaranteed Performance Levels Waste Flow Model

Ref. No.	Headline Criteria	Sub Reference	Technical Sub-Criterion	Overall weighting	Relevant Submission Documents
		T1.4	Value Recovery Performance	[10%]	<ul style="list-style-type: none"> • Schedule of Guaranteed Performance Levels • Waste Flow Model
		T1.5	Environmental Impacts	[5%]	<ul style="list-style-type: none"> • Environmental Management Plan • WRATE submission (Proforma and model for verification) (CFT Stage Only)
T2	Deliverability of Proposed Solution	T2.1	Waste Reception Proposals	[15%]	<ul style="list-style-type: none"> • Waste Reception Facility – Planning and Consents • Waste Reception Plan
		T2.2	Waste Treatment Proposals	[15%]	<ul style="list-style-type: none"> • Waste Treatment Facility – Planning and Consents • Waste Treatment Plan
T3	Service Delivery and Contract Management	T3.1	Health & Safety	[5%]	Health and Safety Plan
		T3.2	Contract and Service Delivery	[10%]	<ul style="list-style-type: none"> • Contract Management Plan • Employment and Staffing Plan • Marketing Plan • Maintenance Plan • Contingency Plan
		T3.3	Added Value	[10%]	<ul style="list-style-type: none"> • Added Value Statement
Total				100.00%	

Insurance

The evaluation assesses the extent to which the bidder submission demonstrates compliance with drafting requirements, and is a simple pass or fail criteria.

Legal Evaluation

Legal evaluation is based on an assessment of the acceptance by the bidder of the legal principles and risk transfer, and contract drafting by the Council's legal advisors.

APPENDIX 2

PERFORMANCE MANAGEMENT

The Bidders are required to bid back a number of Key Performance Indicators, namely:

- Landfill Diversion Performance
- Recycling Performance
- Recovery Performance

The above form part of an overall Performance Framework, which details all of the performance criteria against which the successful Bidder when in contract, will be measured. The bid backs are evaluated and scored as part of the Technical and Sustainability criteria.

Where the measurement of performance shows poor contractor performance taking place, financial deductions will be applied, and failure points accrued as set out in the Performance Framework. Should the level of poor performance reach a trigger point, the Council will be required to require the contractor to produce a Rectification Plan stating how the poor performance is to be rectified. However should poor performance continue, ultimately the Council will have the “right to place the contractor in default”, which can lead to termination of the contract.

Absent from the 3 bullet points above, is perhaps the most fundamental requirement of the contractor, namely to “accept all of our contract waste for the whole of the contract period”, this is because this element, being so fundamental is dealt with specifically under the contract itself. Failure to accept our waste will result in a contractor default, which can trigger termination.

There are several other performance indicators which are dealt with in similar way to those described above, the most significant being the target turnaround times for our waste delivery vehicles delivering waste to the contractor’s facilities.

All the performance requirements of the Bidder when in contract, and how they will be delivered by the contractor, are contained within a series of Plan Documents, again these are scored as part of the Technical and Sustainability criteria.

The full list of Plans required is shown below:

Name	Comment
Employment & Staffing Plan	Details management structures, staffing levels, training and any TUPE issues
Health & Safety Plan	Details all H&S activities
Schedule of Guaranteed Performance	Relates to the bid backs and the Performance Framework
Marketing Plan	How outputs (eg recyclates and energy) will be marketed
Contingency Plan	Should the Contractor’s primary facility fail, this details the alternative options
Waste Acceptance Plan	How and what arrangements there are for the

	Contractor accepting our waste at their facilities
Waste Reception Facility Plan	Details all relevant permissions and consents to operate their facilities
Service Reports	Monthly (invoice), Quarterly and Annual submission on contract performance
Maintenance Plan	Details maintenance arrangements of their facilities
Contract Management Plan	Identifies how the Contractor will manage this contract with the Council
Environmental Management Plan	Includes the WRATE outputs and other environmental control systems
Added Value Statement	Details any benefits to the local community in and around Bradford
Waste Treatment Plan	Details the waste treatment solution, its technology and process stages

The above Plans, known as Contractor's Proposals or Method Statements will form schedules to the legal contract.

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Report of the Chief Executive and Strategic Director Corporate Services to the meeting of Executive to be held on 12th September 2017.

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Subject:

Updated 2017-18 Budget Assessment

Summary statement:

Following the 1st Quarter Financial Position update to the Executive on 11 July 2017, this report details the steps being taken to get the budget back on plan.

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Portfolio: Corporate

Overview & Scrutiny Area: Corporate

1. SUMMARY

- 1.1 The First Quarter Financial Monitor report for 2017/18 indicated a potential overspend on the Council revenue budget of £10.5m. The Executive requested an update detailing the steps taken to bring the budget back on plan.

2. BACKGROUND

- 2.1 Budget Council approved a Council budget of £375.2m in February 2017, which was underpinned by a set of specific budgeted cost reductions to be delivered by service departments. The First Quarter Financial Monitor for 2017/18 provided an early indication of the revenue and capital financial position of the Council at the 31st March 2018 and indicated a revenue budget overspend of £10.5m. The summary of the forecast overspend is replicated in tables 1a and 1b below.

Table 1a – Revenue forecast by department

	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Health and Wellbeing	215.0	223.6	8.5	-105.2	-104.0	1.2	109.8	119.6	9.7
Children's Services	483.5	489.2	5.7	-398.2	-398.9	-0.8	85.3	90.2	4.9
Department of Place	118.1	119.7	1.6	-54.4	-54.4	0.0	63.7	65.3	1.6
Corporate Services	266.9	265.8	-1.2	-223.1	-222.7	0.4	43.8	43.0	-0.8
Chief Executive	3.8	3.8	-0.0	-0.1	-0.1	0.0	3.7	3.7	-0.0
Non Service Budgets	7.2	7.2	0.0	-1.3	-1.3	0.0	5.9	5.9	0.0
Central Budgets & Net Transfers To Reserves*	89.5	79.8	-9.8	-26.6	-21.8	4.8	62.9	57.9	-5.0
Total Council Spend	1,184.1	1,189.0	4.9	-808.9	-803.3	5.6	375.2	385.7	10.5

Table 1b – Revenue forecast by Council Plan Outcomes

	Gross expenditure			Income			Net expenditure		
	Budget	Forecast	Variance	Budget	Forecast	Variance	Budget	Forecast	Variance
	£m	£m	£m	£m	£m	£m	£m	£m	£m
Council Plan Outcomes									
Better Health Better Lives	439.9	455.0	15.1	-270.7	-270.7	-0.0	169.2	184.3	15.1
Better Skills, More Good Jobs And A Growing Economy	95.1	95.8	0.6	-49.8	-49.4	0.4	45.3	46.4	1.1
Safe, Clean And Active Communities	61.2	61.2	-0.0	-22.9	-23.0	-0.1	38.3	38.2	-0.1
A Great Start And Good Schools For All Our Children	425.3	424.3	-1.0	-402.5	-402.1	0.4	22.8	22.2	-0.6
Decent Homes That People Can Afford To Live In	3.6	3.6	-	-0.6	-0.6	-	3.0	3.0	-
A Well Run Council	87.2	87.3	0.1	-32.2	-32.1	0.1	55.1	55.2	0.1
Non Service, Fixed and Unallocated	71.7	61.8	-9.9	-30.2	-25.4	4.8	41.5	36.4	-5.1
Total Council Spend	1,184.1	1,189.0	4.9	-808.9	-803.3	5.6	375.2	385.7	10.5

- 2.2 The estimate was based on information gathered at an early point in the financial year. It signalled that action could and should be taken before the end of the financial year to affect the ultimate outturn.
- 2.3 The report identified some cost reduction proposals at risk of not being delivered in the financial year, together with additional service pressures. The savings identified as being at risk are shown in Appendix 1.
- 2.4 The service areas with the highest levels of savings at risk were Health and Wellbeing (£16.042m) and Children's Services (£3.232m). The Leader of the Council determined that a formal group ("Star Chamber") should meet with the Strategic Directors of Health and Wellbeing and Children's Services to suggest ways in which the budget proposals could be brought back on track. The formal group would alternate between Health and Wellbeing and Children's.
- 2.5 Section 3 below outlines the action points to be taken following the initial meetings of the formal groups.
- 2.6 The financial forecast for the Council will be refreshed for Quarter 2 and a revised report will be brought back to Executive on 7th November 2017. In the meantime additional work will be undertaken to rationalise expenditure and maximise revenue streams across the Council in order to balance the budget.

3. ACTION POINTS FROM THE FORMAL GROUP

- 3.1 The Formal Group for Children's Services met on 31st July 2017, with the following actions agreed:
 - Demand management: develop a more sophisticated model for predicting demand
 - Reviewing service levels: review activities required to meet statutory requirements; consider what a "basic service" would look like; compare scope and role undertaken by Bradford Children's Service to other local authorities
 - Commissioning and procurement: review currently procured services, and assess options for future cost reductions
 - Workforce remodelling: identify process efficiencies across functions; explore more mobile and flexible working; define better uses of technology; optimise use of agency staff
 - Placement strategy: understand the case for and against building a new children's home; explore shared care home facilities
 - SEND: progress the ongoing review of Travel Assistance Service; project and review Council's response to future demand, in collaboration with Adult Services
 - Working with new communities: review with Neighbourhoods Services the Council-wide approach to working with Central and East European communities and families
 - Further work to identify risk to 18/19 and beyond savings.

3.2 The Formal Group for Health and Wellbeing met on 24th August 2017, with the following actions agreed:

- Care packages: desktop review of 6500 clients in receipt of care packages, focus on those with multiple packages – four additional social workers being recruited to support this work
- Review high cost placements
- Emphasise “Home First”: using transformation funding, recruit Home First resource, aim to divert 25% of clients who would end up with care packages –to quantify impact of this action
- Case audits: Principal Social Worker to look at alternative support / creative thinking
- Internal culture change: training and development of staff, with support from HR
- Human resources: review of agency staff
- Consider advantages of shared services
- Financial consequences of demand management: more forensic analysis how actions to manage demand and case-mix affect costs and budget savings profile

4. FINANCIAL & RESOURCE APPRAISAL

4.1 As mentioned in paragraph 2.6 additional work will be undertaken to continue to rationalise expenditure and maximise revenue streams across the Council.

4.2 Further work will also be undertaken to develop proposals to address the forecast financial gap for 2018/19 and 2019/20 as outlined in the Medium Term Financial Strategy.

4.3 The Joint Finance and Performance Mid Year Report will provide a refreshed budget forecast to assess the impact of the measures outlined in this report and the actions being taken by all budget holders to manage the financial position of the Council.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The significant risk is that the actions outlined do not bring the savings back on plan. The effect of this could be felt in 2018/19 and future years where further reductions in Council funding are forecast. Any such shortfalls would have to be dealt with in the future budget planning process.

6. LEGAL APPRAISAL

6.1.1 This report is submitted to the Executive in accordance with the Budget and Policy Framework Procedure rules.

7. OTHER IMPLICATIONS

There are no other specific implications.

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

9.1 This report sets out a series of potential actions being taken to manage the budget position. No further options are proposed at this stage.

10. RECOMMENDATIONS

10.1 That the Executive note the contents of this report and the actions taken to manage the forecast overspend.

11. APPENDICES

11.1 Appendix 1 – Planned savings that are at risk of not being delivered in full

12. BACKGROUND DOCUMENTS

12.1 Council - Budget Report 23rd February 2017 Document W

12.2 Executive - First Quarter Financial Position Statement for 2017/18 Document H

12.3 Executive - Medium Term Financial Strategy 2018/19 to 2020/21 and beyond Document I

Appendix 1 – Table of Planned Savings that are at risk of not being delivered in full

Ref	Saving Narrative	Budgeted Saving £000s	Forecast Saving £000s	Variance
Health & Wellbeing				
3A1	Changes to the Contributions Policy	611	0	611
3A2	Changes to Older People and PD Home Care Service	1,500	0	1,500
3A3	Changes to Supported Living for Learning Disabilities	500	138	362
3A6	Changes LD Day Care and Procurement	1,000	0	1,000
3A10	Changes to Contracts for LD Residential and Nursing	1,000	0	1,000
3A11	Reduce the number of long term placements in the independent sector by utilising in-house beds	200	0	200
3A12	Review Charging Arrangements for People with MH	250	0	250
3A13	Reduce long term placements of Older People into Nursing and Residential Care	1,000	600	400
4A1	Adults - Overall Demand Management Strategy - moving from a dependency model to one that promotes independence and resilience (e.g. reducing numbers coming in to care, care system culture change, speeding up integration, redesign enablement, reviewing financial needs, continued personalisation).	8,000	0	8,000
4A2	Demand management – further reductions in high cost packages, further reductions in Supported Living contracts/packages, various reductions in travel and fees. (Also see proposal 4A1 in Appendix E for more detail on the proposed actions in 2017/18).	2,000	1,200	800
Total 2017/18 new budget savings				14,123
A10	Older People – Reduction in Residential Placements	1,193	493	700
A10	Older People - Closure of Home B	360	100	260
3A1	Changes to the Contributions Policy	466	0	466
3A10	Changes to Contracts for LD Residential and Nursing	278	0	278
3A12	Review Charging Arrangements for People with MH	215	0	215
Unachieved savings from prior years				1,919
Health and Wellbeing Total				16,042
Children's Services				
3C6	Reviewing Work with Young People Who are Not in Employment Education or Training – Connexions	132	102	30
3C7	Looked After Children - bring children cared for outside of Bradford back into the District.	500	85	415
4C4	Child Protection management restructure - reduction in teams by four to ten with potential reduction in team managers plus review other overall budgets	240	0	240
4C5	Children's Social Care management restructure - review of management structure leading to proposed reduction of two service manager posts and one team manager	85	0	85
4C9	Disabled Children Team - to build on review already underway with CAMHS, review overall staffing and no staffing budget	250	155	95
4C3	Children's Services - staffing, restructure, reduction in the Connexions contract with longer term service brought back in to Council, investigate regional data centre, cessation of Employment Opportunities Fund (EOF).	150	0	150
4C14	Reducing agency spend in Children's Social Care Services	1,025	312	713
4C16	Administrative Support restructure – rationalisation of the supervision and management structure	100	35	65
Total 2017/18 new budget savings				1,793
3C7	Looked After Children - bring children cared for outside of Bradford back into the District.	624	0	624

3C8	Looked After Children - Reduce the Numbers of Looked After Children by 75 Over 2 Years.	815	0	815
	Unachieved savings from prior years			1,439
	Children's Services Total			3,232
Department of Place				
3E4	Alternative Week Waste Collection	1,000	775	225
	Total 2017/18 new budget savings			225
3R18	Re-Structure Planning Transport & Highways and Transfer Some Functions to the West Yorkshire Combined Authority	125	0	125
R19	Reform services following on from highways delivery review. Reduce lighting costs and energy consumption through reduced and/or varied street lighting levels across the district's modern lighting stock. Securing a reduced highways insurance premium due to application of new legislation. Reduce the operational budgets for Urban Traffic Control, Street lighting and Highway Maintenance which represent a 10% reduction in operational budgets with a resultant pressure on maintaining assets across those areas. This would adversely affect: the efficiency of first time permanent repair of potholes; overall network condition; potential increase in insurance claims; risk of traffic disruption due to signal failure; increase in repair times for street lighting	170	0	170
3R18	Re-Structure Planning Transport & Highways and Transfer Some Functions to the West Yorkshire Combined Authority	190	0	190
	Unachieved savings from prior years			485
	Department of Place Total			710
	Travel Assistance	4,774	0	4,774
	Total Forecast underachievement			24,858

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Report of the Chief Executive to the meeting of the Executive to be held on 12 September 2017.

P

Subject:

Local Government Association Corporate Peer Challenge review findings and Improvement Action Plan 2017

Summary statement:

Bradford Council invited the Local Government Association (LGA) to undertake an independent Corporate Peer Challenge review, which took place in March 2017. This report details the areas the review looked at, its findings and the Council's response in the form of an Improvement Action Plan.

Kersten England
Chief Executive

Portfolio: Corporate

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Overview & Scrutiny Area: Corporate

1. SUMMARY

Bradford Council invited the Local Government Association (LGA) to undertake an independent Corporate Peer Challenge review, which took place in March 2017. This report details the areas the review looked at, its findings and the Council's response in the form of an Improvement Action Plan.

2. BACKGROUND

2.1 The Corporate Peer Challenge Review

2.1.1 At the request of the Leader and Chief Executive of the Council, an LGA team conducted a Corporate Peer Challenge review of Bradford Council during the period 27- 30 March 2017.

2.1.2 The LGA team was comprised of six local government professionals led by the Chief Executive of Wigan Council and the Leader of Newcastle City Council.

2.1.3 A Corporate Peer Challenge review is designed to complement and add value to a council's own performance and improvement, it is not an inspection. Corporate Peer Challenge reviews have taken place in many councils and are an established method to help determine the "health and awareness" of a council, identifying areas in which it needs to improve.

2.14 Corporate Peer Challenge reviews look at five areas:

1. Understanding of the local place and priority setting:

- Does the council understand its local context and place and use this to inform a clear vision and set of priorities?

2. Leadership of place:

- Does the council provide effective leadership of place through its councillors, officers and constructive relationships and partnerships with external stakeholders?

3. Organisational leadership and governance:

- Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?

4. Financial planning and viability:

- Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?

5. Capacity to deliver:

- Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

- 2.1.5 The Council asked the LGA Corporate Peer Challenge review team to focus on social inclusion and opportunities for young people in skills, education and employment, reflecting Bradford being the youngest city in the country, while reviewing the above five areas.
- 2.1.6 The review team spoke to over 260 people including council staff, councillors, partners, stakeholders and young people. They gathered information and views from over 60 meetings and collectively spent more than 230 hours to determine their findings.
- 2.1.7 The full report has been on the Council website since June when it was received from the LGA and is attached as **Appendix 1**

2.2 The Corporate Peer Challenge Review findings

2.2.1 Headlines

The Council “recognises it is on a journey of change” from being a provider of services to “being a facilitator and co-ordinator of all of the local resources around a set of shared priorities”.

“The Council is ambitious, self-aware and an improving organisation with huge potential, well positioned to benefit from the ambitious goals and programmes set out in the District and Council Plans and increasingly influential within the West Yorkshire Combined Authority.”

There is “effective ward and neighbourhood leadership by councillors, officers, partner organisations and active and committed community leaders and voluntary sector.”

“Exceptionally strong partnership relationships are already established, in particular between the Council and the Police” and “there are excellent examples of partnership working improving people’s lives.”

“There is clear recognition of the financial challenges and increasing demand on services faced by local government and its impact, alongside an ambitious approach” to align resources to the priority outcomes in the Council Plan through the budget process.

“The emerging narrative of place needs to more fully reflect the many places that make up the District, alongside clarity around the District’s role and investment requirements in delivering the City Region Strategic Economic Plan.”

“The £5m Transformation Fund should be reviewed to ensure sufficient resources are allocated” to enable the Council to drive change and make the necessary savings.

Consideration needs to be given on “how to consistently engage on issues with young people” and greater use should be made of apprenticeships.

Communications need to focus on engaging residents through ‘People Can’ and “positioning Bradford regionally and nationally.”

The historic civic crest should be used as the Council brand/ logo as it reflects the city and different towns which make up Bradford District.

2.2.2 Review findings under the five areas, in summary

1. Understanding of the local place and priority setting

The review team reported “Bradford Council“ has a sophisticated understanding of its communities” and said they had “heard many examples of excellent work in promoting community cohesion.”

“There is a recognition that leadership of place isn’t only the responsibility of the Leader of the Council and the Chief Executive, but that everyone in the organisation can play a role.” However, the review team felt that “the workforce is considered an underdeveloped asset in telling a more positive story of Bradford District.”

“The Council Plan is clear and coherent and is becoming increasingly embedded” with “many staff aware of the priorities and their role in achieving them.” The review team also saw a “growing sense of optimism that the Council and the place is improving, with recognition that young people are the City’s greatest asset.”

“It is clear that there is strong community, faith, business and voluntary sector leadership” and “a clear alignment between business and political priorities with transport and education seen as key drivers of economic growth.”

“Although there is strong leadership in supporting this vision, turning the vision into a compelling, forward looking narrative for Bradford District will need to be the next stage of the journey.” “This stronger narrative will help partners better understand the Council’s priorities more clearly and enable the Council to focus its resources on partnerships and relationships that are most important in achieving this vision.”

2. Leadership of Place

The review team stated “the Council Leader and Chief Executive are universally recognised as providing strong, clear and complementary leadership” and there is “proactive engagement with other councils and partners across the region.”

The commitment to working within regional and national partnerships, including the West Yorkshire Combined Authority (WYCA) and Key Cities network “was making Bradford increasingly influential.”

The review team found “strong and excellent partnership arrangements with the Police and Voluntary Sector, with active and committed community leadership with organisations who want to work collaboratively with the Council.”

While the engagement between the Council and its partners was seen as positive, there was an acknowledgement that more could be done to streamline and strengthen partnership working with health organisations.

The review team said: “Councillors in Bradford are passionate, committed and fully engaged in the work of the Council, being visible in their local communities and there is good ward and neighbourhood leadership” undertaken by the Council.

The Council’s ‘People Can’ approach to involve citizens in their neighbourhoods and communities through volunteering and other activities was recognised as “powerful” and having “huge potential” to “empower people and communities to do more for themselves.” The review team felt this ‘People Can’ approach should be rolled out across Council departments and partner organisations to show a unified way of working for the benefit of Bradford District.

3. Organisational leadership and governance

The review team said they “saw evidence of a strong and well regarded political and managerial leadership, observed through constructive councillor and officer working relationships at all levels across the Council.”

The review found that “the corporate governance framework works well, with mutual respect and understanding between councillors and officers” with “no adverse indicators” relating to how the Council’s decision making works. Scrutiny Committees were found to be “effectively holding the Executive to account”, although the review team recommended developing a role for Scrutiny in policy making, as well as scrutinising the Council’s decisions.

The review team suggested that “plans and strategies should be reviewed to make sure they are aligned to the Council Plan” which will help in “difficult decisions” about which services and activities the Council will have to stop doing.

Staff met through the review were considered “loyal, committed and highly motivated to deliver good quality services”. There is a “supportive environment evident, with a can do attitude” underpinned with a “developing organisational culture with staff at all levels starting to reflect the Council’s behaviours and values.”

The review team “saw good examples of the Future Leaders programme and the Innovation Hub facilitating a growing sense of empowerment amongst staff” but pointed out that “the changing nature of local government and the increasing focus on commercialism will require different skills and competencies going forward. They suggested the apprenticeship programme should be reviewed to “bring new ideas into the Council” and “make it more representative of the communities it serves.”

4. Financial planning and viability

The review team said “the scale of the future financial challenge” faced by local authorities “is understood by Bradford Council who acknowledge that business as usual isn’t an option.”

Outcomes Based Budgeting, where resources are aligned to agreed priorities in the Council Plan, “has been introduced as a model for ensuring effective and efficient use of resources and is seen as a significant step towards closing the revenue funding gap.”

The review team found the Council “has managed sensitively” big reductions in its resources - £231 million has been saved since 2011 with a further £32 million to find in 2017-2019. “The Audit Statement confirms the Council has a strong track record of delivering savings and generally keeping within budget though there are significant financial pressures within adult’s and children’s services.

Concerns were expressed about potential over-reliance on the use of compensatory savings when planned savings aren’t delivered and about some instances where opportunities for earlier interventions were not being taken to minimise long term financial risks.

The review team also felt the level of transformation funding was too low to address the significant changes the Council faces.

5. Capacity to deliver and resources

The review report states “staff enjoy working for the Council and feel their contribution is highly valued”. “Overall staff said that change is generally managed well” and they recognise “the role of the Council needs to change going forward.”

The review found “many good examples of the Council working well in partnership to deliver improved outcomes for residents,” in areas such as: school improvement, neighbourhood work, hospital discharges, child sexual exploitation and community cohesion.

The Workforce Development Programme was seen by the review team as pivotal to ensuring change and embedding behaviours and values and it felt the work on this should be accelerated.

The review did not see an overarching approach to programme management and suggested improved arrangements are put in place to ensure linkages, sequencing and inter-dependencies between projects are made clear.

The review also stated that the Council “needs to adopt a consistent approach to digital transformation” and data should be used more to inform decision making, as well as for tracking performance.

It was recommended opportunities should be explored for: further co-located working based on the effective work currently seen in the Multi Agency Safeguarding Hub, shared service arrangements across neighbouring local authorities “where a business case stacks up” and enhanced integrated commissioning of services.

2.3 The Corporate Peer Challenge Review recommendations

The Review made 8 key recommendations:

1. Develop a coherent narrative of place and your ambitions.
2. Use the narrative to place shape more effectively with partners.

3. Use the 'People Can' approach in a more systematic manner.
4. Make best use of newly appointed Strategic Director roles.
5. More robust financial accountability and allocation of resources within the Medium Term Financial Strategy.
6. Accelerate a Team Bradford approach to using Apprenticeships.
7. Review Re-deployment Policy.
8. Pick one brand for the Council.

2.4 The Improvement Action Plan

- 2.4.1 To ensure the recommendations are acted upon, integrated into and monitored through the current Council Plan Delivery programme, the recommendations were presented to the Outcome Delivery Boards, which are responsible for the outcomes in the Council Plan.
- 2.4.2 The Outcome Delivery Boards checked the relevance of the review recommendations against their remit, proposed actions to help progress the recommendations, and identified a lead officer responsible for delivery and Portfolio Holder for governance and assurance purposes.
- 2.4.3 The Outcome Delivery Boards are integrating the recommendations and actions from the Corporate Peer Challenge review Improvement Action Plan into their own milestone plans, to ensure regular checking of progress on implementation.
- 2.4.4 The Improvement Action Plan (**Appendix 2**) shows the key recommendations along with the outcome to be achieved, actions and timescales for delivery.

2.5 Review follow-up

- 2.5.1 The LGA Corporate Peer Challenge review process includes a follow up visit. The purpose of the visit is to help the Council assess the impact of the peer challenge and to demonstrate the progress it has made against the areas for improvement and developments identified by the review team.
- 2.5.2 The follow up visit is a lighter touch version of the original visit and does not always necessarily involve all members of the original peer team. The timing of the visit is determined by the Council, but it is typical a follow up review will take place two years after the review i.e. March 2019.

3. OTHER CONSIDERATIONS

- 3.1 Corporate Overview and Scrutiny Committee and Governance and Audit Committee are both receiving the Corporate Peer Challenge review report and the

Improvement Action Plan on 28 September.

- 3.2 The Corporate Overview and Scrutiny Committee will be asked to identify and direct the recommendations and any actions to the relevant Overview and Scrutiny Committee for their consideration.
- 3.3 The Governance and Audit Committee will be asked to ensure suitable governance arrangements are in place to ensure the timely delivery of the overall Improvement Action Plan.
- 3.4 Both Committees will be asked if they would like to receive periodic progress reports against the Improvement Action Plan.

4. FINANCIAL & RESOURCE APPRAISAL

The delivery of the Corporate Peer Challenge review Improvement Action Plan will be met from within current resources. Responding to the review and implementing its recommendations are key elements in the work of each Outcome Board which ensure the Council Plan is delivered.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

Governance arrangements to ensure the delivery of the Corporate Peer Challenge review Improvement Action Plan will be managed within the programme and project management arrangements of the Council Plan Outcome Delivery Boards.

6. LEGAL APPRAISAL

No comments from the legal appraisal.

7. OTHER IMPLICATIONS

None.

7.1 EQUALITY & DIVERSITY

None directly. Equalities Impact Assessments will be considered as necessary.

7.2 SUSTAINABILITY IMPLICATIONS

None.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

Not applicable.

7.4 COMMUNITY SAFETY IMPLICATIONS

None.

7.5 HUMAN RIGHTS ACT

No Human Rights Act implications.

7.6 TRADE UNION

If changes are made to Council policy as a result of this action plan, Trade Unions will be consulted as appropriate.

7.7 WARD IMPLICATIONS

None directly.

7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS

(for reports to Area Committees only)

Not applicable.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. OPTIONS

1. Agree and approve the Corporate Peer Challenge review Improvement Action Plan.
2. Identify and propose changes to the Corporate Peer Challenge review Improvement Action Plan.
3. Agree governance arrangements for the Corporate Peer Challenge review Improvement Action Plan.

10. RECOMMENDATIONS

1. The Corporate Peer Challenge review Improvement Action Plan be agreed.
2. Governance arrangements through the Council Plan Outcome Delivery Board be approved.

11. APPENDICES

- Appendix 1: Corporate Peer Challenge. City of Bradford Metropolitan District Council. 27th to 30th March 2017. Feedback Report.
- Appendix 2: Corporate Peer Challenge Improvement Action Plan 2017.

12. BACKGROUND DOCUMENTS

None.

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Corporate Peer Challenge

City of Bradford Metropolitan District Council

27th to 30th March 2017

Feedback Report

1. Executive Summary

Bradford is a great city with multiple and diverse communities, major cultural, heritage and historical assets, a good quality of life and some exciting new emerging economic sectors. The Council recognises that as the leader of place and as a provider of many public services it is on a journey of change – from providing an in-house ‘one size fits all’ solution to being a facilitator and co-ordinator of all of the local resources around a set of shared priorities.

Most people we spoke to recognise that the council has started along this journey but that the pace of change needs to be maintained with consistency, and occasionally accelerated, in order for people to continue to be motivated to participate. The Council is ambitious, self-aware and an improving organisation with huge potential. The City is positioned well to benefit from the ambitious goals and programmes set out in the Bradford District Plan and the Council Plan and is increasingly influential within the West Yorkshire Combined Authority.

There is growing confidence and optimism in the council and the place that the City is “on the up” with a clear alignment between business and political priorities, with transport and education as the drivers for unlocking potential and growth. We found a strongly articulated approach to community cohesion across the whole City and widespread recognition that, as the youngest city in the country, young people are their biggest asset.

We evidenced strong, connected and highly regarded political and managerial leadership of both the place and the council. The Council Leader and Chief Executive are seen as visible, energetic, inspiring symbols of the improvement journey the council is on. We found effective ward and neighbourhood leadership by elected members, officers and partner organisations and active and committed community leaders and voluntary sector who value the council’s community leadership role. However, ensure that the policy development role for scrutiny adds value to the council.

Exceptionally strong partnership relationships are already established; in particular between the council and the police. We also found excellent examples of partnership working in improving peoples’ lives, for example hospital discharge, neighbourhood work and child sexual exploitation. The recent Joint Targeted Area Inspection (JTAI) by multiple inspectorates cited strong endorsement of multi-agency safeguarding and prevention services.

There is a clear recognition of the financial challenges and increasing demand on services faced by local government and its impact alongside an ambitious approach to re-aligning priorities through a budget shaped by outcomes. The Council has recognised the need and significant activity required to generate income for the future to fund council services.

Staff are loyal, passionate and hardworking and feel valued and trusted to deliver at all levels but resilience needs to be carefully monitored going forward. There is

a growing feeling of permission and empowerment underpinned by effective examples of investing in the future via the Future Leaders programme and the Innovation Hub. Change is embraced with good examples of service improvement, such as the school improvement service through deploying a different model. The 'People Can' approach is already demonstrating impact and has enormous future potential.

The emerging narrative of place needs to more fully reflect the many places that make up the City alongside clarity around the City's role and investment requirements in delivering the Leeds City Region Strategic Economic Plan. Develop a set of simple, clear and consistent messages to challenge those not yet on board with the re-defining of the City and 'People Can' could be the ideal vehicle to unify the vision for the place – it could also be used to develop a council wide demand management plan for Adults and Children's services. Also use staff as ambassadors of the place as the majority live in the area.

There is an opportunity to strengthen corporate oversight with more robust accountability through the newly established role of the Strategic Director of Corporate Services. You also need to ensure that the newly appointed Strategic Director for Health and Well-Being is adequately supported in order to meet future financial and service challenges. Health engagement could be further streamlined and refined to develop stronger partnerships at all levels.

General fund balances are low and there is a potential over reliance on one off compensatory savings when projects do not deliver targeted savings. The Outcomes Based Budgeting (OBB) approach is emerging and the council should be mindful of relying too heavily on this to deliver savings targets which are not linked back to the budget monitoring regime. The transformation fund at £5m appears relatively low given future savings targets and should be reviewed to ensure sufficient resources are allocated. It would also be helpful to establish a more aggressive and structured approach to commercialism to include an income generation strategy.

The 'Big Project' Workforce Development Programme for changing organisational behaviours and culture is inspiring, but it should be fast-tracked and correctly resourced to be completed ideally in one year. In conjunction, review the existing redeployment policy to ensure all candidates are assessed against behaviours and competencies and are not slotted in to inappropriate roles (square pegs in round holes). Consider how to consistently engage on issues with young people and make greater use of apprenticeships to bring new energy and ideas to the council.

Communications and public relations functions need to focus on engaging residents through 'People Can' and positioning Bradford in both the region and nationally as well as responding to media enquiries. Communications and project management approaches need to be aligned to future priorities. Finally, we noted that you currently use two corporate logos' as an identity for the council so suggest you select the more historic crest brand and phase the other logo out to avoid confusion and provide one identity.

2. Key recommendations

There are a range of suggestions and observations within the main section of the report that will inform some 'quick wins' and practical actions, in addition to the conversations on-site, many of which provided ideas and examples of practice from other organisations. The following are the peer team's key recommendations to the Council:

1. Develop a coherent narrative of place and your ambitions:

Much of this already exists in a variety of places but it needs bringing together as a coherent vision for the long term future of Bradford District the place. This will enable all members and managers to articulate that narrative consistently both internally and with external partners.

It will also inform more clearly Bradford's role and investment requirements in delivering the Leeds City Region Strategic Economic Plan (SEP). Developing a localised version of the SEP will form the basis of your economic and investment strategy.

2. Use the narrative to place shape more effectively with partners:

This stronger narrative would help partners understand the council's priorities more clearly and would also enable the council to focus its resources on the partnerships and relationships that are most important in achieving that vision.

In particular, it will streamline engagement with health and strengthen relationships with all health partners.

3. Use the 'People Can' approach in a more systematic manner:

The 'People Can' approach is well regarded and has huge transformative potential and could be a brand around which to build a refreshed narrative of place. It could describe the council's ambition for pride of place through citizen involvement.

It could also be used to develop a council wide demand management plan for Adults and Children's services and there are other transferable options the Council could actively consider.

4. Make best use of newly appointed Strategic Director roles:

Strengthen corporate oversight through the newly established role of Strategic Director of Corporate Services.

Ensure the newly appointed Strategic Director for Health and Wellbeing is adequately supported to meet future financial and service challenges.

5. More robust financial accountability and allocation of resources within the MTFS:

Need for more robust accountability for delivering agreed financial savings and to link outcomes based budgeting to current financial challenges.

Review and align the transformation fund to 'big change' projects with appropriate capacity.

6. Accelerate a Team Bradford approach to using Apprenticeships:

Accelerate a Team Bradford approach to using apprenticeships as a driver for unlocking young people's potential to bring new ideas into the council, plan for future leaders, address issues around hard to fill posts and make the council more representative of the communities it serves.

7. Review Re-deployment Policy:

Review your current re-deployment policy and assess candidates against behaviours and competencies. The strategy should look at the development needs of existing staff as well as assessing skills, knowledge and capacity gaps for the future. This should be done as part of an overall Workforce Strategy for the organisation.

8 Pick one brand for the Council:

Pick one of the two brand logos you are currently using and stick with it to provide one brand identity for the council to underpin the narrative for the place.

3. Summary of the Peer Challenge approach

The peer team

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected your requirements and the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and agreed with you. The peers who delivered the peer challenge at Bradford Council were:

- Donna Hall – Chief Executive, Wigan Council
- Cllr Nick Forbes, Council Leader, Newcastle-upon-Tyne City Council
- Craig Smith, Assistant Director of Education, Luton Borough Council
- Joanna Sumner, Assistant Chief Executive, London Borough of Hackney
- Peter Rentell – LGA Peer Challenge Manager
- Grace Abel – LGA National Graduate, Kingston Council

Scope and focus

The peer team considered the following five questions which form the core components looked at by all Corporate Peer Challenges cover. These are the areas we believe are critical to councils' performance and improvement:

1. Understanding of the local place and priority setting: Does the council understand its local context and place and use that to inform a clear vision and set of priorities?
2. Leadership of Place: Does the council provide effective leadership of place through its elected members, officers and constructive relationships and partnerships with external stakeholders?
3. Organisational leadership and governance: Is there effective political and managerial leadership supported by good governance and decision-making arrangements that respond to key challenges and enable change and transformation to be implemented?
4. Financial planning and viability: Does the council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?
5. Capacity to deliver: Is organisational capacity aligned with priorities and does the council influence, enable and leverage external capacity to focus on agreed outcomes?

In addition to these questions, you asked the peer team to provide a critical friend review of Bradford's response to the Louise Casey report "*a review into opportunity and integration*" with focus on social inclusion and opportunities for young people in skills, education and employment.

The peer challenge process

It is important to stress that this was not an inspection. Peer challenges are improvement focussed and tailored to meet individual councils' needs. They are designed to complement and add value to a council's own performance and improvement. The process is not designed to provide an in-depth or technical assessment of plans and proposals. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent 4 days on-site at Bradford Council, during which they:

- Spoke to more than 260 people including a range of council staff together with councillors, external partners, stakeholders and young people.

- Gathered information and views from more than 60 meetings and additional research and reading.
- Collectively spent more than 230 hours to determine their findings – the equivalent of one person spending over 6 weeks in Bradford Council.

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their on-site visit (27th to 30th March 2017). In presenting feedback to you, they have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the peer challenge is a snapshot in time. We appreciate that some of the feedback may be about things you are already addressing and progressing.

4. Feedback

4.1 Understanding of the local place and priority setting

Bradford is a place of many communities, some are geographical and some are communities of interest. The Council has a sophisticated understanding of these communities, who are also beginning to be better represented across their workforce. We heard many examples of excellent work in promoting community cohesion that people cite as reasons for Bradford moving on from the riots in earlier years.

There is a recognition that Leadership of Place isn't just the responsibility of the Council Leader and Chief Executive but that everyone in the organisation can play a role. In this regard, the council's workforce is an underdeveloped asset in telling a more positive story of Bradford. As the vast majority of council staff live in the city, they could play a stronger role in tackling the collective lack of confidence that we sometimes heard about culminating in their default statement that "they are in the shadow of Leeds". Bradford needs to be more confident about its role working as a key partner with Leeds in the Combined Authority.

Broadway shopping centre and City Park are physical symbols of Bradford's journey of renewal and we urge you to celebrate the brilliant culture and heritage you have. Moving forward clearly defined priorities will need to be articulated, focused and resourced to continue this improving trajectory.

There is a Council Plan that is clear and coherent and is becoming increasingly embedded across the organisation. Many staff we met were aware of the corporate priorities and the role they play in achieving them. We saw a growing sense of optimism that the council and the place is improving with a widespread recognition that young people are the City's greatest asset now and in the future.

It is clear that there is strong community, faith, business and voluntary sector leadership which is actively engaged in shaping, and is committed to supporting the relatively new political vision set out by the Leader and the Executive. We found a clear alignment between business and political priorities with Transport and Education seen as key drivers of growth and potential. More partners buying into the concept of Civic Enterprise and the potential benefits to both themselves and the city in tackling deprivation and further investing in communities will help to move the vision into reality. Bradford has many large and significant nationally and internationally known businesses who can contribute more to the success of the city and can be key to helping to reduce inequality.

Turning this vision into a compelling, forward looking narrative for Bradford will be the next stage of the journey. It will also provide a reference point to challenge those who do not always speak positively about Bradford's future. There is currently a lack of a coherent narrative that tells the story of the council's ambitions for the metropolitan district into the longer term. This stronger narrative would help partners understand the council's priorities more clearly and would also enable the council to focus its resources on the partnerships and relationships that are most

important in achieving that vision of place. In addition, there is a need to decide how to consistently engage with young people to help shape the future narrative and align skills gap analysis with current and future provision.

4.2 Leadership of Place

The Council Leader and Chief Executive are universally recognised as providing strong, clear and complementary leadership. They work well together and this is recognised across the metropolitan district and beyond with proactive engagement with other councils and partners across West Yorkshire. This solid platform provides an opportunity to lead and further develop the sub-region's approach to wider public sector reform.

The commitment to working within a range of broader partnerships; LGA, Key Cities, West Yorkshire Combined Authority is seen as a very positive step towards challenging some negative external perspectives of Bradford. Bradford is increasingly influential across a wide range of regional and national networks and the Chief Executive is instrumental in networking Bradford as a place. However, the narrative of place needs to better reflect the many local places that make up the District... The peer team coined the phrase "it's not an either/or it's a both and". The City needs a stronger sense of its real identity and role; incorporating the strengths of its different towns, villages and districts. Your great staff are under-used ambassadors for the council and the place and should be utilised as advocates.

We evidenced some strong and excellent local partnership arrangements, particularly with Police and the Voluntary Sector. There are active and committed community leaders and voluntary sector organisations who want to work collaboratively and with the council through co-design of services.

We were shown a draft copy of the recent Joint Targeted Area Inspection by multi-agency inspectorate which was very positive in terms of partnership relationships and leadership and governance. This provides a strong endorsement of current multi-agency arrangements and should be celebrated.

Whilst the engagement of most strategic partners was seen to be positive, enthusiastic and engaged more could be done to streamline health engagement and to develop stronger relationships with health partners. This could include establishment of a Board of non-executive leaders – Chairs of health organisations plus the Council Leader and relevant Executive Members – in order to complement the collaborative work being undertaken by respective senior management teams.

Councillors in Bradford are passionate, committed and fully engaged in the work of the council in a variety of different ways. They are visible in their local communities and there is very good ward and neighbourhood leadership by both members and officers.

'People Can' is a widely recognised approach and a powerful asset-based model which has huge transformative potential. It encapsulates the journey that both the District and the council want to go on; that of empowering people to do more for themselves, and could be a brand around which to build a refreshed narrative of place. Instead of framing the challenges faced by the District as a series of comparisons and competitions, for example between urban and rural Bradford or between Bradford and neighbouring cities, 'People Can' is a simple way of describing the council's ambition for pride of place through citizen involvement. It can be rolled out across departments and partners through place based working linked to a systematic demand reduction plan based on strong business intelligence. Ideally, it needs to become a unifying philosophy of working not just a campaign.

4.3 Organisational leadership and governance

We saw evidence of strong and well regarded political and managerial leadership and constructive member and officer working relationships at all levels across the council. The Council Leader and Chief Executive are seen as symbolic of the improvement journey the council is on and are both working well together to achieve future aspirations for the council and the place. Elected members are engaged at all levels and are committed to making a difference.

Regardless of effective current leadership we suggest you review plans and strategies to ensure strategic alignment to the council plan. This will, in turn, require you to ensure correct alignment of politicians and officers around difficult decisions that will need to be taken going forward about what services to stop, what buildings to close. As a current example of ineffective practice member involvement in appeals, through overturning officer management staffing decisions, can undermine effective staff management processes and behaviours and should be reviewed.

Ward plans are a good example of positive involvement of members as community leaders, although there is a danger that they create unrealistic expectations for the council to deliver. Developing them to be plans supporting members as local leaders of communities and place, possibly around the 'People Can' brand, would be a way of ensuring they don't simply become the repository of local complaints about council services.

The corporate governance framework appears to work well, there is mutual respect and understanding for roles and responsibilities, and we didn't hear of any adverse indicators relating to how the council's decision making machinery works. Scrutiny is effectively holding the Executive to account, although this can sometimes present a confrontational image of local politics for staff and the public. Developing scrutiny's role in commenting on emerging policy issues, as well as scrutinising decisions after the event, would lead to a more balanced position. Organisations such as the Centre for Public Scrutiny can provide developmental support in this regard.

Staff we met are loyal, committed and highly motivated to deliver good quality services and there is a very supportive environment evident during challenging times with a 'can do' attitude developing. We saw good examples of investment in your staff with the Future Leaders programme and the Innovation Hub, both of which facilitate a growing sense of empowerment amongst staff at all levels. Ensure a strengths based approach is consistently embraced to meet future challenges. One area the peer team felt could be further developed is around political awareness for officers and LGA could support training in this area.

The Council has a developing organisational culture with staff at all levels starting to reflect new behaviours and values. However, the changing nature of local government and the increased focus on growth and commercialism will require different skills and competencies going forward so leadership development programmes and succession management will be a critical area of consideration. We suggest you push harder and faster on embedding behaviours with confidence. In parallel, you should review your apprenticeship programme and seek to use apprentices proactively to bring new ideas into the council, plan for future leaders, address issues around difficult to fill posts and make the council more representative of the communities it serves.

4.4 Financial planning and viability

There is a recognition, supported by strong political leadership, of the need to ensure the council is well prepared for the new funding arrangements that will be introduced for local government in 2019/20. This includes an explicit intent to grow the numbers of households paying council tax and businesses paying business rates in the District. The scale of the future financial challenge is understood by the council who acknowledge that business as usual is not an option.

Outcomes Based Budgeting (OBB) has been introduced as a model for ensuring effective and efficient use of resources. Staff we spoke to about OBB are optimistic about the potential for a budget shaped by outcomes and these need to be clearly tied into existing budget monitoring arrangements. The energy and capacity required to develop a robust OBB framework should be balanced against the need to ensure service managers and corporate directors have deliverable savings in place.

Previous reductions have been managed sensitively with the council delivering £231m savings since 2011 with a further £32m to be delivered over the next two years. The Medium Term Financial Strategy (MTFS) sets a net revenue gap of around £100m to be closed by 2020/21 starting from a current base of £378m. Audit statement confirms the council has a strong track record of delivering savings and generally keeping within budget though there are significant financial pressures within Adults and Children's services. The OBB framework is a significant step towards closing the revenue gap through reflecting the corporate priorities and aligning resources accordingly.

We acknowledge that the council has expressed concern about the low level of its general fund balances and is planning to make further use of them to support the

revenue budget. The peer team were concerned about the potential over-reliance on one off compensatory savings when projected savings aren't delivered (25% of projects last year were not delivered against savings plans). We found anecdotal evidence to suggest that policy around the delivery of savings could be more effectively communicated for example, there is still a culture in which some people believe that reserves can be used to fund under-performing projects but we acknowledge that this is not a corporate policy. It might simply be a case of reviewing the current wording on budget monitoring reports to ensure an explicit rather than implied course of action.

We found some instances where financial and service planning is not always consistently robust, and examples where earlier intervention on under delivery of change projects would minimise long term financial risk. One option is to develop a member led 'Star Chamber' approach which could provide greater Executive challenge and scrutiny of detailed savings plans and targets.

There is limited evidence of robust scoping of savings prior to budget setting alongside an under-performance in, and lack of clarity on who is responsible for delivering savings. There is scope to develop the infrastructure of OBB further by implementing it into the performance measures and by creating outcome based directorates, instead of services. This would support the delivery of savings and introduce meaningful culture change. There is also potential to develop a cross-cutting approach to the outcomes so that interdependencies are captured and worked on.

Given the significant change you need to tackle we felt the level of transformation funding was currently too low at circa £5m. We suggest you review the level of transformation funding and how it will be deployed to implement and deliver necessary change.

The council should also consider establishing a more aggressive and structured approach to commercialism, to include an income generation strategy. You will need to consider whether this can be delivered with existing capacity and resources. Work will be required to articulate exactly what this means to staff and what is expected of them and whether new skills need to be developed or bought in. There is a growing body of practice and examples from across the public sector that can inform the debate, including a range of information and case studies on the LGA website at: <http://www.local.gov.uk/commercialisation>.

4.5 Capacity to deliver and resources

Staff clearly enjoy working for the council and they feel that their contribution is highly valued. This is supported by a high level of staff retention. We met and heard of some real star performers who are highly regarded and respected in their roles. Overall staff told us that change is generally managed well and there is a broad recognition that the role of the council needs to change going forward. An example of this starting to happen with tangible impact is with school improvement.

There are many good examples of the council working effectively in partnership to deliver improved outcomes for residents, such as neighbourhood work, hospital discharge, child sexual exploitation and community cohesion. These skills are transferable to other areas and more effective partnership working will serve to build capacity and target further efficiencies through co-creation. The 'People Can' approach is already demonstrating impact and has greater potential. Alongside partners and local communities, young people are willing and ready to go on the change journey with the council so be sure to include them.

There is clear leadership of change at the top layer of the council, the Council Plan sets out clear priorities and staff and partners are "up for" the challenge. However, ensuring change, appropriate behaviours and the vision for Bradford are consistently embedded at every level of the organisation will take additional effort.

The 'Big Project' Workforce Development Programme recognises the pivotal role of middle managers in achieving this and accelerating this programme of support, development and challenge will reap dividends and should be actioned. Whilst people talk about 'business as usual' no longer being an option in terms of the financial challenges faced by the council, more could be done to demonstrate there is a critical mass of improved outcomes so that people can see the benefit of expending time and energy in leading change.

Achieving change requires the council to tell a compelling narrative of the need for things to be done differently; to be clear about governance with the right people (political and managerial) fully signed up and to ensure there is capacity to deliver through appropriate alignment of transformation resources, management accountability and staff engagement. It will require a wholesale re-assessment and re-alignment of current available resources to ensure you take staff with you on the journey. Staff resilience will be a key issue to carefully monitor as pace of change increases.

We could not see an overarching programme management approach, or a structure in place to take an overview of all corporate projects from project initiation, business case through to monitoring successful delivery. The Council will need to ensure that arrangements are put into place to enable the linkages, sequencing and inter-dependencies between the various projects and activity to be clear. Robust monitoring and accountability will need to be a key feature of the Council's programme governance to ensure the contribution to the budget strategy. Such an approach is necessary to consider the linkage of key work streams in any transformational change programme, such as asset rationalisation with agile working and channel shift; and should inform more effective cross-Directorate working.

The council needs to adopt a consistent approach to digital transformation. It would be beneficial to automate as many tasks as possible and introduction of enhanced mobile technology for staff would increase efficiency and reduce use of paper. There should be one IT system for all members of staff to access to ensure interface between all channels of communication and residents including, but not limited to housing, adult social care, children's social care, neighbourhoods and

finance. This would help to provide good knowledge and infrastructure around the person.

Use data to inform intelligent decision making as well as tracking performance as currently you appear to be data rich but could deploy a more intelligence-led approach. Given your majority annual spend on Adults and Children's services we suggest a targeted approach to Demand Management across the organisation in conjunction with your early help offer in order to reduce demand on the care system at the front door for adults and children's services. Similarly, explore opportunities for greater structural alignment with health to support joint commissioning, for example Data/IT/Risk Stratification.

There are opportunities to be explored for further co-located working based on the effective work currently in the Multi-agency Safeguarding Hub along with further consideration of shared service arrangements across neighbouring local authorities where a business case stacks up. Joint and integrated commissioning also needs to be further enhanced. We saw many positive things happening within the council and we would urge you to ensure you celebrate this success both internally and externally. This will impact positively on staff morale and ensure the buy-in to meet the future challenges.

4.6 Young People, Education, Skills and Employment

School Improvement

All stakeholders, including Head teachers, spoke positively of the changes in the last few years and directly related this to key personnel, namely the Strategic Director of Children's Services and Deputy Director responsible for education. The relationship between schools and the Council has been re-engineered to ensure a focus of resources where they are most needed and this is leading to improved outcomes for learners. The relationships are also improved and better calibrated between the Council and the non-maintained school sector, with a real sense of focus on learner outcomes, this has been achieved against a backdrop of significantly reduced staff resource within the Council.

Social Cohesion

There was a real sense of Bradford understanding its role of leader of place and working to ensure all sections of the communities served by the local authority were involved and integrated into a sense of belonging. This was evident in the neighbourhood working and how it has improved, in the Prevent and social cohesion activity in education settings and was backed up by young people in the focus group and by key stakeholders such as the police and the Voluntary Sector.

Link between young people, skills and future employer demand

There were many examples of impressive activity to ensure that young people in Bradford are learning relevant skills which are required for the modern workplace. These were developing to meet identified need and in many cases linked to the comprehensive post 16 education review and forward plan. As standalone activities they are likely to have impact

and support young people as they move forward. There are also a range of activities within the economic development and growth sphere of activity with good attempts to engage local employers in developing Bradford and its employment opportunities. However, there could be more done to link the development of young people's skills and the future needs of employers – the Area Based Review of 2016 has some detail on future economic need but more could be done at a local and sub-regional level to link broadly 'education / skills' supply side activity and 'employer / economic growth' demand side activity. Within the council there could be more joint planning between relevant teams and the Chairs of the Relevant Scrutiny Committees could work together to more effectively support this join up.

Apprenticeship Strategy

Whilst the council is clearly aware of the Levy and Duty which came into force in April 2017 there is still work to be done to ensure this is embedded within the council. There is an understanding of the likely cost of the Levy but there was no apparent plan to ensure the Levy could be utilised to increase the number of apprentices within the council. This is linked to a wider issue of how apprentices are viewed – there is almost a sense of a paternalistic role of seeing apprentices as one year positions to provide a solid start to a career before moving on (as there is an assumption that there will not be opportunities for permanent positions within the council). This needs reviewing and as staff move on there could be a real sense of using apprentices to bring new ideas into the council, plan for future leaders, address issues around hard to fill posts and make the council more representative of the communities it serves. The council should also be using its leader of place role to model good practice and set the standard for other local employers (public and private sector) to strive towards. Furthermore there is an opportunity to pull all this together to ensure a coherent approach to apprentices, both as an employer and as a leader of place.

Young Peoples' Views

The young people who were part of a focus group during the peer challenge were positive and gave their views freely. They were a real credit to Bradford and gave real cause for optimism about the future in Bradford. They articulated views and concerns that you would expect to find in any area, for example what does the future hold for them, will there be enough jobs, and will there be quality opportunities for them in the future. They clearly saw education as the pathway to future opportunities. They were keen on more apprenticeship opportunities especially as there was a concern about the quality and range of jobs that might be available locally in the future.

Specific concerns that they highlighted were: the rise in visible homelessness on the streets especially in the city centre (and showed concern for the welfare of these people and wondered if empty homes could be used to support them), the attractiveness of Bradford as a place to live and work in relation to Leeds and a lack of out of school spare time activities to engage in. We would also suggest you consider re-establishing a 'Youth Council' within the council as they have proved to be a real asset to other local authorities across the region.

5. Next steps

Immediate next steps

We appreciate that the political and senior managerial leadership will want to reflect on these findings and suggestions in order to determine how the organisation wishes to take things forward.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. Mark Edgell Principal Adviser is the main contact between your authority and the Local Government Association (LGA). His contact details are: Email mark.edgell@local.gov.uk Mobile No. 07747 636910.

In the meantime we are keen to continue the relationship we have formed with the Council throughout the peer challenge. We will endeavour to provide signposting to examples of practice and further information and guidance about the issues we have raised in this report to help inform ongoing consideration.

Thank you to everyone involved for their participation and for engaging so constructively with the peer challenge. In particular, please pass on thanks from the peer team to Alison Riley, David Greenwood and their colleagues for their help and sterling support prior to the peer challenge and during the on-site phase.

Follow up visit

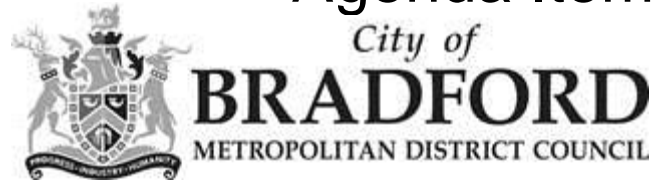
The LGA Corporate Peer Challenge process includes a follow up visit. The purpose of the visit is to help the Council assess the impact of the peer challenge and demonstrate the progress it has made against the areas of improvement and development identified by the peer team. It is a lighter-touch version of the original visit and does not necessarily involve all members of the original peer team. The timing of the visit is determined by the Council. Our expectation is that it will occur within the next 2 years.

Ref	Outcome	Improvement / Action	Timescale	Portfolio Holder	Outcome Board and Officer Lead
LGA Recommendation 1. Develop a coherent narrative of place and your ambitions.					
1.1	A coherent and shared narrative for place - celebrating diversity of place and including "People Can" approach.	Working with our Producer City Partners, develop a shared narrative about Bradford District which can be used to promote our city and district as a place to live, work, study, visit and invest.	Oct. 2017	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Involve local businesses and citizens in developing the shared narrative about Bradford District through workshops, participatory public events, media coverage and social media.	Aug./Sept. 2017	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Share this place marketing narrative widely with local businesses, organisations and groups to ensure consistency in promoting Bradford District.	Nov. 2017	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
1.2	Get Bradford better placed so that we can build our reputation and influence others. Further communicate confidence in our city and district.	Work in partnership regionally and locally to develop and deliver the Positioning Bradford Action Plan.	Oct. 2017	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Identify and work with key stakeholders to improve Bradford District's reputation and influence with key decision makers nationally.	Aug. 2017 - March 2019	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Introduce monthly e-bulletin to further inform and engage key stakeholders.	Completed	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
1.3	Through the New Economic Growth Strategy, express our requirements for inclusive growth, sectoral growth and skills and employment.	Set out the key drivers and enablers for economic growth in the strategy, incorporating skills and employment requirements.	Oct. 2017	Cllr Alex Ross-Shaw	Skills Jobs Economy Strategic Director Place
1.4	Celebrate the culture and heritage of Bradford district.	The cultural partnership further developed and supported by an events programme and the implementation of the destination management plan.	Sept. 2018	Cllr Sarah Ferriby	Skills Jobs Economy Strategic Director Place
1.5	Council priorities defined through West Yorkshire Combined Authority as part of our emerging Economic Growth Strategy.	New Economic Growth Strategy in place with maintained infrastructure for resilience and growth and increased understanding of asset development and conditions.	Oct. 2017 - 2020	Cllr Alex Ross-Shaw	Skills Jobs Economy Strategic Director Place
1.6	Young people engaged in shaping the future narrative.	Using current mechanisms such as Youth Voice consistently engage with young people to shape the future narrative.	On-going to Feb. 2020	Cllr Abdul Jabar	Great start and good schools Strategic Director Children's Services
		Implement a District wide Youth Voice Group.	March 2018	Cllr Abdul Jabar	Great start and good schools Strategic Director Children's Services
		50 young person led initiatives implemented.	March 2020	Cllr Abdul Jabar	Great start and good schools Strategic Director Children's Services
LGA Recommendation 2. Use our narrative to place shape more effectively with partners					
2.1	A Stronger narrative in place that will help partners better understand the council's priorities and how they can contribute.	Put in place a programme of activities to better engage with large and significant national and internationally known businesses who can contribute to the success of the city.	Sept. 2017 - Sept. 2018	Cllr Alex Ross-Shaw	Skills Jobs Economy Strategic Director Place
2.2	Council is better focused on the partnerships and relationships that are most important in achieving the Council's vision.	Further develop our approach to co-design of services opportunities, especially with the Police and Health.	March 2020	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
2.3	Our approach to co-design of services opportunities with VCS and police and health are further developed.	Put in place mechanisms to ensure closer partnership working and operational activity on Shared Spaces..	March 2020	Cllr Abdul Jabar	Safe, Clean and Active Strategic Director Place
2.4	Work specifically with our Health Partners on place shaping through the new narrative	Develop opportunities to integrate service delivery with partners to support people, families, and communities.	Sept. 2017	Cllr Val Slater	Better health better lives Strategic Director Health and Wellbeing

		Develop stronger relationships with health partners through existing and new working arrangements to utilise, share and review commissioning intentions.	Sept. 2017	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
		Streamline health engagement and develop stronger relationships with health partners.	March 2018	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
		Work within the provider alliances to develop our approach towards integration around people, maximising the potential to strengthen the delivery of services at locality level and in key areas across the District.	March 2018	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
		Connect up and strengthen 24 hour support services for citizens of Bradford District.	March 2018	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
2.5	Strengthened corporate data analytics informing intelligence led decision making.	Further develop data analytics IT systems, e.g. the use of PowerBi, and establish shared data hubs with key partners.	March 2018	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
LGA Recommendation 3. Use of 'People Can' approach in a more systematic way					
3.1	<i>People Can</i> approach is further integrated into service provision and future service design.	<i>People Can</i> approach rolled out across departments and partners through the work of the five outcome boards.	Ongoing to 2020 and currently being communicated to all.	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Identify areas where the <i>People Can</i> approach will help reduce demand on services with an aim to systematically reduce demand on council resources.	March 2018	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
3.2	The <i>People Can</i> model encompasses the business community.	Further develop the <i>People Can</i> approach to encompass the business community linked to the delivery of the Business Covenant.	Aug. 2017 - 2020	Cllr Val Slater	Great start and good schools Strategic Director Children's Services
3.3	Focus on <i>People Can</i> for all young people and adults, whatever their individual challenges or age.	Implementation of the Home First Vision.	March 2018	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
3.4	Improved awareness of <i>People Can</i> through the use of technology and improved participation.	Develop the <i>People Can</i> website to drive involvement and take-up.	Dec-17	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Develop online sharing and project development platform e.g. Comoodle.	Completed	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Increase the number of people participating in community life/volunteering by 10% by 2020.	March 2020	Cllr Abdul Jabar	Safe, Clean and Active Strategic Director Place
3.5	Success of our communities celebrated through the use of awards e.g. Community Stars.	Continue to develop <i>People Can</i> , celebrate success through Community Stars.	March 2020	Cllr Abdul Jabar	Safe, Clean and Active Strategic Director Place
3.6	Improvements made to neighbourhoods and businesses through ward planning as a result of delivery of actions and projects. Citizens and partners recognise that they can identify issues at a locality level and influence change.	Ward plans in place that reflect the Council's ambition and incorporate the <i>People Can</i> approach.	Ongoing to 2020	Cllr Abdul Jabar	Safe, Clean and Active Strategic Director Place

3.7	Bradford education Covenant reinforces a <i>People Can</i> mind set in staff and the public.	<i>People Can</i> approach included in the Bradford Education Covenant.	March 2018	Cllr Imran Khan	Great start and good schools Strategic Director Children's Services
LGA Recommendation 4. Make best use of newly appointed Strategic Director Roles					
4.1	Strengthen corporate oversight.	The post of Strategic Director for Corporate Services is now in place, and is an established member of the corporate management team and integral to key decision making groups.	Completed	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
LGA Recommendation 5. More robust financial accountability and allocation of resources within the Medium Term Financial Strategy (MTFS).					
5.1	Outcomes based budgeting better linked to current financial challenges.	The Corporate Plan Delivery Board (CPDB) will take overall responsibility for ensuring the programme of budget actions derived from the outcome based budgeting process is controlled and implemented.	Completed	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Regular reports to the Executive, Corporate Overview and Scrutiny, Corporate Management Team and service managers that flag issues at an early stage.	Ongoing to 2020	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Introduce a series of "Star Chambers" chaired by the Leader of the Council to challenge Strategic Directors where there are signs that savings are at risk of not being met.	Ongoing to 2020	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
5.2	The transformation fund aligned to 'big change' projects ensuring appropriate capacity for these projects.	Review level of transformation funding and how it will be deployed to deliver change.	Completed	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
5.3	Programme management arrangements strengthened to ensure linkages, sequencing, and interdependencies between projects are clear.	Establish Corporate Programme Management Team.	Oct. 2017	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
5.4	Diversifying sources of funding.	Establish funding group.	Ongoing to March 2018	Cllr Susan Hinchcliffe	Well Run Council Chief Executive
		Undertake assessment of what untapped funding sources exist which support Council priorities.	Ongoing to March 2018	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Set Plan of funding acquisition, evaluate its success and monitor its impact.	Ongoing to March 2018	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
5.5	Investment in assets to generate surplus revenues.	Introduce quarterly reviews of investments and investment pipeline to include case for investment outside Bradford District and investment in wider property portfolio through investment funds.	Completed Process in place and quarterly review undertaken.	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
LGA Recommendation 6. Accelerate a Team Bradford approach to using Apprenticeships					
6.1	Accelerate the approach to using apprenticeships to help as a driver for new ideas, future leadership and making the Council more representative of the communities it serves.	Design and implement a Council wide plan for how the organisation will offer up to 500 apprenticeships and traineeship opportunities per year.	Aug. 2017 - 2020	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services

		Develop and implement a district wide approach to apprenticeship opportunities that cross two or more organisations.	Aug. 2017 - 2021	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Establish career progression opportunities for apprentices.	March 2018	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
6.2	Increase apprenticeships in Social Care.	Jointly work and support providers of Adult Social Care (including support services) to offer apprenticeships within the Council and with partners.	March 2018	Cllr Val Slater	Better health, better lives Strategic Director Health and Wellbeing
6.3	Increased use of apprenticeships in Children's Services.	Increased usage of 'apprenticeships' making full use of the reclaimed funding from the 'levy'.	March 2020	Cllr Imran Khan	Great start and good schools Strategic Director Children's Services
LGA Recommendation 7. Review Re-deployment Policy as part of an overall workforce strategy					
7.1	Employment and redeployment policies reviewed as part of the workforce strategy.	Accelerate plans to review our approach to redeployment.	Completed	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Audit of staff skills, commitments and contributions outside work to be undertaken.	Dec-17	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
		Workforce Development Programme regularly reviewed to reflect the needs of existing staff as well as assessing the skills, knowledge and capacity gaps.	Reviewed annually - next review June 2018.	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
7.2	Appeals process reviewed as part of the workforce strategy.	Enhanced training programme for Appeals Panels' members provided. Composition of Appeals Panels reviewed. Consider establishment of officer only panels.	Jun-18	Cllr Susan Hinchcliffe	Well Run Council Strategic Director Corporate Services
LGA Recommendation 8. Pick one brand for the council					
8.1	Single logo for the council.	Use the civic crest consistently as our brand.	Completed	Cllr Susan Hinchcliffe	Well Run Council Chief Executive



Report of the Strategic Director of Place to the meeting of Executive to be held on 12 September 2017.

Q

Subject: Local Plan – Bradford District Waste Management Plan Development Plan Document – Planning Inspectors Report & Adoption

Summary statement:

The Council is in the process of preparing a new Local Plan which will replace the current statutory development plan for Bradford District (the Replacement Unitary Development Plan) which was adopted in 2005. The first of the Local Plan documents is the Core Strategy which was adopted at meeting of Full Council on 18 July 2017. The Waste Management Development Plan Document (DPD) sets out the planning framework for managing the District's waste in a sustainable manner. It includes policies and allocations for the management of waste in line with the national waste strategy and relevant European regulations. It deals with all types of waste including Local Authority Collected Waste. The DPD was approved by Full Council on 20 October 2015 for submission to government for examination. Following publication for representations an examination was held with a government appointed Inspector. Council has now received the Planning Inspector's Final Report and recommendations on the Bradford District Waste Management DPD, which forms part of the Local Plan.

The Inspector has considered all the matters before him including the plan, the evidence underpinning it, and the objections and representations made and the published modifications. In his report he concludes that the Bradford District Waste Management Plan can be considered to be legally compliant and sound, providing a limited set of Main Modifications are made to the plan, as submitted.

The purpose of this report is for the Executive to note the contents of the Inspector's report and to seek authority to proceed to Full Council to request the legal adoption of the modified Bradford District Waste Management Plan in line with the Inspector's recommendation.

Julian Jackson
Assistant Director – Planning,
Transportation & Highways

Portfolio:

Regeneration, Planning and Transport

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Plan Implementation
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Overview & Scrutiny Area:

Environment and Waste

1. SUMMARY

- 1.1 The Council is in the process of preparing a new Local Plan which will contain a suite of documents and will replace the current statutory development plan for Bradford District (the Replacement Unitary Development Plan).
- 1.2 The first of the Local Plan documents is the Core Strategy, which sets out the strategic approach to managing development and change to 2030, and was adopted in July 2017.
- 1.3 The DPD was approved by Full Council on 20 October 2015 for submission to government for examination. Following publication for representations an examination was held with a government appointed Inspector. The Council has now received the Planning Inspector's Final Report and recommendations for the Bradford District Waste Management DPD (Appendix 1). The Inspector has considered all the matters before him including the plan, the evidence underpinning it, and the objections and representations made and the published modifications. In his report he concludes that the Plan can be considered to be legally compliant and sound, providing a limited set of Main Modifications (Appendix 2) are made to the plan as submitted and ready for adoption by the Council.
- 1.4 The purpose of this report is for the Executive to note the contents of the Inspectors report and to seek authority to proceed to Full Council to request the legal adoption of the modified Bradford District Waste Management DPD in line with the Inspector's Recommendation.

2. BACKGROUND

- 2.1 In accordance with the Planning & Compulsory Purchase Act 2004, the Council has commenced the preparation of the Local Plan, formerly known as the Local Development Framework (LDF) for the Bradford District in line with the agreed Local Development Scheme adopted by the Council. The Local Plan will ultimately supersede the current Bradford District Replacement Unitary Development Plan (as saved by the Secretary of State Oct 08). Following the adoption of the Local Plan Core Strategy in July 2017, Council is committed to adopting the following suite of Development Plan Documents:
 - Allocations Development Plan Documents (DPD) (Currently in Production)
 - Bradford City Centre Area Action Plan DPD (AAP) (Currently at Examination)
 - Shipley and Canal Road Corridor Area Action Plan DPD (AAP) (Currently at Examination)
 - Waste Management Development Plan Documents (DPD) (Post Examination Awaiting Adoption)
- 2.2 The Waste Management DPD sets out the planning framework for managing the District's waste in a sustainable manner. It includes policies and allocations for the management of waste in line with the national waste strategy and relevant European regulations. It deals with all types of waste including Local Authority Collected Waste. The DPD will provide the planning policy framework for

determining future planning applications to 2030 in conformity with the policies in the Local Plan Core Strategy.

- 2.3 The Planning & Compulsory Purchase Act 2004 as amended by the Localism Act provides the Legal basis for the preparation of the statutory development plan. This is supplemented by detailed regulations in particular Town and Country Planning (Local Planning) (England) Regulations 2012. The Development plan process is made up of 5 main stages.

Stage 1 Initial Evidence gathering

Stage 2 Initial Consultation and continued work on evidence gathering (reg18)

Stage 3 Publication and Submission (Reg 17, 19 and 22)

Stage 4 Examination (reg 23-24)

Stage 5 Adoption (Reg 26)

- 2.4 The Waste Management DPD has reached stage 5. Work under stage 1, 2, 3 and 4 is briefly summarised below with reference to previous engagement and technical work.
- 2.5 The Waste Management DPD is the key statutory plan which sets out the proposed approach to managing waste in a sustainable manner to 2030. It includes policies and allocations for the management of waste in line with the national waste strategy and relevant European regulations.
- 2.6 Upon adoption, the Waste Management DPD will form the key statutory plan which sets out the proposed approach to managing waste in a sustainable manner to 2030. It includes policies and allocations for the management of waste in line with the national waste strategy and relevant European regulations. It deals with all types of waste including Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) Waste, Construction, Demolition and Excavation Waste (CDEW), Agricultural Waste, Hazardous Waste, and Low Level Radioactive Waste.
- 2.7 The Waste Management Development Plan Document - Submission Draft contained, has been based upon the National Planning Policy Framework (NPPF), National Planning Policy for Waste, practice guidance and extensive community engagement and consultation, and technical evidence and research. Each of these elements is considered in turn below.

Consultation and Engagement

- 2.8 As part of the Local Plan for Bradford District, the Council is committed to producing a Waste Management Development Plan Document (DPD) which will identify sites for waste management and policies for their delivery and implementation in support of the approach set out in national and regional planning guidance as well as the Local Plan: Core Strategy.
- 2.9 The Waste Management DPD will provide the detailed policy framework for managing all types of waste including:
- Local Authority Collected Waste (LACW);
 - Commercial and Industrial Waste (C&I);

- Construction, Demolition and Excavation Waste (CDEW);
- Hazardous Waste including Low Level Radioactive; and
- Agricultural Waste.

2.10 The DPD allocates sites for the major waste streams of Local Authority Collected Waste and Commercial & Industrial Waste only. The other waste streams will be managed onsite / at source and through a planning policy based approach should the need for such a facility arise.

2.11 The DPD has been subject to 5 rounds of public consultations as outlined below.

- The first stage in the preparation of this document, the Issues and Options report, was produced in October 2009. This report set out a number of issues surrounding waste management within the Bradford District and potential solutions to those address those issues. The document was approved for consultation by Executive on 20th October 2009.
- The Preferred Approach reports considered all the comments received during the Issues and Options (2009/10) consultation process and developed a number of policies and approaches to overcome the present and future issues surrounding waste management within the Bradford District. The Preferred Options consultation ran from January 2011 to April 2011. The document was approved for consultation by Executive on 14th January 2011.
- Preferred Approach: Revised Chapter 5 was consulted upon from October to December 2011. This document contained a Revised Shortlist of Sites following changes to the site assessment, which took account comments received at previous stages of consultation. The Preferred Approach: Revised Chapter 5 consultation ran from October 2011 to December 2011. The document was approved for consultation by Executive on 16th September 2011.
- The Preferred Options consultation ran from 21st January 2011 to 1st April 2011.
- Following consultation on the Preferred Approach and Preferred Approach: Revised Chapter 5 in 2011, a Publication Draft version of the Waste Management DPD has been prepared for submission to government for independent examination. The Publication Draft consultation ran from December 2015 to February 2016. The document was approved for consultation by Executive on 15th September 2015.

2.12 The Publication Draft, approved by Full Council on 20 October 2015, was the final stage prior to submission to Secretary of State for independent examination in public with the Planning Inspector. As such this is the stage when it becomes the plan that the Council wishes to see adopted. At the Publication Draft stage the Council needs to ensure that it will pass the key tests at independent examination in public.

2.13 The Local Plan was examined by an independent Planning Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. To this end, the Council, as the local planning authority, submitted a plan for an examination in public which it considers is “sound” – namely that it is

1. Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements,

- including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
2. Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 3. Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 4. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Plan.
- 2.14 Following consultation on the Waste Management DPD Publication Draft the Council submitted the DPD to the Secretary of State on Monday 16 May 2016, for examination in public by an independent Planning Inspector. The Secretary of State then appointed Mr Stephen Pratt BA (Hons) MRTPI to undertake the examination into the Waste Management DPD.
- 2.15 Following the examination of the DPD, the Inspector recommended a number of main modifications to the Plan to make it sound. As required under the Town and Country Planning Regulations 2012, the Council undertook a 6 week public consultation on the Schedule of Modifications. Approximately 2,500 people (including elected members, statutory consultees, people who have made previous represents etc) were notified as part of the public consultation.
- 2.16 Alongside the Schedule of Modifications, the Sustainability Appraisal Addendum was published, which detailed the potential impacts of the main modifications.
- 2.17 The Council received approximately 95 representations on the Schedule of Modifications and the Sustainability Appraisal Addendum. All consultation documents and written representations are available to view on the Council website.
- 2.18 The Inspector has now considered all the representations made during the public consultation and the resulting amendments made to the Schedule of Modifications, and has now issued his final report (Appendix 1 and Appendix 2). The Inspector has found the plan sound subject to the modifications put forward and is now ready for adoption by the Council.

Modifications

- 2.19 The Council has undertaken extensive consultation and community engagement throughout the production of the Plan, which resulted in few outstanding issues and representations at submission stage and consequently the Inspector did not consider there a need to hold formal hearing. However, as part of the examination process, the Inspector has issued a number of Matters, Issues and Questions (MIQs) relating to the legal compliance and soundness of various parts of the Plan. The Council has issued responses to all the MIQs raised by the Inspector, some of which have resulted in a number of main modifications being proposed. Alongside these modifications, the Inspector has also suggested a number of modifications to address any outstanding issues, which the Council have accepted and incorporated

into the overall Schedule of Modifications.

Adoption Process

- 2.20 Assuming the Bradford District Waste Management DPD is adopted following resolution by Full Council, it will form a part of the statutory Local Plan for the District alongside the recently adopted Local Plan Core Strategy for the Bradford District. It will become a key document in the determination of planning applications. It will replace some of the existing saved policies of the RUDP.
- 2.21 It is important to stress that the policies within the RUDP were prepared a considerable time ago and over time will become ever more vulnerable to challenge. This includes policies to protect key environmental assets, as well as those policies which relate to economic growth and development. The adoption of the Bradford District Waste Management DPD will provide policies and land allocations which have been prepared in the light of current government guidance and up to date evidence and which will therefore provide a more robust basis for the Council's decision making when considering planning applications. Should the Bradford District Waste Management DPD be delayed or not adopted there is a much greater risk of successful challenges to the Council's decisions, increased numbers of planning appeals and associated increased costs and greater uncertainty for potential developers and investors in the District.
- 2.22 If the Bradford District Waste Management DPD is adopted by Full Council in line with the Inspector's recommendations with all the proposed Main Modifications the Council will then publish an Adoption Statement. Following this there is a 6 week period allowed for any party to legally challenge the Council's decision to adopt.

3. OTHER CONSIDERATIONS

- 3.1 The Council has a duty under the Planning and Compulsory Purchase Act 2004 to prepare the Local Plan for the District in line with the approved Local Development Scheme (LDS). The Council can determine the nature and make-up, of the Local Plan it wants to put in place in order to meet its statutory duty, as well as the timetable for its' preparation. The currently agreed Local Plan programme, as set out in the approved LDS, commits to 5 Development Plan Documents (see paragraph 2.1).
- 3.2 The process for the preparation of each DPD is prescribed by statute and regulation. In order to ensure a 'Sound' plan it is important that the Council ensures it follows the regulations, ensures effective and robust consultation, and ensures it is founded upon up to date and robust evidence. All DPDs are submitted to the Secretary of State for independent examination to test whether they are sound with reference to the tests set out in legislation and regulations. Failure to ensure a robust approach could result in a DPD being unsound and not capable of adoption. The Inspector has considered fully the legal compliance and soundness and concluded that the Bradford District Waste Management DPD as proposed to be modified is sound and can be adopted by the Council. However he has also confirmed that the original plan submitted to the Planning Inspectorate without the proposed Main Modifications would not be considered 'Sound'. The importance of accepting and incorporating, in full, the schedule of Main Modifications to ensure

that the Plan can be adopted should therefore be emphasised.

- 3.3 Once the examination process is complete, adoption is the final stage of putting a Local Plan in place. This requires confirmation by a full meeting of the Local Planning Authority (Regulation 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000). On adopting a Local Plan, the Local Planning Authority has to make publicly available a copy of the Plan, an Adoption Statement and Sustainability Appraisal in line with regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.4 Government guidance states that while the Local Planning Authority is not legally required to adopt its Local Plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.
- 3.5 National Planning Policy continues to emphasise the need for Local Planning Authorities to prepare an up to date development plan for their district and more recent government statements are seeking councils to progress as a matter of urgency.
- 3.6 The Housing and Planning Act 2016 re-emphasised the need for Local Planning Authorities to make progress to put in place up to date local plans and introduced new powers for the Secretary of State to intervene where sufficient progress was not being made. In a statement to Parliament (July 2015) the then Minister of State for Housing and Planning (Brandon Lewis) made clear the government's commitment to getting Local Plans in place. To this end, the government will publish league tables setting out local authorities' progress on their Local Plans. In cases where no Local Plan has been produced by early 2017 the government will intervene to arrange for the Plan to be written, in consultation with local people, to accelerate production of a Local Plan under the new provisions in the Housing and Planning Act 2016. The adoption of the Bradford District Waste Management Plan would be a major step forward in meeting this requirement and demonstrating to government the District's commitment to producing an up to date Local Plan for the management of waste in support of the Core Strategy. It will therefore enable the Council in conjunction with local communities and stakeholders to maintain control over decisions on the future planning of the District.
- 3.7 It is also important to communities, business and investors that an up to date plan is put in place in order to ensure certainty and confidence. It also will assist in supporting the attraction of much needed investment into infrastructure projects based on clearly articulated plans for delivering growth and supporting business case for supporting investment.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 The preparation of the Local Plan is undertaken by the Planning and Transport Strategy Service, which is funded from within the Department's resources, supported by one off corporate growth payments to cover abnormal costs of consultation and engagement, technical studies and examination cost.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 There are risks to the Council as a result of not having an up to date Local Plan. These include:

- uncertainty for decision making;
- reduced prospects for securing funding for new infrastructure in support of economic growth;
- increase in the number of successful planning appeals with attendant increased costs;
- possible government intervention to externalise plan making; and
- failure to meet key needs for homes and jobs.

5.2 The receipt of the Inspector's Report and recommendations allowing adoption mean the Council is in a position to be able to put in place an up to date planning framework for waste management for the District which will form part of the statutory Local Plan and provide a starting point for the consideration of planning applications. It will also provide confidence and clarify to the development sector as well as business and communities and allow infrastructure providers to be clear about the scale and distribution of development they need to support through their investment plans and decisions.

5.3 As noted above at 3.3, the decision whether to adopt the Bradford District Waste Management DPD is for Full Council.

6. LEGAL APPRAISAL

6.1 The Local Plan is prepared in line with the appropriate, legislation (UK and EU), regulations and guidance, in particular the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012 and Planning and Housing Act 2016. The Submitted plan was supported by a legal compliance check list and the Inspector concluded that the submitted plan was legally compliant.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

7.1.1 The consultation on the Bradford District Waste Management Development Plan Document was undertaken in line with the Statement of Community Involvement, which sets out how the Council will seek to engage the community in the preparation of development plan documents. In order to achieve this it seeks to set a framework to ensure representative and inclusive involvement and engagement at all stages of document preparation. Particular consideration is given in the document to hard to reach groups. In addition the Bradford District Waste Management DPD has been subject to an Equality Impact Assessment screening.

7.2 SUSTAINABILITY IMPLICATIONS

7.2.1 All Local Plan Development Plan Documents are required to be subject to Sustainability Appraisal (SA) including Strategic Environmental Appraisal (SEA) at all key stages. The SA seeks to assess the likely impacts of the policies and

proposals of the relevant plan. A full SA was undertaken by independent consultants Ramboll Environ at key stages of the Waste Management DPD preparation. In addition to this, a Habitats Regulations Assessment (HRA), also prepared by Ramboll Environ, has been undertaken to assess the impact of the policies and proposals set out in the Waste Management DPD on the environmental integrity of the South and North Pennine Moors Special Protection Areas (SPA's) and Special Areas of Conservation (SAC's).

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

7.3.1 The Local Plan is subject to Sustainability Appraisal throughout its development, which identifies the likely impacts of the Plan and where appropriate any mitigation to manage any negative impacts. Climate Change is identified within the Waste Management DPD as a key issue and is covered in the spatial vision of the document and by several policies which seek to reduce greenhouse gas emissions and also manage the potential impacts of Climate Change.

7.4 COMMUNITY SAFETY IMPLICATIONS

7.4.1 There are no direct community safety implications arising from Bradford District Waste Management DPD

7.5 HUMAN RIGHTS ACT

7.5.1 The adopted Statement of Community Involvement sets out how all individuals can have their say on the development plan documents. Anyone who was aggrieved by the Bradford District Waste Management DPD as drafted had a right to be heard at an independent examination in public following submission to the Secretary of State.

7.6 TRADE UNION

7.6.1 There are no Trade Union implications.

7.7 WARD IMPLICATIONS

7.7.1 The Waste Management Development Plan relates to the whole District and therefore affects all wards across the District.

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

The Executive have 3 options.

Options1

9.1 The first option is to approve the Bradford District Waste Management DPD in line with the Inspector's Report and recommendations including the complete set of Main

Modifications contained in the Appendix to the Inspector's Report. The document is considered 'Sound' and legally compliant by the Inspector and capable of adoption only with the proposed Main Modifications.

Option 2

9.2 The second option is to attempt to adopt the Bradford District Waste Management DPD but not to include all the Main Modifications or with different changes. There is a strong likelihood that such a course of action would fail and result in successful legal challenge as the Inspector has made clear that the Main Modifications are all required in order to produce a 'Sound' and legally compliant plan, which is capable of adoption;

Option 3

9.3 The third option is to not adopt the Plan and to review the document. In effect this would amount to a withdrawal of the Plan in total as the Inspector has now concluded his examination. This would delay significantly the adoption of the Local Plan having particular implications for the management of waste. As well as delay of up to 3-4 years to go back through the process there would also be significant additional costs to the Council. There would also be a risk of intervention by the government. In the meantime the District would not have an up to date strategy for waste management and therefore lose control and influence over development proposals in the District. During the course of the production of the Bradford District Waste Management DPD considerable sums have been invested in the Plan's preparation including the production and commissioning of technical evidence and the holding of community consultation events and Planning Inspectorate and Programme Officer feeds relating to the Examination. Failure to adopt the Bradford District Waste Management DPD would lead to significant cost as much of the evidence associated with the document would have to be updated or prepared afresh, further consultation would have to be undertaken and a new Examination would need to be held and paid for.

9.4 The Executive are therefore recommended to follow Option 1 and recommend to Full Council that the Bradford District Waste Management DPD as submitted be adopted with the Main Modifications proposed by the Inspector for the reasons set out in his report and also this report. The other options would have significant serious implications for the timetable for putting in place an up to date Local Plan and associated risks to both the Council and the District and its communities.

10. RECOMMENDATIONS

10.1 The Executive is recommended to note the contents of this report and contents of the Inspector's Report (Appendix 1) and recommend that Full Council formally adopt the Bradford District Waste Management Development Plan as approved by Full Council on 20th October 2015 and submitted to the government for examination with the Main Modifications contained in Appendix 2, as proposed by the Inspector pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004.

10.2 That the Assistant Director (Planning Transportation and Highways) in consultation with the relevant Portfolio Holder be authorised to make other minor amendments of redrafting or of a similar nature as may be necessary prior to formal publication.

11. APPENDICES

Appendix 1 - Report on the examination of the Local Plan for the Bradford District Waste Management Development Plan Document (DPD)

Appendix 2 - Schedule of Main Modifications to the Bradford District Waste Management Development Plan Document (DPD)

12. BACKGROUND DOCUMENTS

- 12.1 Local Development Scheme (July 2014)
- 12.2 Submission Draft Waste Management Development Plan
- 12.3 Sustainability Appraisal
- 12.4 National Planning Policy Framework
- 12.5 National Planning Policy for Waste
- 12.6 National Planning Policy Guidance

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Report to the City of Bradford Metropolitan District Council

by Stephen J Pratt BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

25 July 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Local Plan for the Bradford District Waste Management Development Plan Document

The Plan was submitted for examination on 16 May 2016

The examination was conducted by written representations

File Ref: PINS/R0335/429/11

Abbreviations used in this report

AM	Additional Modification
ATT	Advanced Thermal Treatment
BCS	Local Plan for Bradford District – Core Strategy DPD
BWMDPD	Local Plan for Bradford District – Waste Management DPD
CBMDC	City of Bradford Metropolitan District Council
CD&E	Construction, Demolition & Excavation waste
C&I	Commercial & Industrial waste
DEFRA	Department for Environment, Food & Rural Affairs
DPD	Development Plan Document
DtC	Duty to Co-operate
EA	Environment Agency
EfW	Energy from Waste
EIA	Environmental Impact Assessment
ha	hectares
HE	Highways England (formerly Highways Agency)
HGV	Heavy goods vehicle
HRA	Habitats Regulations Assessment
LACW	Local Authority Collected Waste
LEP	Local Enterprise Partnership
LCR	Leeds City Region
LDS	Local Development Scheme
LLRW	Low-level radioactive waste
MDC	Metropolitan District Council
MM	Main Modification
MOU	Memorandum of Understanding
mm ³	million cubic metres
mt	million tonnes
NE	Natural England
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
¶/para	paragraph
PFI	Private Finance Initiative
PPG	Planning Practice Guidance
RUDP	City of Bradford Replacement Unitary Development Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SEP	Strategic Economic Plan
SPA	Special Protection Area
t/tpa	tonnes/tonnes per annum
WMPE	Waste Management Plan for England
WPA	Waste Planning Authority
WNA	Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study
WYCA	West Yorkshire Combined Authority
WWTW	Waste Water Treatment Works
WYCA	West Yorkshire Combined Authority
YHWTAB	Yorkshire & the Humber Waste Technical Advisory Body

Non-Technical Summary

This report concludes that the Local Plan for the Bradford District Waste Management DPD provides an appropriate basis for waste planning in the district providing a number of main modifications are made to the plan. The City of Bradford MDC has specifically requested me to recommend any main modifications necessary to enable the plan to be adopted. All the main modifications to address this were proposed by the Council and were subject to public consultation over a 6-week period. In a few cases, the Council has subsequently suggested minor changes to the detailed wording of some of the policies and accompanying text, which I have endorsed. I have recommended the main modifications after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amend the Vision and Objectives to refer to the need for a modal shift in the sustainable transportation of waste and ensure that development not only protects but also enhances the district’s environmental assets, with similar amendments to the objectives referred to in the Delivery & Monitoring section of the Plan;
- Update and amend the tables and figures in Sections 3 & 4 of the Plan to reflect the latest information and estimates in the updated Waste Needs Assessment, including the updated figures of current and future waste arisings, the existing waste management capacity gap and future capacity requirements, and the site size assumptions and requirements, along with associated changes to Policy W2 and the accompanying text;
- Amend the text accompanying Policy W4 to indicate the latest estimate of future Construction, Demolition & Excavation (CD&E) waste and confirm that the capacity gap can be met by implementing an existing planning permission and continuing existing on-site management of CD&E waste;
- Amend the text accompanying Policy W5 to indicate the latest estimate of the amount of agricultural waste;
- Amend Policy WDM2 and the accompanying text to ensure that any adverse effects of development are not only minimised, but enhancements are also made, to avoid adverse effects on designated European sites, and to advise applicants to have early discussions with the Environment Agency about Environmental Permits in this policy and in paragraph 4.5 of the Plan;
- Amend Policy WDM3 to delete the reference to “exceptional circumstances” and indicate that the test for alternative uses on existing and proposed waste management sites will be subject to there being no realistic prospect of the site being used for waste management purposes;
- Amend the text accompanying Policy WDM4 to confirm that the policy sets out the objectives for the construction and operation of new developments principally relating to waste management;
- Amend Policy WDM5 to refer to the need to minimise any adverse effects on habitat fragmentation and enhancement, and to investigate the potential of transporting waste by non-road transport modes;
- Clarify and amend the infrastructure and mitigation requirements for proposed Sites WM1-WM6 to acknowledge the potential to consider the utilisation of any heat generated by waste management, and to confirm the need for visual and landscape assessment, and the need to address the potential impact of waste management uses at Sites WM3 & WM5 on the South Pennine Moors SAC/SAP.

Introduction

1. This report contains my assessment of the *Local Plan for the Bradford District Waste Management Development Plan Document* (BWMDPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It first considers whether the Plan’s preparation has complied with the Duty to Co-operate. It then considers whether the Plan is sound and whether it complies with the legal requirements. The National Planning Policy Framework (NPPF) makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy (NPPF; ¶ 182).
2. The starting point for the Examination is the assumption that the City of Bradford Metropolitan District Council (CBMDC) has submitted what it considers to be a sound plan. The basis for the examination is the *Local Plan for Bradford District Waste Management DPD Submission Draft* (May 2016) [WM-SD-001].
3. In view of the limited number of representations made to the publication version of the BWMDPD and the fact that there were no requests for any oral hearings, I have examined this Plan on the basis of written exchanges.
4. My approach to the Examination has been to work with CBMDC and other participants in a positive, pragmatic and supportive manner. In so doing, I have considered all the points made in the representations and statements. However, the purpose of this report is to consider the legal compliance and soundness of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and statements. References to documentary sources are provided thus [].

Main Modifications

5. In accordance with Section 20(7C) of the 2004 Act, CBMDC has requested me to recommend any modifications needed to rectify matters that make the Plan unsound or not legally compliant, and thus incapable of being adopted. This report explains why the recommended Main Modifications, all of which relate to matters and issues raised during the examination, are necessary to make the BWMDPD sound and legally compliant. The Main Modifications are referenced in bold in the report [**MM**] and are set out in the accompanying Appendix. CBMDC also proposes to make other minor changes to the Plan (“Additional Modifications” - AM), which do not affect its overall soundness and do not need any positive recommendation from me.
6. The Schedule of Proposed Main Modifications was subject to sustainability appraisal and public consultation between 15 February – 29 March 2017, and I have taken account of the consultation responses in coming to my conclusions. Most of the representations made at this stage concerned the waste management facility proposed at Site WM3, many of which related to a recent planning application for a specific waste development at this site. Others repeated points made at earlier stages or did not directly relate to the content of the Main Modifications. In the light of these representations, CBMDC has suggested some further amendments to the detailed wording of a few of the policies and/or accompanying text. I have recommended these additional amendments where they are necessary for clarity or consistency. None of these amendments significantly alters the content of the Main Modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. I have highlighted these further amendments, where necessary, in my report.

Policies Map

7. CBMDC should maintain an adopted Policies Map which illustrates the geographical application of the policies in the adopted development plan. When submitting a local plan for examination, CBMDC has to provide a submission Policies Map showing the changes to the adopted Policies Map resulting from the proposals in the submitted local plan. However, the Policies Map is not defined in statute as a DPD, and so I do not have the power to recommend main modifications to it. In this case, CBMDC has submitted a Policies Map which identifies the locations for proposed waste sites [WM-SD-068]. No further changes to the Policies Map are needed as a result of the Main Modifications now recommended.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires me to consider whether CBMDC has complied with any duty imposed by s33A of the Act in relation to preparing the Plan. This requires them to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure.
9. This Duty (DtC) is closely related to the requirements and soundness tests in the NPPF (¶ 156; 178-182), which require plans to be positively prepared and effective. Waste PPG [ID:28-015/016] confirms that waste is a strategic issue which requires a cross-boundary approach and can be addressed effectively through close co-operation between local planning authorities and other bodies to ensure a suitable and sustainable network of waste management facilities is in place.
10. There is a long legacy of strategic co-operation and joint working within the Leeds City Region (LCR) and across West Yorkshire for both officers and elected members. This helps to co-ordinate strategic planning across the county, both from the earlier days of the Regional Spatial Strategy and as set up more recently by the LCR. The latest LCR Statement of Co-operation [WM-SD-005.1] commits the local authorities to co-operating throughout the development plan process, going beyond consultation, taking a pragmatic approach and responding to requests to engage; it also identifies waste planning as a key strategic issue.
11. CBMDC has submitted evidence outlining how it has engaged constructively, actively and on an on-going basis with neighbouring authorities and prescribed bodies during the preparation of the BWMDPD [WM-SD-005/017]. This sets out the strategic context, including the relationship with the LCR and the Local Enterprise Partnership’s (LEP) Strategic Economic Plan (SEP), and identifies key strategic waste issues. It focuses on CBMDC’s positive involvement with the Yorkshire & Humber Waste Technical Advisory Body (YHWTAB), particularly about regional landfill capacity and cross-boundary waste flows, including waste going to landfill and hazardous waste. The YHWTAB is the main forum for discussing waste management issues in this area, and strategic waste management facilities are co-ordinated on a regional/sub-regional basis through this body, particularly in terms of landfill capacity and the cross-boundary movement of waste, including hazardous waste. The latest Waste Position Statement [PC-B006] addresses these key issues, and CBMDC’s representatives have been closely involved with the analysis of the technical data and the outcome of discussions.

12. Issues raised by other local authorities during earlier stages of consultation on the BWMDPD have been addressed [WM-SD-005]. At the publication stage, Leeds City Council raised some issues about the DtC, including clarifying the future roles of the Bowling Back Lane waste management facility and Esholt Treatment Works, as well as the implications of the future closure of the Skelton landfill site. CBMDC has addressed these issues and, following the latest analysis undertaken by YHWTAB [PC-B005/B006], these matters have been satisfactorily clarified [WM-SD-005]. CBMDC has also consulted and engaged with other prescribed bodies, including the Environment Agency (EA) and Natural England (NE) [WM-SD-067], and more recently with the West Yorkshire Combined Authority (WYCA). There is no evidence to counter CBMDC’s view that all neighbouring local authorities are satisfied that CBMDC has fully met the DtC requirements and that there are no outstanding or unresolved matters.
13. Policy W1 of the BWMDPD specifically addresses cross-boundary working, and confirms that CBMDC will continue to work collaboratively with neighbouring waste planning authorities. This includes sharing relevant information, data and analysis of waste arisings, working collaboratively on emerging waste plans, contributing to the work of the YHWTAB and commenting on waste planning applications, as well as supporting cross-boundary working, promoting modal shift in waste movements and commissioning joint monitoring reviews, updates and studies on waste management. CBMDC wishes to amend the policy and accompanying text to confirm the need to work closely with neighbouring authorities and work collaboratively to promote modal shift in waste movement, deleting the reference to the joint initiative with Calderdale Council for municipal waste management facilities **[MM4-5]**. These modifications will ensure that the BWMDPD is fully justified, has due regard to the environment, incorporates the outstanding mitigation measures identified in the Sustainability Appraisal, updates the position on joint working, and is consistent with national policy in the NPPF & NPPW.
14. Consequently, having considered all the evidence, I conclude that CBMDC has engaged constructively, actively and on an on-going basis with adjoining local authorities and prescribed bodies during the preparation of the BWMDPD. The legal requirements of the Duty to Co-operate have therefore been met.

Assessment of Soundness

Preamble

15. The Local Plan for Bradford will comprise a series of DPDs to guide development within the district, including waste facilities. The Core Strategy (BCS) sets out strategic policies for waste management, specifically Policies WM1 & WM2. These establish the strategic framework and spatial guidance for policies in the BWMDPD, with the aim of minimising the negative effects of generating and managing waste on human health and the environment. They also encourage a reduced use of resources, favouring the practical application of the waste hierarchy by delivering an adequate range of waste management facilities to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the district.
16. The purpose of the BWMDPD is to expand on the policies in the BCS, setting out the detailed planning framework for managing waste arisings within the district. It establishes a spatial vision, objectives and detailed planning policies for all waste streams, and includes site allocations for specific waste streams. It outlines

the mechanisms for identifying land suitable for waste management facilities, along with policies and guidance for determining planning applications for waste management developments. It includes the results of the latest analysis of the need for new waste management facilities in the period to 2030, and makes specific site allocations for waste management facilities to meet the required capacity. It also addresses national, regional and sub-regional waste management considerations, including the cross-boundary aspects of waste management arising from consultation with adjoining local authorities, statutory agencies and key stakeholders through the YHWTAB. When adopted, it will supersede the current waste management policies in the Bradford Unitary Development Plan (RUDP).

17. Preparation of the BWMDPD began with consultation on Issues & Options and the Preferred Approach (2009-2011), concluding with consultation on the Publication Draft in 2016. The BWMDPD is accompanied by supporting evidence, including updated calculations on waste arisings and the need for waste management facilities, consultation statements, Sustainability Appraisal and Habitats Regulations Assessment [WM-SD-047-068]. There has also been close liaison between CBMDC, neighbouring LCR local authorities and the YHWTAB to ensure consistency of approach and in cross-boundary issues [WM-SD-005].
18. CBMDC has undertaken its own self-assessment of the soundness of the BWMDPD [WM-SD-006]. In considering the soundness of the BWMDPD, I have not only had regard to the NPPF, National Planning Policy for Waste (NPPW), associated Planning Practice Guidance (PPG) [ID:28] and the Waste Management Plan for England (2013) (WMPE), but also taken account of more recent Government and Ministerial statements about planning and plan-making.

Main Issues

19. Taking account of the representations, supporting evidence, written statements and points raised during the examination, there are six key issues upon which the soundness of the BWMDPD depends.

MATTER 1 - VISION AND OBJECTIVES

Key issue – Are the Vision and Objectives for the Waste Management DPD appropriate, effective and locally distinctive, reflecting European and national planning policy on waste and the views of local communities and the waste industry, and will they help to deliver the waste strategy of the submitted Plan?

20. Section 2 of the BWMDPD sets out the Vision and Objectives for Waste Management. The Vision confirms that Bradford needs to take responsibility for the waste it generates through sustainable waste management, aspiring to achieve net self-sufficiency in the management of waste, and reflecting the key waste management issues faced by Bradford. It is supported by five waste management objectives, related to European and national policy guidance and best practice, the waste hierarchy and other key policies. The Vision and Objectives also give spatial expression to CBMDC’s corporate waste strategies, including the Municipal Waste Minimisation & Management Strategy (2014) [WM-SD-056]. They have been subject to consultation during the preparation of the BWMDPD, and specific evidence explains how the Plan’s policies align with these objectives, the aims of the Community Strategy and the objectives and policies of the BCS [WM-SD-057].
21. The Vision and Objectives take account of the need to safeguard the district’s environment and environmental assets, and safeguard local amenity, addressed by specific policies (WM4-WM7, WDM2 & WDM5). However, in the Vision, CBMDC proposes to refer to the need for a modal shift in the transportation of waste

arising, to assist climate change mitigation and adaptation [MM1]. In addition, Objective 3 needs to be amended to ensure that development not only protects, but also enhances the district’s environmental assets [MM2]; however, to be consistent with NPPF (Glossary), this requirement should be prefixed by “*where appropriate*”. Objective 5 also needs to be amended to ensure that waste arisings are transported by sustainable transport modes [MM3]. These modifications are necessary to ensure that the Plan is fully justified, incorporates the outstanding mitigation measures identified in the Sustainability Appraisal (SA), and is consistent with national policy in the NPPW.

MATTER 2 – NEED FOR NEW WASTE MANAGEMENT FACILITIES

Key issue – Does the Waste Management DPD adequately address the need for new waste management facilities, including existing and future waste arisings for all forms of waste, the existing and future waste capacity gap, and provision to fully meet the need for further waste management capacity, in a manner which is appropriate, effective, deliverable, positively prepared, justified by up-to-date, proportionate and robust evidence, soundly based and consistent with national policy?

22. Section 3 of the BWMDPD addresses the need for new waste management facilities, with Policy W2 setting out the future waste management capacity requirements. Section 4 indicates how the required waste management facilities will be provided, with Policy W3 listing the proposed site allocations for the management of Local Authority Collected Waste (LACW) & Commercial & Industrial (C&I) waste. CBMDC considers these are the priority waste streams, and the policies will help to reduce the amount of biodegradable waste going to landfill and ensure movement up the waste hierarchy; they also tend to be larger in scale and of strategic importance, whilst other waste streams would mainly be managed on-site, subject to other policies in Section 5 of the BWMDPD.
23. The key evidence underpinning the waste strategy of the BWMDPD is the Waste Needs Assessment (WNA), Capacity Gap Analysis and Site/Facility Requirements Studies [WM-SD-047/048/049/050]. This sets out the context for waste management in local, sub-regional and regional terms, including cross-boundary movements of waste. It also details existing and forecast future waste arisings over the plan period, including analysing existing waste management facilities and future capacity requirements. It is a comprehensive and robust assessment, based on reliable, available and proportionate evidence from the EA, DEFRA & CBMDC to forecast future waste arisings and the need for future waste management capacity; it also includes modelling scenarios and options for the provision of sites based on the land-take and size of particular forms of waste management.
24. CBMDC has worked with neighbouring authorities, sharing information on waste arisings, capacity and facilities through the YHWTAB, including cross-boundary, sub-regional and regional movements of waste, particularly for hazardous waste and landfill capacity. CBMDC has also engaged with local communities, the waste industry and key stakeholders, including EA and other Waste Planning Authorities, throughout the preparation of the BWMDPD, and has addressed cross-boundary waste management issues. As a result of consultation and engagement, through the YHWTAB & LCR, the BWMDPD represents a collective vision and agreed set of priorities for sustainable waste management planning within the district.
25. It is perhaps somewhat unfortunate that the WNA has been updated after consultation and submission of the BWMDPD [PS-B017]. Ideally, such up-to-date information should inform and underpin the strategy and policies of the plan before they are finalised. Initially, some of the updated figures contained errors and

inaccuracies which had to be resolved before the latest information could be finalised; consequently, key tables and figures in the submitted version of the BWMDPD will need to be amended, updated and clarified.

26. The updated evidence summarises the latest estimates of current total waste arisings for the various waste streams in Bradford at 2013 and forecasts future arisings up to 2030 using a range of scenarios based on various growth and recycling/recovery rates, with robust methodology based on the latest available information [PS-B017]. It identifies the need for new waste management facilities, including the existing waste management capacity gap in Bradford to manage and dispose of the different types of waste by various forms of management, including transfer stations, recycling, energy recovery, composting, landfill and other forms of processing and treatment. In some cases, the updated figures and estimates are significantly different from those in the previous assessment, but this reflects revised assumptions and approaches for the various waste streams, including secondary waste products, some increases in CD&E, agricultural and hazardous wastes, and excluding the management of LACW from Calderdale. It also includes an updated analysis of the operational capacity of existing waste management facilities and estimates the land-take of additional waste management facilities. I deal with the issue of landfill capacity later in my report, under Policy WM6.
27. Policy W2 confirms the need to provide waste management capacity for over 1.624mt of waste arisings in the period to 2030, including specific additional capacity to manage LACW and C&I waste; this is based on scenarios assuming modest rates of growth in most waste streams, with maximum recycling rates. It also confirms that most additional CD&E, hazardous and agricultural wastes will be managed, recycled, re-used or processed at existing operational sites, either within or outside Bradford district. Proposed amendments to the supporting text, with amended or additional tables, set out the site size assumptions for various types of waste management processes and confirm that existing and proposed capacity (including the proposed site allocations) will more than meet estimated requirements. The proposed site allocations would actually provide almost 18ha of land to meet an estimated requirement for 9ha; this will provide a mix of sites to accommodate different waste streams and waste management processes, as well as giving choice for waste operators and flexibility to accommodate a variety of existing and future waste management processes.
28. As amended, Policies W2 & W3 identify sufficient opportunities to fully meet the identified needs of Bradford district for the management of all waste streams, particularly LACW and C&I waste, including specific new allocations, with additional facilities to manage other waste streams being covered by Policies W4-W7. CBMDC is currently securing long-term arrangements for managing LACW, and the future management of residual LACW generated in Bradford is under review. The management of hazardous and residual waste to landfill will continue to be managed at sub-regional/regional level through the YHWTAB.
29. The overall approach of the policies will help to drive waste management up the waste hierarchy, recognising the need for a mix of type and scale of facilities, so that adequate provision is made for the sustainable management, treatment and disposal of waste. The amended tables properly identify and forecast the amount and percentages of LACW & C&I waste requiring management and disposal over the plan period, in line with the Waste PPG and having regard to CBMDC’s Municipal Waste Minimisation & Management Strategy [WM-SD-056].

30. Policies W2 & W3 also consider the need for waste management facilities alongside other spatial planning concerns, recognising the contribution that waste management can bring to the development of sustainable communities, by identifying and allocating well-located sites for waste management. Policy WDM4 also ensures that sustainable waste management is integral to all new developments. I deal with the specific site allocations to accommodate future waste management needs, principally for LACW & C&I waste, listed in Policy W3, later in my report.
31. At first sight, it may seem rather surprising that the revised figures in the latest WNA, some of which include significant changes, have had very little impact on the strategy, policies and proposed sites in the submitted BWMDPD. However, having examined the updated data and estimates and assessed their implications for the strategy and policies of the Plan, assisted by additional responses from CBMDC [PS-B002-014/018], I am satisfied that they provide a more up-to-date, accurate and robust assessment of existing and future waste management requirements than the previous information, and provide a sound basis for the strategy and policies of the BWMDPD.
32. In order to reflect the updated figures and estimates of existing and future waste arisings, amendments are needed to the accompanying tables and text of the BWMDPD. These include updated figures of current and future waste arisings (Tables 1 & 2) [MM6-7], the existing waste management capacity gap and future capacity requirements (Tables 3 & 4) [MM8/10], and the site size assumptions and requirements (Table 5/new table) [MM11-12], along with associated changes to Policy W2 [MM9]. EA is satisfied with the revised figures, and the recommended modifications will ensure that the BWMDPD is effective, justified, up-to-date, positively prepared, deliverable and soundly based. Further minor amendments (AM) will clarify and update the position.
33. Consequently, with the recommended modifications [MM6-12], the BWMDPD adequately addresses the need for new waste management facilities, including existing and future waste arisings and the future waste capacity gap for all forms of waste. It also makes provision to fully meet the need for further waste management capacity in a manner which is appropriate, effective, deliverable, positively prepared, justified by up-to-date, proportionate and robust evidence, soundly based and consistent with national policy and guidance in the NPPF, NPPW and associated Waste PPG.

MATTER 3 – MANAGING OTHER WASTE STREAMS

Key issue – Does the Waste Management DPD properly address the waste management needs of other waste streams, including Construction, Demolition & Excavation Waste, Agricultural and Hazardous Waste, and Residual Waste for Final Disposal, including the need for additional waste management facilities, in a manner which is appropriate, effective, deliverable, positively prepared, justified with evidence, soundly based and consistent with national policy?

34. Section 5 of the BWMDPD sets out the approach to managing other waste streams, including Construction, Demolition & Excavation Waste (CD&E), agricultural and hazardous waste, and residual waste for final disposal (ie. landfill). For most of these waste streams, the strategy aims to reduce, process, re-use or manage such waste on-site, at existing facilities or at its source.

Construction, Demolition & Excavation Waste

35. Policy W4 permits new and expanded sites for CD&E waste if there is an identified need for the facility and it cannot be reduced or processed on-site at its source. It also sets out criteria to be met if such a need can be identified. Updated figures estimate that the amount of CD&E waste is expected to increase over the plan period from 443,504t to 485,141t (2015-2030), much of which will be recycled or re-used on-site [PS-B017]. In the past, data on the amount of CD&E waste produced was poor, but the latest estimates use data from the Environment Agency (EA), including the Waste Data Interrogator and analysis of waste categories, and is the best information currently available.
36. Although there is an identified need for additional recycling capacity for CD&E waste throughout the plan period, the existing and future capacity gap could be met by implementing an existing planning permission (200,000tpa) and continued management of CD&E waste at existing sites [PS-B017]. There is also sufficient landfill capacity in the sub-region to meet the residual disposal needs of CD&E waste (mainly excavation waste).
37. It is therefore appropriate for applicants to have to demonstrate a need for new facilities in terms of a local/sub-regional/regional capacity gap, and that such waste cannot be reduced, recycled, re-used or processed on-site, reflecting Policy WDM4. If such a need can be demonstrated, then the sequential approach set out in Policy W4 prioritises the development, co-location or expansion of existing facilities, established and proposed industrial/employment sites and other previously developed land within the Area of Search. This will help to avoid any detrimental impacts of such developments on the well-being of local communities and on the environment. It also reflects the principles set out in CBMDC’s Site Assessment Report [WD-SD-016/024/034] and is consistent with the NPPW (¶ 5 & Appx B). This approach is in line with the waste hierarchy and is a sustainable and environmentally sound approach to the management of CD&E waste.
38. However, to ensure the policy is up-to-date, effective, justified and deliverable, the supporting text (¶ 5.3) should indicate the latest estimate of future CD&E waste (485,141t) and confirm that the capacity gap for CD&E waste can be addressed by implementing an existing planning permission and continuing existing on-site management of CD&E waste **[MM31]**. This modification will ensure that the policy is effective and consistent with national policy.

Agricultural waste

39. Policy W5 confirms that proposals for new and expanded sites for managing agricultural waste will be considered if there is an identified need for the facility and it cannot be processed on-site at its source. It also sets out criteria to be met if such a need can be identified. Although Bradford district generates a significant amount of agricultural waste, most is managed, processed and recycled on-site; updated figures estimate that the amount of such waste is expected to remain constant over the plan period at around 296,902tpa [PS-B017].
40. The latest assessment indicates that there is currently no identified need for additional waste management facilities to process agricultural waste within Bradford district [PS-B017]. It is therefore appropriate for applicants to have to demonstrate a need for additional facilities in terms of a local/sub-regional/regional capacity gap, and that such waste cannot be reduced, recycled, re-used or processed on-site. If such a need can be demonstrated, then the sequential approach set out in Policy W5 prioritises the expansion and co-location of existing

agricultural waste management sites and at other existing agricultural sites, as well as at other previously developed land within the Area of Search and mineral extraction/landfill sites. This will help to avoid any detrimental impacts of such developments on the well-being of local communities and on the environment. It also reflects the principles set out in CBMDC’s Site Assessment Report [WD-SD-016/024/034] and is consistent with the NPPW (¶ 5 & Appx B). This approach is in line with the waste hierarchy and is an effective, justified, sustainable and environmentally sound approach to the management of agricultural waste in Bradford.

41. However, to ensure the policy is up-to-date, the supporting text (¶ 5.4) should indicate the latest estimate of agricultural waste (296,902tpa) **[MM32]**. This will ensure that the policy is effective and consistent with national policy.

Hazardous waste

42. Policy W6 confirms that proposals for new and expanded sites for managing hazardous waste will be considered if there is an identified need for the facility and it cannot be processed at an existing facility. It also sets out criteria to be met if such a need can be identified. Bradford district is not a significant producer of hazardous waste, nearly all of which is processed outside the district. Hazardous waste usually requires waste management facilities which need economies of scale. Given the limited production of such waste within the district, this is unlikely to be viable in Bradford unless such a facility imported waste from elsewhere. Hazardous waste has a specific definition, and the amounts of such waste are included in the figures for LACW, C&I and CD&E waste. Estimates of such waste are derived from the EA Hazardous Waste Interrogator, which is the most reliable source of data; updated figures estimate that such waste is expected to increase from 19,338t to 23,570t (2015-2030) [PS-B017].
43. Bradford district is a net exporter of hazardous waste and, although most of the waste generated is managed outside the district, small quantities are managed within the district, mainly generated from healthcare treatment. The future capacity needed to manage hazardous waste has already been taken into account in the figures for LACW, C&I and CD&E waste, and CBMDC anticipates that most waste management facilities for the treatment of hazardous waste will continue to be provided outside the district, particularly since such facilities need economies of scale that cannot be provided from Bradford’s hazardous waste alone.
44. It is therefore appropriate for applicants to have to demonstrate a need for additional hazardous waste management facilities in terms of a local/sub-regional/regional capacity gap, and that such waste cannot be managed at an existing operational hazardous waste facility. This will require detailed discussions with the EA, CBMDC and other relevant WPAs, utilising the latest available information, including existing available capacity within Bradford and elsewhere. If such a need can be demonstrated, then the sequential approach set out in Policy W6 prioritises the expansion and co-location at existing hazardous waste management sites and existing industrial/employment sites, as well as at other previously developed land within the Area of Search and mineral extraction/landfill sites. This will help to avoid detrimental impacts of such developments on the well-being of local communities and on the environment. This approach reflects the principles set out in CBMDC’s Site Assessment Report [WD-SD-016/024/ 034] and is consistent with the NPPW (¶ 5 & Appx B). It is also in line with the waste hierarchy and represents a sustainable and environmentally sound approach to managing the hazardous waste generated in Bradford.

45. Consequently, the proposed approach to managing hazardous waste set out in Policy W6 and the accompanying text is appropriate, effective, deliverable, justified and consistent with national policy and needs no further amendments.

Residual waste for final disposal

46. The Government’s Waste Management Plan for England (2013) (WMPE) confirms that landfill without energy recovery should usually be the last resort for waste, particularly biodegradable waste; the landfill tax is the key driver to ensure that waste is diverted from landfill in order to meet waste management targets.
47. Policy W7 confirms that waste disposal to landfill will continue to play an important part in managing residual waste generated in Bradford. Although there is a need to reduce residual waste without recovery, there is also a need to plan positively for the disposal of final residual waste following recovery and treatment. The policy adopts a “monitor and manage” approach to ensure that a sufficient supply of landfill facilities exists, firstly within the West Yorkshire sub-region and thereafter in the Yorkshire & Humber region. It focuses on residual waste for final disposal to landfill, including waste products from Energy from Waste (EfW) processes. It also sets out a sequential approach to the provision of new or expanded landfill facilities where a need for such facilities can be identified.
48. In this region, the provision of landfill capacity is dealt with on a sub-regional/ regional basis. The latest Memorandum of Understanding (MOU) [WM-SD-005.4] confirms that planned provision for waste management in the Yorkshire & Humber region will be co-ordinated by the YHW TAB; the latest Position Statement [PS-B006] sets out the latest position on landfill facilities. Although existing landfill capacity might possibly be reduced by some 10.8mm³ by 2018 if one specific site closes, the latest Regional Landfill Capacity analysis [PS-B005] confirms that there is more than sufficient landfill capacity (94.3mm³) across the region to meet existing and future requirements without the need for further landfill sites to be identified within Bradford district. Within West Yorkshire, there is also a possible over-capacity of some 14.7mm³ of inert landfill capacity, and sufficient capacity (1.8mm³) for the management of hazardous waste.
49. The latest assessment indicates a requirement for landfill capacity, principally for excavation waste and hazardous waste [PS-B017]. Bradford currently has only limited landfill capacity to accept such CD&E waste, although planning permission was granted in 2013 for an inert landfill site with a capacity of 2mt, which would serve the needs of the Plan period. At present, some of Bradford’s waste goes to landfill sites outside the district, and the evidence shows that there is sufficient landfill capacity within West Yorkshire to meet Bradford’s requirements [PS-B017]. It is expected that Bradford’s waste will continue to be exported to sites in the sub-region in the first instance, and in the wider region if necessary, where significant landfill capacity remains to accommodate such waste. Consequently, there is no need to provide further landfill capacity within Bradford district to accommodate this type of waste within the current Plan period.
50. In these circumstances, it is appropriate for applicants to have to demonstrate an identified need for further landfill capacity, adopting a sequential approach which prioritises the expansion and co-location of existing landfill facilities, including those outside the district, along with existing industrial/employment sites, sites within CBMDC’s Area of Search and mineral extraction sites. This will help to avoid detrimental impacts of such developments on the well-being of local communities and on the environment. This approach also reflects the principles set out in

CBMDC’s Site Assessment Report [WD-SD-016/024/034] and is consistent with the NPPW (¶ 5 & Appx B). Given the need to reduce the amount of residual waste going to landfill and manage waste higher up the waste hierarchy, this represents an effective, justified, sustainable and environmentally sound approach to the provision of further landfill facilities in Bradford, particularly bearing in mind the established approach to monitoring, managing and providing such facilities on a sub-regional/regional basis through the YHWTAB.

51. Consequently, although CBMDC is proposing some minor amendments (AM) [PS-B019] to clarify the definitions and terminology of residual waste for final disposal, no further amendments are needed to Policy W7 in the interests of soundness.

Low-level radioactive waste and waste water

52. The evidence confirms that the amount of low-level radioactive waste (LLRW) produced in Bradford district is minimal, largely comprising hospital and laboratory waste [PS-B017]. There are no sites within Bradford permitted to deal with such waste, but sites exist in Leeds and Lancashire to manage or dispose of such waste, and there are no identified requirements for sites to manage or dispose of LLRW in Bradford during the current Plan period.
53. The only site in Bradford dealing with waste water and sewage sludge is the Esholt Waste Water Treatment Works (WWTW). This is one of the largest sites in Europe and is operated by Yorkshire Water, who has no known requirement for additional facilities. WWTW operators generally try to place new plant and capacity at an existing WWTW and, given the size of the existing facility (over 330ha), it is unlikely that new sites will be needed to handle waste water or sewage sludge.
54. Consequently, with the recommended modifications [MM31-32], the BWMDPD provides a clear, effective, deliverable and soundly based framework for managing other waste streams, which is up-to-date, fully justified with evidence, positively prepared and consistent with the latest national guidance.

MATTER 4 – WASTE DEVELOPMENT MANAGEMENT POLICIES

Key issue – Do the Waste Development Management policies provide an appropriate and soundly-based framework to consider other proposals for waste management facilities and developments, which is effective, deliverable, justified and consistent with national policy?

55. Section 6 of the BWMDPD sets out development management policies to control the nature, characteristics, operation and impacts of waste management facilities, including the assessment of unallocated sites, applications for new and expanded waste management facilities, the loss of existing facilities, waste management within developments, and landfill sites for the disposal of final residual waste.

Unallocated sites

56. Policy WDM1 sets out the criteria for assessing proposals for waste management development on unallocated sites. Applicants have to demonstrate the need for the facility and its contribution to the identified waste management capacity gap and waste hierarchy; sites are also assessed against a sequential approach to its location and its suitability against the site assessment criteria. The site locational criteria, including the sequential approach, reflects the approach adopted in the Site Assessment Report [WM-SD-016/024/034], and will enable the development and expansion of existing waste management facilities and existing employment sites, as well as helping to avoid detrimental impacts on the well-being and amenity of existing communities, in line with national policy and PPG [ID:28-046/047].

57. CBMDC confirms that, in demonstrating the need for new and expanded waste management facilities, applicants would have to show why the type of waste cannot be managed at an existing facility within the district/sub-region and establish that there is a waste management capacity gap. This would require the use of waste management capacity data and discussions with the EA, WPAs and YHWTAB. Sufficient data should be available to demonstrate whether there is an identified need for a particular new or expanded facility and, given the approach of national policy and guidance in the NPPW & Waste PPG, this approach is justified and soundly based.

New and expanded waste management facilities

58. Policy WDM2 sets out the development management and control criteria for assessing planning applications for new and expanded waste management facilities, including demonstrating the need for the facility and its contribution to the waste hierarchy and objectives of the BWMDPD. Applicants also have to demonstrate that any impacts of the proposed development would not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.
59. The site-specific impacts of development should also be assessed and minimised, including impact on designated structures or areas, visual and landscape amenity, flooding and water quality, transport accessibility and capacity, environmental, social and economic effects, human health, noise, vibration, dust and odour, water, ground, light and air pollution, and climate change. The policy also covers design and siting issues, mitigation (including HGV emissions) and biodiversity. The impact of additional traffic is particularly important, including the transport of waste and its impact on local residents in terms of amenity and traffic congestion. These criteria are similar to those used in the assessment of the proposed site allocations [WM-SD-016/024/034] and reflect national policy in the NPPW (¶ 5 & Appx B) as well as other good practice. Most of these assessments would fall within the work normally contained in an Environmental Impact Assessment (EIA) and any associated supporting information.
60. However, clause (j) of the policy should confirm that any adverse effects on designated European sites should be avoided and, in the accompanying text (¶ 6.12), confirm that where such adverse effects cannot be avoided, the applicant must demonstrate that there are no suitable alternatives, that there are imperative reasons of overriding public interest for the project, and that compensation can be delivered [MM34]; this would ensure that the policy is consistent with the Habitats Regulations and address NE’s concerns. To ensure consistency with the NPPF (Glossary) and address Historic England’s concerns, clauses (d) & (e) of the policy should be amended to confirm that any adverse effects of development are not only minimised, but enhancements are also made, where possible and appropriate [MM35-36]. The accompanying text (¶ 6.6) should also be amended, advising applicants to have early discussions with the EA about Environmental Permits [MM33]. These modifications will ensure that the policy is fully justified, reflects outstanding mitigation measures highlighted in the SA, and is consistent with the Habitats Regulations and national policy in the NPPF & NPPW.

Loss of existing waste management facilities

61. Policy WDM3 aims to safeguard existing and proposed waste management facilities and sites and ensure that they are not lost by redevelopment or change of use to other purposes; specific criteria sets out the circumstances which might justify such other development. The safeguarding of existing and proposed waste

management facilities and sites is a key element in ensuring that adequate waste management capacity is provided and retained during the Plan period. Applicants will clearly need to demonstrate how the loss of a facility or development of an allocated site for another purpose will not adversely affect CBMDC’s ability to meet the BWMDPD’s vision and objectives, implement the waste strategy and meet the identified existing and future need for waste management capacity.

62. The need to safeguard existing and proposed waste management facilities and sites is generally supported in national policy (NPPF, NPPW & PPG [ID-28]). However, I consider the reference to *exceptional circumstances* in the policy and supporting text is too strong a term to use and too onerous a test to demonstrate in this context. It is normally only used when dealing with development in Green Belts or other designated areas, such as National Parks, Areas of Outstanding Natural Beauty or ecological and heritage sites. When referring to the long-term protection of employment sites, the NPPF (¶ 22) refers to there being *no reasonable prospect* of the site being used for that purpose. The policy wording should therefore refer to "*particular*" rather than "*exceptional*" circumstances and the accompanying text (¶ 6.14) should be amended to reflect the approach in the NPPF. These modifications **[MM37-38]** will ensure that the policy is effective and consistent with national guidance.

Waste management within development

63. Policy WDM4 outlines the requirements relating to waste management for all new developments in terms of the principles of sustainable design, construction and demolition. It covers the use of recycled and secondary materials for construction, including minimising waste and energy efficient design, on-site generation of electricity from the recovery and treatment of waste, water recycling and sustainable drainage measures; it also covers the management of waste arising from the development, and seeks designs which minimise waste disposal and maximise recovery and recycling of waste materials and the opportunities to contribute to climate change mitigation. This is a wide-ranging policy which applies to all forms of new development, and reflects many of the objectives of national policy in terms of waste management and climate change mitigation; compliance of future developments with this policy will be assessed at the planning application stage.
64. However, the criteria in Policy WDM4 needs to be amended to indicate that applicants should aim to minimise the impact of any proposed on-site management of CD&E waste in terms of environmental, social or economic effects, human health, noise, vibration, dust and odour, water, ground, light or air pollution, and climate change **[MM41]**. The accompanying text (¶ 6.16) should also be amended, to confirm that applicants should be mindful of environmental management regulations and best practice during the on-site use and recovery of CD&E waste to ensure that it does not cause undue nuisance to surrounding communities **[MM40]**. In addition, to clarify the application of the policy and ensure that it is not taken out of context or extends the purpose and remit of the BWMDPD, the accompanying text (¶ 6.15) should confirm that the policy sets out the objectives for the construction and operation of new developments principally relating to waste management **[MM39]**. These modifications will ensure that the policy is effective, fully justified, has due regard to the environment, reflects the outstanding mitigation measures identified in the SA, and is consistent with national policy and soundly based.

Final Residual waste for disposal (Landfill)

65. Policy WDM5 sets out the criteria for assessing proposals for new or expanded landfill sites. The BWMDPD reflects national policy by confirming that disposal of waste to landfill is the final recourse in terms of Bradford’s waste hierarchy. As indicated previously, landfill capacity is dealt with at regional/sub-regional level, with the position being monitored by the YHWTAB. However, if there is a future need for new or expanded landfill facilities within Bradford district, it is important to set out the policy and criteria for assessing such proposals. This reflects Policy W7 in the BWMDPD.
66. Applicants will not only have to show that more advanced waste management technologies for recycling/recovery/treatment of waste have been explored and discounted, but also have to demonstrate a need for the landfill facility in terms of a sub-regional/regional capacity gap; this will require discussions with the EA and CBMDC, as well as other bodies such as WYCA/LCR/YHWTAB. Applicants will also have to show that the site is in a sequentially preferable location, starting with existing operational landfill sites and previously developed land. The policy highlights the need to consider site-specific impacts, the design, siting, appearance and operation of the facility, as well as mitigation, enhancement and restoration/after-care issues. Most of these assessments would fall within the work normally contained in an EIA and any associated supporting information. This approach is consistent with national policy in the NPPW & PPG and other good practice.
67. However, the policy needs to be amended to refer to the need to minimise any adverse effects on habitat fragmentation and enhancement, and to investigate the potential of transporting waste by non-road transport modes **[MM42]**. This will ensure that the policy is fully justified, incorporates outstanding mitigation measures set out in the SA, and is consistent with national policy in the NPPW (¶ 5 & 7), particularly in terms of the local environment.
68. Consequently, I conclude that, with the recommended modifications **[MM31-42]**, the Waste Development Management policies provide an appropriate and soundly-based framework to consider other proposals for waste management facilities and developments, which is effective, deliverable, justified and consistent with national policy.

MATTER 5 – PROPOSED SITE ALLOCATIONS

Key issue – Are the proposed site allocations in suitable and appropriate locations, are they effective, deliverable, fully justified with evidence and soundly based, and do they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations, in accordance with national policy?

69. The BWMDPD proposes six new sites for waste management facilities, in order to meet the identified waste management capacity gap, principally for LACW and C&I waste. These proposals have resulted from a comprehensive assessment of potential sites for waste management facilities, which initially identified over 160 sites, including existing employment allocations from the RUDP and sites submitted through the “call for sites” during the preparation of the Plan; these were narrowed down to around 40 sites which passed the initial assessment, resulting in a short-list of 6 sites after further detailed assessment [WM-SD-016].

70. This approach assessed the suitability of sites for new and/or enhanced waste management facilities in an objective and comprehensive way, in line with national policy (NPPW; Appendix B); it also took account of physical and environmental constraints, deliverability and viability, the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and the cumulative impact of existing and proposed waste management and disposal facilities on the well-being of local communities, in line with national policy and other good practice guidance. It also gives preference to existing sites, industrial/employment land and previously developed land, in line with the PPG [ID:28-41].
71. The assessment criteria and sites were subject to consultation at several stages during the preparation of the Plan. The sites were also assessed in the Sustainability Appraisal (SA) [WM-SD-002/004/011-015], including the reasons for selecting the preferred sites and rejecting alternative sites. Some sites were considered in the Habitats Regulations Assessment (HRA), due to the potential impact on the South Pennine Moors SAC/SPA; proposed amendments to the mitigation requirements for each site incorporate outstanding mitigation measures identified in the SA. Several sites have been identified as having potential to accommodate a range of types of waste management facilities, and the site assessment process has identified no significant factors that might prevent the delivery of the waste management facilities proposed. The shortfall in current waste management capacity in terms of meeting future requirements is significant and fully justifies the provision of additional waste management sites.
72. As indicated previously, the BWMDPD identifies more than enough sites for the provision of waste management facilities in appropriate locations, including the broad types of waste management uses appropriate for each site, to meet future needs, in line with the waste hierarchy and guidance in the NPPW. It also reflects the need for flexibility advocated in the Waste PPG [ID:28-038]. The proposed sites are located in appropriate strategic locations, with the spatial distribution based on proximity to waste arisings, focused on the City of Bradford and Keighley, where most of the LACW & C&I waste arises, and based on proximity to the primary road network. The need to reduce the long-distance transport of waste materials is a key sustainability issue and one of the main criteria in the Site Assessment Report [WM-SD-016]. This approach satisfies the “proximity principle”, helping to minimise the transportation of waste and enabling the proposed sites to serve a large enough catchment area to ensure economic viability.
73. The BWMDPD provides opportunities for the on-site management of waste where it arises, not only at the proposed sites, but also through other policies of the Plan (Policies W4-W7 & WDM1-5). It also takes account of the spatial distribution of existing and proposed waste management facilities, related to sustainability and need, encompassing a broad range of locations; opportunities to co-locate waste management facilities and complementary activities, including low-carbon energy recovery facilities, are provided by Policies W4-W7 & WDM1 & WDM5. The site assessment criteria [WM-SD-016] includes a specific Area of Search and adopts a sequential approach to identifying sites, focusing on the expansion and co-location of waste facilities at existing operational waste management sites, established/proposed employment/industrial sites and other previously developed land, in line with national policy in the NPPW & PPG. This sequential approach is also reflected in other policies in the Plan (Policies W4-W7 & WDM1 & WDM5).
74. The BWMDPD (¶ 6.6-6.12) already encourages applicants to enter into early discussions with CBMDC about waste management proposals. However, in order to encourage developers to enter into early discussions with the EA about

Environmental Permits for particular sites, a specific amendment is needed to this part of the Plan (¶ 4.5) **[MM13]**. This will ensure that the BWMDPD reflects the guidance in the Waste PPG [ID:28-052].

Site WM1 – Princeroyd Way, Ingleby Road, Listerhills

75. This is an allocated 2.1ha employment site within an existing employment zone/ industrial area in the urban area of Bradford. It is currently cleared and vacant, adjoins food-production premises and a residential area, is readily available and accessed off Ingleby Road (A6177). It is considered suitable for a wide range of waste management uses, except for advanced thermal treatment, conventional EfW and open-air waste treatment, and has a waste management capacity of 100,000-150,000tpa.
76. Most of the relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, flood risk, drainage and impact on residential amenity, in consultation with EA and Highways England (HE). However, due to the proximity of the site to neighbouring commercial property, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management, **[MM15]**. Additions are also proposed to the mitigation requirements, including the potential for habitat fragmentation and enhancement, and the need for visual and landscape assessment **[MM14; MM16]**. These modifications are needed to ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, and is consistent with national policy in the NPPF, NPPW & PPG.

Site WM2 – Ripley Road, Bowling

77. This 2.35ha site is partly allocated for employment uses and lies within an existing employment zone within the Bradford urban area. It is cleared and currently used as a skip hire depot. The site is readily available, with access to the main A641 & A650. It is considered suitable for a wide range of waste management uses, except for conventional EfW and open-air waste treatment, and has a waste management capacity of 120,000-160,000tpa. Indeed, planning permission has already been granted for a proposed gasification waste management facility, which has addressed detailed site development issues.
78. Most of the relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, flood risk, drainage and impact on the landscape and on historic assets, in consultation with EA and HE. However, due to the proximity of the site to neighbouring commercial property, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management **[MM18]**. Additions are also proposed to the mitigation requirements, including the potential for habitat fragmentation and enhancement, and the need for visual and landscape assessment **[MM17; MM19]**. These modifications will ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, and is consistent with national policy in the NPPF, NPPW & PPG.

Site WM3 – Aire Valley Road, Worth Village, Keighley

79. This is an allocated 2.8ha employment site within an existing employment area on the valley floor on the eastern edge of Keighley. It is currently vacant and adjoins a gasholder site and a railway line, about 500m south of East Riddlesden Hall, a Grade 1 listed historic property. The site is readily available, with access to the main Aire Valley Road (A650), but may be more expensive to develop due

to previous contamination from former uses. The site is considered suitable for a wide range of waste management uses, except for open-air waste treatment.

80. Planning permission was granted in 2014 for this site to be used for EfW/pyrolysis plants, including C&I waste, waste plastics, tyre pyrolysis and energy generation, and planning permission for an EfW plant was issued in April 2017. I understand that this latest permission is subject to a challenge under Judicial Review, focusing on alleged errors in the assessment of the impact on heritage assets and failure to undertake a separate HRA for the project. However, this challenge seems to largely relate to CBMDC’s consideration of the planning application rather than the principle of allocating this site for waste management purposes. Many of the representations to the BWMDPD about this proposal, particularly at Main Modifications stage, more directly relate to CBMDC’s consideration of the latest planning application. In this regard, it is important to note that the BWMDPD proposal allocates the site for a range of possible waste management uses, rather than for a specific waste management facility or process.
81. The site has been specifically assessed by the HRA [WM-SD-052/054] due to the potential adverse impact on the South Pennine Moors SAC/SPA. After undertaking an air quality modelling exercise, this suggested that a waste management use involving combustion processes at this site would potentially exacerbate the existing situation as regards acid deposition on the Rombalds Moor part of the SAC/SPA; on impact avoidance measures, it suggested that Site WM3 may not be suitable for a waste management use involving combustion processes, and recommended that the BWMDPD be amended to reflect this position. The supporting text therefore needs to be amended to confirm that the potential effects of a conventional EfW facility and Advanced Thermal Treatment (ATT) on the SAC/SPA would need to be assessed under the Habitats Regulations **[MM20]**; I understand that CBMDC would be the competent authority with regard to this matter, and that NE & EA are satisfied with this approach, which reflects the conclusions of the HRA and incorporates the outstanding mitigation measures recommended in the SA/HRA; it will also ensure that any significant detrimental impacts on the SAC/SPA and local area are avoided. The SA has been updated and amended to reflect this position [PS-B032].
82. As regards heritage assets, the Plan specifically refers to the need to consider mitigation against the potential impact of any waste development on the Grade 1 listed East Riddlesden Hall; the SA has also been updated and amended to reflect this position [PS-B030]. The need to avoid any detrimental impact arising from the construction and operation of any waste management use at this site on residential amenity is also specifically highlighted in the mitigation requirements. However, to help minimise any adverse visual impact of the proposal on its setting and surroundings and enable visual enhancements to be sought, the mitigation requirements should be amended to require visual and landscape assessment **[MM20]**. Most of the other relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, air pollution, flood risk, drainage, proximity to sensitive uses and impact on health, biodiversity and highway safety, in consultation with EA, Historic England and Highways England, and were also addressed in the HRA & SA.
83. The need to address these mitigation requirements is further reinforced by Policy WDM2, which requires proposals to demonstrate that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. Detailed site development issues and infrastructure and mitigation requirements were also considered as part of the planning

application process, including the potential impact on the SAC/SPA [WM-SD-067]; potential operators would also need to apply for an Environmental Permit, which would address emissions and air pollution, including the implications of any weather inversions in this valley bottom location.

84. In addition to the need for a separate HRA to assess the potential effects of a conventional EfW/ATT on the SAC/SPA and require a visual and landscape assessment **[MM20]**, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management, due to the proximity of the site to neighbouring commercial property **[MM21]**. These modifications are needed to ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, including the potential impact on the SAC/SPA, and is consistent with national policy in the NPPF, NPPW & PPG.

Site WM4 – Bowling Back Lane Household Waste Collection & Recycling Site

85. This 4.27ha site lies within an existing employment zone in the urban area of Bradford, and is currently used as a Household Waste Collection & Recycling Site. It adjoins Site WM6 and a gypsy/traveller site. Access is readily available to the main A650 & A6177 via industrial estate roads, but the presence of existing uses and structures may result in higher development costs due to the need for site clearance. The site is considered suitable for a wide range of waste management uses, except for open-air waste treatment.
86. Planning permission was granted in 2012 for a Mechanical Recycling Plant and Energy Recovery Plant on this site, with a capacity of 190,000tpa, which was to have been developed in partnership with Calderdale Council through a PFI process. However, the project was not advanced due to PFI credits being withdrawn, and the site remains in use as a waste transfer station and bulking station for LACW.
87. Most of the relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, flood risk and drainage, in consultation with EA and HE. However, due to the proximity of the site to neighbouring commercial property, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management **[MM23]**. Additions to the mitigation requirements are also proposed, including the need to consider the effects on the nearby listed building and on the quality of the surrounding built environment, air quality, noise and visual impact, along with the potential for habitat fragmentation and enhancement, and visual and landscape assessment **[MM22; MM24]**. These modifications are needed to ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, and is consistent with national policy in the NPPF, NPPW & PPG.

Site WM5 – Merrydale Road, Euroway

88. This is an allocated 2ha employment site within the Euroway Trading Estate in the urban area of Bradford. It is currently vacant and has good access to the M606 via industrial estate roads. The site is readily available and is considered suitable for a wide range of waste management uses, except for conventional EfW and open-air waste treatment, and has a waste management capacity of 100,000-150,000tpa. It has also been assessed in the HRA as being unlikely to have any adverse impact on the South Pennine Moors SAC/SPA [WD-SD-051]. Although there are no current planning permissions for waste management uses, there is an extant planning permission for a warehouse/employment unit on this site.

89. Most of the relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, flood risk, drainage and impact on the South Pennine Moors SAC/SPA. However, due to the proximity of the site to neighbouring commercial property, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management **[MM26]**. Additions to the mitigation requirements are also proposed, including the requirement for visual and landscape assessments **[MM27]**, but previous amendments to require air quality and noise assessment and appropriate mitigation (originally set out in [MM25]) are not needed since they are covered by existing mitigation requirements and other policies in the Plan. These modifications are needed to ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, and is consistent with national policy in the NPPF, NPPW & PPG.

Site WM6 – Steel Stock & Scrapholders Site, Birkshall Lane

90. This 4.1ha site is within an existing employment zone in the urban area of Bradford, adjoining Site WM4 and close to an existing railway line, with a rail siding. It is currently used as a waste management facility for steel scrap and recycling, and has good access to the A650 & A6177. However, the presence of existing uses and structures may require clearance and contamination from previous uses may increase development costs. The site is considered suitable for a wide range of waste management uses, except for open-air waste treatment, and has a waste management capacity of 100,000-150,000tpa.
91. Most of the relevant infrastructure and mitigation requirements have been identified, including transport/access, utilities, flood risk, drainage and impact on residential amenity. However, due to the proximity of the site to neighbouring commercial property, CBMDC proposes to amend the infrastructure requirements to acknowledge the potential to consider utilising any heat generated as part of waste management **[MM29]**. Additions to the mitigation requirements are also proposed, including the need to address the impact on the nearby listed building, the effect on the quality of the surrounding built environment and the potential for habitat fragmentation and enhancement, along with visual and landscape assessment **[MM28; MM30]**. These modifications are needed to ensure that the proposal is fully justified, reflects the outstanding mitigation measures highlighted in the SA, and is consistent with national policy in the NPPF, NPPW & PPG.

Overall conclusions on proposed site allocations

92. Having considered all the evidence and representations, I conclude that sufficient sites suitable for the provision of waste management facilities have been identified to meet the future need for additional waste management capacity for LACW & C&I waste in Bradford. The proposed site allocations are in suitable and appropriate locations, are effective, deliverable, fully justified and soundly based. With the recommended modifications **[MM13-24; 26-30]**, they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations, in accordance with national policy.

MATTER 6 – DELIVERY AND MONITORING

Key issue – Does the Waste Management DPD provide a comprehensive, effective and sound framework for delivering and monitoring the implementation of the Plan, including the baseline information, indicators and targets?

93. Section 7 sets out the measures for assessing and monitoring the performance of the BWMDPD, including indicators and targets for each policy against the objectives of the Plan. Performance against the objectives and targets in the SA will be monitored in terms of the contribution towards sustainable development, specific waste data will be collated and monitored, and performance will be reported in CBMBC’s Annual Monitoring Report. However, the wording of the objectives in this section (¶ 7.5) needs to be consistent with the latest wording of these objectives in Section 2 of the BWMDPD **[MM43-44]**.
94. The BWMDPD provides sufficient information about the delivery mechanisms and timescales for implementing the Plan’s policies and proposals, including detailed infrastructure and mitigation requirements for each of the site allocations and a clear indication of further technical work and supporting information required from applicants. Early engagement and pre-application discussions with CBMDC and other bodies, such as EA, is also encouraged. The monitoring framework sets out how CBMDC will monitor and report on the take-up of allocated sites, existing stock and changes in waste management facilities and capacity, waste arisings and the amounts of waste recycled, recovered and disposed of; it also identifies when policies in the BWMDPD may need to be reviewed. This reflects the guidance in the Waste PPG [ID:28-054]. CBMDC is also committed to reviewing and updating the WNA on a regular basis, co-ordinated through the WYCA/LCR/YHWTAB.
95. The policies in the BWMDPD provide sufficient flexibility and contingencies to take account of unexpected changes in circumstances by providing a choice and mix of waste management sites across the district, with the potential to accommodate a wide range of waste management facilities for a variety of waste streams. Not all the identified sites may come forward for waste management development, but further flexibility is provided by the identification of a range of waste management sites, exceeding the total area needed to meet the capacity gap. There is also the opportunity to provide additional sites for particular waste streams through the sequential approach set out in Policies W4-W7 & WDM1-WDM5.
96. Consequently, with the recommended modifications **[MM43-44]**, the BWMDPD provides a comprehensive, effective and sound framework for delivering and monitoring the implementation of the Plan, with sufficient flexibility, which is consistent with national policy.

Other matters

97. Other matters were raised in the representations which do not go to the heart of the soundness of the BWMDPD or relate to more detailed matters about specific proposals or planning applications. In response, CBMDC proposes several minor changes to the wording of the policies and accompanying text as “Additional Modifications” (AM), but these do not directly affect the overall soundness of the Plan and need no endorsement from me. Having considered all the other points made in the representations, including those relating to the Main Modifications, I conclude that there are no further changes needed to ensure that the Plan is sound in terms of the NPPF, NPPW and associated guidance.

Assessment of Legal Compliance

98. CBMDC has undertaken its own self-assessment of the legal compliance of the BWMDPD [WM-SD-007]. My assessment of these and other aspects of legal compliance of the BWMDPD is summarised below, and confirms that it meets all the relevant legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The BWMDPD is identified in the approved LDS (July 2014) [SS/054], and its role and content comply with the LDS. The submission and examination of the Plan is slightly behind the proposed timetable, and adoption will be delayed by the need to consult on Main Modifications and address late representations.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2008 [SS/055]. The plan-making and consultation processes meet the minimum requirements of the Local Planning Regulations and CBMDC’s adopted SCI, including consultation on Main Modifications.
Sustainability Appraisal (SA)	Adequate SA has been carried out at all stages during the preparation of the BWMDPD, including at the Publication Draft and Main Modifications stages [WM-SD-002/004/011-015/028-032/039-040/059-060; PS-B025-028/032]. The Publication Draft was supported by a full SA, which also considered reasonable alternatives, including spatial options, and the outstanding mitigation measures highlighted in the SA have been addressed in the Main Modifications to the BWMDPD.
Habitats Regulations Assessment (HRA)	The original Habitats Regulations Assessment accompanying the submitted BWMDPD [WM-SD-052/053/054] has not been updated since 2013, but the HRA for the BCS has been updated. The HRA for the BWMDPD focused on the potential for emissions from Site WM3 and the impact on the South Pennine Moors SAC/SPA. There are no outstanding issues arising from the HRA as far as Natural England is concerned [WM-SD-067], and so the HRA undertaken for the BWMDPD is satisfactory and does not need to be updated or revised.
National Policy	The BWMDPD is consistent with national policy, except where indicated and Main Modifications are recommended.
2004 Act (as amended) and 2012 Regulations	The BWMDPD complies with the Act and the Local Planning Regulations.
Public Sector Equality Duty (PSED)	The BWMDPD is consistent with the NPPF in providing for the needs of all sections of the community, including people with disabilities, and I have had regard to the equality impacts of the Plan with regard to these matters, including the equality assessments undertaken by CBMDC [WM-SD-035/061/062].

Overall Conclusion and Recommendation

99. The submitted Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend that it is not adopted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
100. CBMDC has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the attached Appendix, the Local Plan for the Bradford District Waste Management Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act, meets the criteria for soundness in the National Planning Policy Framework, and is capable of adoption.

Stephen J Pratt

Inspector

Appendix: Main Modifications required to make the plan sound and capable of adoption

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Waste Management DPD Schedule of Main Modifications

The document sets out the Main Modifications required to the Submission Draft of the Waste Management DPD [WM-SD-001] to ensure that it is sound and legally compliant.

In terms of presentation, the deletion of text is denoted with a 'strike through' (~~strike through~~), with inserted new text as bold underlined (**new text**). Where the detailed wording of the policies and/or accompanying text has been amended following consultation on the Proposed Main Modifications, these are highlighted in red.

Page and paragraph numbers relate to the Waste Management DPD as submitted: Submission Document [WM-SD-001]

Main Modifications (MM)

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
MM1 Page 109	5	Vision	Bradford needs to take responsibility for the waste it generates, undertaking a step-change in the way it manages its waste, through more sustainable waste management, moving the management of waste up the waste hierarchy of: prevention; preparing for re-use; recycling; other recovery and only disposing of waste as a last resort. We aspire to achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities, and will put in place the necessary structures and systems to enable this to happen including the promotion of a range of technologies, <u>modal shift in the transportation of waste arisings</u> and cross-boundary working where appropriate. <u>This will aid in climate mitigation and adaptation</u>
MM2	6	Objective 3	"To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford community and are delivered in a manner which protects <u>and, where appropriate, enhances</u> the District's environmental assets and safeguards human health"
MM3	6	Objective 5	Objective 5: To work in collaboration with appropriate local authorities and waste industry operators to ensure that sub-regional waste (and if necessary beyond the subregion) issues are effectively considered and planned for in accordance with the duty to co-operate. Cross boundary issues including the movement of waste, <u>transportation of waste arisings by sustainable transport modes</u> and locating of facilities near to source must be managed and planned for collectively where possible

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
MM4	10	2.19	The Waste Management DPD therefore does consider opportunities for joint cross-boundary working on waste matters and also reflects the possibility of a continued Bradford and Calderdale joint initiative for Municipal Solid Waste management facilities. need to work closely with neighbouring authorities.
MM5	11	Policy W1	Work collaboratively to promote (where possible) modal shift in the movement of waste from road to more sustainable forms of transport.
MM6	12	Table 1	<p>Table 1: Summary Current Total Waste Arisings in Bradford (20122013)</p> <p>Type of Waste Arising Arisings (Tonnes)</p> <p>Agricultural Waste 283,132 296,902 20.204 20.6%</p> <p>Commercial Waste 254,314 254,314 18.20 17.6%</p> <p>Industrial Waste 219,773 219,773 15.74 14.2%</p> <p>Construction Demolition and Excavation Waste 350,000 440,000 25.02% 30.6%</p> <p>Hazardous Waste 19,155 19,084 1.37% 1.3%</p> <p>Local Authority 272,668 226,085 19.50 15.7%</p> <p>Total*** 1,399,042 1,456,158</p> <p>Waste Water** 1,024,568 Type of Waste Arising Arisings (Tonnes)</p> <p>Source: Environment Agency Waste Data Interrogator (WDI) 2012 2013*. Yorkshire Water 2014**. Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both***</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification						
MM7	13	Table 2	Table 2: Forecast Waste Arisings in Bradford (2013 15 –30) using Bradford Waste Forecasting Model Waste Stream						
			Waste Stream	2013	2015	2020	2025	2030	
			Agricultural Waste*	283,133	283,133 <u>296,902</u>	283,133 <u>296,902</u>	283,133 <u>296,902</u>	283,133 <u>296,902</u>	
			Commercial and Industrial Waste*	513,830	538,326 <u>498,621</u>	558,882 <u>522,078</u>	580,329 <u>546,797</u>	602,721 <u>572,863</u>	
			CDEW*	447,604	455,709 <u>443,504</u>	472,360 <u>456,971</u>	483,800 <u>470,844</u>	495,515 <u>485,141</u>	
			Hazardous Waste*	19,153	19,764 <u>19,338</u>	20,267 <u>20,386</u>	20,782 <u>22,066</u>	21,311 <u>23,570</u>	
			Local Authority Collected Waste – Bradford**	226,085	227,880 <u>200,419¹</u>	257,738 <u>226,684²</u>	268,780 <u>236,396³</u>	279,282 <u>245,629⁴</u>	
			Total Tonnes	1,489,805	1,524,812	1,592,380	1,636,824	1,681,962	

Modification Number	Page No.	Policy / Paragraph	Proposed Modification				
				<u>1,458,784</u>	<u>1,523,021</u>	<u>1,550,939</u>	<u>1,624,105</u>
MM8	15	Table 3	¹ 145,648 tonnes of Secondary Waste generated for Residual Mechanical Treatment ² 164,735 tonnes of Secondary Waste generated for Residual Mechanical Treatment ³ 171,793 tonnes of Secondary Waste generated for Residual Mechanical Treatment ⁴ 178,504 tonnes of Secondary Waste generated for Residual Mechanical Treatment				
			Waste Management	Existing Capacity Gap (Tonnes)			
			Landfill (non-hazardous)	59,439 61,655			
			Landfill (hazardous)	74 5,035			
			Landfill (CD&E)	201,200 74,945			
			Energy recovery (LACW & C&I)	203,169 102,346			
			Incineration (Specialist High Temp)	833 861			
			Recycling (C&I and LACW)	400,084 444,225			
			Recycling (aggregates CD&E)	112,975 334,834			
			Recycling (specialist materials– including metal recycling, End of Life Vehicles and WEEE)	-1,059 2,306			
			Composting	34,340 4,421			
Residual Mechanical Treatment	109,146 195,277						

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	
			Treatment Plant (including Anaerobic Digestion, specialised treatment of biodegradable liquids and wastes, organic waste treatment by distillation)	-52,376 -46,643
MM9	16	Policy W2	There is a requirement to accommodate for 1,681,962 1,624,105 tonnes of waste arisings over the period to 2030. In providing for this level of waste, the Council will support the prevention of waste, its re-use, recycling and other recovery (including energy from waste) in accordance with the Core Strategy policy WM1. The Council aim is to achieve net self-sufficiency and acknowledges the most appropriate and sustainable solution to waste management may result in relying on treatment capacity in adjacent authority areas, in line with European and national policy guidance.	
MM10	16	Policy W2 Table 4	Waste Stream	Capacity Requirements by 2030 (Tonnes)
Page 113			Agricultural Waste	283,133 296,902
			Commercial and Industrial Waste	602,721 572,863
			CDEW	495,515 485,141
			Hazardous Waste	21,311 23,570

Modification Number	Page No.	Policy / Paragraph	Proposed Modification									
			<table border="1" data-bbox="618 276 1451 635"> <tr> <td data-bbox="618 276 887 427">Local Authority Collected Waste – Bradford</td> <td data-bbox="887 276 1451 427"> <p style="text-align: right;">279,282</p> <p style="text-align: right;"><u>245,629*</u></p> </td> </tr> <tr> <td data-bbox="618 427 887 635">Total Tonnes</td> <td data-bbox="887 427 1451 635"> <p style="text-align: right;">1,681,962</p> <p style="text-align: right;"><u>1,624,105*</u></p> </td> </tr> </table> <p data-bbox="618 635 1585 655"><u>*178,504 tonnes of Secondary Local Authority Collected Waste generated for Residual Mechanical Treatment</u></p>	Local Authority Collected Waste – Bradford	<p style="text-align: right;">279,282</p> <p style="text-align: right;"><u>245,629*</u></p>	Total Tonnes	<p style="text-align: right;">1,681,962</p> <p style="text-align: right;"><u>1,624,105*</u></p>					
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Total Tonnes	<p style="text-align: right;">1,681,962</p> <p style="text-align: right;"><u>1,624,105*</u></p>											
M11	17	4.1 and 4.2	<p data-bbox="618 711 2098 906">The established capacity gap is now needed to be translated into a land requirement for new waste management facilities to be allocated within the DPD. This can be extrapolated by working on a broad estimate of approximately 50,000 – 70,000 tonnes per hectare of most standard treatment technologies. This equates to a minimum need of approximately 17 hectares of developable land for allocated waste management sites of various sizes and distributed across the District. <u>based on the following:</u></p> <p data-bbox="618 946 994 975"><u>Table 5 – Site Size Assumptions</u></p> <table border="1" data-bbox="618 1010 1527 1423"> <thead> <tr> <th data-bbox="618 1010 922 1078">Facility Type</th> <th data-bbox="922 1010 1227 1078">Tonnage</th> <th data-bbox="1227 1010 1527 1078">Land Take</th> </tr> </thead> <tbody> <tr> <td data-bbox="618 1078 922 1273">Materials Recycling/Reprocessing Facilities (LACW & C&I waste)</td> <td data-bbox="922 1078 1227 1273">128,000 tonnes</td> <td data-bbox="1227 1078 1527 1273">1 ha</td> </tr> <tr> <td data-bbox="618 1273 922 1423">Materials Recycling/Reprocessing Facilities (C&D waste)</td> <td data-bbox="922 1273 1227 1423">63,000 tonnes</td> <td data-bbox="1227 1273 1527 1423">1 ha</td> </tr> </tbody> </table>	Facility Type	Tonnage	Land Take	Materials Recycling/Reprocessing Facilities (LACW & C&I waste)	128,000 tonnes	1 ha	Materials Recycling/Reprocessing Facilities (C&D waste)	63,000 tonnes	1 ha
Facility Type	Tonnage	Land Take										
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Materials Recycling/Reprocessing Facilities (C&D waste)	63,000 tonnes	1 ha										

Modification Number	Page No.	Policy / Paragraph	Proposed Modification		
			Non-hazardous non-inert landfill	100,000 to 500,000 tonnes (or the equivalent void space)	N/A
			Non-hazardous inert landfill	100,000 tonnes	N/A
			Hazardous landfill	20,000 tonnes	N/A
			Composting	25,000 to 35,000 tonnes.	1 – 2 ha
			Energy Recovery	100,000 – 200,000 tonnes	2 – 3 ha
			Residual Mechanical Treatment	100,000 tonnes	1 ha
			<p><u>The total number of hectares of the sites set out in the Waste Management DPD (17.62ha) is greater than the maximum land take required under the capacity gap forecasts. A surplus land take requirement has been adopted for the following reasons:</u></p> <ul style="list-style-type: none"> ● <u>Providing a choice and mix of potential waste management sites across the District is important to support waste hierarchy objectives;</u> ● <u>It ensures flexibility of the Plan respond to future circumstances and changing approaches to waste management including technological advancement;</u> ● <u>An appropriate mix of sites will help accommodate different waste streams allowing waste operators flexibility to</u> 		

Modification Number	Page No.	Policy / Paragraph	Proposed Modification																																												
			<p><u>develop the necessary waste management facilities the District needs.</u></p> <p>More information relating to the methodology of calculating 'Need' and the 'capacity gap', can be found in the accompanying Evidence Base Report: <u>Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study.</u></p> <p>4.2 Providing a choice and mix of potential waste management sites across the District is important to support waste hierarchy objectives. An appropriate mix of sites will help accommodate different waste streams (particularly MSW and C&I waste) allowing waste operators flexibility to develop the necessary waste management facilities the District needs.</p>																																												
MM12 Page 116		Additional Table	<table border="1"> <thead> <tr> <th data-bbox="618 651 925 799">Waste Management</th> <th data-bbox="936 651 1128 799">Year</th> <th data-bbox="1128 651 1391 799">Tonnage/year</th> <th data-bbox="1391 651 1615 799">Min no new (additional) Facilities in year</th> <th data-bbox="1615 651 1861 799">Size (ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="618 799 936 1011" rowspan="3">Energy recovery (LACW & C&I)</td> <td data-bbox="936 799 1128 871">2015</td> <td data-bbox="1128 799 1391 871">100,404</td> <td data-bbox="1391 799 1615 871">1</td> <td data-bbox="1615 799 1861 871">2 – 3 ha</td> </tr> <tr> <td data-bbox="936 871 1128 943">2020</td> <td data-bbox="1128 871 1391 943">94,412</td> <td data-bbox="1391 871 1615 943">0</td> <td data-bbox="1615 871 1861 943">2 – 3 ha <u>N/A</u></td> </tr> <tr> <td data-bbox="936 943 1128 1011">2030</td> <td data-bbox="1128 943 1391 1011">102,346</td> <td data-bbox="1391 943 1615 1011">0</td> <td data-bbox="1615 943 1861 1011">2 – 3 ha <u>N/A</u></td> </tr> <tr> <td data-bbox="618 1011 936 1224" rowspan="3">Incineration (Specialist High Temp)</td> <td data-bbox="936 1011 1128 1083">2015</td> <td data-bbox="1128 1011 1391 1083">861</td> <td data-bbox="1391 1011 1615 1083"><1</td> <td data-bbox="1615 1011 1861 1083">N/A</td> </tr> <tr> <td data-bbox="936 1083 1128 1155">2020</td> <td data-bbox="1128 1083 1391 1155">861</td> <td data-bbox="1391 1083 1615 1155"><1</td> <td data-bbox="1615 1083 1861 1155">N/A</td> </tr> <tr> <td data-bbox="936 1155 1128 1224">2030</td> <td data-bbox="1128 1155 1391 1224">861</td> <td data-bbox="1391 1155 1615 1224"><1</td> <td data-bbox="1615 1155 1861 1224">N/A</td> </tr> <tr> <td data-bbox="618 1224 936 1289" rowspan="2">Recycling (C&I and LACW)</td> <td data-bbox="936 1224 1128 1295">2015</td> <td data-bbox="1128 1224 1391 1295">325,611</td> <td data-bbox="1391 1224 1615 1295">3</td> <td data-bbox="1615 1224 1861 1295">3 ha</td> </tr> <tr> <td data-bbox="936 1295 1128 1359">2020</td> <td data-bbox="1128 1295 1391 1359">385,958</td> <td data-bbox="1391 1295 1615 1359">0</td> <td data-bbox="1615 1295 1861 1359">3 ha <u>N/A</u></td> </tr> </tbody> </table>	Waste Management	Year	Tonnage/year	Min no new (additional) Facilities in year	Size (ha)	Energy recovery (LACW & C&I)	2015	100,404	1	2 – 3 ha	2020	94,412	0	2 – 3 ha <u>N/A</u>	2030	102,346	0	2 – 3 ha <u>N/A</u>	Incineration (Specialist High Temp)	2015	861	<1	N/A	2020	861	<1	N/A	2030	861	<1	N/A	Recycling (C&I and LACW)	2015	325,611	3	3 ha	2020	385,958	0	3 ha <u>N/A</u>	2015	100,404	1	2 – 3 ha
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Modification Number	Page No.	Policy / Paragraph	Proposed Modification				
				2030	444,225	1	4ha <u>1 Ha</u>
			Recycling (aggregates CD&E)	2015	148,313	3	<u>N/A Extant PP in place in combination with onsite management</u>
				2020	315,301	2	<u>N/A Extant PP in place in combination with onsite management</u>
				2030	334,834	0	<u>N/A Extant PP in place in combination with onsite management</u>
			Composting	2015	-16,692	Surplus	Surplus
				2020	-649	Surplus	Surplus
				2030	4,421	<1	N/A
			Residual Mechanical Treatment	2015	16,073	1	<u>0.5-1 ha</u>
				2020	180,844	1	<u>2-ha 1 ha</u>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification										
			<table border="1"> <tr> <td></td> <td>2030</td> <td>195,277</td> <td>0</td> <td>4 ha <u>N/A</u></td> </tr> <tr> <td colspan="4"><u>Total estimated additional land take</u></td> <td><u>9 ha</u></td> </tr> </table>		2030	195,277	0	4 ha <u>N/A</u>	<u>Total estimated additional land take</u>				<u>9 ha</u>
	2030	195,277	0	4 ha <u>N/A</u>									
<u>Total estimated additional land take</u>				<u>9 ha</u>									
MM13	17	4.5	A number of sites have been shortlisted as having potential to accommodate more than one type of waste management facility, subject to Environmental Permits being obtained. <u>Applicants are advised to enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed.</u> Any development proposals on shortlisted sites must accord with the relevant Waste Development Management policies as set out in Section 7 of this document. For further information on the site assessment process see the full Site Assessment Report which accompanies this document.										
MM14	21	Site WM1	In addition, there is a need to deliver an 8m buffer to the watercourse running to the north of the site as part of any development on Site 1, to form a wildlife buffer zone, which should be free from all built development and any formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and be appropriately retained and managed throughout the lifetime of the development. <u>Before site development takes place the following effects will need to be investigated and mitigated: the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).</u>										
MM15	21	Site WM1	<p>Utilities</p> <p>Access to national grid / capacity of grid for local energy production?</p> <p><u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u></p>										
MM16	21	Site WM1	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>										

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
MM17	23	Site WM2	<u>Before site development takes place the following effects will need to be investigated and mitigated: the potential on the site for habitat fragmentation and habitat enhancement (including helping to achieve BAP targets). Air quality and noise should be assessed (in accordance with Policy WDM2) and mitigation put in place as necessary.</u>
MM18	23	Site WM2	<p>Utilities</p> <p>Access to national grid / capacity of grid for local energy production? District heat network potential due to proximity to the city centre? Stand-off distance from the railway line?</p> <p><u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u></p>
MM19	23	Site WM2	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>
MM20	25	Site WM3	<p><u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u></p> <p><u>The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC will need to be assessed under the Habitats Regulations through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required.</u>"</p>
MM21	25	Site WM3	<p>Utilities</p> <p><u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u></p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
MM22	27	Site WM4	<u>Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets). Air quality, noise and visual effects should be assessed and mitigation put in place as necessary due to residential receptors located nearby.</u>
MM23	27	Site WM4	Utilities <u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>
MM24	27	Site WM4	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>
MM25	29	Site WM5	<u>Air quality and noise assessment and appropriate mitigation will be required in order to ensure there are no negative effects on sensitive receptors.</u>
MM26	29	Site WM5	<u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>
MM27	29	Site WM5	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>
MM28	31	Site WM6	<u>Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the</u>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			<u>potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).</u>
MM29	31	Site WM6	Utilities <u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>
MM30	31	Site WM6	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>
MM31	33	5.3	The key issues for Bradford District in relation to the management of Construction, Demolition and Excavation Waste (CDEW) are: <ul style="list-style-type: none"> • CDEW arisings form a significant proportion of total waste arisings across Bradford District at the current time and forecast into the future with arisings set exceed 490,000 <u>to reach 485,141</u> tonnes by 2030. • CDEW arisings are likely to grow in the future linked to the District's forecast population growth and the subsequent need for local planning of economic and housing development. This growth will stimulate additional waste arisings; The Council will encourage the management of CDEW waste (along with other waste streams) on-site at the point of origin with an emphasis on re-use and recycling, in accordance with the waste hierarchy. The Council considers this the most sustainable and environmentally sound solutions for management of Construction, Demolitions and Excavation Waste. <u>The Council are of the opinion the capacity gap for Construction and Demolition Waste can be addressed through a combination of an extant planning permission for CDEW management and the continuation of on-site management.</u>
MM32	35	5.4	Although the quantities of agricultural waste are quite significant, reaching 283,133 296,902 tonnes by 2030, the quantities of agricultural waste for off-site management are very small at just over 2,000 tonnes and this is fragmented across facilities

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			of various types
MM33	40	6.6	Pre-application consultation with the Council is essential to establish what supporting information is likely to be required and is strongly encouraged as an important element of applying for permission for waste development. This is particularly so given the likely need for a supporting Environmental Impact Assessment (EIA), Transport Assessment, Health Impact Assessment and other impact related studies. Such liaison will also help ensure planning applications are processed efficiently and effectively. In accordance with the Localism Act and the NPPF, public consultation with the local community is strongly encouraged at the earliest stage of waste development proposals, with the process of consultation on planning applications set out in the Council's Statement of Community Involvement. <u>It is also advised applicants enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed.</u>
MM34	42	WDM2 (j) 6.12	j) The applicant must demonstrate any biodiversity enhancement has been fully investigated through an ecological assessment and <u>adverse effects on European Designated Sites are avoided through appropriate mitigation;</u> and <u>"Where the ecological assessment (Criteria J of Policy WDM2) determines that adverse effects on the integrity of European Designated Site(s) cannot be avoided, the applicant must demonstrate that there are no suitable alternatives, that there are imperative reasons of overriding public interest for the project and that compensation can be delivered."</u>
MM35	42	WDM2 (d)	d) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and where possible and appropriate, enhancements made, to:</u>
MM36	42	WDM2 (e)	The impacts of the proposed waste management facility are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and where possible enhancement made, in terms of to:</u>
MM37	44	6.14	The Council will resist the loss of existing facilities and allocated sites unless <u>there is no realistic prospect of the site being used for waste management purposes</u> exceptional circumstances can be demonstrated. Exceptional <u>Particular</u> circumstances will need to demonstrate how the loss of an existing facility, or development of an allocated waste site for another unrelated purpose, does not adversely affect the Council's ability to meet the District's waste management vision

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			and objectives.
MM38	44	WDM3	<p>The Council will resist the loss of existing facilities and allocated sites through redevelopment or change of use for any other purposes other than waste management, unless the applicant can demonstrate any of the exceptional <u>particular</u> circumstances exist:</p> <ul style="list-style-type: none"> a) There is no longer any identified need for the facility or site across any form of waste arising in the District and sub-region, <u>and such a facility could be accommodated elsewhere</u>; or b) The facility or site does not accord with Bradford’s core waste policies or cannot contribute to the waste hierarchy’s objectives; or c) The use of the facility or site for waste management activities are proved to be obsolete or economically unviable and market testing effectively demonstrates that other waste operators would not bring the site facility or site into use- <u>there is no realistic prospect of the site being used for waste management purposes</u>; or d) An alternative, suitable waste facility site is identified elsewhere in the District enabling a site swap that is capable of satisfying the site location criteria for the waste management facility.
MM39	45	6.15	The preferred policy sets out the objectives for the construction and operation of developments, <u>principally relating to waste management.</u>
MM40	45	6.16	6.16 All new and expanded developments will be required to demonstrate that any buildings associated with the development have regard to sustainable construction methods. <u>Applicants should be mindful of environmental management regulations and best practice during the on-site use and recovery of CDEW to ensure it does not cause undue nuisance to surrounding communities.</u>
MM41	45	WDM4	<p>WDM4: Waste Management within Development</p> <p>Proposals related to the expansion of existing and new developments will be permitted where they demonstrate:</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			<p>a) The use of recycled and secondary materials for construction of the development, including the minimisation of waste resulting from construction;</p> <p>b) Energy efficient design, maximising, the on-site generation of electricity from the recovery and treatment of wastes and the provision of other renewable energy sources, including opportunities to contribute to climate change mitigation;</p> <p>c) Water efficient design, including where possible water recycling and sustainable drainage measures;</p> <p>d) That waste to be treated cannot practically and reasonably be reused, recycled or processed to recover materials;</p> <p>e) The appropriate management arrangements are in place for waste arisings generated by the development;</p> <p>f) Reduction in gases associated with adverse climate change;</p> <p>g) Design which minimises the disposal of waste and maximises the recovery and recycling of materials at the end of the development's life; and</p> <p>h) Maximise opportunities to contribute to climate change mitigation and priorities.</p> <p>Where demolition needs to take place before construction, as far as possible, construction and demolition waste should be recovered or recycled, preferably on-site. <u>The applicant must also demonstrate the impacts of any proposed on-site management of construction and demolition waste are minimised in terms of:</u></p> <ul style="list-style-type: none"> • <u>Environmental, social or economic effects;</u> • <u>Human Health;</u> • <u>Noise, vibrations, dust, odour;</u> • <u>Water, ground, light or air pollution; and</u> • <u>Climate Change</u>
MM42	47	WDM5	<p>a) d) Residual landfill development proposals will be permitted where: a) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised on:</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			<ul style="list-style-type: none"> • Designated protected areas of landscape, historic or nature conservation <u>including habitat loss or fragmentation;</u> • Visual and landscape amenity; • Floodplains, groundwater or water quality; • Transport accessibility, capacity and the need to travel <u>including investigating the potential of transporting waste by non-road transport modes;</u>
MM43	50	Objective 3	<p>“To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford community and are delivered in a manner which protects and, where appropriate, enhances the District’s environmental assets and safeguards human health”</p>
MM44	50	Objective 5	<p>Objective 5: To work in collaboration with appropriate local authorities and waste industry operators to ensure that sub-regional waste (and if necessary beyond the subregion) issues are effectively considered and planned for in accordance with the duty to co-operate. Cross boundary issues including the movement of waste, <u>transportation of waste arisings by sustainable transport modes</u> and locating of facilities near to source must be managed and planned for collectively where possible</p>

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Report of the Strategic Director of Place the meeting of Executive to be held on 12 September 2017

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Subject:

The Destination Management Plan and Future Delivery of the Frontline Visitor Information

Summary statement:

This report is to inform the Executive of the Destination Management Plan (DMP) and Tourism Review reports and consider that the new approach to destination management is the right way forward and agree the delivery model for the Tourism frontline service

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Overview & Scrutiny Area:
Regeneration and Economy

1. SUMMARY

- 1.1 The purpose of this report is to inform the Executive of the Destination Management Plan (DMP) and Tourism Review reports and consider that the new approach to visitor economy development and destination management is the right way forward and agree the future delivery model for the Tourism frontline service.

2. BACKGROUND

- 2.1 Due to a challenging budgetary environment, changing industry approaches to destination management and growth opportunities within the visitor economy, CBMDC decided to commission two reports; a new Destination Management Plan that would set out how CBMDC will deliver visitor economy growth in the future and a review of frontline visitor information services. These can be found in Appendices 1 and 2.
- 2.2 Team Tourism were appointed as consultants and conducted a full consultation process with key partners, via workshops, face to face interviews, and telephone conversations. The key partners included industry partners from the Tourism sector including attractions, accommodation, and business.
- 2.3 Both reports were put out to consultation until from Jan 9th 2017 - 6th March 2017 on bradford.gov.uk and notification was sent to MP'S, Councillors, Parish Councillors, tourism businesses, partners and local stakeholders.

3. THE DESTINATION MANAGEMENT PLAN (Appendix 1)

- 3.1 Team Tourism's DMP report analysed the current tourism offer in Bradford District and recommended a new strategic approach to destination management and an action plan based on: Product and Place; Promotion and Information and Facilitation and Partnership.

3.2 Aim and objectives

- 3.2.1 Current estimates put the value of the visitor economy in Bradford at £612m per annum with the potential to grow this to £725m in the medium term and possibly by more in the longer term if the correct conditions can be created. This will contribute to providing better skills, more good jobs and a growing economy.
- 3.2.2 The primary aim for intervention in the visitor economy at a destination level is to maximise the economic impact through the generation of spend, profit and jobs. In its simplest terms this aim is achieved by a combination of attracting more visitors, and increasing their length of stay and spend and having them return again in the future.
- 3.2.3 Ancillary positive impacts are also achievable for inward investment and place marketing through better alignment of messages and shared use of marketing collateral.

3.3 Strategic Approach

- 3.3.1 Developing the visitor economy in Bradford District must be predicated on a clear identification of target markets and our ability to carefully match their needs with tourism assets in the district. The DMP outlines a number of markets (e.g. UK coach operators and group organisers, overseas coach tours, families, 'active indulgents', 'young explorers' and event visitors) which have different characteristics and needs. Different approaches will be required to attract them.
- 3.3.2 While future activity will continue to distinguish four places and areas – Bradford, Haworth, Saltaire and Ilkley, we will also seek to package thematic experiences that cut across several or all of these places. In general, contemporary visitors are more interested in experience rather than place and future tourism product development needs to reflect this trend.
- 3.3.3 The DMP suggests that achieving a unified brand concept for the whole area and developing campaigns for each destination is unrealistic and given the new emphasis on experiences, potentially unhelpful. However, we will explore further whether an umbrella brand is useful, taking into account work currently being undertaken by P S London on behalf of the council which is looking at place marketing..

3.4 Facilitation and Partnership

- 3.4.1 While there will be an ongoing role for CBMDC in the development of the visitor economy, it will increasingly need to act as a facilitator and enabler of private and voluntary sector visitor economy development. In order to do this the sector needs to work better as a coherent whole. At present, partnerships across the district and within specific areas are quite weakly developed.
- 3.4.2 Moving forward the visitor economy sector needs leadership in terms of an organisation or group that will take ownership of the Destination Management Plan and drive it forward. Visit Bradford will take a lead on facilitating this shift supported by a steering group with significant private sector involvement and working closely with Welcome to Yorkshire.
- 3.4.3 Stronger partnerships and working arrangements are required within BDMC (e.g. across planning, regeneration, place marketing, WHS management, events, culture etc.), with other destinations (Leeds, and West Yorkshire, the Dales and Harrogate), and with Welcome to Yorkshire. Visit Bradford will also work closely with the nascent Bradford BID to ensure that they can play a full part in promoting the district.

3.4 Product, Place & Positioning

- 3.4.1 The Destination Management Plan usefully sets out the distinct essence of the visitor offer across the four key destinations within the district – Bradford City, South Pennines & Haworth, Saltaire and Ilkley and sets out some initial thoughts on market positioning. However, for the district to truly realise its significant potential

there is a need for further product development particularly in relation to developing themed experiences across different places.

- 3.4.2 This is particularly the case for Bradford itself where in addition to further product development, the development of the night time economy, further retail development, city centre animation and the quality of some arrival points such as Bradford Interchange need addressing.
- 3.4.3 Outside of the city centre the priority is primarily around improving visitor management (i.e. toilet provision, car and coach parking, signing and interpretation), and continued development of quality retail, and catering businesses.
- 3.4.4 Across the district there are a number of themes or areas for potential product development. The key one is further development and promotion of an events and festivals programme, which strengthens the key themes and offers of the district and its destinations and helps create demand at quieter times. Curry is a strong theme for Bradford but not easy to experience as a product -further development of the offer is a priority. Hockney, as a theme, has huge potential for Bradford if it can be further developed. Guided tours and added value activities for coach groups would be desirable, particularly in Bradford itself.

3.5 Promotion, Information and visitor welcome

- 3.5.1 There are a number of crosscutting principles that should underpin destination marketing – these include:
- Building awareness of the district and the wealth of its options.
 - Focusing on the market and the experience. Markets are becoming more focused on experiences and less on places. This is particularly the case for a destination like Bradford district where awareness is not strong and perceptions can be negative, but where appealing experiences can be presented
 - Dynamic marketing with experiences and itineraries changing through the year – reflecting seasons, what's new and fresh (e.g. events and festivals) etc.
 - Upselling and cross selling the destination with the promotion of specific experiences should focus on upselling something else in the district.
 - Keeping it simple and making it easy – experiences and itineraries need to be simple (e.g. based around a half day or 24 hour option) with only a limited number of options. Too much information is counter-productive.
 - Ensuring an exceptional visitor welcome and developing new ways of delivering in-destination information.
- 3.5.2 Budgetary pressures within CBMDC mean that maintaining four Visitor Information Centres in the form they currently operate isn't financially viable. There is also a general move away from this type of provision across the tourism sector which is

tending to operate more flexible ways of providing visitor information and welcoming visitors. Section 4 and Appendix 2 below deal in detail with proposals for existing visitor information centres.

- 3.5.3 In short, alternative delivery models are being developed for facilities at Haworth, Ilkley and Saltaire. Bradford VIC, which also accommodates back office marketing, promotion and enquiries will remain open until April 2019 while a new visitor welcome is designed and enhanced marketing and promotion capabilities developed. This delay will also enable the Bradford BID to have an input in shaping what comes next.
- 3.5.4 Some alternative ways of delivering a visitor welcome and visitor information are outlined below.
- 3.5.5 Visitor Information Points can be in the form of a kiosk in a key location as **Fig 3.6 and 3.7** or within museums, **Fig 3.8** visitor attractions, accommodation providers, retailers, restaurants and transport operators.
- 3.5.6 Council frontline staff can play an important role as an ambassador for Bradford. Sport & Culture frontline services are sometimes the first to welcome a visitor into the district and they can leave a positive or not positive impression on them. Word of mouth if positive is a very powerful way to improve perceptions.
- 3.5.7 The Skills House deliver a World Host Course. This course will give staff the skills to be an ambassador for their local area. Staff will learn how equipping themselves with knowledge about what's on offer in the district and their local community can take their service to another level, and how a positive and enthusiastic attitude can have a real effect on the visitor experience (and ultimately visitor spend).
- 3.5.8 Some cities such as Leeds, Manchester, London and Birmingham have introduced professional Welcome Ambassadors, who are funded by the private sector and Business Improvement Districts. These ambassadors are highly visible in distinctive uniforms, often wearing a bowler hat, as **Fig 3.9**. They are located in key areas and gateways within the City Centre and meet and greet visitors and business commuters, directing them and providing expert knowledge and guidance. Their main purpose is to enhance the welcome experience in the city through providing a professional meet and greet service for all city users and giving a lasting impression of friendliness and vibrancy.
- 3.5.9 Taxi Ambassador Schemes can be considered for Hackney Carriages. These can be the first port of call for a visitor and can give a warm and friendly welcome in the visitor experience.

Fig 3.6



Volunteer Ambassadors using a kiosk and meeting and greeting.

Fig 3.7



Hull City of Culture 2017 Welcome Kiosk at Hull Paragon Station including self-service ticket purchase and collection facility for city events.

Fig 3.8



Tourist Information located inside the Lowry Centre, Salford Quays, Greater Manchester.

Fig 3.9



Welcome Ambassadors

4. TOURISM REVIEW (Appendix 2)

4.1 Bradford Council currently operates four Visitor Information Centres, (VIC's) located in Bradford City Centre, Haworth, Ilkley and Saltaire.

4.2 The service has been operating on transitional budget and there is a further reduction to the budget in 2018/19. Therefore, the current VIC operating cost of £326,000 per annum will reduce to £94,000 in 2018/19.

4.3 In reviewing activity and reducing budgets, consideration has been given to a number of factors including:

- **Changes in consumer demand** – the advent of the internet and prevalence of smart phones provides visitors with many alternative sources of visitor information.
- **Commercial opportunities** – There are some opportunities within the VICs to improve the retail offer and provide other commercial services (e.g. advertising, left luggage, and a Post Office counter in Haworth). However, these are limited and only likely to make a marginal contribution (up to 20-25% maximum) to running costs.
- **'Taking Information to the Visitor'** – via pop-up or mobile VICs. A pop up stand, a table and some wi-fi connected tablets can provide a proactive visitor information service at events across the district (such as The 40s Weekend, Curry Festival) and in busy locations and sites through the year.
- **Apps and a mobile enabled website** - containing suggested itineraries and experiences can provide information in-destination.
- **Partner outlets** –opportunities to provide information outlets within operators' properties (e.g. in attractions or retailers).

4.4 The overall assessment of the relative pros and cons of the four VICs is as follows:

	Pros	Cons
Bradford	<ul style="list-style-type: none"> • Deals with the majority of back office enquiries • Low property costs • Destination with greatest growth potential / future VIC need 	<ul style="list-style-type: none"> • Not identifiable as 'Welcome Centre' as corporate council branded.
Haworth	<ul style="list-style-type: none"> • Highest number of 'tourist' visits and probably added value • Good location 	<ul style="list-style-type: none"> • Leased property • Most expensive to run

Ilkley	<ul style="list-style-type: none"> • Highest number of visits • Provides box office/booking services for King's Hall and Ilkley events • Low property overheads • Cheapest VIC to run 	<ul style="list-style-type: none"> • Primarily a local audience • Ticket sales are a high proportion of sales
Saltaire	<ul style="list-style-type: none"> • High proportion of 'tourist' visitors • Sits in World Heritage Site • Most distinctive and attractive VIC 	<ul style="list-style-type: none"> • Poor location within Saltaire • Least visited VIC • Most expensive per visit • Leased property

4.5 In December 2016 the consultants published a recommendation for the Tourism Review as follows:-

- That Bradford VIC remains open. Bradford, as a destination has significant growth potential and the VIC could be an important aspect of the longer term development of the visitor economy.

4.6 Due to the budget cuts, the Council can no longer continue to fund four VICs. Visitor information is evolving and technology will continue to shape the future of visitor information provision. The internet is a key source of information in the planning and booking of destination visits. Social media is extremely influential and has an increasing role in the planning stage of a visit and the visitors experience when in destination. Visitors are looking for 'immersion' in culture, unique experiences, authenticity, and exploration, adventure and personal fulfilment from their holiday experience.

4.7 The Tourism service needs a Digital Media Officer and a Tourism Officer post to support and grow these functions.

5. FINANCIAL & RESOURCE APPRAISAL

5.1 February 2016 - a consultation on the proposed budget reduction commenced to try to identify delivery options of the VIC'S. However, at this point the proposal had been increased to £19k in 2016/17 and £172k in 2017/18 (*The Tourism Review commissioning date was amended to April 2016 in the Summary of the review*).

5.2 In February 2016 there was a further proposed budget cut of £50k in 2018/19.

5.3 Implementing the changes proposed above will realise these savings and enable investment in a reshaped digital marketing resource.

- Transitional funding for the VIC's ceased in April 2017/18
- There is a risk of some staff being displaced due to redesign and closure of some VIC'S
- There may a TUPE Transfer of staff at Haworth VIC
- There will be Trade Union Consultation
- There is a possibility of reputational damage to CBMDC

6. RISK MANAGEMENT AND GOVERNANCE ISSUES

6.1 To be compliant in any undertaking of TUPE Transfer

7. LEGAL APPRAISAL

7.1 The Council has powers under Section 144 of the Local Government Act 1972 (either alone or jointly with any other person or body) to encourage persons, by advertisement or otherwise, to visit their area for recreation, for health purposes, or to hold conferences, trade fairs and exhibitions and to provide facilities for those purposes.

7.2 In the event that notice needs to be given on the leases at Salts Mill and the building where Haworth VIC is located then this and any penalty which may arise will need to be negotiated.

8. OTHER IMPLICATIONS

8.1 EQUALITY & DIVERSITY

None

8.2 SUSTAINABILITY IMPLICATIONS

None

8.3 GREENHOUSE GAS EMISSIONS IMPACTS

None

8.4 COMMUNITY SAFETY IMPLICATIONS

None

8.5 HUMAN RIGHTS ACT

None

8.6 TRADE UNION

There will be Trade Union consultation in relation to possible redundancies and TUPE Transfers

8.7 WARD IMPLICATIONS

None

8.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS

None

9. NOT FOR PUBLICATION DOCUMENTS

None

10. OPTIONS

10.1 Bradford

10.1.1 The recommendation from the Tourism Review is that Bradford VIC remains open, as the destination has the greatest growth potential. However, visitor information in destination is evolving and the service needs to move to a re-shaped delivery model.

10.1.2 Pop up visitor information, supported by a team of volunteers can have a presence at key events across the district and in busy locations and sites throughout the year

10.1.3 Professional Welcome Ambassadors can enhance the welcome experience in the city through providing a professional meet and greet service for all city users and giving a lasting impression of friendliness and vibrancy.

10.1.4 World Host trained frontline staff and Taxi Ambassadors can enhance the visitor experience that increases length of stay, increased spending and revisits.

10.1.5 That Bradford VIC continues to deliver its current service in the current location with reduced staffing until March 2019. This will allow an opportunity to re-think the future resourcing and delivery options of Bradford visitor information provision and provide the opportunity for engagement with external partners, including the proposed Bradford Improvement District

10.1.6 The remaining budget is invested in creating 2 new posts of a Tourism Development Officer and Tourism Digital Media Officer.

10.2 Haworth VIC

10.2.1 The Bronte Society has submitted a formal proposal to agree a level of Tourist Information provision for Bradford District based on the current 7 day opening. They agree to dedicate at least 50% of the existing service level to this, including window space.

10.2.2 They will carry the full range of Discover and Visit Bradford Guides.

10.2.3 They will continue to promote local and district events and we will continue to offer a ticket agency service, and promote the accommodation providers in Haworth

10.2.4 In terms of staffing, they wish to TUPE Transfer the current VIC staff. Bradford Council is currently collating details in relation to the pension scheme.

10.3 Ilkley VIC

10.3.1 Ilkley Parish Council have submitted a formal proposal to make a contribution of £19,000 per year for a period of two financial years (2018/19 and 2019/20).

10.3.2 This will fund 2 members of staff at Ilkley Visitor Information Centre.

10.3.3 The VIC would relocate into Ilkley library and would have a retail space to offset any other running costs.

10.4 Saltaire VIC

10.4.1 There has been an informal proposal from Shipley College to provide a Visitor Information Point in Victoria Hall Reception. .

10.4.2 Victoria Hall currently has a staffed reception area and this proposal is to provide an information point for visitors within this area.

10.4.3 There is space to relocate some of the leaflet displays that are currently in the VIC, and they would display the Discover Guides, events leaflets and information relating to Saltaire and the district.

11. RECOMMENDATIONS

1. That the strategic approach to Destination Management outlined in the DMP report be implemented.
2. That Bradford Visitor Information Centre be kept in its current location until 2019 and partnership opportunities be identified to find future resourcing and delivery options for frontline visitor information, including professional Welcome Ambassadors in Bradford.
3. That a team of Pop up volunteers be developed to meet and greet at key events across the district.
4. That the Bronte Society takes over the lease of the Haworth Visitor Information Centre building and provides a frontline Tourist Information provision for Haworth and Bradford District. The Council consults with them on the TUPE Transfer of current staff.
5. That Ilkley Parish Council fund Ilkley Visitor Information Centre and the service moves from the Town Hall into Ilkley Library.

6. That Shipley College have a Visitor Information Point in Victoria Hall and direct all emails and phone calls to Bradford Visitor Information Centre.
7. The remaining budget be invested into Tourism development and marketing creating 2 new posts of a Tourism Digital Media Officer and Tourism Officer.

12. APPENDICES

Appendix 1 – The Destination Management Plan
Appendix 2 – The Tourism Review

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**Bradford District
Destination Management Plan**

December 2016

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Contents

Executive Summary	i
1. Introduction	1
2. Strategic Context	2
2.1 The Importance of the Visitor Economy	2
2.2 Market and Consumer Trends	2
2.3 The Policy Context	3
3. Tourism in Bradford District	3
3.1 The offer	3
3.2 Recent and potential developments	5
3.3 Markets and performance	5
4. Strengths, Challenges and Opportunities	6
4.1 Strengths	6
4.2 Issues and challenges	6
4.3 Opportunities	7
5. Aims and objectives	8
6. Strategic Approach	9
6.1 Markets	9
6.2 Positioning	10
7. The Destination Management Plan – Product and Place	11
7.1 Strategic Need	11
7.2 Activities and actions	13
8. The Destination Management Plan – Promotion and Information	14
8.1 Strategic Need	14
8.2 Activities and actions	15
9. The Destination Management Plan - Facilitation and Partnership	16
9.1 Strategic Need	16
9.2 Activities and actions	17
Appendix 1: Market and consumer trends	18
Appendix 2: Policy Context	21
Appendix 3: Product Offer	24
Appendix 4: Bradford in the Guide Books	27
Appendix 5: Market Segments	28
Appendix 6: Market Segments – marketing approaches	32

Executive Summary

Introduction

The total **value** of the visitor economy was estimated to be worth £612m to Bradford District in 2015. This supported approximately 9,600 FTE jobs across the district. While a key economic sector, the visitor economy is not fulfilling its enormous potential – it could be delivering more spend and jobs.

This Destination Management Plan (DMP) aims to identify an **ambitious shared vision** and common goals for the future growth of the visitor economy of Bradford District. It identifies the priorities, and the interventions that will add real value to the visitor economy across the whole area and in individual destinations within it.

Tourism in Bradford District

Bradford District has some **exceptional product** in places. Haworth, and Saltaire are Unique Selling Points (USPs) for the district with a strong sense of place and visitor experience. They have national and international appeal. The National Media Museum is one the north's most visited museums and a key attractor. The district has a developing range of exciting events. There are also a number of key attractions and particular **themes** which either generate visits and / or have strong development potential – Ilkley Moor and the outdoors, literature, curry, Hockney etc.

The **bulk of accommodation** is in Bradford city. Occupancies in Bradford, while improving, are relatively low for a major city and rates are low. Overnight stays in Bradford are typically **non-discretionary**. They are driven by corporate/business travel, low budget travel trade groups, visiting friends and relatives and family events (such as weddings). Events and festivals and the Alhambra also generate overnight stays.

Within the **Haworth area** there are some short stay / additional holidays – probably driven by the wider South Pennines / West Yorkshire offer, and a combination of activities (sightseeing, walking etc.). **Day visitors** are an important market – key groups include attraction visitors, sightseers, special interest/activity visitors for walking and events etc.

In visitor economy terms, Bradford District is a **diverse** area. Perceptions of, and associations with different parts of the district vary. As such, a 'Bradford' brand is not necessarily appropriate for Ilkley/Wharfedale, and Haworth and upper Airedale. While there is some stand out product in the district, there is a lack of **critical mass and connectivity** (both in physical and thematic/offer terms) between areas. This means that the district functions more as a series of separate experiences but not a compelling or coherent destination. As a consequence, length of stay is relatively short.

Bradford, as a visitor destination, has challenges. It suffers from issues regarding its perception and does not have a critical mass of product.

However there are **opportunities**. Bradford is benefiting from a significant amount of positive development, the district's **events** programme has significant potential, and there are a

number of **themes** that have further development potential and could provide unique experiences for visitors.

Aim and objectives

The primary **aim** for intervention in the visitor economy at a destination level is the generation of spend, profit and jobs. In its simplest terms this aim is achieved by a combination of attracting more visitors, and increasing their length of stay and spend. The aspiration should be to have a visitor economy in the district that generates over £725m.

Across the district, more specific **objectives** differ slightly by area. For Bradford, intervention in the visitor economy, while trying to drive new business to the city centre, should also focus on:

- developing product and providing more compelling reasons to visit;
- helping to raise the profile and build a brand for Bradford as a destination (and as place for investment etc.);
- supporting city centre development and animation.

Within the rest of the district, particularly Haworth and Saltaire but also Ilkley and the rural areas the following are important objectives:

- ensuring good management of the destination;
- increasing length of stay;
- growing business out-of-season.

Strategic Approach

Developing the visitor economy in Bradford District must be predicated on a clear identification of **target audiences**. The DMP outlines a number of markets (e.g. UK coach operators and group organisers, overseas coach tours, families, 'active indulgents', 'young explorers' and event visitors) which have different characteristics and needs. Different approaches will be required to attract them.

Future activity must continue to focus on four places and areas – Bradford, Haworth, Saltaire and Ilkley. These are distinct places, separate from each other with generally different offers and markets. The DMP identifies the **essence of the offer** of these areas from a visitor perspective and how these areas can be **positioned** in the market place.

While, achieving a unified brand concept for the whole area and developing campaigns for each destination is probably unrealistic, 'Bradford and beyond' provides a potential umbrella for marketing the whole of the area. However, the key to successful communication will be the messaging and activities below this umbrella.

The Destination Management Plan – Product and Place

For the district to truly realise its significant potential there is a **need for further product development**.

This is particularly the case for Bradford itself. A longer term aspiration is for the development of a second major city centre arts or cultural facility to complement the National Media Museum.

Outside of the city centre the product and place priorities are primarily around improving **visitor management** (i.e. toilet provision, car and coach parking, signing and interpretation), and continued development of quality retail, and catering businesses

Across the district there are a number of themes or areas for potential product development. The key one is further development and promotion of an **events and festivals** programme, which strengthens the key themes and offers of the district and its destinations and helps create demand at quieter times. **Curry** is a strong theme for Bradford but not easy to experience as a product -further development of the offer is a priority. **Hockney**, as a theme, has huge potential for Bradford if it can be further developed and would be the ideal theme for a major new arts facility (see above). **Guided tours** and added value activities for coach groups would be desirable, particularly in Bradford itself.

The Destination Management Plan – Promotion and Information

There are a number of crosscutting principles that should underpin destination marketing – these include:

- Building **awareness** of the district and the wealth of its options.
- Focusing on **the market and the experience**. Markets are becoming more focused on experiences and less on places. This is particularly the case for a destination like Bradford district where awareness is not strong and perceptions can be negative, but where appealing experiences can be presented
- **Dynamic** marketing with experiences and itineraries changing through the year – reflecting seasons, what's new and fresh (e.g. events and festivals) etc.
- **Upselling** and **cross selling** the destination with the promotion of specific experiences should focus on upselling something else in the district.
- Keeping it **simple** and making it easy – experiences and itineraries need to be simple (e.g. based around a half day or 24 hour option) with only a limited number of options. Too much information is counter-productive.
- Developing new ways of delivering **in-destination** information.

The Destination Management Plan - Facilitation and Partnership

The visitor economy in the district is not working as a coherent whole – partnerships across the district and within specific areas are quite weakly developed.

Moving forward the visitor economy sector needs **leadership** in terms of an organisation or group that will drive the Destination Management Plan forward. This should be VisitBradford supported by a steering group with significant private sector involvement.

Stronger partnerships and working arrangements are required within BDMC (e.g. across planning, regeneration, place marketing, WHS management, events, culture etc.), with other destinations (Leeds, and West Yorkshire, the Dales and Harrogate), and with Welcome to Yorkshire.

1. Introduction

TEAM Tourism Consulting (TEAM) was appointed by Bradford Metropolitan District Council to prepare a Destination Management Plan for the five-year period 2016-2021.

The total value of the visitor economy was estimated to be worth £612m to Bradford District¹ in 2015. This supported approximately 9600 FTE jobs across the district. While a key economic sector within the district, the visitor economy is not fulfilling its enormous potential – it could be delivering more spend and jobs.

The key aspiration for the wider tourism and visitor economy is to boost these visitor numbers and spend.

However, Bradford is a complex destination with a range of potential attractors that generate visits and a range of different types of visitor with different characteristics, needs, and interests. It also a number of different places with different characteristics and differing appeals to visitors.

The Destination Management Plan (DMP) therefore aims to identify an ambitious shared vision and common goals for the future growth of the visitor economy of Bradford District. It identifies the priorities, and the interventions that will add real value to the visitor economy across the whole area and in individual destinations within it.

It is about collaborative action, and provides a framework for all partners in the area with an interest in the Visitor Economy to work together effectively to improve and develop the destination over the next five years.

This Plan has been developed with ideas and observations from a wide range of businesses, attractions and public, private and volunteer representatives involved in the visitor economy of the area.

¹ The Economic Impact of Tourism on Bradford District 2015. This includes direct day and staying visitor expenditure, spend on second homes and by residents of the area who are hosting friends and relatives. It also includes multiplier effects – i.e. successive rounds of expenditure by tourism related businesses employers.

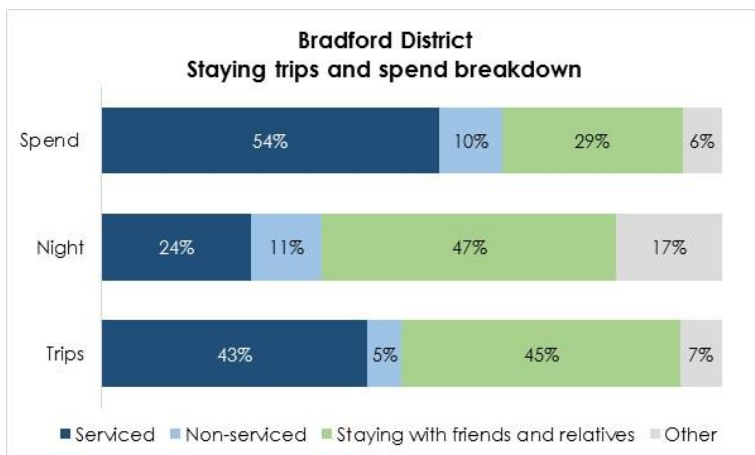
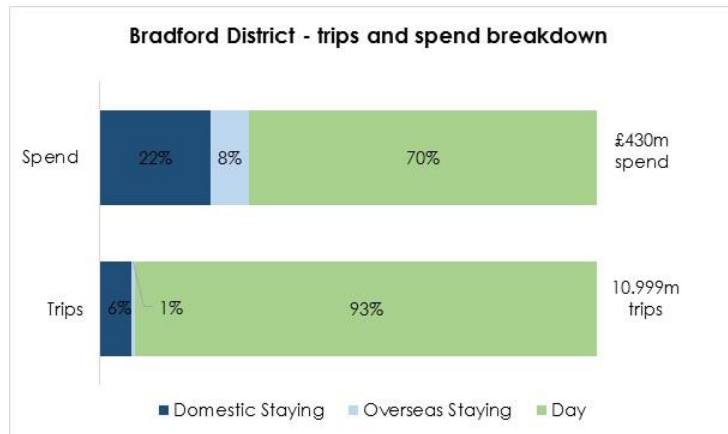
2. Strategic Context

2.1 The Importance of the Visitor Economy

In overall terms, the visitor economy was estimated to be worth £612m to Bradford District² in 2015.

There were estimated to be nearly 11m trips to Bradford District in 2015 – these accounted for £430m of direct expenditure.

The majority of this was generated by day visitors who accounted for 93% of trips and 70% of expenditure.



The most common forms of accommodation for staying visitors were serviced (hotels etc. – 43% of trips), and staying with friends and relatives (which accounted for 45% of overnight trips). Visitors staying in serviced accommodation accounted for the majority of spend by staying visitors.

2.2 Market and Consumer Trends

Over the next decade, the visitor market place will be influenced by a range of factors – economic, demographic, social and technological. The key ones are (see appendix 1 for more details):

- **Continued growth in demand** – both domestic tourism and inbound are forecast to grow in the medium term.
- **Domestic visitors are often creatures of habit** – most people booking a UK destination do not consider another destination and the vast majority will have visited that place

² The Economic Impact of Tourism on Bradford District 2015. This includes direct day and staying visitor expenditure, spend on second homes and by residents of the area who are hosting friends and relatives. It also includes multiplier effects – i.e. successive rounds of expenditure by tourism related businesses employers.

previously. Visitors will typically be looking at options in their immediate region (up to 2 hours away).

- **Changes in the UK population** with an ageing population, a growth in younger generations, and a smaller time poor middle generation. All have different travel requirements. Family structures are evolving with the rise of the 'Vertical Family'. Bradford District has the fourth largest population for a metropolitan district and is home to half a million people. It is the youngest city in the England with over 124,000 people aged under 16.
- **Online booking and marketing** - the internet is the primary source of visitor information with a number of well-established travel sites in the market place, Destination sites are only one of these - they tend to be used at the planning stage of the customer journey.
 - The direction of travel in information provision is '**mobile first**'. Rating experiences, **making information simple, and developing customised unique experiences** are also key trends in customer demands.
 - **Social networking will increase in importance** - online networks will be a vital channel for businesses for distribution, awareness creation and recommendations.
- **Tourism is becoming increasingly experiential** - the 'what' is more important than the 'where'. We are also **more 'active'** (i.e. doing many things) creating time pressures and a subsequent desire for control in our lives. This means a desire for greater **simplicity** in some of our choices and, linked to the technology trend, is the move to 'Individualocracy' and the desire for personalised products.

2.3 The Policy Context

Tourism and the visitor economy, within Bradford District, is seen as an important element in a number of policy related documents (see appendix 2). Key points include the need:

- To develop a unique and attractive offer in Bradford city but which is complimentary to neighbouring towns and cities.
- To develop the evening economy, a rich programme of events and leisure opportunities; and new cultural and visitor attractions.
- For the development of a Festival City
- To address the 'whole' experience – for example, investing in parking and transport; bars and restaurants and shopping will create a better holistic experience
- To re-position Bradford (using culture) as an appealing City in the minds of residents and visitors
- For development of the visitor product in Airedale to be concentrated at the three key destinations of Saltaire World Heritage Site, Keighley and Worth Valley Railway and Haworth.

3. Tourism in Bradford District

3.1 The offer

Bradford District has some **exceptional product** in places. **Haworth**, and **Saltaire** are Unique Selling Points (USPs) for the district with a strong sense of place and visitor experience. They have national and international appeal. The **National Media Museum** is one the north's most

visited museums and a key attractor. These are all identified in mainstream guides (like the Rough Guide and Lonely Planet) (see appendix 4).

Keighley and Worth Valley Railway is an important regional attraction.

There are a number of other key 'attractors' that generate visits (both day and overnight) that include:

- **Events and festivals**; – the district has a range of quality events. Some will have relatively local (and possibly regional) appeal while others will have national (but niche) appeal. Examples include Bingley Live, Saltaire Festival, Ilkley Literature Festival, Bradford Literature Festival, Curry Festival, the Mela;
- The **Alhambra** – strong regional theatre with West End and other productions;
- The **walking and cycling** product – this is good but, compared to potential competitor destinations is not necessarily unique except where it ties into 'sense of place' – for example Haworth and Penistone Hill, and, of course, Ilkley Moor.
- **Bradford's museums** (especially Bradford Industrial Museum), and
- **Ilkley** and the Wharfe Valley, which offer a pleasant destination of walking, shopping and dining (particularly in a regional context).
- **Family attractions** – like the National Media Museum, other Bradford Museums, Shipley Glen Tramway, Ilkley Lido etc.

There are also a number of particular **themes** which have strong potential and give the area some unique stories and experiences. These include architecture (particularly Bradford city centre – e.g. Little Germany), curry (Bradford, Keighley and events), literature and literary heritage (Bronte Parsonage Museum, Literature festivals), film and film locations (National Media Museum, locations like Esholt (Emmerdale) and the Keighley Worth Valley Railway (Railway Children)), Hockney (Salts Mill, Cartwright Hall), industrial heritage (Bradford Industrial Museum), and religious tolerance and peace (Peace Museum, mosque and temple visits).

From a visitor perspective these can be experienced to differing degrees and with different levels of ease or difficulty. Generally, these themes need further development before being taken to market as potential visitor experiences.

A more detailed overview of the product offer is provided in appendix 3.

In terms of **accommodation**, there are over 2000 serviced rooms in Bradford District. About two thirds of these are in the Bradford city centre, with a secondary concentration in the Aire Valley. There are less than 200 rooms respectively in the Haworth and Ilkley areas. About two-thirds of serviced rooms are budget / 2*, and about a third are 3 / 4 * quality.

There is also a concentration of self-catering accommodation in the Haworth area (reflecting a leisure / holiday demand) and the University of Bradford can provide bedspaces at certain times and online sites such as Airbnb provide accommodation in private homes in various parts of the district.

Serviced accommodation and staying with friends and relatives account for the majority of overnight stays (see section 2.1).

3.2 Recent and potential developments

Bradford district has seen a number of developments in recent years and has a number of potential developments in the pipeline:

- Hotels – Jurys Inn (2010), Premier Inn (2011) and Travelodge (2012)
- City Park (2012)
- Broadway Shopping Centre (2015)
- Bradford's 'Renaissance' – the Independent Quarter and North Parade, West End, Sunbridge Wells and Ivegate.
- Bradford Odeon – plans to develop the Odeon into a music venue, with 3500 seating and 4000 standing in stalls (making it the third largest in Yorkshire)
- St Georges Hall currently undergoing a £4m refurbishment
- City Centre Growth Zone - a £35 million initiative set-up to support new businesses and existing business growth
- Cinema and restaurant developments near the Broadway centre.

3.3 Markets and performance

In terms of **overnight** markets, occupancies in Bradford, while improving, are relatively low for a major city (approximately 70%). Rates are low (an average of £38.71 in 2014) and room yield was also low (£27.13 in 2014) – as a comparison this was approximately half the yield of York and Leeds.

Overnight stays are typically **non-discretionary** and are driven by:

- **Business** – mainly corporate travellers. Conferences are not a significant component of the business mix and tend to be day events (not overnight)
- **Travel trade** – hotels in Bradford are attracting coach business. This is mainly using Bradford as a base for touring the north (e.g. going to York, Haworth etc.) or as stopover for going to Scotland. Price rather than the destination is the appeal.
- **VFR / social events** – including weddings, graduation, student VFR, the local community
- **Events and Festivals**
- **'City' breaks** – driven by a number of elements – e.g. Alhambra productions, price (and using Bradford as a base for the surrounding area).

Within the Haworth area there are some short stay / additional holidays – probably driven by the wider South Pennines / West Yorkshire offer, and a combination of activities (sightseeing, cities, walking etc.).

In terms of **day visitors** the larger market groups are:

- **Attractions visitors** – typically visiting for one attraction (but not much more). A high proportion of these are local (primarily from Bradford itself) and families, but not all.
- **Sightseers** – these are similarly linked to attraction visitors. They may be visiting an attraction but will also be undertaking a wide range of activities in the destination, typically with a longer dwell time. These are likely to be in Saltaire and Haworth (and Ilkley to a lesser extent). These markets are more likely to be couples / groups of friends, and travelling from further afield.

- **Groups** – these will undertake similar activities to the previous two groups but will be travelling as organised groups – either through the travel trade, clubs and societies or special interest groups
- **Walkers and other outdoor activities**
- **Events visitors**

In addition, there are a number of other smaller day visitor markets – drivers for these will include educational visits, theatre, and special interests (e.g. railways, literature, film etc.).

4. Strengths, Challenges and Opportunities

4.1 Strengths

In terms of its visitor economy, Bradford District has a number of strengths:

- A number of strong USPs, and product with international and national appeal (see section 3.1 above)
- The diversity of the offer – capable of attracting a number of different markets
- A large catchment population in close proximity - particularly the West Yorkshire conurbation and, to a lesser extent, Greater Manchester and Lancashire.
- A central location in UK (which is particularly appealing to the travel trade), and good accessibility (by road, rail and air)
- A number of free attractions (particularly in Bradford)
- Some strong events and festivals with broad appeal
- Attractive hotel rates, particularly in Bradford city centre (and especially at weekends).

4.2 Issues and challenges

In visitor economy terms, Bradford District is a diverse area. This is recognised by its subdivision into four discrete marketing areas. There are some common crosscutting offers and themes that cover parts of the district but not necessarily all of it. This diversity is both a strength and a challenge.

Challenges for the district include:

- There is not a unifying brand (or brand concept) for the district. Perceptions of, and associations with different parts of the district vary. As such a 'Bradford' brand is not necessarily appropriate for Ilkley/Wharfedale, and Haworth and upper Airedale (although there is potentially more relevance for Saltaire / Shipley).
 - Perceptions of Bradford are generally negative
 - Perceptually (and thematically) Haworth has more in common with the South Pennines
 - Ilkley sits more closely with Skipton and south Dales, or with Otley and Harrogate.

This is reflected in some of the Guide Books (see appendix 4).

- While there is some stand out product in the district, there is a lack of critical mass and connectivity (both in physical and thematic/offer terms) between areas. This means that the district functions more as a series of separate experiences but not a compelling or coherent destination.

- As a consequence, length of stay is relatively short across most of the district's 'destinations' – 2 hours to a half a day would be typical in Saltaire, Haworth, Ilkley and Bradford.
- Bradford, as a visitor destination, has challenges. It suffers from issues regarding its perception (see above) but these are founded on a reality.
 - There is a lack of critical mass of product (e.g. visitors to National Media Museum will come to the city centre but then leave without doing too much more) or a concentration of product in any one area (e.g. museums are outside the city centre and dispersed).
 - Things are improving dramatically (see below) but the city centre is still 'down at heel' in many places. In addition, compared to other city destinations (e.g. Leeds), it does not have a strong or distinctive retail offer, and has a relatively weak evening economy. This has drawn residents of the suburbs away from Bradford City Centre.
 - As a consequence, the centre often lacks animation or a buzz of activity and the 'comfort zone' for visitors is narrow - both in physical terms and also by times of day (particularly in the evening and night time).
 - The 'Bradford story' is not well told or interpreted. This, allied to points above, impacts on its sense of place (compared with Haworth and Saltaire).
 - Public transport links to Bradford city from Leeds, Manchester and London are weak, with old rolling stock and slow services (in contrast to the Aire and Wharfe Valley lines).
- The National Media Museum's positioning is ambiguous – is it a Bradford family fun day out or a regional / national cultural attraction?
- Across the district there are some good events but, there is a lack of a clear events strategy particularly in terms of potential impacts on the visitor economy.
- Opportunities for new development or products that will transform or significantly increase the scale of visitor economies in Haworth, Saltaire and Ilkley are limited – incremental growth is more realistic.
- Within Haworth and, to a lesser extent Saltaire, seasonality is an issue. There are also visitor management issues, particularly in terms of car and coach parking.
- Co-ordination and communication within the tourism sector could be better – both between public and private sector, and private-private sector. Previous groups (such as Destination Bradford) have ceased to exist due to a lack of engagement or focus.
- Resources for development and promotion of the destination are limited and unlikely to increase in the near future.

4.3 Opportunities

While there are challenges, Bradford district as a visitor destination has huge potential and there are significant opportunities for the future.

- There are a number of **themes** that have further development potential and could provide unique experiences for visitors (see section 3.1) – to either broaden the appeal (and length of stay, and spend) of existing visitors or attract new markets.
- Linked to this there is the potential for further development of Bradford district's **events** programme – in terms of strengthening existing or developing new events.
- **Bradford's renaissance** - while there is currently no one major proposed strategic opportunity or 'game changer', there are a number of potential new developments

in Bradford (e.g. the Broadway extension, Odeon, Sunbridge Wells, increasing numbers of overseas students to the University) that will bring about improvements to the offer for residents and visitors and help to further catalyse city centre development.

- Other **potential initiatives** that could impact positively on the visitor economy include the potential establishment of a Business Improvement District (BID) in 2018 (which will have public realm and marketing funds).

5. Aims and objectives

The primary **aim** for intervention in the visitor economy at a destination level is the generation of spend, profit and jobs. In its simplest terms this aim is achieved by a combination of attracting more visitors, and increasing their length of stay and spend.

There is significant potential to grow the visitor economy in Bradford District. Based on the current impact (£612m - see section 2.1), the **aspiration** should be of a visitor economy in the district that generates over £725m. This would help to support an estimated additional 1 650 jobs.

Across the district, more specific **objectives** differ slightly by area.

For Bradford, intervention in the visitor economy, while trying to drive new business to the city centre, should also be about the following objectives or outputs:

- Helping to raise the profile and build a brand for Bradford as a destination, and also contribute to a wider place marketing agenda.
- Supporting city centre development and animation.
- Further developing product and providing more compelling reasons to visit.

Within the rest of the district, particularly Haworth and Saltaire but also Ilkley and the rural areas the following are important objectives:

- Ensuring good management of the destination
- Increasing length of stay
- Growing business out-of-season.

6. Strategic Approach

6.1 Markets

Developing the visitor economy in Bradford District must be predicated on a clear identification of target audiences.

The following table summarises potential **markets** to develop and intervene in. These markets will currently already be visiting but to differing degrees.

Market segment	Overview
Coach Operators and Group Organisers (UK)	<p>A UK market comprising retired groups (65+), clubs and societies, from within a 2 hour catchment area. They will be visiting for the day and overnight.</p> <p>They will be attracted by the location and accessibility, the combination of high profile products and attractive countryside, and (potentially) the reasonable rates.</p>
Overseas coach tours	<p>Inbound tour groups looking at UK highlights. Typically first time visits to the UK and likely to be older age groups. Both day and staying visitors. Primary attractions will be Haworth and Saltaire but there would be opportunities to increase spend in Bradford through added value activities.</p>
Families	<p>Younger families (with children aged up to 12-14 years). This will be primarily a day visitor market, typically from Bradford district itself and West Yorkshire but also potentially from further afield. It may be accompanied by a VFR market.</p> <p>The offer will be varied for this market. While there is scope to grow volume, there is also the potential to increase length of stay and spend, create a sense of pride in the local area, and increase awareness.</p>
Active Indulgents	<p>This is a domestic market that will undertake day trips and short breaks. It will predominately be older couples travelling without children and be typically from higher socio-economic groups. They will be interested in heritage, cultural and countryside activities but also in indulging themselves (food, shopping, drink, accommodation).</p>
Young explorers	<p>A domestic market – primarily day tripping from the West Yorkshire area but also from further afield (with some staying visitors). They will be under 35, and either single, couples, or groups of friends. Typically they will be higher socio-economic groups (graduates / young professionals).</p> <p>Primarily a Bradford segment they will be motivated by somewhere different to visit, an authentic and eclectic</p>

	experience, and a combination of cultural activities and nightlife.
Events	Characteristics will vary according to individual events.

More detail is provided on these segments in appendix 4.

6.2 Positioning

This destination plan is not intended to be a branding strategy. However, the positioning of the district and its products is key in developing the visitor economy. Within Bradford District, there are potentially multiple destination brands and products, which will have different levels of resonance depending on the audience. For an international audience, the brand might be as simple as Yorkshire or even just the North – or specifically the Brontes in some markets. For a more local audience, there will be more awareness but perhaps a lack of understanding on how the experiences can fit together.

At present, destination marketing activity focuses on four places and areas – Bradford, Haworth, Saltaire and Ilkley. This makes sense – they are distinct places, separate from each other (although Bradford and Saltaire are more easily connected in terms of transport) with generally different offers and markets.

The following table summarises, for these four areas, the essence of the offer from a visitor perspective and how, in broad terms, these areas can be positioned in the market place.

Bradford City	South Pennines and Haworth
<p>Essence of offer: A cultural city – contemporary culture, art and film A festival city A diverse city - multi-cultural, inclusive, colourful Authentic / real Quirky / eclectic / left field Family friendly</p> <p>Positioning Day out – Family day out – value, compact, quality - Young explorers – art / culture and nights out</p> <p>Overnight – Bradford Plus break - culture, heritage (inc. Saltaire), Leeds, curry and craft beer - (An added value) base for group excursions</p>	<p>Essence of offer Quintessential Yorkshire - rugged / grit / windswept Literary heritage 'Wuthering Heights' Back in time/ a bygone age (KVWR, 1940s weekend etc) Artisan / Fair Trade / Independent Inspirational / active landscape</p> <p>Positioning Day out – the Brontes, Haworth and moorland walk - family time together on the KWVR - group excursion</p> <p>Overnight – South Pennines – walking, sightseeing in off-the-beaten-track Yorkshire</p>

<p>Saltaire</p> <p>Essence of offer World class heritage Compact beauty Cultured / engaged pottering Arts, crafts and home treat (shopping) Hockney</p> <p>Positioning Day out – must see heritage site with art, and luxury shopping - Group excursion</p>	<p>Ilkley</p> <p>Essence of offer Urbane / chic / smart / trendy Partner time Yorkshire and Victorian hauteur (Harrogate light) Easy outdoors / rugged (but comfortable) Quality restaurants and bars</p> <p>Positioning Day out – easy walking, and a spot of indulgence (food, drink, shopping) Overnight – short break base – best of rural and urban.</p>
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Achieving a unified brand concept for the whole area is probably unrealistic. Similarly, developing campaigns for each destination (with separate resources and collateral) is probably also unrealistic (even with considerably more resources than are available at present) – although digital marketing techniques allow more differentiation between markets than was previously possible.

'Bradford and beyond' provides a potential umbrella for marketing the whole of the area but key is the messaging and activities below this. Section 8 below outlines the marketing approach in more depth.

Bradford as a city requires a specific focus on its own - it also requires a positioning that differentiates it from competitor cities - Leeds, Sheffield, York, and to a lesser extent Huddersfield and Wakefield. This needs to tie in with wider place marketing activity but from a visitor perspective this could be predicated on three potential pillars:

1. A Cultural City
2. A Festival City
3. A Diverse City.

7. The Destination Management Plan – Product and Place

7.1 Strategic Need

While the district has some excellent product and places, there are challenges to these – and connectivity (both in physical and thematic/offer terms) between areas (see section 4.2). For the district to truly realise its significant potential there is a **need for further product development**.

This is particularly the case for Bradford itself. A longer term aspiration or need would be for the development of a second major arts or cultural facility to complement the National Media Museum. Ideally this would be located in the city centre to help to create a greater critical mass of attractions and ideally look to celebrate some of Bradford's themes (see below).

Other priorities in Bradford, from a visitor perspective, include:

- Further development of the **evening economy** - particularly in terms of restaurants and bars. This is gradually happening (see section 3.2) and is being facilitated by city centre development initiatives. The visitor economy can play a role in helping develop this sector – through engagement with it, and targeting markets that will help support these operations (e.g. young explorers – see above).
- Further development and upgrading of the **retail** offer
- **Animation** and management of the city centre particularly in the evening (this links to the previous point about the evening economy).
- In the long term, re-development of the **Bradford Interchange** area which is a poor gateway.
- Achieving the refurbishment of St. George's Hall, and re- development of the Odeon.

Outside of the city centre (primarily within Saltaire, Haworth, and Ilkley) the product and place priorities are primarily around reviewing and improving **visitor management** (i.e. toilet provision, car and coach parking, signing and interpretation), continued development of quality retail, and catering businesses where appropriate, and continued development of **events and festivals**, particularly out-of-season (see below). Saltaire, as a world heritage site, has a comprehensive Management Plan (see appendix 2) which provides an appropriate mechanism for this. This model should be extended to Haworth and Ilkley.

Across the district there are a number of themes or areas for potential product development.

- The key one is further development and promotion of an **events and festivals** programme. As far as possible this should tie in with, and strengthen, the key themes and offers of the district and its destinations (e.g. walking, multiculturalism and diversity (arts, markets, tolerance and peace curry etc.), heritage, photography and film, art literature). Events should be a tool for creating demand at quieter times (the Saltaire Festival and Ilkley Literature Festival are good examples). They should be a key component of the experiences that the destination promotes (see section 8).
- **Curry**. Curry is a strong theme for Bradford – the city is synonymous with it and invests annually in 'Curry Capital'. However, for a visitor it is not necessarily easy to experience this as a product, and the story is not well told. Further development of the offer is a priority.
- **Hockney**. Hockney is one of the UK's most important modern artists (possibly the most important) and a potential theme of huge importance to Bradford if it can be further developed. Hockney would be the ideal theme for a major new arts facility (see above) - which may or may not be feasible. In the interim, the Hockney theme should be further developed as an experience (see section 8) building on Salt's Mill, the Cartwright Gallery and, ideally, temporary exhibitions.
- **Guided tours** that tell the Bradford story and added value activities for coach groups -developing a network or database of guides across the district would be

desirable, particularly in Bradford itself. The city is attracting travel trade business but not maximising spend or word of mouth recommendations from this group. The development of guided packages and other added value activities would increase the spread of visitors within the city centre.

Other strong Bradford district themes, like photography and film, literature, multiculturalism, industrial heritage, and peace and tolerance are best developed through a combination of existing product, guided tours and festivals / events.

While staff training and development is primarily the responsibility of individual businesses, there is a need at destination level to look at improving product knowledge and upselling of the area (on restaurants, places to eat, attractions, transport information etc.) among front of house staff.

7.2 Activities and actions

The following table outlines potential areas of destination intervention for the visitor economy over the next five years.

Activity	Description and action
New cultural facility	Undertake scoping and pre-feasibility study to look at the broad concept, feasibility and siting of a major new cultural facility.
Events Strategy	Development of an events strategy to include an audit of existing activity (particularly identifying primary events with tourist appeal), identify gaps and opportunities, and the types of events to potentially be supported and promoted in the future.
Management Plans	Develop detailed place management plans for Haworth, in the first instance, and Ilkley. These should look at local destination management issues in some depth – e.g. car parking, coach parking and coach facilities, toilets, and information provision (signing, interpretation, information points and potential partnership information outlets) and identify realistic actions for the future.
Curry	Develop the curry product. An initial action will be the development of an appropriate group or partnership of operators that are potentially interested in working on a collaborative basis. Subject to this there should be a programme of 'soft' product development around better information provision on restaurants (how to get to them, opening times and booking requirements, alcohol provision or not etc.), and interpretation and telling the story of curry in the Bradford area.
Guided tours	Develop a database of potential guides that can work with / be booked by the travel trade, along with a number of sample itineraries for the district. These would be for both walking and

	coach tours. Developing Bradford product is a priority.
Training	Develop and roll out a programme of product familiarisation and product knowledge for front to of house staff in key visitor facilities (accommodation, attractions, cafes/restaurants, transport hubs, retailers etc).

8. The Destination Management Plan – Promotion and Information

8.1 Strategic Need

Effective marketing is based on presenting the right product to the right market. As explained in section 3, the area has a diversity of products and markets which means that a 'one size fits all' approach will not be effective. With the advent of digital marketing techniques, it is now more affordable and realistic to reach specific markets with distinct messages – and this is the necessary approach for the Bradford district.

Section 6.1 identifies potential target markets for the area. These will require both different messages but also different channels of communication. An overview of the channels required to reach these markets is summarised in appendix 6.

There are a number of crosscutting principles that should underpin the destination marketing approach. These include:

- Building **awareness** of the district and the wealth of its options. Perceptions and awareness are challenges (section 4.2) – over time these need to be addressed.
- Focusing on **the market and experience**. Markets are becoming more focused on experiences and less on places. This is particularly the case for a destination like Bradford district where awareness is not strong and perceptions can be negative (see above). The sales pitch in marketing needs to be about specific activities and itineraries (ideally focused on specific markets).
- **Dynamic** marketing – digital media allow for (and require) dynamic content. Experiences and itineraries that are proactively pushed (on the web, and through social media) should be changed through the year – reflecting seasons, what's new and fresh (e.g. events and festivals) etc.
- **Upsell** and **cross sell** the destination – promotion of specific experiences should focus on upselling something else in the district – e.g. a walk on Ilkley Moor and a cup of tea in Bettys or pint in the Bar Tat – or cross-selling e.g. 'like Salt's Mill, you might like Cartwright Hall'.
- Keep it **simple** and make it easy – experiences and itineraries need to be simple (e.g. based around a half day or 24 hour option) with only a limited number of options. Too much information is counter-productive.
- New ways of delivering **in-destination** information. Historically in-destination information provision in the district has been based around largely reactive Visitor Information Centres and print. More dynamic and proactive models need to be adopted in the future.

8.2 Activities and actions

The following table outlines potential areas of destination intervention for the visitor economy over the next five years.

Activity	Description and action
Experience and itinerary development	Develop content on experiences and itineraries that are focused on the different target markets. These should focus on half and one day (and possibly two+ days) itineraries and focus on key potential experiences – with cross-selling and upselling opportunities (see above). Itineraries should also be potentially tactical – reflecting events and seasonal opportunities.
PR activity	Press activity (including broader activity including travel bloggers) will be key to both developing awareness but also supporting tactical opportunities (e.g. events) and a coherent campaign needs to be developed through a range of activities including familiarisation trips. This should target bloggers, specialist publications and the local press, and also regional and national press (which will have continued importance for some markets).
Website	The destination should have an enhanced and dynamic website which is visually engaging and leads with a series of experiences/itineraries that regularly change (see above). Behind the experiences there needs to be the comprehensive listings on visitor related facilities that the VisitBradford site currently features – ideally these need to be more curated to make it easier for the visitor. The site also needs to be designed in a mobile friendly way.
Social media	Developing a social media strategy is of key importance, particularly for younger market segments, and for promoting tactical opportunities like events. The campaign should feature competitions, quiz, prizes for best photos etc. and be conducted across a range of different social media platforms.
A programme of managing third party content	Third party travel sites on Online Travel Agencies (OTAs) (such as TripAdvisor, Booking.com) have huge importance in the market place. They provide opportunities for the distribution of content and itineraries, and an ongoing programme of activity should be developed.
In-destination print – focusing more on the specifics	Print should focus more on an in-destination role providing detailed suggestions and practical information for visitors in the area (like, e.g. the current Saltaire Guide). Initially it is suggested that guides are produced for the four areas of Bradford, Haworth, Saltaire and Ilkley.
Tactical campaign activity	Campaign related activity (i.e. a focused set of promotional activity on specific product or market involving print, PR, advertising etc.) is likely to be undertaken on an ad-hoc basis as

	<p>opportunities arise (e.g. Northern Growth Fund activity with Leeds).</p> <p>One area of campaign activity would be a 'Discover Your Doorstep' campaign targeting families and other residents (and by extension the VFR market) in the West Yorkshire and North Yorkshire areas. This would feature a range of activities (see above and appendix 6). It could, in time, be developed on a West Yorkshire basis.</p>
Database development	Developing databases of markets, particularly travel trade, will be an important part of the marketing approach. All digital activity (especially) social media should be orientated at capturing user contacts.
In-destination information	As in-destination information moves away from VIC services, alternatives should be explored and developed (as e.g. part of local management plans). These could include partnership activities, pop-up VICs, and in-destination print and a mobile friendly website (see above).

9. The Destination Management Plan - Facilitation and Partnership

9.1 Strategic Need

The visitor economy in the district is not working as a coherent whole – partnerships across the district and within specific areas are quite weakly developed. While there are valid reasons for this – changes in personnel over the years, a loss of momentum of activities, and, in some areas, a lack of critical mass of operators.

However, moving forward the visitor economy sector needs:

- Leadership in terms of an organisation or group that will drive the Destination Management Plan forward.
- Greater private sector involvement in decision making and implementation, and funding destination related activity
- To work in a wider context in terms of:
 - Working with other interests (planning, regeneration, place marketing, WHS management, events, culture etc.) across the district to ensure a holistic approach to the visitor economy is adopted;
 - Work beyond the district's boundaries with other destinations (Leeds, and West Yorkshire, the Dales and Harrogate) and operators, and with Welcome to Yorkshire to provide and promote customer focused experiences.
- Facilitate and enable partnerships to work locally and develop initiatives together;
- Improve market and product intelligence.

VisitBradford should be the **lead organisation** for the implementation of the DMP. There are a number of options for this. It could:

- Stay as it is – i.e. a section within Bradford MDC;
- Become a separate (or arm's length) public / private sector organisation. This is a risky (and potentially time consuming option) since the scale and nature of the private sector means this may not be financially viable;
- Form part of a wider city centre group (e.g. the Make it York, or CV1 model) within Bradford MDC. This would be dependent on wider re-organisation but would have the advantage of closer linkages with, for example, city centre management and events development. However, the danger is it becomes too city centre focused to the detriment of the wider district.

9.2 Activities and actions

In the short to medium terms (i.e. next five years), VisitBradford should either stay broadly as it is, or form part of a wider city/district place development and marketing team.

The destination plan will need to be 'owned' and implemented in partnership with other organisations. A successful model will be likely to have:

- A steering group for DMP implementation.
- A new approach to working with other BMDC departments / units (e.g. City Centre Management, Events team) and to working with regional partners like Leeds City Council and other West Yorkshire authorities, on specific campaigns (particularly around the 'Discover your Doorstep' campaign) with a view to maximising joint budgets and potential Bradford District return on investment.
- A more pro-active approach to maximising the potential opportunities for gaining more impact within existing Welcome to Yorkshire programmes – particularly in digital programmes, and benefiting from their high level of social media engagement and travel press activity.
- Development of local groups (or working more closely with existing groups) with a brief to develop local management plans, develop itineraries and identify tactical opportunities for content (like events). Although, this should not lead to a proliferation of too many groups with no real agenda - where there are groups these need to be action focused, with a 'start and finish' programme.

Appendix 1: Market and consumer trends

- **The continuing “Staycation”**. The economic downturn led to a change in holiday behaviour and attitudes, with leisure becoming ever more important even as finances were stretched. The increase in domestic trip taking and parallel decline in overseas travel was initially driven by cost, but many other factors have contributed to the continuation of the trend – including a preference for multiple short breaks over the year, risk aversion, last minute planning, more deals and offers available through online travel agents and daily deals sites, hotel and visitor accommodation development and improvement, including a number of new accommodation products that have captured the market's imagination and new visitor attractions, events and festivals. In the short term, the staycation effect is likely to remain.
- **Economics and recession-led trends**. In the longer term, holiday taking patterns are unlikely to revert to pre-recession patterns – for some people behaviours have changed fundamentally, while others have discovered and genuinely enjoy breaks in England. There is however an ambition to have long holidays abroad, which people will do when they can afford to. There is also likely to be a continuation of recessionary spending patterns even after recovery (and especially among younger generations) – this means more emphasis on deals, offers and added value packages. However, recessionary experiences (and therefore recovery experiences) differ among consumers – some consumers have experienced increased spending power, others the opposite.
- **Other recent domestic tourism trends** include:
 - Turning VFR trips into leisure ones. The driver behind this has partly been economic (see above) but other drivers exist which may mean the trend may continue – these include maximising leisure time, and the changing demographic picture (creating more opportunities for family get-togethers).
 - Domestic tourism can benefit from wider trends – e.g. health tourism (spa breaks) and active / adventure tourism. This will be driven by a more active retired generation.
 - Rural and urban tourism have experienced strong growth in recent years. Both destination types can benefit from the growth in short breaks, with an opportunity to combine breaks (rural and urban).
- **Domestic visitors are often creatures of habit** -two thirds of people booking a UK destination do not consider another destination – 93% of these will have visited that place previously. Four fifths are not influenced by any advertising. Destination choice, especially for short breaks, tends to be driven by where someone lives – they will typically be looking at options in their immediate region (up to 2 hours away).
- **Population changes** include:
 - **An ageing UK population** – in the medium term the number of people over 65 is increasing. This generation is a powerful economic force, with sufficient time and disposable income to enjoy short breaks and regular holidays – albeit spending power can be threatened by declining values in pension plans and savings.
 - **Growth in younger generations** - while this is a potential opportunity for domestic destinations, it is also a challenge – this group is characterised by a lack of

knowledge and also prejudices about England and English destinations which prevents them considering these as holiday or break options. The Generation Y market also has very different requirements and expectations from hotels, accommodation businesses and destinations, with a greater importance placed on distinctive design, a relaxed atmosphere and a high level of technology and connectivity.

- **A 'squeezed' middle generation** – the 35-49 age group is going to decline numerically. This group will be time poor with a potential consequence an enhanced desire for quality time and treats.
- **Family composition** is also changing – with grandparents more involved in childcare (the 'Vertical Family'). This has implications with potentially more intergenerational family holidays and a need for appropriate products to cater for this. Similarly, the UK population is becoming increasingly **ethnically diverse** and this represents a market of increasing importance but one that is poorly understood.
- **Online booking and marketing** - Information technology and the ways in which consumers access tourism information have changed dramatically over the last twenty years - and continue to do so. The following are some of the key factors relevant to tourism information provision:
 - In general, the internet is the primary source of visitor information. Mobile (tablet and smartphone) are becoming increasingly important - particularly in terms of providing in-destination information.
 - There are a number of well-established internet players providing potential visitor information. These include Google, TripAdvisor, Online Travel Agents (OTAs) and booking sites (like Expedia, Last Minute, Booking.com, Late Rooms), meta-search engines (or aggregators like Trivago and Kelkoo) deal sites (Groupon, Wowcher), and the 'Sharing economy' (AirBnB).
 - Destination sites are only one of these - they tend to be used at the planning stage of the customer journey.
 - Different market groups (life-stages) will plan their trips in different ways - some groups will often leave their trip planning to the 'on-the-move' / in-destination stages. There are differing attitudes to, and use of, digital and social media. The largest (and growing) group are 'info-seekers' who are actively using digital to seek and find information.
 - **Social networking will increase in importance** - online networks will be a vital channel for businesses for distribution, awareness creation and recommendations. Impacts of this include the amplification of negative experiences, disintermediation (consumers direct to businesses), fear-of-missing out' (FOMO), which means consumers want to share the experiences of their peers – they want to hear stories and have stories to tell and share.
 - The direction of travel in information provision is '**mobile first**' for all stages of the customer journey – particularly in terms of in-destination information. **Rating experiences, making information simple, and developing customised unique experiences** are also key trends in customer demands – For marketers, there is need to convey the potential experiences quickly and visually. Wireless access on holiday and information in the right format will be key. Bookings will be more 'last minute'.

- **Tourism is becoming increasingly experiential** - tourists are looking for 'immersion' in a culture, unique experiences, authenticity, exploration, adventure and personal fulfilment from their holiday experience. The 'what' is more important than the 'where'. From a marketing perspective customising and personalising are key – different market segments want different experiences.
- Linked to this, as we, as a society, have become **more 'active'** (i.e. doing many things) we have created time pressures and a subsequent desire for control in our lives. This means a desire for greater simplicity in some of our choices and, linked to the technology trend, is the move to 'Individualocracy' and the desire for personalised products.
- While environmental concerns are not currently mainstream in terms of holiday taking decisions in the UK, for some markets, other consumer trends include **evolving ethical concerns** among consumers. These are now broader than more established environmental concerns and conspicuous forms of consumption have fallen out of favour (with an emphasis on consumers learning new skills and acquiring 'cultural capital' to distinguish themselves).
- **Inbound tourism** is forecast to grow in the UK. The Deloitte/Oxford Economics report for VisitBritain projects a 6.1% per annum growth in inbound tourism to the UK and an average real annual growth rate of just over 14% in overseas tourist spending in the UK through to 2025. Strong growth is expected to come from the emerging economies such as China, UAE, India, Brazil and Russia due to the increasing wealth of consumers in these countries. However the potential impacts of Brexit remain unclear – potentially visa arrangements, currency strength, cultural links and brand strength could all impact.

Appendix 2: Policy Context

Bradford City Plan Prospectus (Feb 2015)

This highlights importance of visitor elements – City Park, events National Media Museum (and Bradford City of Film), theatres, shopping in the city offer (and regeneration). It also highlights that:

- Bradford needs to have a secure distinctive role that is complimentary to neighbouring towns and cities.
- Develop a clear offer that plays to our distinctive assets and strengths
- Provide the leisure services and facilities that businesses, customers, residents and visitors demand

Five point plan which is based around Bradford City Centre as:

- A Place of Dynamic Business & Entrepreneurship
- A Centre of Excellence for Learning
- An exemplar of 21st Century Urban Living
- A Major Transport Hub
- A Destination & Experience

Transport hub highlights the need to develop a modern pedestrian way-finding strategy in conjunction with city centre management, in order to improve legibility of the central area. As a city centre, the plan identifies key elements as cultural resources (the NMM, Alhambra Theatre, St. George's Hall, UNESCO City of Film Designation), festivals, the Asian influence (in restaurants and retail), and the backdrop of Victorian architecture. The challenge is to develop the city centre as a key visitor attraction and overcome negative perceptions of Bradford.

There is a need to:

- Better understand the performance of the city centre as a visitor destination;
- Develop a more coordinated approach to the management and marketing of the city centre;
- Continue to invest in the public realm and ensure good connections between the city centre's component parts;
- Encourage a good balance of mainstream and independent traders to distinguish the retail offer so that it can compete with other retail destinations and with online shopping;
- Develop the evening economy;
- Ensure a rich programme of events and leisure opportunities; and
- Continue to encourage new cultural and visitor attractions.

The vision is identified as 'Bradford city centre will be a destination of choice for leisure and shopping for residents of the district, with a unique and attractive offer which is distinctive from other centres. The city centre will welcome visitors from the UK and overseas, who will be attracted by its rich cultural offer, excellent services and vibrant street life'.

This will be predicated on an attractive retail experience, a thriving evening economy which attracts all types of visitors including families, a world class, vibrant cultural experience, and a local regional, national and international reputation.

Key actions will include:

- Establish a retail strategy for the primary shopping streets and highlight those areas where comparison retail activity should be focussed. To include plans and proposals for the future markets offer in the city centre.
- Reinforce the 'Top of Town' as an important convenience and independent retail destination, and as a key arrival point with excellent public transport connections, car parking capacity, and accessible public realm.
- Manage and maintain the city centre to the highest standards. Develop a Destination Management Plan with partners
- Work with centre managers, retailers and businesses to develop an Evening/ Night time Economy Strategy that is family friendly and appeals to all.
- Seek to grow the cultural offer in the city centre including the redevelopment of the Odeon as a large modern music venue; the refurbishment of St George's Hall as a concert venue, and the delivery of a new city centre based sports facility. Work to attract more privately run and commercially sponsored events and facilities.

Airedale Corridors - A Masterplan & Strategy for Airedale (Airedale Partnership)

Focus on Keighley, Bingley and Shipley. The Masterplan identifies, within the Lifestyle corridor theme, that components for the town centres include the development of high-quality leisure and cultural facilities within the town centres. Components for tourism development include:

- Co-ordinated marketing and promotion of destinations with online booking and payment;
- Provision of high-quality hotel accommodation in three town centres to encourage overnight stays for tourists and business users alike, with provision of conference and leisure facilities;
- Concentrated development of the tourism product at the three key destinations of Saltaire World Heritage Site, Keighley and Worth Valley Railway and Haworth.

The Masterplan makes a number of recommendations of relevance to tourism development including:

- Enhancements to the rural landscape.
- Development of a high-quality hotel with conference, leisure and restaurant facilities, and an Arts Centre in Keighley

In terms of Saltaire, the plan highlights that the historic contexts provided by the village, the park, the canal and Airedale itself provide a vital context for Salt's Mill, but do not in themselves offer much to the non-specialist visitor. There is a need for change (rather than fossilisation) within the village. The plan proposes:

- The development of a hotel between Shipley and Saltaire, on the Saltaire Road.
- Refurbishment of Roberts Park
- Development of a visitor and interpretation centre located on land at Caroline Street between the new hotel and the Mill.

Saltaire WHS Management Plan 2014 (Bradford MDC)

This recommends a number of actions including:

- Improving signage to and within the World Heritage Site and deliver better interpretation
- Exploring the feasibility of a major new community arts building

- Exploring the feasibility of creating and interpreting an historic residential property open to the public
- Developing a distinctive tourism offer for the Site which complements and delivers on CBMDC's Cultural and Tourism Strategy objectives
- Carry out regular relevant and bespoke visitor research
- Conduct a feasibility study into the development of B&B and hotel accommodation in the immediate setting of the WHS

Bradford a Leading Cultural City 2014-2024 (Bradford Cultural Strategy)

The Vision is of 'A leading cultural city that people love and enjoy'.

Diversity is a key theme of the strategy. The Cultural strategy is built on five strategic priorities:

- Priority 1: Investing in our People - A District where people can freely access, enjoy, create, engage in and contribute to Bradford's cultural offer.
- Priority 2: Building a resilient and sustainable sector – Create an agile, enterprising, and entrepreneurial creative and cultural sector.
- Priority 3: Responsible and active Leadership – A 'can-do' leadership position at all levels that engenders ownership, responsibility and ambition.
- Priority 4: A thriving cultural offer – One that inspires our residents and visitors and delivers a magnificent cultural experience for all.
- Priority 5: A cultural destination – telling and selling our story – Encouraging people to actively take part, watch, engage and experience Bradford as a leading cultural city locally, nationally and internationally.

Key points within these priorities include:

- Training, and supporting people to position Bradford as a leading cultural City – i.e. a focus on the experience and not just on marketing
- Developing a thriving cultural offer through developing a **Festival City**. Promoting the wealth of nationally renowned festivals (such as Ilkley Literature Festival, Bradford Animation Festival, Bradford International Film Festival, the MELA, Saltaire Festival and World Curry Festival) as part of an annual calendar will be a starting point to establishing the district's festival offer but there is an aspiration to deliver an iconic festival for the district.
- Addressing the 'whole' experience – for example, investing in parking and transport; bars and restaurants and shopping will create a better holistic experience during leisure time.
- Culture will be used as a distinctive vehicle for re-positioning Bradford as an appealing City in the minds of residents and visitors. The intention is by 2024 that Bradford District is positioned as a leading cultural city in the UK - a City that is front of mind as a cultural destination. Part of this includes:
 - Building audience intelligence and an understanding of what residents and visitors want
 - Improve marketing of place across the district. The council, cultural sector and communities need to work together to build collaborative approaches to reaching and persuading audiences and visitors to engage, concentrating combined resources on the best opportunities to develop campaigns that are fully integrated and impactful.

Appendix 3: Product Offer

Product element	Product offer – by area.				Stand outs
	Bradford City	Saltaire, Baildon, Bingley	Ilkley and Wharfedale	Haworth and Keighley	
Countryside / outdoor activity		Walkers are Welcome (Baildon and Bingley) Baildon (and Baildon Moor) Aire Valley Towpath Airedale Greenway Bradford's Millennium Walk	Ilkley Moor (and others) Wharfe Valley Walkers are Welcome (Burley in Wharfedale) Tour De France route Dales Way / Dales High Way Bradford's Millennium Walk	Haworth Moor The Bronte Way Bradford's Millennium Walk Great Northern Railway Trail Calder Aire Link (cycling)	Ilkley Moor Haworth Moor
Arts and Culture	National Media Museum and IMAX City Of Film (and Film Heritage) Alhambra (regional theatre) St George's Hall Cartwright Hall (Inc Hockney Gallery) Impressions Gallery Kala Sangam	1853 Gallery (and Hockney)	King's Hall and Winter Gardens	Bronte Parsonage Museum	Hockney National Media Museum Bronte Parsonage Museum
Heritage	Bradford Industrial Museum	World Heritage Site (inc distinct architecture)	Manor House (closed)	Bronte Parsonage Museum	Bronte Parsonage Museum

	Bolling Hall Bradford Cathedral Peace Museum	Salt's Mill ShIPLEY Glen Tramway		Keighley and Worth Valley Railway East Riddlesden Hall Cliffe Castle Museum and Gardens The Police Museum	Saltaire (WHS and Salt's Mill)
Environment and Towns	Mixed – superb architectural heritage and buildings (e.g Little Germany, City Hall), City Park but also blighted by poorer architecture in many places	Saltaire village - WHS	Ilkley - attractive Victorian spa town	Strong sense of place in Haworth and attractive village	
Retail	Broadway and city centre shopping – typically budget to mid high street brands	Salt's Mill and independents with visitor appeal in Saltaire	Mixture of mid to designer high street brands and independents	No. of independents, particularly at top of village.	
Family	National Media Museum and IMAX City Park	ShIPLEY Glen Tramway Cycling	Ilkley Lido Toy Museum	Keighley and Worth Valley Railway	National Media Museum
Accommodation	Nearly 1400 rooms – mix of 3/4 star (BW Cedar Court, Midland, Great Victoria, Bradford) and budget/2* (e.g. Jury's Inn, Campanile). Majority (about two- thirds) are budget/2*.	Nearly 500 serviced rooms concentrated in small number of hotels (e.g. Mercure Bankfield, Marriott Hollins Hall, Ibis ShIPLEY, Premier Inn Bingley).	Approx 150 serviced rooms – inc. 3* Craiglands and Rombalts	Approx 80 serviced rooms mainly in smaller independents (exception is the Travelodge Keighley) plus approximately 75 self-catering properties (the majority of the District's supply).	
Conference and	Various small / medium				

business	sized venues				
Events and festivals	Bradford Festival, Bradford Literature Festival World Curry Festival Mela Festival City park Events	Saltaire Festival Bingley Music Live	Ilkley Literature Festival Ilkley Summer Festival Ilkley Arts Trail South Pennines Walk and Ride Festival Wharfedale Music Festival	Haworth 1940s Weekend 1960s Weekend Steampunk Weekend	
Food and drink	Curry North Parade / West End Bradford Brewery	No. of independent cafes and bars Brewing - Saltaire	Good range of cafes / tea shops, restaurants and modern bars Brewing – Ilkley	Beer and Brewing – Tim Taylors, Gosse Eye, Naylor's, Old Bear	Curry
Other	Multi-cultural city Sport – Bradford Bulls, Bradford City FC Film		Tennis Club		

Appendix 4: Bradford in the Guide Books

Guide	Highlights	Feature	Quotes
Rough Guide England	Has a '30 things not to miss' section which includes Haworth and Bradford Curry. These are two of the eight Yorkshire highlights	<p>'Bradford and around' has about 2 pages. This features the National Media Museum, Saltaire and Salt's Mill'.</p> <p>Haworth has its own section – about a side which highlights the Bronte Parsonage Museum.</p> <p>Ilkley is in the Yorkshire Dales section. It has about a side of coverage featuring All Saint's Church, Ilkley Moor and the Manor House Museum</p>	<p>'The main interest in the centre of Bradford is provided by the National Media Museum'</p> <p>'The city's extraordinary attraction of Saltaire'</p> <p>'The small town of Ilkley holds a special place in the iconography of Yorkshire out of all proportion to its size. Vibrant and stylish, Ilkley has plenty to see.'</p>
The Lonely Planet England	<p>The guide has a top experiences in England - no Bradford mentions.</p> <p>Within the 'Yorkshire Highlights' there are seven places mentioned include:</p> <ul style="list-style-type: none"> • Haworth • National Media Museum 	<p>Bradford and Saltaire are featured in the 'Around Leeds' section. Each has about half a page.</p> <ul style="list-style-type: none"> • Bradford elements that are highlighted include Bradford Mela, National Media Museum, ImaX, City Park, Bradford Curry Guide. • The Saltaire section focuses primarily on Salt's Mill but also mentions guided walks. <p>Haworth has its own section - nearly three sides with a map. This highlights walks, Haworth Parish Church, KWVR, and Bronte Parsonage Museum.</p>	
Berlitz Great Britain	Has top 25 GB - no Bradford mentions	<p>Less than half a page on Bradford. Includes:</p> <ul style="list-style-type: none"> • Salt's Mill • National Media Museum <p>Bronte Country also get a separate mention (under north from Leeds section).</p>	Haworth 'scorched in summer, lashed by rain and wind in winter, this atmospheric place is home to the Bronte Parsonage'

Appendix 5: Market Segments

Segment	Coach Operators and Group Organisers (UK)
Characteristics	<p>UK market comprising retired groups (65+), clubs and societies.</p> <p>Typically within a 2 hour catchment area (Yorkshire, Gtr Manchester, Lancashire, East Midlands, West Midlands).</p> <p>Visiting for the day and overnight.</p>
Rationale	<p>Bradford district is attractive to this market and has the potential to develop it further. It is relatively easy to reach and is potentially influenceable with attractive packages and the right product.</p> <p>However, while representing a relative high volume market, it is not necessarily high yield and ideally should be targeted for off-peak periods. Cross selling other products / itineraries to increase length of stay in the district will also be important – e.g. Haworth and Saltaire (not just one of them).</p>
Essence of the offer	<p>Core elements of the offer for this market will be:</p> <ul style="list-style-type: none"> • Attractive rates (particularly hotels) • Location and accessibility (within the north of England / UK) • Combination of high profile products and attractive countryside.
Potential key areas and products	<p>Examples include:</p> <ul style="list-style-type: none"> • Haworth and Bronte Parsonage Museum • Saltaire and Salt's Mill • Ilkley – Ilkley Moor, Bettys, shopping • Alhambra (show specific) • Special interests themes – literature, Hockney, industrial heritage, faith and tolerance, railways and film locations.

Segment	Overseas coach tours
Characteristics	<p>Inbound tour groups looking at UK highlights. Typically first time visits to the UK and likely to be older age groups. Key markets will be South East Asia (China, S. Korea), and North America.</p> <p>Day visiting but also overnight. More likely to be visiting in peak / shoulder periods.</p>
Rationale	<p>Like the domestic market, Bradford is potentially attractive to this market, and it can be influenced and has the potential for growth.</p>

	The emphasis should be on securing overnight business (focused on Bradford) and increasing activities and spend (particularly within Bradford city centre).
Essence of the offer	<ul style="list-style-type: none"> • Good value overnight stay as part of UK tour • Location and accessibility (within the north of England / UK) • Combination of high profile iconic products in the immediate area (Haworth) and within an hour (e.g. York) • Added experience – e.g. evening special interest tour/talk, themed dinner.
Potential key areas and products	<p>In the short term primary areas / attractions will be Haworth and Saltire but supported by:</p> <ul style="list-style-type: none"> • Local guide/welcome service • Special interest themes and study tours – multi-culturalism, faith, peace etc

Segment	Families
Characteristics	<p>Younger families (with children aged up to 12-14 years). This will be primarily a day visitor market, typically from Bradford district itself and West Yorkshire but also potentially from further afield. It may be accompanied by a VFR market.</p> <p>Families will have a spectrum of socio-economic characteristics (and will include 'Vertical' families). The defining characteristic will be time with, and entertaining children.</p>
Rationale	<p>Families are one of the key markets for a range of products in the destination. There is scope to grow this further from the local and regional catchment area.</p> <p>In addition to growing volume there is potential to increase length of stay and therefore spend, attracting this market will (particularly from local visitors) create a sense of pride in the local area, and increase knowledge of what the area has to offer for recommendations, VFR, social media activity etc</p>
Essence of the offer	<ul style="list-style-type: none"> • Family day out – time with the kids • Entertaining, educational and healthy • Value for money • Attractions, events and festivals, special open days and guided tours
Potential key areas and products	<ul style="list-style-type: none"> • Core family orientated attractions like National Media Museum, Bradford Museums, Keighley and Worth Valley

	<p>Railway, Shipley Tramway etc</p> <ul style="list-style-type: none"> • Events and Festivals • Outdoor activities – parks, Shipley Canal, Ilkley Moor etc.
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Segment	Active Indulgents
Characteristics	<p>This is a domestic market that will undertake day trips and short breaks. It will be predominately be older couples (45/50+), travelling without children (but may include younger age groups), typically from higher socio-economic groups (ABs). Day visitors will be primarily from West and North Yorkshire but also from Lancashire/Gtr Manchester.</p> <p>Overnight visitors will also come from these areas and will also come from a potential 1½ to 2 hr catchment (the north and north Midlands). They may combine elements of a Bradford visit with activities in the wider area (e.g. the Dales, Harrogate, South Pennines).</p>
Rationale	<p>This is a high spend market with disposable income and, in many cases, time. Bradford has good product to attract more of this market. There is potential to increase more lucrative overnight stays from this group, with the right offer.</p>
Essence of the offer	<p>This market will have two key drivers – including:</p> <ul style="list-style-type: none"> • Activities and experiences (albeit not necessarily in an explicit way) – these will be a combination of 'learning' experiences (i.e. heritage, and cultural sightseeing, attractions and events), and countryside and outdoor activities (a walk, bike ride). While, the balance will vary between individual groups this segment is not purely about outdoor physical pursuits (at least not on this trip). • Indulgence – the trip will also be indulging /treating ones self – e.g. eating and drinking in a quality bar / restaurant or café/tea shop, staying in nice hotel / cottage, quality shopping.
Potential key areas and products	<p>All areas of the District have the potential to attract these visitors – key elements could include:</p> <ul style="list-style-type: none"> • Haworth, the Brontes and walking. • Saltaire And Salt's Mill • Ilkley – Ilkley Moor or the Wharf Valley , shopping, cafes and restaurants <p>Aside from events, Bradford's offer is not currently as strong for this market but potential products include the National Media Museum, Impressions Gallery, Cartwright Hall. It also offers a potential accommodation for the wider area (e.g. Midland Hotel, Great Victoria Hotel).</p>

Segment	Young explorers
Characteristics	<p>This is a domestic market – primarily day tripping from the West Yorkshire area but also from further afield (with some staying visitors). They will be under 35, and either single, couples, or groups of friends. Typically they will be higher socio-economic groups (graduates / young professionals).</p> <p>They might be familiar with the area – from personal knowledge, friends, or may have previously studied in Bradford. They are more likely than other segments to be travelling by train.</p>
Rationale	<p>This market has growth potential, generating additional spend. It is also a potential ambassadorial role – helping to promote Bradford and put it on the map, and support Bradford's independent quarter.</p>
Essence of the offer	<ul style="list-style-type: none"> • Somewhere different to visit • An authentic and eclectic experience • A combination of cultural activities and nightlife
Potential key areas and products	<p>This segment will be primarily focused on Bradford and Saltaire. Key products will include:</p> <ul style="list-style-type: none"> • The National Media Museum – particularly the Imax and temporary exhibitions • Festivals and gigs – music, film, literature • Salt's Mill • Curry • North Parade, Sunbridge Wells and the West Ends • (Potentially) the Odeon

Appendix 6: Market Segments – marketing approaches

The following table outlines potential marketing approaches to different market segments

Market segment	Overview of potential activities
Coach Operators and Group Organisers (UK)	<ul style="list-style-type: none"> • Develop databases of clubs and societies and coach operators • Develop suggested itineraries, combining attractions with tours of Bradford district, film and TV links and special interest themes • Produce A4 leaflet/PDF, with itineraries, package prices, maps of coach parking, drop off points and driver facilities • Organise familiarisation visits for coach operators and organisers (via dedicated media and magazines) • Mailing to database with leaflet, fam visit invitation etc • On-going PR programme in trade and specialist press • Provide welcome service at key attractions with souvenir leaflet and map and offers for repeat visits
Overseas coach tours	<ul style="list-style-type: none"> • Develop database of existing and potential incoming tour operators via UKInbound and relevant attractions • Contact via email and social media with special offers, incentives, new coach facilities, meet & greet • Develop web pages (downloadable page) with itineraries and services • Work with Welcome to Yorkshire and VisitBritain to feature content on relevant sites and via marketing activity programmes – including features in translated pages
Families	<ul style="list-style-type: none"> • Local Press, radio and TV coverage - and neighbouring area –including editorial and advance features with advertising support • Develop day out itineraries – e.g. 5 best days out for kids differentiated by age (e.g. pre-school, primary, early teens) • Promote online and on third party websites (family days out, Mumsnet, etc.) • Social media campaign – featuring competitions, quiz, prizes for best photos etc • Print 'On your doorstep' featuring days out, how to get around, special offers, festivals – possibly on a district or West Yorkshire basis. • Tactical leaflet inserts in local newspapers and wide distribution via commercial company (covering seasonal things to do, events etc.) • General leaflet' available all year round, regular distribution.

	<ul style="list-style-type: none"> • Collect contact details for on-going promotions of events, special offers etc. and encourage sign up on social media
Active Indulgents	<ul style="list-style-type: none"> • Development of suggested online experiences/itineraries for half, one and two+ days – geographical and easy to follow e.g. Saltaire- plus, Haworth- plus, Ilkley- plus etc) • Local / regional press and national press via W2Y • Content provided to travel bloggers, 3rd party websites, OTAs etc. • Feature on dedicated pages on Visit Britain website
Young explorers	<ul style="list-style-type: none"> • Curated content on social media and interest apps (e.g. film etc.) • Local / regional and regional listings (e.g. Bradford Review) • Mainly word of mouth on social media, re-tweeting and 'likes' • Photos, films and blogs • VFR via university websites, reunions etc. • Links from IMAX films, evening offer packages etc. • Via places to stay and online links e.g. Airbnb hosts, rental cottages, hostels etc.
Events	<p>Events will typically have their own marketing strategies. However, for key events destination activity could include:</p> <ul style="list-style-type: none"> • Itineraries on destination website • Including in 'On your doorstep' print • PR and social media activity

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Visit Bradford Tourism Review

December 2016

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1	Introduction.....	1
2	Current Visit Bradford Services.....	2
2.1	Visitor Information Centres.....	2
2.2	Other Visit Bradford activities.....	3
2.3	The Current Budget.....	4
3	Market Trends.....	5
4	Future Options.....	7
4.1	Considerations in future service development.....	7
4.2	Future Options.....	10
4.3	Option 1: Keep two VICs.....	12
4.4	Option 2: Keep Haworth VIC open.....	13
4.5	Option 3: Keep Bradford VIC open.....	14
4.6	Option 4: No VICs.....	15
5	Recommendations.....	16
	Appendix 1: VIC Services.....	17

1 Introduction

In April 2016, The City of Bradford Metropolitan District Council commissioned TEAM Tourism Consulting to develop a Destination Management Plan (DMP) for the district. This DMP provides the framework for the development and promotion of the visitor economy across the area.

TEAM Tourism Consulting was also commissioned to review BDMC's Tourism Service. The aim of this review was to provide a basis for the future development and operation of the Tourism Service, within the context of three key drivers:

1. The Destination Management Plan, which identifies challenges and a forward strategy for the visitor economy
2. Changes in the way consumers now access information with the widespread use of smartphones, travel review sites and online hotel booking agencies for example.
3. A challenging spending framework for BDMC, with a need to reduce overall spend by £172,000 by 2017/18.

This review looks at:

- Current service provision in terms of:
 - Marketing and promotional activity delivered by the Tourism Service
 - Operation of the four Bradford District VICs.
- Potential future delivery options in terms of VICs and marketing

2 Current Visit Bradford Services

2.1 Visitor Information Centres

Bradford MDC currently operates four Visitor Information Centres (VICs) in Bradford, Haworth Ilkley and Saltaire. These are open year round (see appendix 1 for an overview of current VIC services).

The following table provides an overview of the relative performance and costs of each VIC.

Costs, income and cost ratios					
	Bradford	Haworth	Ilkley	Saltaire	All VICs
Number of visits	51,332	69,254	75,726	29,669	225,981
Number of other enquiries (telephone, email etc.)	20,141	3,551	2,436	4,189	30,317
Net costs (£k) ¹	71.2	101.4	56.7	85.7	315
Estimated income ² (£k)	11.9	19	24.3	8.9	64.1
Cost per enquiry (inc. tel. and email) / visit	£1.00	£1.39	£0.73	£2.53	£1.23
Cost per visit	£1.39	£1.46	£0.75	£2.89	£1.39
Net income per visit	£0.23	£0.27	£0.32	£0.30	£0.28

Notes:

1. Source: Bradford MDC. Net cost includes staff costs, rents at Haworth (£11k) and Saltaire (£13.8k) and costs on Epos maintenance, uniform, stationery, computer costs, PRS licence and PPL Licence and stock
2. Based on sales figures and estimated profit margins. Margins differ across different goods and services. Averages from 2014 - 2016 have been applied to 2015/16

Key points in relation to the performance of the VICs are:

- They are dealing with approximately 225,000 visits.
- Ilkley is the busiest VIC in terms of visits. Bradford deals with the most telephone and email enquiries servicing brochure requests as a result of advertising campaigns
- Haworth and Saltaire are estimated to be dealing with higher proportions of 'tourists' (as opposed to residents of the area). They are the most seasonal TICs with more noticeable peaks and troughs in activity. Bradford and Ilkley are less seasonal and more likely to be used by local residents.
- In net terms, Haworth and Saltaire are the most expensive VICs to run.
- Ilkley is the cheapest VIC to run and the most cost effective relative to the number of visits. Ilkley and Haworth generate the most income – much of Ilkley's is from ticket sales for the King's Hall.

Other points in relation to the VICs:

- Bradford District's VIC operations are mature, with many staff having been in post for a long time.
- All four VICs are well located in their respective destinations – the exception is probably Saltaire which, in the context of its location in Salt's Mill, is slightly off the

beaten track. Bradford VIC, while in a good city centre location, does not have a particularly prominent position.

- In terms of decor and condition, all VICs (with the exception of Saltaire) are 'fit for purpose' but could benefit from some improvement. They have a 'traditional' feel with discrete retail, brochure and counter areas. Saltaire is the exception – it is in the best condition and the VIC with the most character and, in terms of layout, has an 'open' feel. Bradford has recently refreshed its retail offer and increased its appeal.
- There is little sense in the displays that the VICs are proactively selling other parts of the district or the attractions outside their immediate areas – though all allocate a significant proportion of space to displaying brochures for other parts of the UK.
- There is no sense that the VICs are 'telling the story' of their location or adding to the sense of place or civic pride.
- The retail offer of all VICs is good and targeted at their specific audiences with a range of goods at different price points. One issue is an excess of slow moving goods (i.e. goods which are not selling quickly but where the VIC has significant stocks).
- All VICs are of an adequate size but do not really have spare space to enable extended commercial opportunities (e.g. a coffee shop or increased retail functions).

2.2 Other Visit Bradford activities

VisitBradford delivers a number of marketing related services that also provide visitor information:

- **Website.** The VisitBradford website has plenty of strong images and positive messages, grouped in themes. The Destination Management System costs £12,500 per year to run, via NVG. This includes the website, a full content management system, e-news facility and consumer database.

Bradford is promoted on other websites via the DMS or through content supplied by the marketing team. For example it is featured on partner sites such as the Welcome to Yorkshire website and VisitEngland.

- **Digital Marketing and Social Media:** There is no specific budget for digital marketing, but VisitBradford works hard to gain traction in the digital sphere, particularly on social media and content provision on third party sites. It has around 11.2k followers on Twitter and provides regular updates on events, retweeting relevant content and photos. It has over 5,500 Facebook 'Likes'.

In terms of review sites, VisitBradford is featured on **Trip Advisor** webpages but is not active in responding to enquiries that are posted on the site – though there are some regular contributors who deal with most questions. VisitBradford has engaged with other sites such as www.Toptourist.com and VisitEngland's Twitter campaign.

- **Print:** The main guide 'Visit Bradford and District' is the 'inspirational' piece, distributed widely via Carrier Direct mainly outside the district via other TICs and as the fulfilment piece for specific campaigns such as via Bitesize Britain. 20,000 are produced and £4,000 of advertising income covers the costs of production.

The 'Discover' series of leaflets are produced for the four distinct areas of the district (Bradford, Haworth, Ilkley, and Saltaire). They seek to encourage visitors to spend longer and explore further while in the area, with strong messages and photos. Distribution is however a challenge, with little engagement from tourism businesses in the distribution of these guides locally. Approximately 10-15,000 of each are produced each year.

- **PR.** PR is out-sourced to a specialist PR agency which specialises in tourism and therefore has national travel contacts and can successfully organise journalist visits from national media. It is also used on specialist projects such as the Curry Capital.
- **Campaign Activity.** VisitBradford undertakes some advertising and campaign activity. This has included:
 - Challenge Fund campaign
 - Familiarisation trips including china travel trade
 - Food and Drink campaign
 - Poster campaigns at Leeds, Liverpool, Manchester, Birmingham, Sheffield and Bradford Foster Square.
 - Various adverts – e.g. Metro, Go Yorkshire
 - Christmas shopping campaign with Broadway Shopping Centre

Planned activity includes an advertising campaign at Leeds Bradford Airport

2.3 The Current Budget

The current tourism budget is as follows:

	Net cost / Council Contribution
Visit Bradford Officers x 3	130,500
VICs	
Haworth VIC	95,800
Bradford VIC	65,600
Saltaire VIC	80,100
Ilkley VIC	51,100
VIC Shared costs*	22,200
Total VIC	314,800
Marketing	
Print	10,000
Web / DMS	12,500
PR	10,000
Campaigns / advertising / projects	36,500
Total Marketing	69,000
Total Budget (2016/17)	514,300

3 Market Trends

The ways consumers access tourist related information continues to evolve. Some of the key trends include:

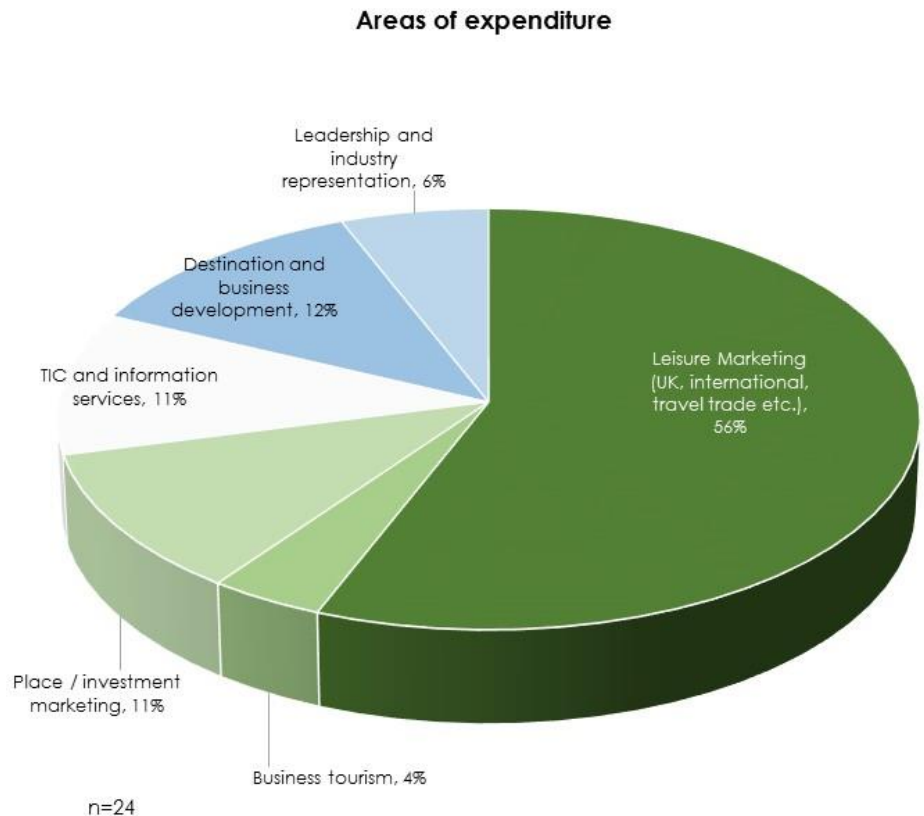
- At all stages of the 'customer journey', **digital content and channels are becoming increasingly important**. They are also blurring the differences between stages of the customer journey or merging them or even re-ordering them. **Consistent players** have emerged in the digital space in the UK. For example, Google is a trusted player, used throughout the travel process and among all target groups, and is particularly popular in the inspiration, conceptualisation, comparison, planning, and defining stages. Facebook, with both lovers and haters, is huge in the sharing stage. TripAdvisor is used widely by all target groups and has established itself as a key player in the comparative stage and used as a reference point.
- **Customer review** sites, in particular TripAdvisor, are becoming more important. Recent research indicates that 43% of British tourists are now using TripAdvisor for inspiration prior to booking a main holiday, with 23% posting reviews following a trip. Destinations can set up alerts to questions posed on TripAdvisor and can provide content on the site for their destination. There are also 'widgets' that destinations can incorporate into their own website pages, and this latter opportunity has been taken up by VisitBradford.
- Facebook, Twitter, Foursquare and other **social media sites** are providing a means of sharing word of mouth recommendations with very wide circles of 'friends' and networks. **YouTube** can be an effective means of inspiration – particularly when 'shared' or 'liked' on social media - and VisitBradford's 'You tube' channel has some good content – though limited views for some films.
- **Online booking** - consumers are increasingly booking accommodation through the growing number of third party websites that offer discounted accommodation and holidays such as LateRooms, lastminute.com, booking.com, Expedia, Trivago, and hotels.com, and taking advantage of special offers promoted through daily deals sites such as Groupon, Wowcher, Living Social, Travelzoo and Secret Escapes. Booking.com recently added Book Now for last minute bookings. **AirBnB** is offering a new channel of visitors wanting independent accommodation and it is now the 5th most popular travel website, achieving over 4 million visits per month
- **'Mobile first'**- smart phones and tablets are increasingly being used as the first point of contact for most communications, including tourism searches, enquiries and bookings. Wireless access on holiday and information in the right format will be key. Bookings will be more 'last minute'.
- **Google maps** and transport apps provide visitors with large amounts of information in their smartphones – but including content of relevance to visitors and checking its accuracy depends on local monitoring and input.

In terms of **destinations**, public sector cut backs have dramatically impacted on provision in tourism. A review of spending and operations of English destination management organisations undertaken by TEAM in 2016 indicated that under half now ran Visitor Information Centres. The table below shows the percentages of destinations involved in different types of tourism operation.

Areas of Operation	
	% DMOs
Domestic leisure (consumer) marketing	92
Business advice and support	76
Research	71
Travel trade marketing	68
Events development / support	68
International leisure (consumer) marketing	66
Other in-destination information provision	66
Destination development – interpretation, product development etc.	66
Sector Training	55
Tourism Conference	50
Tourism Awards scheme	45
TIC operation	42
Broader place and inward investment marketing	39
Convention Bureau / Business tourism – sales and marketing	29

The average turnover of public sector organisations was £605k compared to £514 for Bradford – although on average 22% of income was coming from sources other than the local authority – such as membership, European funding etc

The chart right show the relative spending on different types of activity – so VIC and information services accounts for an average of 11% of spend – compared to 61% for BDMC. Marketing spend accounts for an average of 56%, compared to only 13% for BDMC.



4 Future Options

4.1 Considerations in future service development

Moving forward the budget for tourism services needs to move from its current level of £514,300 (which includes transitional funding) to £342,300 – a saving of £172,000.

As highlighted in section 1, reducing budgets is only one consideration. Delivery of the DMP and changes in consumer demands are other important considerations.

In reviewing activity and reducing budgets, consideration has been given to a number of factors:

- **Changes in consumer demand** – the advent of the internet and prevalence of smart phones provides visitors with many alternative sources of visitor information. The traditional role of VICs in sending out brochures and providing information on local hotels and attractions has largely been superseded by destination websites, online booking portals and review sites. There is still demand for printed maps and leaflets, but these can be distributed through various outlets, not only VICs.
- **Delivery of the Destination Management Plan** – the DMP outlines a potentially ambitious programme of activity. This will require a more dynamic approach to communicate more effectively across a number of different markets and resources, support events' programmes and product development, and engage more proactively with the tourism industry.

At £69k and one FTE, marketing and development resources for Bradford District are modest (individual attractions have larger budgets). While there is a strong case to increase marketing resources this might be difficult in the current Local Authority climate. However, savings from the fixed VIC costs could allow a **more proactive approach to marketing and visitor information provision** within the district – and one that is more in line with other English destinations.

- **Commercial opportunities** – There are some opportunities within the VICs to improve the retail offer and provide other commercial services (e.g. advertising, left luggage, and a Post Office counter in Haworth). However, these are limited and only likely to make a marginal contribution (up to 20-25% maximum) to running costs. They would need to be assessed against additional staff resources, space requirements and consumer demand.
- **Differences in VIC performance and potential** – the level of difference in current and future budgets will necessitate some form of VIC closure. Management statistics on Bradford MDC's four VICs highlight their differing performance. However, there are no statistics on the actual impact of VICs relative to each other or relative to

marketing services. Our assessment of the relative pros and cons of the four VICs is as follows:

	Pros	Cons
Bradford	<ul style="list-style-type: none"> Deals with the majority of back office enquiries Low property costs Destination with greatest growth potential / future VIC need 	<ul style="list-style-type: none"> Not identifiable as 'Welcome Centre' as corporate council branded.
Haworth	<ul style="list-style-type: none"> Highest number of 'tourist' visits and probably added value Good location 	<ul style="list-style-type: none"> Leased property Most expensive to run
Ilkley	<ul style="list-style-type: none"> Highest number of visits Provides box office/booking services for King's Hall and Ilkley events Low property overheads Cheapest VIC to run 	<ul style="list-style-type: none"> Primarily a local audience Ticket sales are a high proportion of sales
Saltaire	<ul style="list-style-type: none"> High proportion of 'tourist' visitors Sits in World Heritage Site Most distinctive and attractive VIC 	<ul style="list-style-type: none"> Poor location within Saltaire Least visited VIC Most expensive per visit Leased property

From a tourism perspective, as opposed to a community perspective, Haworth is the key VIC. It deals with the most visitor enquiries and probably adds the most value to the destination. Looking to the future Bradford, as a destination, has both significant needs and opportunities. A Bradford VIC could play an important role but its role would need to change from a traditional VIC to more of a welcome and interpretation centre.

- Back office functions** – there is a danger when looking at VICs that one thinks of them only in terms of counter related services. VICs also undertaken a significant amount of 'back office' functions – dealing with email and telephone enquiries and theatre bookings, collating information and content for publication, managing social media etc. These are important functions but can potentially be undertaken in any location.
- Partnership opportunities** - there may also be options to look at alternative arrangements for the delivery of simplified VIC services with a third party operating a VIC instead of, or in some form of partnership with, Bradford MDC. This model has worked well in some destinations (e.g. County Durham).
- New ways of working** - at present the VICs are generally reactive and 'building centric'. Consumers are increasingly accessing information in different ways, and there are opportunities for new ways of working and providing visitor information in alternative ways to VICs. For example:
 - Within VICs, there is a substantial (almost dominant) retail element. An alternative is to focus more on creating '**Welcome Centres**' that provide a

strong sense of place and focus on selling the destination more through utilising a range of different media and imagery. This approach is particularly pertinent to the Bradford VIC but could apply to other centres as well.

- **'Taking Information to the Visitor'** – via pop-up or mobile VICs. A pop up stand, a table and some wi-fi connected tablets can provide a proactive visitor information service at events across the district (such as The 40s Weekend, Curry Festival) and in busy locations and sites through the year. This approach requires a different mind-set and more proactive approach. It would also require some flexibility in job descriptions and staffing arrangements.
- **Apps and a mobile enabled website** containing suggested itineraries and experiences can provide information in-destination.
- **Partner outlets** – there may be opportunities to provide information outlets within operators' properties (e.g. in attractions or retailers). This could feature tourist information literature and provide face-to-face advice. To be successful this approach would require on-going support from Bradford MDC in terms of providing training and support, branding, literature etc.

These activities would require some on-going revenue support mainly in terms of staff time - from both VisitBradford officers and VIC (or equivalent) staff.

4.2 Future Options

Looking to the future and predicted trends in smart phone and online information provision, there are a number of options that could be pursued – and which may have greater impact on the visitor economy. The differential between current and future budgets, and the limited commercial opportunities in VICs, means that Bradford MDC will need to reallocate some funding from VIC operations. The following table outlines four potential options.

	Option 1: Keep 2 VICs	Option 2: Keep Haworth VIC	Option 3: Keep Bradford VIC	Option 4: No VICs
Description	Keep Haworth and Bradford VICs at current opening and staffing levels. Close Ilkley and Saltaire VICs	Maintain Haworth at its current operational level (staff and opening hours) and close all other VICs	Maintain Bradford, refocusing it as a welcome and interpretation centre. (Maintain current opening hours and staff levels). Close all other VICs	Close all VICs. Re-invest the savings in alternative forms of information provision and enhanced marketing
Approx. cost saving	£142k	£213k	£244k	£315k
Potential impact on marketing and information budget	-£30k	+£41k	+£77k	+£143k
Advantages	<ul style="list-style-type: none"> Keeps 2 VICs operational including Haworth (which has a relatively traditional audience and poor 4G, reducing likely use of digital alternatives). 	<ul style="list-style-type: none"> Maintains a VIC service in Haworth Allows for modest investment in alternative information provision and marketing 	<ul style="list-style-type: none"> Maintains a VIC service in Bradford and the core of the back office function. Allows for investment in alternative information provision and marketing 	<ul style="list-style-type: none"> Significant opportunities to enhance marketing activity Can provide range of alternative info. provision across the district
Disadvantages	<ul style="list-style-type: none"> Reduced marketing budget (by £30k) No budget for 	<ul style="list-style-type: none"> Ability to cope with all the back office function at Haworth or a need to 	<ul style="list-style-type: none"> Approach is based on Bradford's potential, not current, performance – 	<ul style="list-style-type: none"> Back office function will be required in some form

	<p>alternative in-destination information provision</p>	<p>maintain a function in Bradford</p> <ul style="list-style-type: none"> Limited funds available to invest in alternative information provision elsewhere or enhanced marketing 	<p>in the short term this is not the most efficient option (in terms of cost per enquiry)</p>	<ul style="list-style-type: none"> No VICs – can staff and expertise be retained for alternative information provision - such as pop-ups and coordination of delivery via other outlets?
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4.3 Option 1: Keep two VICs

Description and rationale

Option 1 is predicated on keeping two VICs open – Bradford and Haworth. The rationale behind this is that Haworth is the most important VIC in terms of the numbers of tourists it serves. Bradford, as a destination, has significant growth potential and a re-positioned VIC (as a welcome /interpretation centre) could be an important aspect of the longer term development of the visitor economy.

In contrast Ilkley is mainly providing a ticketing service to local residents, which, while important, is not servicing a visitor demand or adding significant value to the destination it serves. There may be opportunities for alternative arrangements in the town through a partnership approach. Saltaire is the least visited VIC and the most expensive per enquiry to run. Its location is not ideal.

However to maintain services in two VICs would have a significant impact on the destination marketing budget.

Potential Future Budget

	£(k)
Visit Bradford officers	130.5
VIC Services	172.5*
Marketing/ other information services	39.3
Total	342.3

* Based on current opening hours and staffing level in Haworth and Bradford

Potential Future Activities

VICs	Operate two VICs <ul style="list-style-type: none"> • Haworth VIC – current staffing and opening hours • Bradford – current staffing and opening hours • Reposition Bradford VIC as a welcome / interpretation centre (telling the Bradford 'story')
Alternative information provision	<ul style="list-style-type: none"> • Bradford VIC to deal with back office functions for Saltaire and Ilkley • In destination print (see below) • Explore partner information outlets in Haworth, Saltaire and Ilkley (albeit financial support for these would be minimal).
Marketing	Budget for destination marketing would be reduced. Activities could include <ul style="list-style-type: none"> • Maintenance of the website • Production of in-destination print – 4 guides • Social media campaign – primarily conducted in-house • PR activity – primarily conducted in-house • Minimal campaign and advertising activity

4.4 Option 2: Keep Haworth VIC open

Description and rationale

Option 2 is predicated on keeping only Haworth open – on the basis that it is the most important VIC in terms of the levels of tourists it serves.

By closing three VICs this option also enables some investment in alternative information provision and additional marketing activity.

Potential Future Budget

	£(k)
Visit Bradford officers	130.5
VIC Services	101.4*
Marketing / other information services	110.4
Total	342.3

* Based on current opening hours and staffing level in Haworth

Potential Future Activities

VICs	Operate Haworth VIC – current staffing and opening hours
Alternative information provision	<ul style="list-style-type: none"> Haworth VIC to deal with back office functions for Bradford, Saltaire and Ilkley OR maintain a back office function (1 to 1.5 FTE) in Bradford which deals with the district's enquiries, bookings, content management, and social media activity In destination print (see below) Development of a more mobile friendly website Refocus the position of Visitor Information Manager to have a more developmental role working with external partners in providing information, and explore alternative arrangements for face-to-face services. Some support (e.g. for brand materials) would potentially be available.
Marketing	<p>The size of the marketing budget will be partly dependent on back office arrangements and whether additional staff (beyond those currently in Haworth VIC) are required. Potential marketing activities will include:</p> <ul style="list-style-type: none"> Maintenance and re-development of the website Production of in-destination print – 4 guides Social media campaign and PR activity – primarily conducted in-house (with possibly some external support) Some campaign and advertising activity but this is likely to be relatively ad-hoc and tactical

4.5 Option 3: Keep Bradford VIC open

Description and rationale

Option 3 is predicated on keeping only Bradford VIC open – on the basis of its potential developmental role for Bradford. The VIC should be re-developed as a Welcome Centre ('This is Bradford') that utilises digital and presentational materials to tell the Bradford story, and generate local pride and a strong sense of the City's heritage.

By closing three VICs this option also enables some investment in alternative information provision and additional marketing activity.

Potential Future Budget

	£(k)
Visit Bradford officers	130.5
VIC Services	71.2*
Marketing / other information services	140.6
Total	342.3

* Based on current opening hours and staffing level in Bradford

Potential Future Activities

VICs	Operate Bradford VIC – current staffing and opening hours
Alternative information provision	<ul style="list-style-type: none"> Bradford VIC to deal with back office functions for the district In destination print (see below) Development of a more mobile friendly website Refocus the position of Visitor Information Manger to have a more developmental role working with external partners in providing information, and explore alternative arrangements for face-to-face services across the district. Potentially some pop-up VIC services at events across the district
Marketing	<p>The size of the marketing budget will be partly dependent on the level of other information provision (e.g. pop-up and partner activity). Potential marketing activities will include:</p> <ul style="list-style-type: none"> Maintenance and re-development of the website (including mobile friendly version) Production of in-destination print – 4 guides Social media campaign and PR activity – primarily conducted in-house (with some external support / expertise) Some campaign and advertising activity – primarily ad-hoc and tactical but the budget might allow for the development of a more proactive campaign with a dedicated budget (circa £30-40k)

4.6 Option 4: No VICs

Description and rationale

Option 4 is predicated on closing all four VICs. This would enable investment in alternative information provision and significant additional marketing activity.

Potential Future Budget

	£(k)
Visit Bradford officers	130.5
VIC Services	
Marketing / other information services	211.8
Total	342.3

Potential Future Activities

VICs	None
Alternative information provision	<ul style="list-style-type: none"> • Maintain a back office function (1 to 1.5 FTE) which deals with the district's enquiries, bookings, content management, and social media activity • In destination print (see below) • Development of a more mobile friendly website • Refocus the position of Visitor Information Manager to have a more developmental role working with external partners in providing information, and explore alternative arrangements for face-to-face services. • Pop-up VIC services at events
Marketing	<p>Potential marketing activities will include:</p> <ul style="list-style-type: none"> • Maintenance and re-development of the website (including mobile friendly version) • Production of in-destination print – 4 guides • Social media campaign and PR activity – partly conducted in-house (with external support / expertise) • Enhanced campaign and advertising activity - development of 2-3 proactive campaign with dedicated budgets (circa £30-40k) – e.g. travel trade, 'Discover your Doorstep', and campaigns for 'active indulgents' and 'young explorers'.

5 Recommendations

Our recommendation would be to pursue **option 3** – i.e. keeping a VIC presence in Bradford. The rationale for this is that:

- Bradford VIC effectively provides the majority of the back office function for the District. This will continue to be required in the future and it may be difficult in another VIC (e.g. Haworth) or require some staff provision if Bradford was to close.
- Bradford, as a destination, has significant growth potential and a re-positioned VIC could be an important aspect of the longer term development of the visitor economy.
- There is a potential opportunity to reduce cost in Bradford VIC through sharing of services with other leisure related functions in the City Hall (e.g. the Museum of Rugby League). This provides an opportunity to increase spend in other marketing and information services across the district.

However, pursuing option 3 should be predicated on re-positioning the centre as more of an interpretation centre (helping to tell Bradford's story) and welcome centre (helping to sell both the city and the wider area). If this is not realistic, then **option 4** (no VICs) would be our preferred option on the basis that it would maximise the available budget on marketing and information services across the district. These are likely to generate a greater return on investment than traditional VIC services (like options 1 and 2).

Appendix 1: VIC Services

VIC	Opening and staffing	Description and notes
Bradford	<p>Year round opening Monday – Saturday:</p> <ul style="list-style-type: none"> April - September 10:00 - 17:00 October - March 10:00 - 16:00 <p>Staff hours per week:</p> <ul style="list-style-type: none"> Summer: 112 hours Winter: 96 hours 	<p>The VIC is located in a council building on Broadway. The VIC is spacious. Its retail offer has a bias towards gifts (both general and Bradford specific) which have proved to be a strong seller. Bradford VIC leads on information fulfilment (from marketing campaigns) – see below.</p> <p>The ambience and feel of the VIC is traditional and there is not a strong sense of place.</p> <p>Within the context of the city, the VIC is well located – close to both train stations and the City Park. However, in the context of current attractions in the city (particularly City Park and the National Media museum), it is slightly off the beaten track and not in a particularly visible location. The opening of the Broadway Shopping Centre nearby should be an opportunity and is likely to increase footfall in the area. It could have a positive impact on the retail offer and sales. There are no building charges for Bradford VIC</p>
Haworth	<p>Year round opening Monday – Sunday:</p> <ul style="list-style-type: none"> April - September 10:00 - 17:00 October - March 10:00 - 16:00 <p>Staff hours per week:</p> <ul style="list-style-type: none"> Summer: 147 hours Winter: 120 hours 	<p>It is located on West Street in the heart of Haworth's tourism area. It is in a good location close to key car parks and the Brontë Parsonage Museum. It has a good frontage.</p> <p>The VIC is relatively narrow and small. Its retail offer includes both general and Brontë specific. The VIC is in good condition but traditional in its feel.</p> <p>There has been discusses on the potential of incorporating a Post Office Local counter. This would serve the whole of the village and may require a separate counter. There is space on the upper floor that has been used for exhibitions of local art and crafts in the past, and generated some revenue.</p> <p>Haworth VIC is leased at a cost of £11,000 per year. There are 7 years remaining on the lease.</p>
Ilkley	<p>Year round opening Monday – Saturday:</p> <ul style="list-style-type: none"> April - September 9.30 - 16:30 October - March 10:00 - 16:00 	<p>Located in the Town Hall on Station Road, Ilkley VIC is close to the station and next to the King's Hall. It is a council owned property with no external lease charges. While close to the town centre it is slightly away from the main shopping area. This, combined with a lack of visible frontage, will reduce passing trade.</p>

	<p>Staff hours per week:</p> <ul style="list-style-type: none"> • Summer: 105 hours <p>Winter: 90 hours</p>	<p>The VIC is relatively small but an acceptable size. The centre has a traditional feel. The retail offer specialises in walking related publications. Ticket sales for the King's Hall are a significant part of the centre's income (see below).</p> <p>It opens half an hour earlier than the other VICs to catch potential walkers before the departure of the Dales bus (at 9.45).</p>
Saltaire	<p>Year round opening Monday – Sunday:</p> <ul style="list-style-type: none"> • April - September 10:00 - 17:00 • October - March 10:00 - 16:00 <p>Staff hours per week:</p> <ul style="list-style-type: none"> • Summer: 119 hours • Winter: 102 hours 	<p>The Saltaire VIC is located at Salt's Mill. External signage is good but the centre is located slightly out of the way (both in terms of its location around a corner of Salt's Mill but also in terms of the combined stair and corridor access) – passing footfall will be limited. The property is leased at a cost of £10,000 per annum – there are five years remaining on the lease. It is the most recently opened VIC (in 2011).</p> <p>Internally the centre is nicely decorated and the shelving and table layout works well. Staff are situated behind a table (as opposed to a counter) which creates a more open feel.</p> <p>Again retail is specific to the location.</p>



Report of the Strategic Director Department of Place to the meeting of Executive Committee to be held on 12th September 2017

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Subject:

Bradford District Housing Allocations Policy 2017

Summary statement:

The Housing Act 1996 requires local authorities to maintain and publish a formal social housing allocations policy. The report presents a revised policy for the District of Bradford.

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Regeneration and Economy

1. SUMMARY

- 1.1 The Housing Act 1996 requires local authorities to maintain and publish a formal social housing allocations policy. This report presents a revised policy for the District of Bradford. See Appendix.

2. Background

- 2.1 The current social housing allocations policy for the Bradford District was agreed by the Executive in January 2014 and since then, a number of changes and impacting factors have necessitated the current review.

- 2.2 As the Council is a limited stockholding authority, our social housing allocations function is delivered primarily through a nominations process with the district's Registered Providers (RPs) and other participating landlords. RPs have a duty to co-operate with housing authorities, where the authority requests it through Nomination Agreements.

- 2.3 Nominations Agreements with locally operating RPs are already in place and these set out the proportion of lettings that will be made available to applicants on the Council's Housing Register. The existing agreements require all RPs (apart from Incommunities) to provide a minimum of 50% of their voids. The agreement with Incommunities is to make available 75% of its void stock for nominations.

- 2.4 RPs operating within the District are required to co-operate with any reasonable requests in delivering the objectives of the policy and in improving its effectiveness in the pursuit of allocating housing and in discharging the statutory duty to prioritise applicants on the housing register.

- 2.5 There are approximately 30,000 social homes in the district. Almost all of these are owned by around 20 different RPs (Housing Associations). Around two-thirds of the social stock is owned by Incommunities. Other RPs include Manningham Housing Association, Accent Group, Hanover Housing, Places for People, Yorkshire Housing, Home Group, Housing 21 and Your Housing Group. Bradford Council has developed around 176 new social homes, with another 139 in the pipeline. These Council properties are managed by Incommunities.

2.6 Current System

The allocations policy adopted in 2014 represented a significant shift in approach by replacing Choice Based Lettings (CBL) with a new Value Based Lettings (VBL) scheme. The shift incorporated learning from CBL including issues around bidding for properties, re-let times, administration process etc. VBL offered a computerised matching system as opposed to active bidding by applicants. The VBL system has been operating for the past 3 years and the learning from that has been incorporated into this review process.

In the current VBL system properties are allocated by prioritising applicants depending on government guidance/legislation and locally determined priorities. This is achieved through a banding system rather than awarding points.

Registration date is used to prioritise within the individual bands.

The bands in the current scheme, in priority order, are as follows:

- A. Statutory Need band – these include households who are owed the main statutory homeless duty
 - B. Urgent Need band - households in unsuitable housing/circumstances requiring urgent re-housing (e.g. Medical, Domestic abuse cases, over/under occupied by 2 bedrooms etc)
 - C. Reasonable Preference band (e.g. Non priority homeless, over/under occupied by 1 bedroom etc)
 - D. General Need band (all those not covered by the above three bands)
- 2.7 All applicants for social housing are assessed strictly against the banding criteria set out in the Allocations Policy.

2.8 Current VBL Housing Register

Table 1: Breakdown of the number of applicants per band (as at 31 Mar 2017)

Priority Bands	Household Applicants
Statutory Need	113 (0.9%)
Urgent Need	1,301 (10.1%)
Reasonable Preference	2,480 (19.3%)
General Need	8,966 (69.7%)
Total	12,860

- 2.9 Applicants in the lowest band, General Need, represent the largest group as the award of higher banding is tightly defined by the Allocations Policy.

2.10 Lettings by band

Table 2: Lettings by Band during 2016/2017 – Incommunities properties only

	Number	Percentage
Statutory Need	221	9%
Urgent Need	975	39%
Reasonable Preference	628	25%
General Need	688	27%
TOTAL	2512	

48% of all Incommunities lettings went to those in Statutory and Urgent need band.

2.11 Methodology Review

A review of the VBL system is currently being carried out jointly with Incommunities and Registered Providers which may result in making major changes to how it operates including replacing the methodology with a system which is more effective in the task of allocating social housing. The scope of this review, therefore, is not limited to the current VBL methodology and the primary objective is to implement a system which works for customers, Registered Providers and assists the local authority in the effective discharge of its statutory obligations.

2.12 Legislative Framework

S159 of the Housing Act 1996 requires local authorities to either;

- allocate housing accommodation when they select a person to be a secure or introductory tenant of local authority housing, or
- nominate a person to be a secure or introductory tenant of housing accommodation held by another person (i.e. another local authority), or
- nominate a person to be an assured tenant of housing accommodation held by a registered provider (RP).

S167 requires local authorities to have a scheme (their “allocation scheme”) for determining priorities and the procedure to be followed, in allocating housing accommodation.

S170 enables co-operation between RPs and local housing authorities:

‘Where a local housing authority so request, a registered social landlord shall co-operate to such extent as is reasonable in the circumstances in offering accommodation to people with priority under the authority’s allocation scheme’

Reasonable Preference- Government guidance states that local housing authorities in England must frame their allocation scheme so as to give some preference to households that fall within a *statutory reasonable preference* category. These categories are;

- homelessness,
- residence in overcrowded, insanitary or otherwise “unsatisfactory” housing,
- those needing to move due to medical or welfare reasons, or to avoid “hardship”.

2.13 Private Rented Sector and other housing options

The Localism Act 2011 enabled local authorities to end their homelessness duty by making an offer of a tenancy in the private rented sector (PRS) if it is suitable with a minimum fixed-term tenancy of 12 months. ‘Suitability’ is defined in legislation and encompasses the size of the accommodation, affordability, a health and safety assessment of the property and its location. This list is not exhaustive and there are other issues that can be considered in a composite assessment. The current policy

allows the use of the PRS for discharging duty and to offer PRS as a further choice in the allocations system. The Council has been actively working with private landlords recently to offer up their properties for applicants on the Housing Register.

3. Key strategic principles

There are four key strategic principles proposed for the revised Allocations Policy, which will be used to determine the allocations criteria:

- To prioritise those people who the Council owes the main housing duty to and those where rehousing would help to meet other key Council priorities e.g. Care Leavers, Foster Carers etc
- To prioritise those in greatest housing need particularly those at imminent risk of becoming homeless
- To minimise the use of and length of stay in temporary accommodation
- To support Registered Providers in achieving sustainable outcomes for applicants.

3.1 Prioritisation categories

The Council is proposing to move to a 6 band structure, with bands ranked from Band 1 (highest priority) to Band 6 (lowest priority) as outlined in the table below.

Within each band, there is a list of categories with criteria / qualifying circumstances and definitions which would apply to the categories in the bands. These categories are those which local authorities are normally required to rank or identify a system of prioritisation for.

The bands are summarised as follows:

- **Band 1 Statutory / Service Need** - these include households who are owed the main statutory homeless duty and those who whose housing needs arise from other council service priorities / duties, e.g. Care Leavers, Foster Carers
- **Band 2 At risk of homelessness** - households who need assistance to prevent them from becoming homeless (to deal with the Homelessness Reduction Act's prevention duty)
- **Band 3 High Need** - households in unsuitable housing requiring urgent re-housing
- **Band 4 Medium Need** - households with a band 1, 2, 3 need but with no local connection to the District and households in unsuitable housing but with less urgent need than those in Band 3
- **Band 5 Low Need** - households with a band 4 need but with no local connection to the district and those with low housing need
- **Band 6 General Need** - those who do not fall in any of the above categories

BAND 1 – STATUTORY / SERVICE NEED In no priority order	Examples of Qualifying Circumstances / Summary of Criteria
<p>Applicants who are homeless (and not intentionally homeless) and owed the main housing duty by Bradford Council.</p>	<p>All homeless people as defined in Part VII of the Housing Act 1996 who are owed the main housing duty following a homelessness assessment under section 193 or 195 of the Housing Act 1996.</p>
<p>High risk victims of domestic abuse recommended by Multi-Agency Risk Assessment Conference (MARAC) for urgent re-housing.</p>	<p>High risk victims of domestic abuse who are subject to MARAC as part of an agreed safety plan will be placed in this Band.</p>
<p>Approved foster carers or adopters supported by Bradford Council.</p>	<p>Applicants who are approved foster carers or approved to adopt by Bradford Council's Fostering and Adoption Team, who need to move or secure a larger home in order to accommodate a looked after child will qualify for this band. Evidence from social services will be required before awarding this band.</p>
<p>Applicants who are Care Leavers of Bradford Council and children assessed by Bradford Council's Children Services Department as in need or at risk (where housing is a factor)</p>	<p>Applicants are awarded this category in accordance with protocols agreed between the Council's Housing Options Service and the Children Services Department. Applicants must be a former 'Relevant Child' as defined by the Children Leaving Care Act 2002 and be a young person at risk who may be owed such duty. Normally such a young person would have a housing related support package brokered either through Leaving Care Service or Housing Options and would be Tenancy Ready unless exceptionally there is joint agreement that the Council's duties require a different approach.</p>
<p>Hospital Discharge - applicants who are bed blocking</p>	<p>Applicants 'bed blocking' in hospital requiring urgent discharge, i.e. where a client is occupying a hospital bed that they no longer need, but cannot be discharged home due to unsuitability of their present accommodation which cannot be made suitable through adaptations due to cost, structural difficulties or the property cannot be adapted within a reasonable amount of time.</p>
<p>UK Armed Forces Personnel</p>	<p>Applicants who would qualify either for Band 2 or Band 3 due to their housing need but are also:</p> <ul style="list-style-type: none"> • Former members of the Armed Forces

	<ul style="list-style-type: none"> • Applicants who are serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service • Applicants who are bereaved spouses or civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner. • Applicants who are serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service. <p>Evidence will be required to substantiate the above.</p> <p>Local Connection criteria will not be applied to this category.</p>
<p>Where the Council's Housing Standards team has served an Emergency Prohibition Order.</p>	<p>Housing Standards have identified an imminent risk of serious harm in the applicant's current home which has resulted in a need to serve an Emergency Prohibition order and it would not be safe for the occupants to remain.</p>
<p>BAND 2 – AT RISK OF HOMELESSNESS In no priority order</p>	<p>Examples of Qualifying Circumstances / Summary of Criteria</p>
<p>Applicants experiencing or fleeing domestic abuse</p>	<p>Applicants who need to move due to domestic abuse and who are not at risk of immediate danger following housing options assessment or a referral from a domestic abuse refuge or a domestic abuse partner agency.</p>
<p>Applicants experiencing or fleeing harassment or others forms of abuse (race, gender, sexual orientation, disability, religion or belief etc) which would lead to homelessness / psychological harm.</p>	<p>Households suffering harassment and or other forms of abuse (race, gender, sexual orientation, disability, religion or belief etc) or threatened or actual violence which is likely to cause psychological harm and necessitates an urgent need for rehousing. E.g. neighbourhood disputes/racial harassment incidents/hate crime resulting in intimidation or serious threats or damage to property which is recurrent. Appropriate enquiries will be made including requirement for medical evidence before awarding this band.</p>

<p>Rough sleepers assessed and referred by No Second Night Out (NSNO) service</p>	<p>This category is aimed at supporting the Council's NSNO service work with rough sleepers and to assist those clients who NSNO deem are tenancy ready to move on from the service.</p>
<p>Displaced by family, friends or from settled accommodation within 56 days</p>	<p>An assessment of an applicant's need due to being displaced by family, friends or from settled accommodation like prisons or tied accommodation will be made by the Council taking into account information provided by one or more of the following:</p> <ul style="list-style-type: none"> • Family/friends • Social Services, Youth Workers, Probation and other relevant professionals • A voluntary sector organisation representing the applicant. <p>As part of the assessment the possibility of reconciliation and other preventative options will be explored by Housing Options before determining the award of this band.</p>
<p>Landlord has served a valid notice to quit, intends to apply to court for possession of the property and there is no defence against possession proceedings.</p>	<p>Applicants with an assured shorthold tenancy who have been served a valid notice to quit where the landlord intends to make an application for possession and there is no defence against possession proceedings. Evidence will need to be provided.</p>
<p>BAND 3 – HIGH NEED In no priority order</p>	<p>Examples of Qualifying Circumstances / Summary of Criteria</p>
<p>Urgent medical, welfare grounds or disability</p>	<p>Where an applicant's medical, health or welfare condition is such that rehousing is required to provide a basis for the provision of suitable care.</p> <p>The applicant's condition is severe and their existing accommodation is a major contributory factor.</p> <p>The applicant's health is severely affected by the accommodation to the extent that it is likely to become life threatening. For example, where an applicant has significant mental health problems which are exacerbated by their accommodation.</p> <p>Disabled applicants who have restricted or limited mobility and are limited by their accommodation and unable to carry out day to</p>

	<p>day activities (Disability Discrimination Act 1995) or have difficulties accessing facilities inside and outside of their accommodation and require rehousing into accommodation suitable for their use.</p> <p>Applicants will only be placed in this band if rehousing to more suitable accommodation would stabilise or improve their health and wellbeing.</p> <p>An assessment of an applicant's need to move due to urgent medical, welfare ground or disability will be made by the Council taking into account supporting information provided by the applicant from one or more of the following:</p> <ul style="list-style-type: none"> • An applicant's GP or consultant. • Social Services. • Occupational Therapist. • Age Concern or any other voluntary sector organisation representing the applicant.
Applicants who need an adapted property	<p>Applicants who are disabled or have complex health or care needs requiring specialist accessible accommodation and where the nature of the adaptations required is materially different from those in their current home and it is not feasible to carry out the adaptations due to financial constraints and/or the property is unsuitable for adaptation.</p> <p>Social housing tenants in specialist adapted properties in areas of high demand and in properties of high demand and who no longer require those adaptations can be placed in this band in order to facilitate a move to make best use of stock. However each applicant will be considered on a case by case basis.</p>
Overcrowded by 2 or more bedrooms	<p>Applicants who are severely overcrowded according to the Bedroom Standard. For this band, applicants must lack 2 or more bedrooms than the number which the household is eligible for.</p> <p>Evidence will be required.</p>

<p>Move on from Supported Accommodation.</p>	<p>An applicant in supported accommodation who has been assessed as suitable for independent living by the Provider as per the Tenancy Ready Framework.</p> <p>If an application is made when the individual is not ready for independent living the application will be placed in Band 6 until such a time as the individual is ready to move on when it will be placed in Band 3 as appropriate.</p>
<p>Applicants suffering financial hardship where moving would alleviate their hardship</p>	<p>Applicants who are suffering from financial hardship (e.g. loss of income, benefit reductions, change of circumstances, under occupation) where rehousing will alleviate the hardship will be eligible for this band. An affordability assessment (based on affordability calculator) will be carried by the Housing Options before placing applicants in this band.</p>
<p>Applicants who need to move to a particular locality within the District, where failure to meet that need would cause hardship to themselves or others.</p>	<p>This category applies to those who need to move to a particular area within the Bradford District boundary, where failure to meet that need would cause hardship to themselves or others. This includes the need to move to a specific location for employment reasons and also to give or receive care where evidence is provided.</p> <p>Social housing tenants in the District who wish to move to be nearer their employment, education or training to ease hardship will be required to provide evidence.</p>
<p>Social Housing tenants from outside the District who:</p> <ul style="list-style-type: none"> • need to move to the District to avoid hardship (s.166 (3) (e)) • Need to move because the tenant works in the District • Need to move to take up an offer of work 	<p>Hardship grounds (other than for work reasons) would include, for example, a person who needs to move in order to give or receive care, or to access specialised medical treatment.</p> <p>Where the need to move is due to employment, education or training the applicant will need to prove that failure to move would cause them hardship. The LA will take into account the following in determining hardship due to work:</p> <ul style="list-style-type: none"> • The distance and/or time taken to travel between work and home • The availability and affordability of transport, taking into account level of earnings • The nature of the work and whether similar opportunities are available closer

	<p>to home</p> <ul style="list-style-type: none"> • Other personal factors, such as medical conditions and child care, which would be affected if the tenant could not move • The length of the work contract • Whether failure to move would result in the loss of an opportunity to improve their employment circumstances or prospects, for example, by taking up a better job, a promotion, or an apprenticeship <p>The definition of work does not apply to work which is short-term or marginal in nature, or if it is ancillary to work in another district. Voluntary work is also excluded.</p> <p>This category covers the requirement under the Statutory Right to Move policy. The Council's Local Connection criteria will not apply to this category.</p>
<p>Unsatisfactory housing conditions in the Private Sector where there is one or more Category 1 hazards.</p>	<p>This band will be awarded where the Council's Housing Standard's team identify that a person's home has at least one Category 1 hazard, (excluding overcrowding) for which there must be a high likelihood of an occurrence that could cause harm or a Suspended Prohibition Order has been served and there is no reasonable likelihood that the landlord will address the problems.</p>
<p>Applicants who are homeless but found intentionally homeless or non-priority following the statutory homelessness assessment by Bradford Council</p>	<p>Applicants who following an assessment under Part 7 of the Housing Act 1996 (as amended by the Homelessness Act 2002) were found to be intentionally homeless or non-priority.</p>
<p>BAND 4 – MEDIUM NEED</p>	<p>Examples of Qualifying Circumstances / Summary of Criteria</p>
<p>Applicants who fall into either Band 1, 2 or 3 due to their circumstances but who do not have a local connection in Bradford.</p>	
<p>Applicants with a health or welfare need related to the current housing circumstances where moving would improve their health.</p>	<p>An applicant's housing is unsuitable for health reasons or for the occupant's specific needs related to disability, but whose present accommodation does not cause serious barriers to day to day activity or whose life is not at risk due to their current housing.</p> <p>An assessment of an applicant's need to move</p>

	<p>due to ill-health or disability will be made by the Council taking into account information provided by the applicant from one or more of the following:</p> <ul style="list-style-type: none"> • An applicant's GP or consultant. • Social Services. • Occupational Therapist. • Age Concern or any other voluntary sector organisation representing the applicant.
Overcrowded by 1 bedroom	<p>Applicants that are overcrowded according to the Bedroom Standard. For this band, applicants must lack 1 bedroom than the number which the household is eligible for.</p> <p>Evidence will be required.</p>
BAND 5 – LOW NEED	Examples of Qualifying Circumstances / Summary of Criteria
Applicants with a low housing need	Applicants who fall into Band 4 due to their circumstances but who do not have a local connection to Bradford.
BAND 6 – GENERAL NEED	Examples of Qualifying Circumstances / Summary of Criteria
Applicants who don't fall into any of the above categories.	<p>Applicants who don't fall into any of the above categories.</p> <p>Homeowners (including joint and sole owners) with equity over £60k will be placed in this band (unless the applicant requires sheltered accommodation / extra care scheme, or has a medical, disability or statutory homeless need)</p>

3.2 Application renewal/closure

Applications are closed for many reasons including when someone is re-housed but experience suggests that many people's housing circumstances change yet they still remain on the housing register for years.

Under the revised policy, applicants will be required to renew their applications periodically e.g. every 12 months. The Council may also regularly cleanse the data and close applications where they are redundant. This will ensure the housing register is kept up to date.

3.3 Homelessness Reduction Act 2017

Through the Homelessness Reduction Act, a number of amendments to Part 7 of the *Housing Act 1996* have been set out which seek to strengthen the local authority duty to prevent homelessness. Key measures include:

- An extension of the period during which an authority should treat someone as threatened with homelessness from 28 to 56 days.
- Clarification of the action an authority should take when someone applies for assistance having been served with a section 8 or section 21 notice of intention to seek possession from an assured shorthold tenancy.
- A new duty to prevent homelessness for all eligible applicants threatened with homelessness.
- A new duty to relieve homelessness for all eligible homeless applicants.
- A new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless

3.4 Whilst the above measures will require changes to the way the Housing Options Service operates, the housing allocations policy also offers an opportunity to address the Council's prevention objectives by prioritising those at risk of homelessness.

3.5 Policy fact sheets relating to the Homelessness Reduction Act were published by DCLG in December 2016. The Act, which has attracted Government and cross-party support, is expected to be implemented in spring 2018. Relevant guidance is expected to be issued in autumn 2017.

3.6 Right to Rent

From 1st February 2016 it became a requirement for local authorities and landlords to undertake Right to Rent checks on applicants on the Housing Register. Right to Rent requires landlords to ensure immigration eligibility checks are carried out prior to letting properties to prospective tenants. To minimise the administrative burden, the Council, instead of carrying out full and thorough checks at the point of application to the housing register, is proposing that Registered Providers carry out Right to Rent checks at the point of making an offer of a tenancy i.e. when RPs carry out their suitability checks. Applicants' right to rent status may change between registration and being offered a property.

3.7 Qualification Criteria

Guidance allows local authorities to set qualification criteria and exclude certain categories of applicants. This approach not only necessitates a high degree of administration but can be open to legal challenge, particularly where protected characteristics are affected. In the current Policy (2014-17) the Council operates an open register and does not restrict applicants by imposing qualifications.

As the current practice has worked well, we are suggesting that we retain an open process without excluding applicants, other than those deemed ineligible on immigration status by statute.

3.8 **Armed Forces**

The regulations require "additional preference" to be given to members of the armed forces and/or their families and dependants whose circumstances would qualify them for reasonable preference in the allocation of social housing in England. The current policy already adheres to this requirement. However in the draft policy we are proposing enhanced support in the form of waiting time backdated to their length of service.

3.9 **Local Connection**

The government, through guidance, recommended the implementation of a 2 year residency requirement as part of local authority qualification criteria. However some LAs chose to adopt this whilst others like Bradford did not. Those LAs that have adopted a residency requirement face the risk of legal challenge due to *R (on the application of HA) v Ealing LBC (2015)* where it was concluded that local connection could not be used to exclude an applicant with a reasonable preference need. However it is possible to prioritise local people over those with no local connection to the District through the banding framework. We are proposing to adopt a method of prioritising local people by awarding a lower priority in the banding system to those with no local connection.

3.10 **Local Connection Policies in Neighbourhood Plans**

Where an s.106 agreement has clauses regarding local connection or similar eligibility criteria which may conflict with the Housing Allocations Policy, the Council will look at the most appropriate way of accommodating such criteria.

4. **The Consultation Process**

4.1 When drawing up its local allocations scheme, or making any significant changes to it, a local authority is required to consult RPs with whom it has nominations arrangements. A minimum 12 week consultation period is recommended.

4.2 The following consultations have already taken place:

- Registered Providers consultation 7 September 2016, 8 December 2016 and 21 March 2017
- Bradford Housing Association Liaison Group on 13 September 2016
- Bradford District Tenants and Residents Federation Group - 23 February 2017
- Equality Together service user group - 15 March 2017
- Homelessness Core Group - 23 March 2017
- Public consultation via website ended 21 April 2017
- Registered Provider consultation ended date 28 April 2017 (full policy document)
- Regeneration & Economy Overview Scrutiny Committee on 26 July 2017

5. OTHER CONSIDERATIONS

5.1 Policy 'Go live' date

Implementation will necessitate some immediate changes to the IT system which will be made by Incommunities within a few weeks after adoption, and an effective 'Go live' date will be agreed. Prior to the 'Go live' date the current policy will operate.

6. FINANCIAL & RESOURCE APPRAISAL

6.1 No additional costs will be incurred in implementing the new policy. However, in order to make the current allocations process more efficient and effective, changes to the IT system are being considered as part of a re-tendering process. There is provision within the service budget to resource this.

7. RISK MANAGEMENT AND GOVERNANCE ISSUES

7.1 Risk implications such as reputational issues would only arise if the Council failed to meet its legal duties as set out above.

8. LEGAL APPRAISAL

8.1 The Council is required to comply with Part VI of the Housing Act 1996 which requires local authorities to have an allocations policy and procedure in place in order to allocate housing.

8.2 Section 166A Part VI of the Housing Act 1996 provides that every housing authority must have a scheme for determining priorities, and the procedures to be followed in allocating housing accommodation and under Part VII of the Housing Act 1996) to make provision for homeless households. The housing allocation scheme must be framed so that "reasonable preference" is given to people who are homeless, people eligible for assistance under the Housing Act 1985, people who are occupying insanitary or overcrowded or otherwise unsatisfactory housing, people who need to move on medical or welfare grounds, and people who need to move to a particular part of the authority's area where failure to meet that need would cause hardship. Subject to that requirement relating to "reasonable preference groups", an allocations scheme may also make provision about the allocation of particular accommodation to persons who make a specific application for accommodation and persons of a particular description S166A(6)

8.3 In addition the Council is required to comply with the information requirements for the allocation scheme as set out under Section 168, Part VI of the Housing Act 1996.

8.4 The Council is also required to have regard to the *Allocation of accommodation: guidance for local housing authorities in England* (June 2012).

9. OTHER IMPLICATIONS

9.1 EQUALITY & DIVERSITY

The Council is required to draft its Allocations Policy in line with the legislative requirements outlined in relevant Acts, Codes of Guidance and Case Law, which themselves take into account consideration of equality issues.

The Housing Allocations Policy is designed to award priority for housing to those in greatest need, and those who fall under the Council's key priorities. Whilst many people who share a protected characteristic are likely to be awarded priority banding under this policy, that banding will be determined by their housing need and housing circumstances.

Whilst this policy is unlikely to help to eliminate discrimination or harassment generally, it is likely to have a positive impact on victims of such discrimination, as there are provisions within the Allocations Policy to award priority banding to people who are experiencing or fleeing harassment or other forms of abuse which would lead to homelessness or psychological harm. This includes people who are suffering harassment due to their protected characteristic(s).

A full Equality Impact Assessment has been undertaken during the process of reviewing the allocations policy.

9.2 SUSTAINABILITY IMPLICATIONS

This policy work and its practical implementation forms part of the approach for the Council to focus on effective accommodation for residents of the District. As such it seeks to provide a framework that supports personal, social and community well-being especially in improving effectiveness in the pursuit of allocating social housing and in discharging the statutory duty to house the homeless.

9.3 GREENHOUSE GAS EMISSIONS IMPACTS

The revised allocations policy is not considered to impact on emissions. Indeed the policy will not introduce changes that will influence emissions arising from the current housing stock.

9.4 COMMUNITY SAFETY IMPLICATIONS

The Allocations Policy poses no specific implications for Community Safety but vibrant, cohesive and sustainable communities are promoted within it.

9.5 HUMAN RIGHTS ACT

The Human Rights dimension of housing is recognised in the United Nations Covenant on Economic, Social and Cultural Rights, which includes the right of everyone to an adequate standard of living for himself and his family, including

adequate housing. The United Kingdom is legally bound by this treaty. The Council also has regard to good practice in housing particularly those that adhere to guidance contained in: 'Deciding Rights - Applying the Human Rights Act to Good Practice in Local Authority Decision-Making' (LGA).

9.6 TRADE UNION

There are no trade union implications arising from this report.

9.7 WARD IMPLICATIONS

There are no specific ward implications identified, as the policy is district-wide in its focus.

10. NOT FOR PUBLICATION DOCUMENTS

None

11. OPTIONS

Option 1 – Adopt as Council policy the revised housing allocations policy set out in Appendix 1

This is the recommended Option.

This will enable the Council to meet its obligations as set out in the Housing Act 1996 and adhere to DCLG guidance. It will also provide clarity to RPs on how to develop their own lettings policies to co-operate with the local authority in discharging its housing duties.

Option 2 – Return the Draft Policy for amendments

This option is not recommended as the proposed policy already takes into account the stated views of stakeholders, the identified needs of customers and the current legislative and national guidance framework. Also timely implementation is advised in order to allow the procurement of the new IT system.

Option 3 – Reject the Allocations Policy

This option is not recommended as an updated policy is needed in response to new legislation and guidance, and the identified needs of customers in the district.

12. RECOMMENDATIONS

It is recommended that:

12.1 The Executive approves the Housing Allocations Policy as set out in the Appendix.

12.2 The Executive gives delegated authority to the Strategic Director of Place in

consultation with the relevant Portfolio holder to implement and monitor the Housing Allocations Policy, including agreeing the 'Go Live' Date, and, during the lifetime of the policy, to make any necessary amendments as required at the appropriate time, provided such changes do not fundamentally alter the policy principles on which this policy is based.

- 12.3 That Executive gives delegated authority to the Strategic Director of Place in consultation with the Portfolio Holder to consider and introduce any changes to the IT system and methodology to improve the allocation of housing within the District.

13. APPENDICES

Appendix – Draft Bradford District Housing Allocations Policy 2017

14. BACKGROUND DOCUMENTS

- Bradford District Housing Allocations Policy 2014 -2017
<https://www.bradford.gov.uk/media/1868/housing-allocations-policy-jan-14v2.pdf>
- Allocations of accommodation: Guidance for local housing authorities in England June 2012.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5918/2171391.pdf
- Policy fact sheets on Homelessness Reduction Act
<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>
- Government's research briefing paper on 'allocating social housing' published on 9th June 2017.
<http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN06397>



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

APPENDIX 1

Bradford District Housing Allocations Policy 2017

DRAFT

Document Control

Document Control	
Author	Hiron Miah
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CONTENTS

Introduction	4
Section 1: Context and Aims	4
Section 2: Legal Framework	6
Section 3: Joining the register and banding under the Allocations Policy	8
Part 1: Eligibility and Qualification	8
Part 2: The Housing Allocation Process	10
Part 3: The Allocation Bands	15
Part 4: Banding Criteria and Restriction	22
Part 5: Reduced Priority	24
Section 4: Reasonable preference and additional preference	27
Part 1: Reasonable Preference	27
Part 2: Additional Preference	32
Section 5: Matching and lettings under the allocations policy	35
Part 1: The Matching Process	35
Part 2: Suitability check following a match	37
Part 3: Landlords refusing applicants following suitability check	39
Part 4: Application closure and renewal	40
Section 6: Review and Appeals Process	41
Section 7: Monitoring and Review of Policy	42
Appendix 1 – Glossary of Terms	43
Appendix 2 – List of Registered Providers	45

INTRODUCTION

- 1.1 This is the City of Bradford Metropolitan District Council's Housing Allocations Policy.
- 1.2 The policy sets out an allocations scheme for social housing as required under Part VI of the Housing Act 1996 as amended ('the Act'). This wholly replaces the previous CBMDC Housing Allocations Policy dated 2014-17.
- 1.3 Bradford Council is not a significant social housing provider and relies on working in partnership with Registered Providers and other Landlord partners to provide homes for households who have joined the District's housing register. This Policy therefore sets out how the Council will prioritise nominations to Registered Providers.
- 1.4 Consultations have been undertaken with a range of statutory and non-statutory organisations as well as service user groups and the responses have been taken into account in the formulation of the final policy.

SECTION 1: CONTEXT AND AIMS

- 1.5 This Allocations Policy sets out the criteria to be used by the Council to allocate housing to applicants with competing housing needs and outlines how the Council prioritises applicants in line with the legal definition of 'Reasonable Preference'.
- 1.6 The housing accommodation available to the Council consists of the following:
 - 1.6.1 Housing owned by the Council (whether or not managed by one of the Council's management agents), and
 - 1.6.2 Housing owned by Registered Providers of Social Housing with whom the Council has a Nomination Agreement which allows the Council to nominate an applicant for housing to the Registered Provider. Nomination Agreements allow the Council Nomination Rights to a minimum of 50% of a Registered Provider's vacant housing stock and a minimum of 75% for Incommunities Ltd (as part of the stock transfer agreement) or up to 100% of new build stock where the Council has contributed towards the development e.g. Section 106 sites, capital contribution, gift of land, other infrastructure costs etc.
 - 1.6.3 Whilst not subject to formal nomination arrangements, private rented accommodation is also available to the Council through participating private landlords. Care will be taken by the Council in using this tenure in terms of security of tenure, quality of accommodation and landlord management standards.
- 1.7 In this Policy, Registered Providers of Social Housing will be abbreviated to 'Registered Providers' and for the purposes of this Policy mean only those Registered Providers who are landlords providing low cost social rented accommodation.
- 1.8 'Social housing' is housing owned by local authorities and Registered Providers for whom guideline rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements, as agreed with the local authorities or with the Homes and Communities Agency. This policy excludes market rented accommodation, shared ownership and other low cost home ownership schemes owned and managed by Registered Providers.
- 1.9 In Bradford the demand for social housing in some parts of the district is greater than the number of homes available. The Council will have responsibility for ensuring that Registered Providers work together under nominations agreements and will monitor the effectiveness of their delivery. See appendix 2 for a list of Registered Providers operating in Bradford District.

- 1.10 Under the Government's Statutory Right to Move requirement local authorities are required to set aside a proportion of their allocations to meet the requirement of social tenants moving to the district for work, where, if they were unable to move, would cause them hardship. As Bradford is a limited stockholding authority we have chosen not to apply a quota, but we will exempt applicants from outside the district who fall under this definition from the Local Connection criteria and award reasonable preference in Band 3 – High Need.
- 1.11 **The key aims of the policy**
- 1.12 There are four key strategic aims which underpin this policy and have been used to formulate the allocations criteria:
- To prioritise applicants who the Council owes the main housing duty to and those applicants linked to key Council priorities
 - To prioritise those in greatest housing need particularly those at imminent risk of becoming homeless
 - To minimise the use of and length of stay in temporary accommodation
 - To support Registered Providers in achieving sustainable outcomes for applicants.
- 1.13 Over the lifetime of this policy, the Council's strategic priorities or government guidance and legislation may change and this Policy may need to be amended to reflect the resulting priorities or the legislative context. Amendments may therefore be required and partner landlords will be consulted prior to any major changes the Council makes.
- 1.14 This policy will complement the following policies/strategies to achieve the purpose of supporting the applicant to find a suitable home:
- 1.15 *Bradford District Housing & Homelessness strategy "A Place to call home" 2014-2018, Tenancy Strategy 2013-2018, Tackling Empty Homes in the Bradford District Action 2017-2019, Bradford Council Plan 2016- 2020 and Bradford District Plan 2016 – 2020, Comprehensive Housing Renewal Policy 2016, Domestic and Sexual Violence Strategy 2015-2020, Housing Strategy for people with Learning disabilities 2010, Safeguarding Adults West and North Yorkshire and York Multi agency Policy and Procedure 2015, Bradford Safeguarding Children Board Business Plan 2015-2016, West Yorkshire Community Rehabilitation Company, Multi Agency Public Protection Arrangements (MAPPA), Bradford District's Child Poverty Strategy 2014-2017.*

SECTION 2: LEGAL FRAMEWORK

- 2.1 Local authorities are required by s.166A of the Act to publish an allocation scheme for determining priorities and defining the procedures to be followed in allocating housing. The Council may allocate housing in such manner as it considers appropriate, subject to specific provisions of Part VI of the Act.
- 2.2 In accordance with s.159 (4A) and (4B) of the Act this Allocations Policy includes tenant transfers.
- 2.3 The policy gives 'reasonable preference' to classes of people as provided for within s.166A (3) to (8) of the Act i.e. people with high levels of assessed housing need. This includes homeless people, those who need to move on welfare or medical grounds, people living in unsatisfactory housing and those who would face hardship unless they moved to a particular locality within the local authority's area.
- 2.4 The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them.
- 2.5 This Policy includes a statement (see 3.40) of the Council's policy on offering applicants a choice of accommodation or, in certain circumstances, the opportunity to express preferences.
- 2.6 This Policy has regard to the June 2012 Code of Guidance and reflects the new Regulations concerning Armed Forces personnel as set out under section 160ZA(8)(b) of the Housing Act 1996 (*the Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012 (SI 2012/1869)*) and section 166A(7) of the Housing Act 1996 (*The Housing Act 1996 Additional Preference for Former Armed Forces Personnel) (England) Regulations 2012 (SI 2012/2989)*). See *the Supply and Allocation Report 12th June 2013*.
- 2.7 The Act requires local authorities to make all allocations and nominations in accordance with an Allocations Policy. A summary of the Allocations Policy must be published and made available free of charge to any person who asks for a copy or available on the website www.bradford.gov.uk

2.8 Equality of access

- 2.9 The Policy is drafted and framed to ensure that it is compatible with the Equality Act 2010 including the duty to eliminate unlawful discrimination and to promote good relations between different racial groups, as well the duty to promote equality between disabled persons and other persons and between men and women. The Council has carried out an Equality Impact Assessment in relation to the Policy and also operates the Policy in accordance with the Rehabilitation of Offenders Act 1974.
- 2.10 This Policy has considered:
- The Council's statutory obligations and discretion as to who is eligible for housing allocation.
 - The Council's statutory obligation to provide 'Reasonable Preference' to certain categories of applicants set down by law i.e. those who must be given a 'head start' under the Council's Allocations Policy.
 - The Council's statutory discretion to grant 'additional preference' and/or to determine priority between applicants with 'Reasonable Preference'.

2.11 The Application of 'Reasonable Preference'

- 2.12 Bradford Council is required by law to determine the relative priority that housing applicants are awarded. This is particularly important when, as is the case in some parts of the District, the demand for social housing is greater than the number of homes available.
- 2.13 The law requires that Reasonable Preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). The statutory Reasonable Preference categories cover:

- All homeless people as defined in Part VII of the Housing Act 1996.
- People who are owed a duty under s190 (2), 193 (2) or 195 (2) of the 1996 Act (or under section 65 (2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any Housing authority under section (192 (3)).
- People occupying unsanitary, overcrowded or otherwise unsatisfactory housing.
- People who need to move on medical or welfare grounds (including grounds relating to a disability).
- People who need to move to a particular locality within the district to avoid hardship to themselves or others.

2.14 Specific details and examples of how Reasonable Preference and priorities are determined and applied are detailed in Section 4.

2.15 The Application of Additional Preference

2.16 In addition the Policy also grants 'additional preference' (or an extra head start) to applicants where the Council is satisfied that these applicants also have other exceptional or urgent housing needs. This is set out in more detail in Section 4 Part 2 of this document.

2.17 What are 'Allocations' under this Policy?

2.18 A local housing authority is responsible for all 'allocations' of housing accommodation and makes an 'allocation' when it:

1. Selects an applicant to be a secure or introductory tenant of the Council (including notifying an existing tenant or licensee that his tenancy or licence is to be a secure tenancy). This includes properties that are owned by the Council and managed by agents. This also includes the granting of a new tenancy to an existing tenant by way of 'transfer' upon the tenants request or the granting of a new tenancy under the Council's (non-statutory) contractual and/or discretionary succession policy or
2. The nomination of a person to be an Assured or an Assured Shorthold tenant of housing accommodation held by a Registered Provider (via the Council's Nomination Rights Agreement with the Registered Provider). Often the nomination will be that of a 'Starter Tenant' of a Registered Provider whereby the Registered Provider will grant an Assured Shorthold Tenancy for a set 'probationary' period (usually 12 months) and provided the tenant successfully completes the 'probationary' period the Registered Provider will grant an Assured Tenancy or
3. Selects an applicant who is already a secure or introductory tenant of housing accommodation who is transferred to another property.

2.19 The following is not an 'allocation' under this policy:

- Succession to a tenancy on a tenant's death pursuant to the Housing Act 1988, or
- Assignment of a tenancy by way of mutual exchange, or
- Assignment of a tenancy to be a person qualified to succeed to the tenancy on the tenants death, or
- Transfer of the tenancy by a court order under family law provisions or under the Civil Partnership Act 2004, or
- An introductory tenancy becoming a Secure/Assured tenancy, or
- Landlord initiated transfers (e.g. decant to alternative accommodation to allow for major works), or
- Rehousing due to being displaced from previous accommodation by a registered provider or the Council or being re-housed by the Council pursuant to the Land Compensation Act 1973, or
- Provision of non-secure, interim or temporary accommodation in discharge of any homelessness duty or power.

SECTION 3: JOINING THE REGISTER AND BANDING UNDER THE ALLOCATIONS POLICY

SECTION 3: PART 1 - ELIGIBILITY AND QUALIFICATION

3.1 Who can apply (eligibility to join the Housing Register)?

3.2 The Council as local housing authority must consider all applications made in accordance with the procedural requirements of the Council's allocation scheme (this policy document) (1996 Housing Act.166 (3)). In considering applications, the Council must ascertain:

- if an applicant is eligible for an allocation of accommodation, determined through national legislation, and
- If the applicant qualifies for an allocation of accommodation, determined by local authority policy.

3.3 Eligibility

3.4 Any persons whom the Secretary of State for the Government Department of Communities and Local Government (DCLG) has deemed ineligible for an allocation of housing accommodation will not be eligible to be placed on the waiting list regardless of their circumstances.

3.5 Categories of ineligible applicants are defined as:

- Persons who are 'subject to immigration control' (unless they fall within a class prescribed by regulations as eligible).
- Persons who are not subject to immigration control, but are nevertheless prescribed by regulation as being 'persons from abroad' (this may include British citizens)
- Any other person as prescribed by the Secretary of State.

3.6 Further provisions concerning eligibility are set out with regard to allocations in s.160ZA of the Act.

3.7 We will exercise favourable consideration to ineligible dependent household members who are included on the application. We will also give due consideration to cases where there are non-dependent ineligible household members. Any application that includes a 'restricted person' (e.g. member of household who is ineligible) will not be entitled to Band 1 on the register by virtue of their homelessness status. Bradford Council will end any homelessness duty on a 'restricted case' with the offer of accommodation in the private rented sector.

3.8 Applicants must inform the Council of any change in their circumstances which may impact on their eligibility, for example, changes in employment for EEA Nationals or leave to remain status for non EEA nationals.

3.9 'Subject to immigration control & Persons from abroad'

3.10 At the point of registration for housing, applicants are asked for information about their housing history and immigration status, including whether they are persons from abroad or subject to immigration control. Bradford Council then carries out checks to establish eligibility to the Housing Register under the relevant legislation.

3.11 Applicants who apply are registered but are not assessed via the Housing Register or placed in any higher priority band until a decision has been made regarding their eligibility status.

3.12 Qualification

3.13 This policy promotes and operates an open membership and any eligible person(s) aged 16 years or older are considered to qualify subject to 3.15. Restrictions do however apply to eligibility in line with legislative requirements as set out above.

3.14 Tenancies for people aged 16 or 17

3.15 People aged 16 or 17 are not disqualified from joining the Housing Register however a minor cannot hold legal estate in land unless a tenancy is held in trust for them, by an adult, landlord or an organisation until they reach the age of 18. This means that an equitable tenancy will be created for the benefit of the young person and will require an appropriate adult, landlord or organisation to act as the tenant. If appropriate a landlord may offer a licence rather than a tenancy.

3.16 Applicants with support needs and supported tenancies

3.17 The allocation of supported housing tenancies are not covered by this Policy, therefore applicants who have high or very high identified support or care needs will be routed through the and housing related support gateway managed by the Council's Housing Options Service.

SECTION 3: PART 2 - HOUSING ALLOCATION PROCESS

3.18 The Housing Allocations Process

3.19 Registration:

3.20 Applicants must be registered on the Council's Housing Allocations Register before they can be nominated to a Registered Provider (RP) or a private landlord. An applicant will be able to register online or via the Council's customer service team on 01274 435999. Applicants who are transfer tenants of Registered Providers will be registered via their relevant landlord in line with their transfer policy (where applicable).

3.21 Application:

3.22 The registration process requires applicants to provide information that will enable staff to determine whether or not they are eligible to go on the Housing Register and to determine the priority banding.

3.23 Applicants may be matched to properties in the social rented and private rented sectors. Matches and offers will depend on the applicant's circumstances and affordability. Applicants are encouraged to select preferences for a range of areas and to consider different types of properties e.g. in the private rented sector particularly if they require a specific area where demand is high.

3.24 The registration process requires applicants to:

- Confirm that the information given is correct and report any changes in their circumstances once an application is made
- Confirm that they will allow full enquiries to be made into their circumstances for verification purposes.
- Give consent to share information about their application with any other partner Registered Provider

If an applicant withholds their confirmation that the information provided is correct or withholds consent for sharing information then the application will not be registered.

3.25 Applicants with medical needs that require adaptations will have these needs recorded; properties with adaptations will therefore where possible be matched using the Housing Register to applicants with a need for such adaptations.

3.26 For all applicants who may be in urgent housing need an assessment of the applicant's needs and personalised requirements will be undertaken. This will be conducted by either an officer in the housing options service, or in the case of a transfer, by the nominated officer of the Registered Provider.

3.27 The Housing Register will provide 'what's my chances' information giving applicants estimates about their prospects of getting re-housed. The Housing Allocations Register will also promote other housing options, such as low cost home ownership options and private sector renting even though these fall outside the scope of the Housing Allocations Policy.

3.28 Applicants who make unrealistic demands or set preferences for allocation which are unlikely to result in a match with available accommodation will be advised to amend their choices.

3.29 Applicants will be able to specify their bedroom requirements based on affordability of the size and type of property they require.

3.30 With the exception of applicants who are owed the main housing duty, membership of the Housing Register is effective for 12 months only and if applicants have not been rehoused in that time they will be asked to renew their application for a further 12 months. Those applicants who do not renew will have their applications closed. Upon renewal their banding priority may be amended in line with their circumstances at the time of renewal.

3.31 Verification of Information:

- 3.32 Verification checks will be carried out and may take place at any stage of the allocations process by the Council's Housing Options Service or a participating Registered Provider. Checks will verify:
- that the application meets eligibility criteria
 - that qualification criteria are met
 - the identity of the application and household details
 - the level and nature of housing need i.e. banding
 - the ability to sustain a tenancy
 - the current and previous housing circumstances, including conduct and behaviour within tenancies
 - that lettings criteria are satisfied
 - an assessment of any risks that may be present
- 3.33 Verification will involve the applicant or an organisation providing additional information or supplying documentation. This may include a home visit by the Council, support provider or participating landlord (Registered Provider) staff prior to any offer being made. Some participating landlords may require additional information to ensure that their own lettings/allocations policies are complied with.
- 3.34 Support providers and key agencies working with vulnerable people (e.g. Adult Services, housing support staff) are expected, with the applicant's consent, to provide details of the applicant's needs and if necessary a risk assessment. This is to assist with verification as to whether the applicant will be able to sustain a tenancy. For applicants with complex needs, participating landlords may request further supporting information.
- 3.35 A verification process may be carried out both at the point of application and the point at which an offer of a nomination/tenancy is made. If verification at the point of offer of a property shows relevant changes in circumstances of which the participating landlord has not been notified, the offer may be revoked. If at the point of offer an applicant's banding is incorrect, this may also lead to the offer being revoked.
- 3.36 The 1996 Housing Act makes it a criminal offence to give false information, or to knowingly withhold relevant information in a housing application. If a tenancy is granted on the basis of provision of false information, the landlord may take action to gain possession of the property through the courts.
- 3.37 The Prevention of Housing Fraud Act 2013 makes subletting the whole of a social rented dwelling a criminal offence. In addition Registered Providers have a regulatory obligation under the Homes and Communities Agency's Tenancy Standard to ensure that 'homes continue to be occupied by the tenant to whom it was let in accordance with the requirements of the relevant tenancy agreement' and 'to publish clear and accessible policies that outline Registered Provider's approach to tackling tenancy fraud'. Fraud is defined as 'the deliberate use of deception or dishonesty to disadvantage or cause loss (usually financial) to another person or party'. Tenancy fraud occurs 'when a housing association or council home is occupied by someone who is not legally entitled to be there or has obtained use of the property fraudulently', Fraud Advisory Panel 2015. The main category of tenancy fraud relevant to this policy is that of obtaining a tenancy by deception:
- 3.38 Applicants for housing must confirm that the information they have given is correct. Obtaining a tenancy by deception can include; providing false information, as part of a homeless application or an application to join the housing register, failing to update personal information as a result of a change of circumstances or using false documents such as forged identification or claiming another person's identity. In these circumstances the Council will close the application and the applicant will not be able to re-apply for 12 months. Applicant will be notified of the closure and given a right of review as per Section 6.
- 3.39 Where an applicant is found to have deliberately or negligently worsened their own housing circumstances their housing need will be assessed to determine the appropriate band. The test that will be applied will broadly follow the 'intentionality' assessment that is outlined in Part 7 Housing

Act 1996 (as amended). In these circumstances the application will be closed for a period of 12 months. The applicant will be notified of the closure and given a right of review as per Section 6.

3.40 Policy on offering choice to applicants

3.41 The Council is committed to giving applicants choice in where they live, what kind of property they live in and who they have as Landlord. To assist applicants in making informed choices about their future housing we will provide them with relevant information about social housing available in the district. This information will enable them to assess their prospects of obtaining housing of the type and in the area they wish to live. Applicants can amend their matching preferences e.g. location, size or type of property which will determine what properties they are matched to by the housing register.

3.42 Change in circumstances

3.43 The applicant will have responsibility for updating their application of any material change of circumstances such as moving house, relationship breakdown or change in household composition, employment status etc. Failure to do so may result in their application being closed for a period of 12 months. The applicant will be notified of the closure and given a right of review as per Section 6.

3.44 If the Council or Registered Provider becomes aware that housing or personal circumstances have changed (e.g. disrepair has been rectified) then the applicant's banding and or preferences will be amended as necessary.

3.45 Any material change in circumstances may require applicants to undertake a further assessment and their banding to be reassessed.

3.46 If the applicant's contact details are incorrect (due to not being updated) and three reasonable attempts to contact the applicant prove unsuccessful their application will be closed 30 days after first contact was made, until further contact is made.

3.47 Data protection, sharing and use

3.48 The Council and the Registered Providers shall comply at all times with the provisions of the Data Protection Act 1998. The Council will seek the consent of applicants joining the Housing Allocation system to share personal information about the applicant, and any member of their household.

3.49 All Registered Providers (listed in appendix 2) shall ensure they maintain all technical and organisational measures to prevent unauthorised or unlawful processing of personal data (as defined in the Data Protection Act 1998) and accidental loss or destruction of, or damage to, personal data including but not limited to taking reasonable steps to ensure the reliability of its staff having access to the personal data.

3.50 Privacy and confidentiality will be respected and information will normally be shared with the applicant's implied consent (i.e. verbal) to deliver the service they are seeking, to verify information in order to assess eligibility and priority and, to answer enquiries from elected representatives and/or authorised agents acting on behalf of the applicant.

3.51 Anonymised data from the housing register may be used for purposes of research, monitoring of trends/demand, new property developments and responding to Freedom of Information Act 2000 requests.

3.52 Where it is necessary for personal information to be shared with third parties for these purposes, it will be transferred in a secure way to ensure it is not compromised or accessed by anyone who is not entitled to it.

3.53 The Council (where relevant) will share risk assessment data with RP's and other landlord's in order to minimise health and safety risks for partner's staff.

3.54 Information sharing without consent

3.55 On a case by case basis, where the law requires or permits this and the disclosure is necessary and proportionate, information about an applicant may be shared in the absence of consent without breaching data protection, human rights or the common law obligation of confidence. Usually this will involve striking a balance between the rights of the applicant and other legitimate interests which may justify the information sharing. An obligation of confidentiality/privacy may be set aside where the interference is in accordance with the law, necessary and proportionate to the legitimate aim being pursued to meet one or more of the following interests:

- national security
- Public safety e.g. in accordance with the provisions of the Crime and Disorder Act 1998 (section 115).
- the detection or prevention of fraud, disorder or crime
- protection of health
- the protection of the rights or freedoms of others (i.e. safeguarding public funds, protecting those at work)
- to assist Electoral Registration Officers in maintaining the electoral register

3.56 False statements or withheld information

3.57 It is a criminal offence for applicants and/or anyone providing information to this Housing Register to knowingly or recklessly make false statements or knowingly withhold reasonably requested information relevant to their application (s171 Housing Act 1996). This includes but is not limited to information requested on the housing registration form, in response to correspondence at the renewal of the application, or relating to any other review of the application. An offence is also committed if a third party provides false information whether or not on the instigation of the applicant. This would apply at any stage of the application process.

3.58 Where there is suspicion or an allegation that a person has either provided false information or has withheld information, the application will be given the status 'suspended' during the investigation and will be excluded from this Housing Allocation system until an outcome is reached.

3.59 If the outcome of any investigation is that the applicant did not provide false information or there was no withholding of information or such was not found to be withheld knowingly, then the application will be reinstated to its previous position within the Housing Allocation system meaning that the relevant applicant should not suffer prejudice.

3.60 However, where the investigation shows that false information was provided on the application form, or was deliberately withheld, this would render the application invalid. Ground 5 in Schedule 2 to the Housing Act 1985 (as amended by the 1996 Act, s.146) enables the landlord to seek possession of a property where it has been granted as a result of a false statement by either the tenant or a person acting at the tenants instigation.

3.61 If the Council determines that an applicant directly, or through a person acting on his or her behalf, has deliberately given false information or withheld required information it may result in their application being removed from the Housing Allocations Register and rendered Invalid.

3.62 Right to Information

3.63 It is a statutory requirement under Data Protection Act 1998 that applicants have access to their personal information held on the system. This can be accessed by making a request to the Information Governance Team using the Data Protection – Subject Access Request Form. This is available from our website: <https://www.bradford.gov.uk/open-data/data-protection/make-a-data-protection-request/>

3.64 Following this request an applicant will be provided with a copy of his/her entry on the Housing Register. The Council will also, on request from the applicant, provide such information that is

practicable and reasonable to supply, to explain their position and priority on the Housing Register in relation to when an offer of suitable accommodation might be made. An applicant has the right to be informed of any decision about the facts of their case which is likely to be taken into account when considering whether to allocate housing to them. It is important to note that information provided by the Council in relation to an applicant's prospects of housing is only a 'snapshot' of their position within the Housing Register at that time. The constant changes in the number and status of applicants on the Housing Register and the number and type of homes available for allocation will mean the position may alter.

SECTION 3: PART 3 - ALLOCATION BANDS

3.65 Allocation Bands

3.66 Bradford Council operates a needs based banding system as set out below. Following an assessment of their needs by the Housing Options Service or Registered Provider partner, applicants will be placed into one of six bands:

3.67 The six bands are:

- **Band 1 - Statutory / Service Need** these include households who are owed the main statutory homeless duty and those whose housing needs arise from other council service priorities / duties.
- **Band 2 – At risk of Homelessness** - households who need assistance to prevent them from becoming homeless
- **Band 3 – High Need** - households in unsuitable housing requiring urgent re-housing
- **Band 4 – Medium Need** - households with a band 1, 2, 3 need but with no local connection to the District and households in unsuitable housing but with less urgent need than those in Band 3
- **Band 5 – Low Need** - Households with a band 4 need but with no local connection to the district and those with low need
- **Band 6 – General Need** - Those who do not fall in any of the above categories

BAND 1 – STATUTORY / SERVICE NEED In no priority order	Examples of Qualifying Circumstances / Summary of Criteria
Applicants who are homeless (and not intentionally homeless) and owed the main housing duty by Bradford Council.	All homeless people as defined in Part VII of the Housing Act 1996 who are owed the main housing duty following a homelessness assessment under section 193 or 195 of the Housing Act 1996.
High risk victims of domestic abuse recommended by Multi-Agency Risk Assessment Conference (MARAC) for urgent re-housing.	High risk victims of domestic abuse who are subject to MARAC as part of an agreed safety plan will be placed in this Band.
Approved foster carers or adopters supported by Bradford Council.	Applicants who are approved foster carers or approved to adopt by Bradford Council's Fostering and Adoption Team, who need to move or secure a larger home in order to accommodate a looked after child will qualify for this band. Evidence from social services will be required before awarding this band.
Applicants who are Care Leavers of Bradford Council and children assessed by Bradford Council's Children Services Department as in need or at risk (where housing is a factor)	Applicants are awarded this category in accordance with protocols agreed between the Council's Housing Options Service and the Children Services Department. Applicants must be a former 'Relevant Child' as defined by the Children Leaving Care Act 2002 and be a young person at risk who may be owed such duty.

	Normally such a young person would have a housing related support package brokered either through Leaving Care Service or Housing Options and would be Tenancy Ready unless exceptionally there is joint agreement that the Council's duties require a different approach.
Hospital Discharge - applicants who are bed blocking	Applicants 'bed blocking' in hospital requiring urgent discharge, i.e. where a client is occupying a hospital bed that they no longer need, but cannot be discharged home due to unsuitability of their present accommodation which cannot be made suitable through adaptations due to cost, structural difficulties or the property cannot be adapted within a reasonable amount of time.
UK Armed Forces Personnel	<p>Applicants who would qualify either for Band 2 or Band 3 due to their housing need but are also:</p> <ul style="list-style-type: none"> • Former members of the Armed Forces • Applicants who are serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service • Applicants who are bereaved spouses or civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner. • Applicants who are serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service. <p>Evidence will be required to substantiate the above.</p> <p>Local Connection criteria will not be applied to this category.</p>
Where the Council's Housing Standards team has served an Emergency Prohibition Order.	Housing Standards have identified an imminent risk of serious harm in the applicant's current home which has resulted in a need to serve an Emergency Prohibition order and it would not be safe for the occupants to remain.
BAND 2 – AT RISK OF HOMELESSNESS In no priority order	Examples of Qualifying Circumstances / Summary of Criteria
Applicants experiencing or fleeing domestic abuse	Applicants who need to move due to domestic abuse and who are not at risk of immediate danger following housing options assessment or a referral from a domestic abuse refuge or a domestic abuse partner agency.

<p>Applicants experiencing or fleeing harassment or others forms of abuse (race, gender, sexual orientation, disability, religion or belief etc.) which would lead to homelessness / psychological harm.</p>	<p>Households suffering harassment and or other forms of abuse (race, gender, sexual orientation, disability, religion or belief etc.) or threatened or actual violence which is likely to cause psychological harm and necessitates an urgent need for rehousing. E.g. neighbourhood disputes/racial harassment incidents/hate crime resulting in intimidation or serious threats or damage to property which is recurrent. Appropriate enquiries will be made including requirement for medical evidence before awarding this band.</p>
<p>Rough sleepers assessed and referred by No Second Night Out (NSNO) service</p>	<p>This category is aimed at supporting the Council's NSNO service work with rough sleepers and to assist those clients who NSNO deem are tenancy ready to move on from the service.</p>
<p>Displaced by family, friends or from settled accommodation within 56 days</p>	<p>An assessment of an applicant's need due to being displaced by family, friends or from settled accommodation like prisons or tied accommodation will be made by the Council taking into account information provided by one or more of the following:</p> <ul style="list-style-type: none"> • Family/friends • Social Services, Youth Workers, Probation and other relevant professionals • A voluntary sector organisation representing the applicant. <p>As part of the assessment the possibility of reconciliation and other preventative options will be explored by Housing Options before determining the award of this band.</p>
<p>Landlord has served a valid notice to quit, intends to apply to court for possession of the property and there is no defence against possession proceedings.</p>	<p>Applicants with an assured shorthold tenancy who have been served a valid notice to quit where the landlord intends to make an application for possession and there is no defence against possession proceedings. Evidence will need to be provided.</p>
<p>BAND 3 – HIGH NEED In no priority order</p>	<p>Examples of Qualifying Circumstances / Summary of Criteria</p>
<p>Urgent medical, welfare grounds or disability</p>	<p>Where an applicant's medical, health or welfare condition is such that rehousing is required to provide a basis for the provision of suitable care.</p> <p>The applicant's condition is severe and their existing accommodation is a major contributory factor.</p> <p>The applicant's health is severely affected by the accommodation to the extent that it is likely to become life threatening. For example, where an applicant has significant mental health problems which are exacerbated by their accommodation.</p>

	<p>Disabled applicants who have restricted or limited mobility and are limited by their accommodation and unable to carry out day to day activities (Disability Discrimination Act 1995) or have difficulties accessing facilities inside and outside of their accommodation and require rehousing into accommodation suitable for their use.</p> <p>Applicants will only be placed in this band if rehousing to more suitable accommodation would stabilise or improve their health and wellbeing.</p> <p>An assessment of an applicant's need to move due to urgent medical, welfare ground or disability will be made by the Council taking into account supporting information provided by the applicant from one or more of the following:</p> <ul style="list-style-type: none"> • An applicant's GP or consultant. • Social Services. • Occupational Therapist. • Age Concern or any other voluntary sector organisation representing the applicant.
Applicants who need an adapted property	<p>Applicants who are disabled or have complex health or care needs requiring specialist accessible accommodation and where the nature of the adaptations required is materially different from those in their current home and it is not feasible to carry out the adaptations due to financial constraints and/or the property is unsuitable for adaptation.</p> <p>Social housing tenants in specialist adapted properties in areas of high demand and in properties of high demand and who no longer require those adaptations can be placed in this band in order to facilitate a move to make best use of stock. However each applicant will be considered on a case by case basis.</p>
Overcrowded by 2 or more bedrooms	<p>Applicants who are severely overcrowded according to the Bedroom Standard (see 4.22 overcrowding). For this band, applicants must lack 2 or more bedrooms than the number which the household is eligible for.</p> <p>Evidence will be required.</p>
Move on from Supported Accommodation.	<p>An applicant in supported accommodation who has been assessed as suitable for independent living by the Provider as per the Tenancy Ready Framework.</p> <p>If an application is made when the individual is not ready for independent living the application will be placed in Band 6 until such a time as the individual is ready to move on when it will be placed in Band 3 as appropriate.</p>

<p>Applicants suffering financial hardship where moving would alleviate their hardship</p>	<p>Applicants who are suffering from financial hardship (e.g. loss of income, benefit reductions, change of circumstances, under occupation) where rehousing will alleviate the hardship will be eligible for this band. An affordability assessment (based on affordability calculator) will be carried by the Housing Options before placing applicants in this band.</p>
<p>Applicants who need to move to a particular locality within the District, where failure to meet that need would cause hardship to themselves or others.</p>	<p>This category applies to those who need to move to a particular area within the Bradford District boundary, where failure to meet that need would cause hardship to themselves or others. This includes the need to move to a specific location for employment reasons and also to give or receive care where evidence is provided.</p> <p>Social housing tenants in the District who wish to move to be nearer their employment, education or training to ease hardship will be required to provide evidence.</p>
<p>Social Housing tenants from outside the District who:</p> <ul style="list-style-type: none"> • need to move to the District to avoid hardship (s.166 (3) (e)) • Need to move because the tenant works in the District • Need to move to take up an offer of work 	<p>Hardship grounds (other than for work reasons) would include, for example, a person who needs to move in order to give or receive care, or to access specialised medical treatment.</p> <p>Where the need to move is due to employment, education or training the applicant will need to prove that failure to move would cause them hardship. The LA will take into account the following in determining hardship due to work:</p> <ul style="list-style-type: none"> • The distance and/or time taken to travel between work and home • The availability and affordability of transport, taking into account level of earnings • The nature of the work and whether similar opportunities are available closer to home • Other personal factors, such as medical conditions and child care, which would be affected if the tenant could not move • The length of the work contract • Whether failure to move would result in the loss of an opportunity to improve their employment circumstances or prospects, for example, by taking up a better job, a promotion, or an apprenticeship <p>The definition of work does not apply to work which is short-term or marginal in nature, or if it is ancillary to work in another district. Voluntary work is also excluded.</p> <p>This category covers the requirement under the Statutory Right to Move policy. The Council's Local Connection criteria will not apply to this category.</p>
<p>Unsatisfactory housing conditions in the Private Sector where there is one or more Category 1 hazards.</p>	<p>This band will be awarded where the Council's Housing Standard's team identify that a person's home has at least one Category 1 hazard, (excluding overcrowding) for which there must be a high likelihood of an occurrence that could cause harm or a Suspended</p>

	Prohibition Order has been served and there is no reasonable likelihood that the landlord will address the problems.
Applicants who are homeless but found intentionally homeless or non-priority following the statutory homelessness assessment by Bradford Council	Applicants who following an assessment under Part 7 of the Housing Act 1996 (as amended by the Homelessness Act 2002) were found to be intentionally homeless or non-priority.
BAND 4 – MEDIUM NEED	Examples of Qualifying Circumstances / Summary of Criteria
Applicants who fall into either Band 1, 2 or 3 due to their circumstances but who do not have a local connection in Bradford.	See 3.88 reduced priority due to local connection policy
Applicants with a health or welfare need related to the current housing circumstances where moving would improve their health.	<p>An applicant's housing is unsuitable for health reasons or for the occupant's specific needs related to disability, but whose present accommodation does not cause serious barriers to day to day activity or whose life is not at risk due to their current housing.</p> <p>An assessment of an applicant's need to move due to ill-health or disability will be made by the Council taking into account information provided by the applicant from one or more of the following:</p> <ul style="list-style-type: none"> • An applicant's GP or consultant. • Social Services. • Occupational Therapist. • Age Concern or any other voluntary sector organisation representing the applicant.
Overcrowded by 1 bedroom	<p>Applicants that are overcrowded according to the Bedroom Standard (see 4.22 overcrowding). For this band, applicants must lack 1 bedroom than the number which the household is eligible for.</p> <p>Evidence will be required.</p>
BAND 5 – LOW NEED	Examples of Qualifying Circumstances / Summary of Criteria
Applicants with a low housing need	Applicants who fall into Band 4 due to their circumstances but who do not have a local connection to Bradford (see 3.88 local connection policy)
BAND 6 – GENERAL NEED	Examples of Qualifying Circumstances / Summary of Criteria
Applicants who don't fall into any of the above categories.	<p>Applicants who don't fall into any of the above categories.</p> <p>Homeowners (including joint and sole owners) with equity over £60k will be placed in this band (unless the</p>

	applicant requires sheltered accommodation / extra care scheme, or has a medical, disability or statutory homeless need)
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3.68 How will applicants be ranked?

- 3.69 Applicants within bands 1 to 5 are ranked in date order. The date used is the date on which an application was accepted into the band and is called the award date. In circumstances where applicants are seeking the same properties and have the same band awarded, the allocation will be made to the applicant who was awarded the band first. If more than one set of categories apply to an applicant, then the highest applicable category will be used for banding purposes; the 'category restrictions' presented above apply to all award decisions.
- 3.70 The ranking order for Band 6 group will be made to the applicant who applied first ('registration date').
- 3.71 Exception to the above will only apply to adapted properties which will be ranked on need and suitability for the property.

SECTION 3: PART 4 BANDING CRITERIA AND RESTRICTIONS

- 3.72 In order to discharge its legal obligation there are some categories where the Council will restrict the number of offers that are made to applicants. In such instances if the applicant rejects the suitable offer then their banding may be affected.
- 3.73 **Band 1 – Statutory Homeless under S.193 and S.195 Housing Act 1996 and owed the main housing duty**
- 3.74 Applicants who are owed the main housing duty under S.193 and S.195 Housing Act 1996 will only be allowed **one** suitable offer. Housing Options Officer will widen the applicant's areas of choice if the main housing duty has been accepted and will include the whole district (unless particular needs can be demonstrated as per 3.78).
- 3.75 The following outcomes will end the full homelessness duty the Council may owe to applicants:
- Where an applicant is offered, and accepts the offer of the accommodation.
 - Where an applicant currently residing in any type of Temporary Accommodation provided by the Council is offered suitable accommodation directly under this Policy and refuses that offer.
 - In relation to bullet points 2 and 3 (above), this will be subject to the applicant having reasonable opportunity to consider the offers (and their Part VII Housing Act 1996 right to review the suitability of the accommodation as discharge of the Council's full homelessness duty).
- 3.76 If a Statutorily Homeless (band 1) applicant is matched for suitable accommodation and a suitable offer is made to the applicant, then this will be the applicant's final offer and will end the Council's main housing duty even if the offer is refused. The offer will always be confirmed in writing stating that this is the final offer that will end the Council's duty to the applicant under part VII of the 1996 Housing Act (as amended). Any offer will normally last for 5 days from the date of the letter but this may be extended at the discretion of the Council or relevant Registered Provider.
- 3.77 Where a property is refused the Council's Housing Options team will be informed immediately by the relevant Registered Provider, a decision will be made by Housing Options on the suitability of the offer within 5 working days during which time the property must remain available.
- 3.78 Band 1 Statutory Homeless applicants will be entitled to one suitable offer under this Policy unless an additional need for a particular locality can be demonstrated. If an applicant has the duty ended in this way they are entitled to remain on the Housing Register and their priority will be reduced to band 3 with the original registration date retained.

Examples of additional needs for a particular locality (not exhaustive) may include:

- An essential need to give or receive care/support in a locality that is not accessible from elsewhere in the Bradford District.
- One or more children in the household whose education would be particularly disrupted by moving schools, because they are undertaking GCSEs, A-levels or similar or because they have specialist support in place at their existing school.
- The applicant or a member of the applying household would be at risk of violence in certain neighbourhoods within the Bradford District.
- The applicant can demonstrate that moving to a locality may lead to loss of employment to him or a member of the applicant's household or cause financial hardship.
- That a property would significantly impact on the health or mobility of a member of the household

The applicant exercises their right to review the suitability of an offer and this is upheld by the authority.

- 3.79 Whether or not a Band 1 Statutory Homeless applicant accepts an offer of accommodation made under the Policy, they have the right to request a review of the suitability of the accommodation they have been offered in discharge of the Council's Part VII duty.
- 3.80 Statutory Homeless applicants are therefore encouraged to accept the offer that has been made to them, even if they intend to request a review of its suitability. If the applicant has been accepted as being owed a statutory duty by the Council, this duty will cease if the property is refused. In such circumstances an applicant will no longer be entitled to any duty, will have to leave any temporary accommodation provided, and make alternative accommodation arrangements.
- 3.81 The Statutory Homeless within Band 1 will be reviewed on a monthly basis.
- 3.82 Band 2 - At risk of homelessness - offer restriction for all categories in this band**
- 3.83 Applicants in this band will only be allowed **one** suitable offer. Applicants who reject one offer are likely to have their banding reduced. Applications in this band will be reviewed after 56 days and Housing Option officers may use their discretion to extend the priority for a further 56 days or another agreed extension period. Housing Options officers will reduce the applicant's banding priority if the agreement within the individualised plan is not met.

SECTION 3: PART 5 – REDUCED PRIORITY

3.84 How reduced priority is awarded under this policy

3.85 The Council has a right to reduce an applicant's priority under this Policy. This part of the Policy describes those circumstances under which priority will be reduced. In doing so, due regard has been given to the requirement to give Reasonable Preference to those categories outlined in the Housing Act 1996 (as amended). The Reasonable Preference categories are listed in section 4 part 1.

3.86 Those applicants who are eligible under the Policy will be assessed to determine if they are owed a Reasonable Preference or not. If they are, they will be allocated a band according to the Council's allocation priority as set out in Section 3 Part 3 of this Policy. However, where an applicant would have been awarded a specific band due to assessed need but if they are not ready i.e. in the case of supported housing tenants or No second night out clients in agreement with the applicants their application will be given a reduced priority (allocated a lower band) until the applicants are tenancy ready.

3.87 Reduced priority will apply under the following circumstances.

3.88 Reduced priority due to the Local Connection Policy

3.89 Applicants are able to apply for social housing within the Bradford District from anywhere within the United Kingdom. However, in order to ensure that the Council prioritises local applicants over those from outside the District, reduced priority will be given to applicants without a local connection. 'Local connection' will be assessed mainly in accordance with the definition of local connection contained in section 199 Housing Act 1996. Applicants from outside the District assessed with a Band 1, 2 or 3 need but without a local connection will have their priority reduced to Band 4 until they acquire a local connection to the District. Applicants with a Band 4 need will be placed in Band 5 until they acquire a local connection.

3.90 The following factors as set down in s199 Housing Act 1996 will be taken into account in determining whether or not an applicant has a local connection with the Bradford Metropolitan District Council area. An application is awarded a local connection if an applicant or members of their household included in their application fulfil any of the criteria set out below:

- Having lived in the area for the previous 6 out of 12 months or 3 years out of the last 5 years. It doesn't need to be a continuous period of time.
- Currently engaged in employment within the district for a minimum of 16 hours and the length of the work contract is a minimum of 12 months
- Currently graduated from university study in the area;
- Having immediate family in the area, who have lived there for the previous 5 years,
- Needing to live in the area to provide essential support to a permanent resident of Bradford District (who have lived here for the previous 5 years) and there is no other person able to do this
- Needing to move into the area to receive essential support from a permanent resident of Bradford District (who have lived here for the previous 5 years) and there is no other way of receiving such support
- Social tenants moving to the District for employment (as per 4.44)
- Is a serving member in the regular forces or who was serving in the regular forces at any time in the five years preceding their application for an allocation of social housing
- Is a bereaved spouse or civil partner of someone who has served in the regular forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service
- Is a serving member or former member of the reserve forces who is suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service.

3.91 For the purposes of determining local connection, living in Bradford, the Council will **not** include the following:

- Occupation of a holiday letting which includes a permanent building, mobile home, caravan or motor caravan, hotel or bed and breakfast accommodation for the purposes of a holiday.
- Persons accommodated by another Local Authority under their homelessness duty
- Resident of Her Majesty's Prison, Bail Hostels or other such accommodation if no 'city status' exists.

3.92 Exceptions for Special Circumstances

3.93 There may be occasions not predicted by this Policy where the application of the local connection policy is deemed inappropriate by the Council and accordingly there is a manager's discretion available not to invoke the local connection policy in these exceptional circumstances. One example might be someone who has been placed out of Bradford for a period of time, whilst being looked after by Children's Services – although each case would need to be considered on its merits.

3.94 Applicants who do not have a local connection with Bradford but to whom Bradford Council have accepted a full Homelessness duty under section 193(2) Housing Act 1996

3.95 Worsening of Housing Circumstances

3.96 An applicant will be given reduced priority if the Council is satisfied they deliberately did or failed to do something which, as a consequence, led to a worsening of their housing circumstances. The household will be placed into Band 5 or 6. The situation will be reviewed every 12 months or upon a material change of circumstance within the household.

3.97 Examples of which could include but not limited to:

- Applicants giving up an affordable and suitable private rented tenancy which they are able to maintain, to move in with other relatives, creating a situation of overcrowding.
- An applicant requesting or colluding with a landlord or family member to issue them with a Notice to Quit.
- an applicant gives up settled accommodation in order to move into less settled or overcrowded accommodation
- an applicant deliberately overcrowds their property by moving in friends and/or other family members who have never lived together and/or have not lived together for long, then requests rehousing to larger accommodation

The above list is not exhaustive.

3.98 Reduced priority due to refusal of suitable offers of accommodation

3.99 Band 1 Statutory homeless applicants owed a full homelessness duty under section 193(2) or 195(2) of the Housing Act 1996 where only one reasonable offer will be made and refusal of that offer will result in the discharge of the Council's homelessness duty.

3.100 Applicants in Band 2 who have refused one suitable offer of accommodation under this Policy will have their priority for rehousing reduced (and the banding will be reassessed under their circumstances) unless they have genuine reasons for refusing the offers in which case they may be reinstated to band 2.

3.101 Reduced Priority for those who are Intentionally Homeless or non-priority

3.102 If an applicant is assessed under Part VII of the Housing Act as intentionally homeless (non-statutory) and or non-priority then the applicant will be placed in Band 3.

3.103 Reduced priority due to capital, savings and/or assets

3.104 Generally, property (sole or joint) owners who are adequately housed or people with sufficient financial resources e.g. equity, or capital above £60,000 available to them (which may be anywhere in the world) to meet their housing needs will be given reduced priority. Such applicants without housing need will be placed in Band 6.

In detail:

Applications from property owners will be reduced to Band 6 unless:

1. The applicant is over 55 and needs to move to sheltered or Extra Care Housing for health, welfare or medical reasons.
2. The applicant, or a resident member of their family, has a disability and requires a suitably adapted property where their current home cannot meet their needs in the long term and the applicant's household does not have the financial means to purchase suitable alternative accommodation.
3. The applicant is in significant mortgage arrears and has been assessed as requiring priority after they have been offered, taken and followed the advice of appropriate advisors who specialise in the prevention of homelessness due to mortgage arrears.
4. Applicant who has been assessed and accepted as statutorily homeless

3.105 In these circumstances, applicants will be placed in whichever band (1 to 5) applies to their housing need/circumstances. Where a home owner gets matched to a property they will generally only qualify for a one year probationary tenancy (assured shorthold tenancy) until such time as the applicant no longer has an ownership stake in a property.

3.106 Any homeowner who accepts an offer of social rented housing through this Policy will be expected to actively market their former home within 3 months of becoming a tenant of a Registered Provider and to sell/transfer their interest as soon as possible. Exceptions to this will be made if this would cause significant hardship to the applicant or a third party (e.g. an ex-partner).

3.107 Reduced Priority – Not ready to Move on from Care or Support

3.108 Applicants currently occupying supported accommodation or receiving care linked to their tenancy will be assessed as having Reasonable Preference but will have their priority reduced and be placed in Band 6 until such a time as it is confirmed by the relevant support providers that the applicant is ready to move on.

3.109 Notification of reduced priority

3.110 Any applicant whose priority is reduced will be provided with written notification of the decision that will contain the following information:

- The reasons for the decision to reduce priority
- The band that their housing circumstances would have warranted and the band that they have been placed in as a result of the Council's decision
- The applicant's right to appeal against the decision
- What they have to do before they can be considered again for any higher band warranted by their housing needs.
- That any appeal against the decision must be made in writing within 21 days of written notification of the decision
- That any appeal will be dealt with by a Senior Officer not involved in the original decision. All appeals will be dealt with within 8 weeks, and the applicant advised of the outcome.

SECTION 4: REASONABLE AND ADDITIONAL PREFERENCE

4.1 In this section of the document we explain

Part 1: What is Reasonable Preference and how is it applied under this Policy?

Part 2: What is Additional Preference and how is it applied under this Policy?

SECTION 4: PART 1 – REASONABLE PREFERENCE

What is Reasonable Preference and how is it applied under this Policy?

4.2 Bradford Council is required by law to determine the relative priority that housing applicants are awarded. This is particularly important when, as is the case in Bradford, the demand for social housing is greater than the availability of homes in some areas.

4.3 The law, as it applies to local housing authorities, requires that Reasonable Preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). Applicants with Reasonable Preference must be given a head-start in terms of accessing housing by comparison with applicants who do not have Reasonable Preference.

4.4 The statutory Reasonable Preference categories are:

- All homeless people as defined in Part VII of the Housing Act 1996.
- People who are owed a duty under s190 (2), 193 (2) or 195 (2) of the 1996 Act (or under section 65 (2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any Housing authority under section (192 (3)).
- People occupying unsanitary, overcrowded or otherwise unsatisfactory housing.
- People who need to move on medical or welfare grounds (including grounds relating to a disability).
- People who need to move to a particular locality within the district to avoid hardship to themselves or others.

4.5 The Council will use a banding based system to allocate accommodation. In assessing housing need the Council will give Reasonable Preference to those applicants who fall into the statutory categories.

4.6 The Council's Allocations Policy has been devised to ensure that it meets its legal obligations to provide overall Reasonable Preference to the above categories of applicants.

4.7 Who qualifies for Reasonable Preference?

4.8 The following criteria detail when someone would qualify for Reasonable Preference pursuant to section 167(2) (a) to (e) Housing Act 1996 (as amended) following an assessment.

4.9 **A: Reasonable Preference category s167 (2) (a) - applicants who are homeless within the meaning of Part VII Housing Act 1996.**

4.10 This group comprises all applicants who are homeless under the definition of homelessness contained in sections 175 -177 of Part VII of the Housing Act 1996.

4.11 This definition includes a person who does not have accommodation which is legally and physically available to him or her, or has accommodation that is not reasonable for him or her to continue to occupy. Applicants who have been assessed for this category and owed the main housing will be placed in Band 1.

4.12 **B: Reasonable Preference category s167 (2) (b) –applicants who are owed a duty by any local housing authority under s190 (2) 193(2) or 195(2) (or under section 65(2) or 68(2) of the**

Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3).

Applicants who have been assessed for this category and owed the main housing will be placed in Band 1.

4.13 C: Reasonable Preference category s167 (2) (c) – People occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.

4.14 Please note that those applicants who occupy unsanitary or unsatisfactory housing but which has been assessed as not being severe enough (overcrowded by one bedroom) will be awarded band 4.

4.15 Insanitary or Unsatisfactory housing conditions

4.16 Applicants will be awarded Reasonable Preference due to unsatisfactory housing conditions if they:

- Lack a bathroom, or
- Lack a kitchen, or
- Lack a functioning WC, or
- Lack hot or cold water supplies (where there is no realistic possibility that these can be reinstated within 24 hours), or
- Lack electricity, gas or adequate heating (where there is no realistic possibility that these can be reinstated within 24 hours) , or

Occupy a property where there are one or more Category 1 hazards present

4.17 Unsatisfactory housing conditions in the Private Sector where there is one or more Category 1 Hazards

4.18 Reasonable Preference will be awarded where the Council's Housing Standards team identify that a person's home has at least one Category 1 hazard, (excluding overcrowding) or have served a Prohibition Order in relation to the property.

4.19 Occupants of properties in which one or more relevant Category 1 hazard has been identified (for which there must be a high likelihood of an occurrence that could cause harm), or the Council has served a Prohibition Order and where the hazard(s) identified poses a significant threat to the health and wellbeing of the occupants, but where the threat is not an immediate threat of serious injury or life-threatening will be placed in Band 3.

4.20 Where an Emergency Prohibition order has been served and the occupants are required to vacate by law and it would not be safe for the occupants to remain, they will be placed in Band 1.

4.21 In cases where the applicant must move temporarily from their home whilst remedial repairs are undertaken the presumption will be that the landlord should facilitate and fund the alternative accommodation. In exceptional circumstances the Council may facilitate temporary accommodation of the household to a suitable alternative temporary accommodation whilst remedial repair works are carried out. The applicant and their household will then return to the original property. The applicant will not be eligible for Reasonable Preference for a relevant Category 1 hazard under this Policy whilst resident in the alternative temporary accommodation.

4.22 Overcrowding

4.23 Those overcrowded by one or two bedrooms in line with the 'Bedroom standard' will be granted Reasonable Preference and will be placed in the Band 3 or 4, depending on which of the category the applicant falls into.

4.24 The bedroom standard states that a separate bedroom shall be allocated to the following persons:

- two persons living together with another as husband and wife (whether that other person is of the same sex or the opposite sex)
- a person aged 21 years or more
- two persons of the same sex aged 10 years to 20 years
- two persons (whether of the same sex or not) aged less than 10 years
- two persons of the same sex where one person is aged between 10 years and 20 years and the other is aged less than 10 years
- Any person aged under 21 years in any case where he or she cannot be paired with another occupier of the dwelling so as to fall within (c), (d) or (e) above.

4.25 Although the overcrowding definitions under the Housing Act 1985 remain in statute, under this Policy applicants will be assessed by the 'bedroom standard' which is described earlier in this section and is recognised as a higher standard. The bedroom standard enables Housing Options Officers to identify those applicants who are overcrowded, and the appropriate banding for their needs, e.g. if the applicant is overcrowded by 2 bedrooms according to the bedroom standard then they will be placed in Band 3 and if the applicant is overcrowded by 1 bedroom according to the bedroom standard they will be placed in Band 4.

4.26 For the purposes of this Policy Bradford Council recognises that persons considered for sharing a room must be family members. This means that two young adults who are **not** in the same family and are **not** in a relationship should be considered as each requiring their own bedroom. Also, in assessing for overcrowding Bradford Council recognises pregnant women and children aged less than 12 months will be counted as requiring an additional bedroom where applicable. Evidence will be required e.g. Mat B1 forms or child benefit letters etc.

4.27 Please note: for those applicants where their housing conditions or level of overcrowding mean that it is not reasonable for them to continue to occupy their overcrowded accommodation and following an homelessness assessment are owed a statutory homeless duty under section 193(2) of the Housing Act 1996, they will no longer be allocated priority from Reasonable Preference category (c) as the Council will be under a legal duty to remedy the cause of homelessness through the provision of suitable accommodation. This may result in an award of Band 1 - Statutory homeless

4.28 D: Reasonable Preference category s167 (2) (d) – Medical, Disability and Welfare.

4.29 Medical Reasons to Move

4.30 Reasonable Preference is awarded by the Council following an assessment of the applicant's household and their current living situation and a review of evidence provided from one or more of the following:

- An applicant's GP or consultant.
- Social Services.
- Occupational Therapist.
- Age UK or any other voluntary sector organisation representing the applicant.

4.31 An applicant's circumstances will normally be referred for a medical assessment if an applicant has indicated that there is a medical or disability problem that is made substantially worse by their current housing. Priority will be given depending on how unsuitable the current accommodation is in relation to their medical, welfare or disability needs. The assessment is not of the applicant's health but how their accommodation affects their health or welfare.

4.32 Reasonable Preference will be awarded where an applicant's housing is unsuitable for severe health/ medical reasons or for reasons relating to the applicant's disability, but whose present accommodation does not cause serious barriers to day to day activity or whose life is not at risk due to their current housing. However their housing conditions directly contribute to causing serious ill-health. If this is the case they will be awarded Reasonable Preference and placed into Band 3 or 4. This will normally be assessed by a Council Housing Options Officer or referred an Occupational

Therapist for an assessment where the applicant is likely to need an adapted property depending upon the circumstances.

4.33 Examples of situations where an applicant would be awarded Reasonable Preference under category D, for medical, disability and welfare reasons.

4.34 The following are examples of cases that would qualify for Band 3 or 4 statuses under one of the statutory Reasonable Preference categories. i.e. medical, welfare or disability needs:

- The applicant's accommodation is directly contributing to the deterioration of the applicant's health such as severe chest condition requiring intermittent hospitalisation as a result of chronic dampness in the accommodation.
- Children with severe conditions such as autism, or cerebral palsy where their long term needs cannot be met without settled accommodation.
- A member of the household seeking accommodation is disabled and rehousing will enable that person to overcome physical barriers created by current accommodation e.g. steps and stairs.
- A disabled person who has restricted mobility or experiences barriers to carrying out day to day activities who requires substantial adaptations to a property which is not provided for in their current accommodation.
- A person with a terminal illness or long term debilitating condition whose current accommodation is not having a significant impact on their condition but where their quality of life would be significantly improved by moving to alternative settled accommodation which may or may not be closer to support.
- A person suffering with mental illness or disorder where the medical condition would be significantly improved by a move to alternative accommodation.

4.35 Need to move on welfare grounds due to ill-health related to old age or disability related to old age

4.36 These cases will have their welfare need recognised and Reasonable Preference awarded should their current housing be inadequate. An assessment of an applicant's need to move due to ill-health or disability related to old age will be made by the Council taking into account information from one or more of the following:

- An applicant's GP or consultant.
- Social Services.
- Occupational Therapist.
- Age Concern or any other voluntary sector organisation representing the applicant.

4.37 If an applicant has a significant need to move on welfare grounds which are not detailed above an appeal can be made using the procedure described under section Review. Applicants with these needs would be awarded band 3 or 4 depending on the level need.

4.38 Applicants fleeing Domestic Abuse

4.39 The current cross-government definition of domestic violence and abuse (included in Bradford Domestic & Sexual Violence Strategy 2015-20) is:

"Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or violence between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of violence: psychological, physical, sexual, financial and emotional."

4.40 High risk victims of domestic abuse who are subject to a MARAC (Multi Agency Risk Assessment Conference) as part of an agreed safety plan for high risk victims will be placed in Band 1. Local Connection criteria will not be applied to MARAC cases.

4.41 Applicants who need to move due to domestic abuse and not at risk of immediate danger will be placed in Band 2. However, those victims of domestic abuse who are in immediate danger if they continue to occupy their current accommodation will have the option to make a homeless application and may get placed in Band 1 following an assessment.

4.42 E: Reasonable Preference category s167 (2) (e) – People who need to move to a particular locality in the local authority’s district, where failure to meet that need would cause hardship to themselves or to others.

This category applies to:

- People resident in the Bradford District who need to move to a particular area within the Bradford District, where failure to meet that need would cause hardship to themselves or others.
- Existing social housing tenants in other local authority areas in England who need to move to the Bradford District because the tenant works or has secured employment in the District and has a genuine intention to take up the employment and where failure to meet that need would cause hardship to themselves or others.
- Applicants who meet the hardship criteria will be placed in Band 3.

4.43 Bradford residents seeking to move within the city

- Those who need to move to give or receive care that is substantial and on-going. Evidence will be required from the applicant to support this. For example, an award of Carers Allowance, Social Services involvement, confirmation from other agencies etc.
- Those who need to access social services facilities, and are unable to travel across the district due to limited mobility, medical issues that may inhibit the applicant from travelling or financial constraints.
- To take up (or continue) employment, education or a training opportunity that is not available elsewhere and who does not live within reasonable commuting distance.
- Applicants who meet these criteria will be placed in Band 3.

4.44 Right to move - Existing social tenants seeking to transfer to Bradford from another local authority district in England

4.45 A local connection will not be applied to existing social tenants seeking to transfer from another local authority district in England who need to move for work to the local authority’s district where failure to meet that need would cause hardship. In this case an applicant has a need to move if s/he works in the Bradford district or has secured employment in this district and the Council is satisfied that s/he has a genuine intention of taking up the offer of employment. Work that is short term or marginal in nature, is ancillary to work in another district, or is voluntary work, is not included in this definition of work.

4.46 The Council must be satisfied that the tenant needs, rather than wishes, to move for work related reasons. Factors that will be taken into account include:

- The distance and/or time taken to travel between work and home
- The availability and affordability of transport, taking into account level of earnings
- The nature of the work and whether similar opportunities are available closer to home
- Other personal factors such as medical conditions and child care, which would be affected if the tenant could not move.
- The length of the work contract i.e. a minimum of 12 months
- The number of hours worked i.e. a minimum of 16 hours per week
- The level of earnings
- Whether failure to move would result in the loss of an opportunity to improve their employment circumstances or prospects, for example, by taking up a better job, a promotion, or an apprenticeship.
- Evidence of employment (both current and secured) will need to be provided before this band is awarded.

Applicants who meet the above criteria will be placed in Band 3

SECTION 4: PART 2: ADDITIONAL PREFERENCE

What is Additional Preference and how is it applied under this policy?

4.47 Bradford Council can grant 'additional preference' (or head start) to applicants under this Policy where the Council is satisfied that these applicants have exceptional or urgent housing needs. These include the following categories:

4.48 UK Armed Forces Personnel

4.49 Former members of the Armed Forces will be given additional waiting time backdated to their length of service. This will be evidenced by the discharge letters or references provided the Ministry of Defence.

4.50 Members of the Armed Forces currently serving in the armed forces or those who have left in last 5 years will not need to have a local connection to apply to go on the council's housing waiting list. Applicants who meet the UK Armed Forces criteria will be placed in Band 1.

4.51 Those leaving or who are ready to move on from Council accredited support or care schemes.

4.52 The Council wants to ensure that care leavers and other vulnerable people with support needs are helped to move on from schemes. It is important that they are only able to access social housing when they are assessed as ready to move on. Therefore their application for housing will be placed in Band 6 – General Needs until they are ready to move on. At this point the applications will be placed in Band 1.

4.53 Foster carers and adoptive parents

4.54 Band 1 will be awarded to potential foster carers and adopters who meet:-
(1) the eligibility and qualifications criteria of this Policy, and
(2) who receive a deferred recommendation as suitable foster carers or adopters by the Council's Adoption and Fostering team, subject only to their finding accommodation that meets the property size and health and safety conditions required by the Adoption and Fostering team.

4.55 Move on from Care

4.56 Applicants who are Care Leavers of the Bradford Council and children assessed by Bradford Council's Children Services Department as in need or at risk (where housing is a factor). Applicants are awarded this category in accordance with protocols between the Housing Service and the Council's Children Services Department. Applicants must be a former 'Relevant Child' as defined by the Children (Leaving Care) Act 2000 and be a young person at risk who may be owed such Duty. Normally such a young person would have a housing related support package brokered either through Leaving Care Service or Housing Options and would be Tenancy Ready unless exceptionally there is joint agreement that the Council's duties require a different approach.

4.57 The evidence to support this will be provided by the Council's leaving care service and will consist of confirmation that:

- The care leaver is ready to move to independent settled housing and is genuinely prepared for a move to independent living.
- The care leaver possesses the life skills to manage a tenancy including managing a rent account.
- The care leaver has either long term or medium term tenancy support arranged, as required.
- On-going support needs have been assessed and, where appropriate, a support plan is in place.

- 4.58 It should be noted that an applicant currently provided with care or living in supported accommodation will be assessed as having Reasonable Preference but will have their priority reduced to Band 6 General Needs until they are assessed as being ready to move. Applicants who are ready to move will be placed in Band 1.

For further information about care leavers and young people assessed as in need and owed duty, see:

http://bradfordchildcare.proceduresonline.com/pr_care_leavers.html

http://bradfordchildcare.proceduresonline.com/p_homeless16_17.html

http://bradfordchildcare.proceduresonline.com/pr_homeless.html

4.59 Hospital Discharge (Bed Blockers)

- 4.60 Applicants who need to be discharged from hospital will all be medically assessed and generally fall into the following categories:

- Those who have somewhere suitable to live but do not want to continue living there upon discharge from hospital and there are no medical reasons for them not returning to their home. These applicants would not be awarded with Band 1 for hospital discharge and, assuming they do not meet one of the other criteria for Reasonable Preference, will be placed in Band 6.
- Those who have somewhere to live but it is unsuitable for their medical needs and cannot be made suitable through adaptations because of cost effectiveness, structural difficulties or the property cannot be adapted within a reasonable amount of time. These applicants would qualify for Reasonable Preference for medical, disability or welfare grounds. Depending on the severity of the impact of living in the accommodation applicants in this category may be awarded Band 3 or 4. These cases will be individually assessed.
- Those who have nowhere at all to live when they leave hospital. These applicants qualify for Band 1.
- Hospital discharge band 1 will only be retained for the period that the applicant is hospital 'bed-blocking'. Once the applicant has been discharged from hospital, a housing need assessment will need to be carried out to determine any banding awarded according to the policy.

4.61 Move on from Supported Accommodation.

- 4.62 Applicants occupying supported accommodation and who is Tenancy Ready will be awarded Band 3. The application will initially be placed in Band 6 until such a time as the following is confirmed;

- An applicant has completed the Tenancy Ready Framework and is ready to move to independent settled housing on the recommendation of the support service manager.
- Appropriate support package is available.

4.63 Rough sleepers assessed and referred by No Second Night Out (NSNO) service

- 4.64 Rough Sleepers occupying the No Second Night Out service accommodation and who is Tenancy Ready will be awarded Band 2. The application will initially be placed in Band 6 until such a time as the following is confirmed;

- The rough sleeper has completed the Tenancy Ready Framework and is ready to move to independent settled housing on the recommendation of the NSNO service.
- Appropriate support package is available.

4.65 Displaced by Family/Friends/Settled accommodation i.e. prison or tied accommodation

- 4.66 These applicants will be assessed by Housing Options before they are awarded Band 2 and enquiries will be made, but are not limited to, the following:

- The reason for the displacement
- When they are required to move out
- Time spent at the family/friends address/prison/tied accommodation
- Contributions to household and living expenses
- Possibility of reconciliation and/or mediation
- Exploration of other preventative and housing options solution

4.67 Landlord has served a valid notice to quit, intends to apply to court for possession of the property and there is no defence against possession proceedings

4.68 Applicants with an assured shorthold tenancy who have been served a valid notice to quit where the landlord intends to make an application for possession and there is no defence against possession proceedings. Applicants will be asked to provide the notice and any other documentary evidence required to establish whether the notice is valid. The landlord will be contacted to substantiate whether he/she intends to seek possession of the property and only if there is no defence against possession proceedings then Band 2 may be awarded as part of the prevention duty work.

4.69 Owner Occupiers with possession orders and tenants of owner occupiers where the mortgage lender is seeking possession will also qualify for Band 2. Evidence will be required.

4.70 Adapted Properties

4.71 Applicants who are disabled or have complex health or welfare needs requiring specialist accessible accommodation and where the nature of the adaptations required are materially different from those in their current home and it's not feasible to carry out the adaptation due to financial and/or property unsuitable for adaptation will be awarded Band 3.

4.72 Applicants will be required to provide evidence from one or more of the following:

- An applicant's GP or consultant.
- Social Services.
- Occupational Therapist.
- Age Concern or any other voluntary sector organisation representing the applicant.

4.73 Applicants suffering financial hardship where moving would alleviate their hardship

4.74 Applicants who are suffering from financial hardship due to negative income levels (e.g. loss of income, benefit reductions, under occupation) will be eligible for this band. An affordability assessment will be carried out by Housing Options before placing applicants in Band 3. Applicants may be asked to provide proof of their income and expenditure.

4.75 Applicants experiencing or fleeing harassment or others forms of abuse (race, gender, sexual orientation, disability, religion or belief etc.)

4.76 Households suffering harassment and or other forms of abuse, (race, gender, sexual orientation, disability, religion or belief etc.) - threatened or actual violence which necessitates an urgent need for rehousing. E.g. neighbourhood disputes/racial harassment incidents/hate crime resulting in intimidation or serious threats or damage to property which is recurrent. Appropriate enquiries will be made before awarding Band 2.

SECTION 5: MATCHING AND LETTINGS UNDER THE ALLOCATIONS POLICY

In this section of the document we explain the criteria applied to the matching and lettings process

Part 1: The Matching process

Part 2: Suitability check following the match

Part 3: Notification on offers from Registered Providers

Part 4: Application closures/renewals

SECTION 5: PART 1 - The Matching process

- 5.1 The Council's Housing Register will match properties based on the applicant's preferences as soon as void properties are placed on the system by participating landlords. The system will operate on the following principles:
- 5.2 Participating Landlords will place details of void properties onto the system when they become available to let through the Council's Housing Register.
- 5.3 Landlords will identify the following criteria in relation to each property and include this information in the property details input on to the system:
- Property type: house, flat, maisonette, bedsit, bungalow
 - Size of accommodation: number of bedrooms & rooms
 - Garden: with garden or without garden
 - Age restricted properties
 - Sheltered Accommodation
 - Adaptations
 - Accessibility: ground level, low rise, high rise (with lift)
 - Cost: Rent and service charge details
 - Location: address, postcode and ward
 - Plus any other additional information, such as room sizes, car parking facilities etc.
- 5.4 It is the responsibility of participating landlords to ensure that any other relevant property criteria are entered onto the system so that they can be matched appropriately.
- 5.5 More specific requirements which are not part of the matching criteria will be picked up at the point of suitability, i.e. family member age criteria.
- 5.6 The system will identify an applicant on the register whose preferences are a match for the property criteria.
- 5.7 If there is more than one applicant in the same band within the same preferences, then priority will be established between applicants in the same band by award date. Where there is more than one applicant within the same band, with the same award date matched to a single property, the applicant with the longest waiting time will be offered the property. In cases for applications in the 'General Need' group, priority will be given to the applicant with the longest waiting time.
- 5.8 When a void comes onto the system**
- 5.9 Registered Providers and private rented providers are expected to put void properties on the system as soon as they are available to let and in the case of new build or major refurbishment properties not longer than two months before the property is ready for occupation.

5.10 Withdrawal matches

- 5.11 The Council reserves the right to withdraw matches where the occupation of the property may take longer than two months. In these and other exceptional circumstances the match will be withdrawn but the applicant can retain the band, priority award date and the registration.

SECTION 5: PART 2 – SUITABILITY CHECK FOLLOWING A MATCH

- 5.12 This policy is designed to support the development of sustainable tenancies and communities across the district. Registered Providers will therefore need to be satisfied that applicants are able to sustain a tenancy prior to a formal offer of a tenancy being made.
- 5.13 Once an applicant has been matched by the Housing Register as first ('nominee') in order for an allocation of a property the Registered Provider (RP) will carry out a suitability check in line with their lettings policy to determine if they are suitable.
- 5.14 The Council understands that RPs have responsibility to manage all of their stock, not just the stock which they nominate into the Council's scheme. Registered Providers are therefore expected to operate within their own lettings policies and at the same time adhere to the Council's housing allocations policy. This policy permits Registered Providers to make suitability decisions using their own suitability criteria in their lettings policies whilst adhering to the general principles and requirements within this Policy. The Council however reserves the right to challenge refusals by RPs which the Council feels do not adhere to the RPs own published policies.
- 5.15 RPs policies and procedures need to be legally compliant with the requirements of s.166A (9) Housing Act 1996 as inserted by s.147 Localism Act 2011. RPs will be expected to inform the applicant when, in accordance with their policies, they decide to reject the applicant. Applicants would be given the right of review to be undertaken by the RP (See Section 6: Review and Appeals).
- 5.16 Applicants will only be rejected for an offer of a tenancy on suitability grounds where the unsuitability of the offer can be clearly evidenced by the Registered Provider/other landlord in line with their lettings and allocations policy.
- 5.17 Suitability is an assessment of the following criteria:
- 5.17.1 Sustainability: The applicant can demonstrate that they (with or without support) are able to:
- Understand and adhere to the terms of the tenancy agreement
 - Afford the property they have been offered
- 5.17.2 Landlord's property restrictions: Constraints on whether a customer is suitable for specific properties may also be imposed by individual Registered Providers/other landlords who may have definite letting criteria on the property, such as (but not limited to):
- Age restricted properties
 - Disabled adapted properties
 - Flats at height
 - Pet restricted properties
- 5.18 Right to rent checks**
- 5.19 From 1st February 2016, landlords are required to undertake Right to Rent checks. As the Council is limited stockholding authority without stock management responsibilities, RPs and other landlords will be required to undertake these checks as part of their suitability assessment. Applicants who fail the eligibility and right to rent checks will not be allocated the property.
- 5.20 Rent arrears**
- 5.21 In respect of current or former tenant rent arrears individual Registered Providers/other landlords may apply their own policy as to whether and on what terms they are prepared to allocate a property to an individual with arrears from a previous tenancy either with that or any other provider. Regard will be made to the amount of arrears outstanding, the frequency of arrears and whether a satisfactory repayment arrangement has been made and/or maintained, in line with their policy.

5.22 Conduct and unacceptable behaviour

5.23 Unacceptable conduct will be considered at the point of suitability; in respect of an applicant with a history of anti-social behaviour in a previous tenancy. The landlord may determine that an individual is not suitable for allocation of a particular property or type of property or a property in a particular area. Registered Providers and other landlords may apply reasonable precondition before allocating a property such as the conclusion of an undertaking or Acceptable Behaviour Contract or the acceptance of Intensive Tenancy Management or support.

5.24 The types of behaviour (by the applicant or a member of their household) that may lead to an applicant not securing a tenancy are:

- Anti-social behaviour, that is behaviour causing or capable of causing nuisance or annoyance to persons residing visiting or otherwise lawfully in the locality of the applicant's then home, where there is good reason to believe that such behaviour may be recurrent
- Convictions for an indictable offence committed within the locality of the applicant's then home except in cases where there is strong evidence that causes of this behaviour have been addressed
- Negligently allowing or causing the condition of a rented property to deteriorate substantially
- Obtaining a tenancy by deception, or attempting to do so: for example giving false information or negligently failing to notify of a material change in circumstances.

5.25 In reaching any such decision the Registered Providers will consider the frequency and seriousness of previous behaviour and the likelihood of this behaviour causing disruption and/or risk to residents, staff and the community and any evidence that the applicant has permanently altered his/her conduct.

5.26 Bedroom entitlement

5.27 Some Registered Providers and other landlords do not allow under occupation in their properties. In those circumstances Registered Providers and other landlords may reject an applicant if the household composition does not meet their lettings criteria on occupation.

5.28 Suspension by Registered Provider or other landlords

5.29 Registered Providers (RP) can with agreement from the Council place suspension/restriction on an applicant's ability to match to their properties. This is to prevent applicants who are unlikely to get rehoused with a landlord matching for their properties. Applicants would be given the right of review (to be carried out by the RP) following the suspension decision and the decision needs to be in accordance with the RP's lettings policies. Suspension would be time limited until the applicant has improved their conduct, behaviour and/or rectified the reason for suspension.

SECTION 5: PART 3 – REGISTERED PROVIDERS/OTHER LANDLORDS REFUSING APPLICANTS FOLLOWING SUITABILITY CHECK

- 5.30 The Registered Provider/landlords will write to applicants who are not seen as being suitable for the tenancy, setting out the reasons why. Applicants have a right to request a review of this decision and the review will be carried out by a member of staff who is senior to the person who made the original decision in line with their policy.
- 5.31 Registered Providers have the final decision as to whether or not an applicant is offered a tenancy in one of their properties. However, the Council retains the right to challenge any RP decision to refuse an applicant following suitability check, where it considers the decision was taken without due regard to the principles of this Allocations Policy, relevant equalities legislation, or the RP's own lettings policies. If the Council deems it necessary, it retains the right to escalate its challenge of that decision through the RP's complaints procedures, the RP's governance structure and/or regulatory body.
- 5.32 Prospective tenants where 5.30 and 5.31 above applies will be managed by the local authority or RP through the relevant policy framework in order to access housing. This is likely to take time and require efforts on the part of the household to show improvements in debt and/or instances of anti-social behaviour.

SECTION 5: PART 4 – APPLICATION CLOSURES AND RENEWALS

- 5.33 Applicants will be contacted annually on the anniversary of their registration date and will be given 28 days to renew their application. Failure to renew will result in the application for housing being closed on the Council's Housing Register.
- 5.34 In cases where an application has been closed the applicant can, within three months of application closure, request for reinstatement of the application with the same banding and registration date. This will be assessed by the Housing Option service and the circumstances for closure and reinstatement will be considered. Where an application has closed and passed the reinstatement period, applicants will need to re-register as a new applicant and their circumstances will require reassessment.
- 5.35 Applications will also be closed for one or more of the following reasons:
- An applicant requests cancellation.
 - An applicant's circumstances change and they are no longer eligible under this Allocations Policy.
 - An applicant has been housed in a tenancy by any landlord or provider using this system.
 - If the applicant's contact details are incorrect (due to not being updated) and two reasonable attempts (by phone, sms, email, letter) to contact the applicant prove unsuccessful their application will be closed, until further contact is made. Applications can only be reactivated within three months from the closure, after which time the application cannot be re-activated and a new application will have to be completed.
- 5.36 Our experience suggests that many people's housing circumstances change yet they still remain on the housing register for years. The Council reserves the right to close through periodic data cleansing exercises. Attempts will be made to contact the applicant and where no contact is received the application will be closed. As per 5.34, applicants can request reinstatement of the application.

SECTION 6: REVIEW PROCESS AND APPEALS

6.1 General Information

6.2 Applicants have the right to request such general information as will enable them to assess:

- How their application will be treated and whether they will be given any preference.
- Whether housing accommodation appropriate to their needs is likely to become available and how long they may have to wait for an allocation of such accommodation.

6.3 Information about decisions and reviews

6.4 Applicants have specific rights to information about decisions and rights of review of decisions.

6.5 Reviews will be carried out by the Review Officer at Bradford Council or delegated to an appropriate organisation or officer who was not involved in the original decision.

6.6 Applicants can request a review of a decision made in relation to:

- Eligibility to join the Housing Register
- The priority banding awarded
- Reduction of priority band award
- A decision by any participating landlord not to make an offer to the applicant following a match/offer. The review of this decision will be carried out by the landlord.

6.7 Applicants have a statutory right under Housing Act 1996 Part 6, to request a review of the following three categories of decisions made in relation to an application:

- not awarded reasonable preference on the grounds of unacceptable behaviour
- any refusal to nominate an applicant
- that the applicant is not eligible for a nomination.

6.8 Applicants who are rejected for a match or offer at the point of suitability can follow a two stage process:

1. Applicants should contact the relevant Registered Provider to request an explanation, and if not satisfied, should follow that organisation's complaints process. The Council's partner Registered Providers will report all such requests and complaints to the Council.
2. If the applicant is not satisfied following the complaint process, they can request a review of the Registered Provider decision with the Council.

SECTION 7: MONITORING AND REVIEW OF POLICY

- 7.1 The policy will be reviewed annually by the Council to ensure it is operationally fulfilling its aims and objectives.
- 7.2 A full strategic review will be undertaken five years from the date of initial implementation, unless major changes are required due to legislation or change in Council priorities.
- 7.3 In the interim any amendments that are required will be subject to approval by the Council's Strategic Director of Place in liaison with the relevant Housing Portfolio holder.

7.4 Access points

Applications to join the housing register can be made at the following access points:

The Council's Housing Option Team - Britannia House, Hall Ings, Bradford, BD1 1HX or by Tel 01274 435999

The Council's Housing Options Team - Bow Street, Keighley, BD21 3PA or by Tel 01274 435999

For Incommunities transfer tenants

Incommunities - The Quays, Victoria Street, Shipley, BD17 7BN. Tel 01274 254000 / 0845 120 8171

Appendix 1 – Glossary of terms

Definitions

The following words and phrases are used within the policy and carry the following meanings

- **Anonymised data-** this is information (data) which an applicant has given to the Council or its partners when making an application for housing. However the information has had all personal information removed from it such as your name and address, date of birth and telephone number. The data is then used for statistical purposes but the use does not breach a person rights under the data Protection Acts.
- **The Applicant** – a person applying for housing accommodation.
- **Assured Tenancy-** A tenancy granted usually by social landlords which gives continued rights of occupation of a residential property and following within the meaning of section 1 Housing Act 1988. The tenant has continued rights of occupation and will not be asked to leave the property unless there is another suitable property provided, improvement works are required, The tenants will be asked to leave the property subject if the condition of tenancy are not followed e.g. the payment of rent on time, taking proper care of the property and not causing nuisance or annoyance to neighbours through the tenants own actions or those of visitors (see schedule 2 of the Housing Act 1988). In general, applicants will be offered assured tenancies; in some circumstances a Registered Provider may offer other types of tenancies.
- **Assured Shorthold Tenancy** – is a type of assured tenancy and the conditions of an assured shorthold tenancy are generally similar to an assured tenancy. i.e. The tenants will be asked to leave the property subject if the condition of tenancy are not followed e.g. the payment of rent on time, taking proper care of the property and not causing nuisance or annoyance to neighbours through the tenants own actions or those of visitors (see schedule 2 of the Housing Act 1988).The principal difference between the two is an assured shorthold tenancy only provides limited security of tenure to the tenant.
- **The Council-** is the local authority for the Metropolitan District of Bradford which came into being on the 1st April 1974 under the Local Government Act 1972. The Councils district covers the areas of Bradford, Keighley Shipley and Ilkley and has various statutory functions and duties including those under the Housing Act 1996.
- **The Council’s partners-** Those Registered Providers (mentioned in this policy appendix 2) and other landlord partners.
- **The Housing Register** - the information technology system used by the Council to allocate properties in Bradford. The Council’s Housing Register prioritises applicants based on an assessment of their housing needs and stated preferences and is used to match applicants to properties.
- **Introductory Tenancy** – These tenancies will be for twelve months only as an introductory or probationary tenancy. The tenant will be allowed to stay for the whole of the 12 months given compliance with the terms and conditions of tenancy and will become an assured tenant after 12 months. The landlord has the option to extend the tenancy to 18 months. If the tenancy is extended to 18 months it becomes an assured tenancy at that time if the tenant has complied with all terms and conditions of tenancy.
- **A Local Housing Authority-** is the Council for the area which has responsibility to provide social housing accommodation and address homelessness within its district under the Housing Act 1996 which is the Council for the purpose of this policy.

- **Offer of tenancy-** this is an offer made by the Council or its partners to an applicant which if accepted by signing a lease with conditions will lead to the grant of a suitable residential property by way of an assured tenancy or short hold tenancy or an introductory tenancy.
- **The Policy-** the information in this document which sets out the manner and details of how the Council and its partners will allocate social housing accommodation within the Bradford District as required under the Housing Act 1996 (as amended) and including the system i.e. the process through which a void property is matched/allocated to applicant on the housing register.
- **Private Rented/Sector**–Private landlords who work with the Council's Private Sector Lettings service to find appropriate tenants for their properties.
- **Registered Provider** – has the meaning derived under section 112 of the Housing and Regeneration Act 2008 (the 2008 Act) (Chapter 3), through which providers of Social Housing in England can become Registered Providers with the Homes and Community Agency.
- **Verification at offer of nomination/tenancy**–The Council or its partners will undertake checks on the applicant's history in a former tenancy (where applicable). These are set out in Section 5 Part 2 – suitability.

Appendix 2 – List of Registered Providers in Bradford District

Registered Providers with whom the Council has nomination agreements are listed below:

- Abbeyfield Bradford Society Ltd
- Anchor Trust
- Accent Group Ltd
- Affinity Sutton
- Equity Housing Association
- Habinteg Housing Association
- Hanover Housing
- Home Group
- Housing 21
- Incommunities Group Ltd
- Stonewater Housing Association
- Jonny Johnson Housing Association
- Manningham Housing Association
- Muir Housing Association
- Places for People
- Sanctuary Housing
- The Riverside Group Ltd
- Yorkshire Housing
- Your Housing Group

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Report of the Strategic Director for Place to the meeting of Executive to be held on 12th September 2017

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Subject:

Bradford Culture Update including support to Leeds bid to be European Capital of Culture 2023.

SUMMARY STATEMENT

To provide an update on Bradford's Strategic framework for Culture, this includes information on the investment into the district from Arts Council England.

To gain approval from Bradford District Metropolitan Council to provide a letter of support to Leeds City Council as they bid to be European Capital of Culture in 2023, this will form part of the submission and deadline in October 2017.

Steve Hartley
Strategic Director Place

Portfolio:

Environment, Sport & Culture

Report Contact: Bobsie Robinson
Culture, Policy & Events Manager
Phone: (01274) 431922
E-mail: Bobsie.robinson@bradford.gov.uk

Overview & Scrutiny Area:

Regeneration & Economy

1. SUMMARY

- 1.1 To provide an update on the work undertaken, since ratification of the Cultural Strategy Strategic Framework in 2014 and inform Members of development going forward.
- 1.2 To provide information on the level of funding coming into the Bradford District from Arts Council England over the next four years through Bradford's National Portfolio Organisations.
- 1.3 To provide information on Leeds City Council bid to be European Capital of Culture in 2023.
- 1.4 To gain approval that Bradford provides a letter of support for the Leeds' bid to be European Capital of Culture in 2023 which will form part of their submission in October 2017.

2. Background – Cultural Strategy Development

- 2.1 A review of the Cultural Strategy 'Only Connect' was commissioned in 2012 to devise a new strategic framework for investment and support to arts, heritage and cultural activities over a ten year period (2014-2024). Public consultations were undertaken between August 2012 and June 2013.
- 2.2 The revised strategic framework for Culture was approved at Executive in April 2014 [Appendix 1].
- 2.3 The purpose and function of the revised framework was to ensure that over a period of ten years, a direction of travel and ambition was at the forefront in informing development and better use of resources to enable arts, heritage and cultural activities to attract additional investment both internal to the council and through external partners and organisations.
- 2.4 As part of this revision, support to commissioned arts and culture organisations timescale period were realigned to coincide with external cultural investment organisations such as Arts Council England to ensure stability to develop capacity, confidence and resilience within the creative/cultural sector.

3. Bradford District Cultural Strategy Update

3.1 Advocacy and Capacity Building

- 3.1.1 Since the ratification of a strategic framework for culture in 2014, a wide range of activities have been undertaken to advocate, support, build capacity and enable the creative/cultural to flourish. Examples of interventions undertaken are as follows:
- 3.1.2 In partnership with Arts Council England, three 'Grants for the Arts' workshop for individual artists and arts organisations were held to encourage more applications from the district. Following this intervention Bradford has seen an increase in

successful 'Grants for the Arts' applications with an increase in investment of 120% over a three year period.

- 3.1.3 A Creative Employment Programme funded by Arts Council England and the Creative & Culture Skills Council supported 19 small/medium size creative/cultural enterprises to grow and develop new business models of working with young people. The programme enabled 34 young people aged 16-24 from various backgrounds to gain a qualification whilst receiving on the job training to develop the skills and experience required by employers.
- 3.1.4 A Bradford Local Cultural Education Partnership (BLCEP) has been created, which brings together, FE/HE Education providers, primary and secondary schools head teachers and arts and culture organisations to develop a scheme of work to ensure that children and young people within the district are able to access, enjoy and engage with the wealth of cultural provision available. The partnership development programme is supported by IVE (formally CAPE UK) – a funded regional Arts Council England project establishes to champion cultural Education.
- 3.1.5 Advocating and championing Bradford Cultural offerings and potential to Arts Council England nationally resulted with visits from the Chair of Arts Council England – Sir Peter Bazalgette and Darren Henley the Chief Executive of Arts Council England to Bradford following an invitation from the Portfolio Holder for Culture, Employment and Skills to meet with a number of arts organisations, artists and schools committed to cultural education and excellence.

3.2 Culture Commissions and Investment

- 3.2.1 The Council's investment through the culture commissions for the period 2015 – 2018, which has an annual budget of £266,222, supports 16 organisations, which have collectively levered external funding into the district during 2015/16 of £2,666,266. Every £1 invested by CBMDC has returned £10 in external investment. The council's investment plays a crucial role for the organisations in demonstrating value and commitment from their LA to external funding bodies.
- 3.2.2 Recent announcements made by Arts Council England will see investment of £7,088,844 over 4 years from April 2018 up from £3,899,244 coming into the Bradford District – representing an increase of 65%. The investment is reliant on the funding through the council's culture commissions. This investment will go to 11 organisations which include: Artworks, Dance United Yorkshire, Freedom Studios, Ilkley Literature Festival, Impressions Gallery and Kala Sangam as existing National Portfolio Organisations. Three new organisations from Bradford will join the National Portfolio – they are Commonwealth Theatre, Bradford Literature Festival, which becomes the best funded literature festival in ACE's portfolio and the Bronte Society. Two current organisations Theatre in the Mill (Bradford University) and Mind the Gap will see an increase in their funding to support talent development.

3.3 Other Key Cultural Achievements over the last twelve months.

- 3.3.1 The National Media Museum re-launched with a new name, National Science & Media Museum and a new exhibition space Wonderlab in March 2017. They successfully delivered a new Science Festival in July 2017 working with partners including Bradford College and Broadway Shopping Centre.

- 3.3.2 The Alhambra Theatre in collaboration with the Royal Shakespeare Company on teaching and learning of Shakespeare in schools recently culminated in a presentation of Julius Caesar by SLP College and four other Bradford schools. Approximately 80 pupils gave two performances attended by more than 300 people in the Studio Theatre. Selected representatives from each school went on to perform in the National Shakespeare Festival in Stratford this summer.
- 3.3.3 Bradford Museum service successfully launched 'Splendours of the Sub Continent' – A Prince's Tour of India 1875-6 at Cartwright Hall, Art Gallery in March. The exhibition had been developed in partnership with the Royal Collections Trust and New Walk Museum and Art Gallery in Leicester. The exhibition was the first time in 135 years that these magnificent objects had collectively been on display. The exhibition attracted almost 30,000 visitors from diverse backgrounds.
- 3.3.4 Bradford Museum service opened a new David Hockney permanent exhibition at Cartwright Hall in July to coincide with the artist's 80th birthday. This is the first dedicated gallery to the artist's work and history and since opening has attracted over 10,000 visitors in the first month, up 60% on the same period last year.
- 3.3.5 Work continues within the Libraries service on community management. Four more libraries have moved over to community management, a prime example of 'People Can' enabling local communities to take over the operation of their local library. This brings the total number of community/venue managed libraries to 10.
- 3.3.6 The Library service have been successful in securing £74,692 from Arts Council England Libraries Opportunities for Everyone Innovation Fund to pilot a programme of activities to increase the number of children and adults with special educational needs and disabilities (SEND) to access library services and inform best practice nationally.
- 3.3.7 The Events service has delivered a number of key signature events such as the Tour de Yorkshire 3rd day start, organised a Cycling Festival which included over 100 Women and Girls in attendance at the Women and Cycling Conference, a National Cycle City Active City Conference and Exhibition which culminated in Bradford City Cycle – a mass participation family event. In addition to these events delivered in partnership the Council has delivered a number of key events such as Bradford Festival and Bingley Music Live. Collectively all these events have attracted increased footfall into the city centre whilst supporting a number of local businesses and increasing participation and engagement.
- 3.3.7 City of Film have been busy creating a number of new family friendly film festivals such as Small World Festival – an international short film festival which brings together heart-warming and humorous stories from across the globe, which ran throughout the month of June; Bradford Family Film Festival – which encourages community venues, museums and galleries, libraries to support family film screenings during the summer holidays. In October 2016 City of Film created Yorkshire's first three day film festival which celebrates active ageing and life through film.

- 3.3.8 Discussions are underway to open a Bradford Film office in Qingdao – China, site of the world’s largest film production facilities and candidate city for UNESCO City of Film status.
- 3.3.9 A number of community festivals have grown in confidence and profile with council support such as LGBT History Month and International Women’s Day. Together they delivered over 200 community lead activities, debates, awards ceremonies and seminars.

3.4 Next Steps

- 3.4.1 Work is underway to bring together people and organisations with the right skills, resourcefulness and commitment to create a new Cultural Partnership Board. The organisations and individuals being approached are active, innovative with connections and influence, who can lead the way in changing the perception of Bradford and championing its cultural future. This is being developed alongside the work being delivered with regards to a new creative vision for Bradford.
- 3.4.2 The next round of the Culture commissions will commence in September 2017 with a decision made by 31st December 2017. Continued ACE funding is predicated upon a continued commitment from CBMDC.
- 3.4.3 The Events programme will be revised by March 2018 and work is on-going with city centre businesses to devise a joined up programme of events/festivals to increase footfall and stimulate the night time economy.
- 3.4.4 To ensure Bradford’s role and profile in the Great Exhibition of the North for summer 2018, we will develop a programme of satellite events which will run concurrent with the exhibition in Newcastle Gateshead. 2018 will also include pilot activity for a new Mela for the district, which will re-launch fully in 2019.

4. Leeds bid to be European Capital of Culture 2023.

4.1 Background

- 4.1.1 European Capital of Culture is a prestigious Europe-wide competition which celebrates the cultural offer of a city. Following the success of Glasgow 1990 and Liverpool 2008, a UK City will host the European Capital of Culture in 2023 along with a city from Hungary. The winner will follow the likes of Barcelona, Lille, Amsterdam and Istanbul in being recognised as a major centre of culture. Hull currently holds the title of UK City of Culture which is a different competition.
- 4.1.2 For Liverpool, hosting the title brought over £750 million to the economy in addition to major infrastructure development, a growth in tourism of 34% and transformations in overall perceptions of the city. Moreover, the year engaged 60% of Liverpool’s residents and saw an increase in city pride.
- 4.1.3 Hull, the holder of the 2017 smaller UK City of Culture title has attracted over £32 million investment for its programme and major partnerships with the BBC, Tate

and other national partners. Hull's media coverage has generated over £60 million media value and its economic value from increased tourism is estimated at £150 million over 4 years.

- 4.1.4 In 2015, the decision for Leeds to bid for the title in 2023 was approved by Leeds City Council's Executive Board following a city wide consultation. The Leeds' bid needs to have the whole city behind it – politicians, business, universities, cultural organisations and artists, the people and communities of Leeds.
- 4.1.5 On 16 December 2016, the Department of Culture, Media and Sport announced its decision to launch the competition for the 2023 European Capital of Culture. The timings and process for submitting bids have now been decided and the deadline for the first stage submission is 27 October 2017 with the UK winning city to be announced by the end of 2018.
- 4.1.6 The other cities known to be bidding for the title are Belfast/Derry, Dundee, Milton Keynes, Nottingham and Truro/Cornwall. The winning city is not based on size or current cultural offering but on which city can best tell the story of how it can transform itself through culture in a European context. It is worth noting that there is only one bid from Northern Ireland and one from Scotland, both of which have the advantage of being able to secure support from their respective devolved administrations and from the relevant national Arts Councils. The English cities do not have this advantage, though financial support is likely to be forthcoming from Arts Council England if an English city wins.
- 4.1.7 The bidding process itself requires investment and, in addition to Leeds City Council support, Leeds has drawn down sponsorship from both HE and FE, with the University of Leeds and Leeds Beckett University being its two Principal Partners. Leeds Trinity University, Leeds City College, Leeds College of Art, Leeds College of Building and the Northern School of Contemporary Dance have also come in as sponsors from the wider education sector. Moreover, Leeds has secured cash support from 11 private sponsors so far (including regional businesses such as Yorkshire Water, Yorkshire Building Society and Yorkshire Bank) as well as Leeds-based telecommunications company AQL and Leeds Bradford Airport. Leeds is not requesting investment from other local authorities for the bid phase.
- 4.1.8 Winning cities have five or six years to plan the full programme and to raise considerable investment. There will be a balance of local, regional, national and international investment into the programme. The proposed Leeds' delivery budget will be revealed when its application is published in October 2017.
- 4.1.9 Over the next nine months, Leeds will be strongly focused on writing its bid book, consisting of 52 in-depth questions on Leeds' vision and strategy. In the last few months, there has been a public call for programme ideas, with a number of responses received from the West Yorkshire area.
- 4.1.10 The timescale for the bid process is:
- Outline bid submitted: 27th October 2017
 - Shortlisting: November 2017

- Final Application: April 2018
- Decision: Autumn 2018.

- 4.1.11 West Yorkshire, outside of Leeds, is already a world-class leader in culture with organisations such as Huddersfield Contemporary Music Festival, the Hepworth, Yorkshire Sculpture Park, National Science & Media Museum and a host of venues including the recently re-open Piece Hall in Halifax and LBT in Huddersfield. Within Leeds, world class organisations such as Opera North, Northern Ballet, West Yorkshire Playhouse and the oldest West Indian Carnival in Europe find their home. However, culture is not just in these prestigious organisations but can also be found embedded throughout all the region's communities in a myriad of shapes and forms from community galas to dance classes and book clubs.
- 4.1.12 Furthermore, collaborations such as the Yorkshire Festival have highlighted the success of regional partnership. In 2014, the cultural festival generated close to £10 million for the county's economy.
- 4.1.13 Nevertheless, Leeds itself is still thought to 'punch below its weight' culturally in comparison to European cities of a similar scale. It is a city currently better known for retail and sport than it is for culture.
- 4.1.14 Leeds' bid in 2023 is just one response to this in terms of raising a collective aspiration. The Leeds' bid offers a further opportunity to show that through culture, it can collectively showcase the success, talent and aptitude of Leeds and the wider region on a national and international stage.
- 4.1.15 Regional support has been a defining factor in the success of other bids and is critical for Leeds as it moves forward. While events like the 2014 Tour de France and recent initiatives such as the Yorkshire Sculpture Triangle have started to build these connections, the new Leeds cultural identity developed through the bidding process will increasingly reference the regional and northern cultural offer.
- 4.1.16 Consultation work undertaken to date revealed a mix of identities for Leeds residents. Findings show citizens strongly identify with being from Yorkshire and being 'northern'. This highlights an important reason for engaging with the wider region in the bid as an articulation of the identity felt by many across West Yorkshire.
- 4.1.17 With no other bidding cities in the North, Leeds would like its bid to be fully adopted as a 'Northern bid'. The ambition is to show the UK, Europe and the world that Leeds and the region is open for tourism, business and investment, bringing success to cultural organisations, artists and audiences across the north.
- 4.1.18 Leeds' decision to bid has been taken with enough lead in time to prepare a winning case and secure wide backing. Leeds was the first UK city to declare publicly its decision to bid and has already attracted additional publicity and press coverage both nationally and internationally.
- 4.1.19 There is already popular support in the city for a Leeds bid. This will be sustained if wider backing from the city region can be attracted and firm commitments from

other partners who will share the initial risk and stand to share in the benefits which will accrue.

- 4.1.20 If the bid is successful, Bradford's residents will be able to access high quality and diverse cultural activities in Leeds, but there will be opportunities for some of these activities to take place within Bradford. For example, if a nationally renowned performance company visits Leeds, it will be possible for any associated outreach activities to take place in Bradfords' schools or community or cultural venues. It may be possible for Bradford to host associated events during the year.
- 4.1.21 The Leeds' programme will offer numerous opportunities for regional artists including Bradford' based artists. These will include access to employment and skills development plus the opportunity to experience work which inspires their creative practice.
- 4.1.22 Bradford will benefit from any tourism initiatives such as the marketing of the region and demand for bed spaces. Bradford will take advantage of the proximity of the two cities to market its own cultural and tourism activities and venues.
- 4.1.23 The Leeds bid provides an opportunity for regional bodies such as the LEP/WYCA to further develop strategies and plans for cultural investment across West Yorkshire, reflecting the potential link to tourism and the economic benefits listed in this report. Bradford could then bid for regional investment for some of its proposed cultural projects such as a new national museum in Bradford City Hall. The risk for Bradford is that if the bid is successful and requires significant levels of regional funds, this may reduce the levels of funds to which Bradford can apply for programmes it wishes to advance.
- 4.1.24 There is a reputational risk to Leeds, and therefore Bradford, should the bid not be shortlisted or not win the competition. However, a number of unsuccessful bids in the past have, despite this, led to positive benefits for the cities and regions involved.

5. Other Considerations – Implications for the Council

5.1 Early Intervention and Prevention (EIP)

- 5.1.1 The Leeds' bid to become European City of Culture in 2023 supports Leeds City Council's ambition to be a compassionate city with a strong economy whilst tackling inequalities. The bid will seek to engage all the city's diverse communities. The bid has the potential to support the children and family agenda, address issues of learning and citizenship and promote community cohesion.
- 5.1.2 There are likely to be opportunities for Bradford's residents to access and be involved with cultural activities which contribute to many of the outcomes listed above.

5.2 Economic Resilience (ER)

5.2.1 The title of European Capital of Culture has a significant effect on boosting a city's cultural, social and economic development. Many cities with a previously low (and, at times, even negative) profile have experienced an image renaissance, attracting considerable media attention and enhancing local, national and international perceptions. Cities such as Glasgow, Lille, Liverpool have been successful in repositioning themselves as cultural hubs at a national and/or European level.

5.2.2 The evaluation of Liverpool showed that there were significant benefits to the wider Merseyside and Cheshire regions with more hotel beds sold outside the city than in Liverpool itself. The economic benefits of a successful Leeds' bid are likely to be spread across the whole of the Yorkshire region and hopefully, particularly in Bradford given our close proximity and good transport links to Leeds.

5.2.3 Further benefits of winning include:

- The repositioning of Leeds and West Yorkshire's image in the UK and Europe
- 6 years in the spotlight and the attraction of major national funding and events to the region
- Development of jobs and skills in the creative industries
- Provision of a step change in Tourism
- Promotion of well-being and pride
- Providing a catalyst for growth and development
- Raising the profile of Leeds as a major European city capable of hosting major events and it will boost Leeds and Leeds city region as a cultural destination with a great quality of life.

5.3 Next steps

5.3.1 If approved, a letter of support, signed by the Leader of the Council, will be sent to the Leader of Leeds City Council.

5.3.2 Leeds will submit their bid, including the Bradford letter of support, by 27th October 2017.

6. Financial & Resource Appraisal

6.1 This report does not commit the council to additional funds. All related activity will be covered by existing approved resources - such as the work being undertaken to support development of a new cultural partnership and a creative vision going forward for the city centre. In the main this will amount to officer time across the Department of Place.

7. Risk Management and Governance Issues

None

8. Legal Appraisal

- 8.1 The Council has powers under Section 144 of the Local Government Act 1972 (either alone or jointly with any other person or body) to encourage persons, by advertisement or otherwise, to visit their area for recreation, for health purposes, or to hold conferences, trade fairs and exhibitions and to provide facilities for those purposes. This is a wide power which will encompass cooperation with other Authorities, seeking grant funding, and providing or funding cultural events where it is seen to directly or indirectly benefit the local community.

9. Other Implications

9.1 Equality & Diversity

N/A

9.2 Sustainability Implications

N/A

9.3 Greenhouse Gas Emissions Impacts

N/A

9.4 Community Safety Implications

N/A

9.5 Human Rights Act

N/A

9.6 Trade Union

N/A

9.7 Ward Implications

N/A

10. Not For Publication Document

None

11. Recommendations

- 11.1 That arts and culture progress to date, the level of external funding through Arts Council England over the next four years into the district and next steps going forward be noted.
- 11.2 That Leeds' bid to be European Capital of Culture 2023 be supported and a letter of support be provided to be included in the submission. That it be noted that the Leeds' bid presents a significant opportunity for Leeds and the wider region, including Bradford, in terms of cultural, social and economic benefits.
- 11.3 That cultural organisations from Bradford be encouraged to be involved in the bid. That it be noted that this bid provides an opportunity to develop a regional brand for the cultural offer and should stimulate more joined up ways of working between local authorities and cultural organisations across the region.
- 11.4 That the potential call on regional funds to invest in the delivery of the bid if it is successful be noted.

12. Appendices

Appendix 1 – Cultural Strategy Framework 2014 - 2024

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BRADFORD A LEADING CULTURAL CITY

2014-2024

Vision: A leading cultural city that people love and enjoy.

Mission: Every day we will celebrate, inspire and engage residents and visitors in a magnificent cultural experience.

Bradford District's Cultural Priorities

The Cultural strategy framework is built on five strategic priorities that link to a range of actions.

Priority 1: People & Participation - A District where people can freely access, enjoy, create, engage in and contribute to Bradford's cultural offer.

Priority 2: Building a resilient and sustainable sector – Create an agile, enterprising, and entrepreneurial creative and cultural sector.

Priority 3: Responsible and active Leadership – A 'can-do' leadership position at all levels that engenders ownership, responsibility and ambition.

Priority 4: A thriving cultural offer – One that inspires our residents and visitors and delivers a magnificent cultural experience for all.

Priority 5: A cultural destination – telling and selling our story – Encouraging people to actively take part, watch, engage and experience Bradford as a leading cultural city locally, nationally and internationally.

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**MINUTES OF THE MEETING OF THE
WEST YORKSHIRE COMBINED AUTHORITY
HELD ON THURSDAY, 29 JUNE 2017 AT COMMITTEE ROOM A, WELLINGTON
HOUSE, 40-50 WELLINGTON STREET, LEEDS**

Present:

Councillor Peter Box CBE (Chair)	Wakefield Council
Councillor Tim Swift (Vice-Chair)	Calderdale Council
Councillor Keith Aspden	York Council
Councillor Andrew Carter CBE	Leeds City Council
Councillor Susan Hinchcliffe	Bradford Council
Councillor Simon Cooke	Bradford Council
Roger Marsh OBE	Leeds City Region Enterprise Partnership
Councillor James Lewis	Leeds City Council
Councillor Stewart Golton	Leeds City Council
Councillor Shabir Pandor	Kirklees Council

In attendance:

Ben Still	WYCA
Caroline Allen	WYCA
Angie Shearon	WYCA

1. Membership of West Yorkshire Combined Authority

The Authority considered a report of the Director of Resources in respect of the following:

- The appointment of members and substitute members to WYCA by the Constituent Councils and the City of York Council, the Non-Constituent Council.
- The appointment of the Leeds City Region Local Enterprise Partnership member ("the LEP member") and substitute LEP member to WYCA.
- Granting of voting rights to the WYCA member appointed by the City of York Council and to the LEP member, and substitutes.

Resolved:

- (a) That the members and substitute members of WYCA appointed by the Constituent Councils and Non-Constituent Council, as set out in the appendix to the report be noted.
- (b) That the continuing appointment of Roger Marsh as the LEP Member of WYCA, and Bob Cryan as substitute LEP Member, to act in the absence of the LEP Member, be confirmed.
- (c) That the LEP Member and the Non-Constituent Council Member may vote at any meetings of WYCA (including any committee or sub-committee to which those members are appointed) on any decision, subject to the following exceptions:-
 - budget and levy setting; and
 - the adoption of any implementation plans appended to the Single Transport Plan which relate specifically to the combined area (that is, West Yorkshire).
- (d) That the substitutes for the LEP Member and the Non-Constituent Council Member may exercise the voting rights granted to the LEP Member and the Non-Constituent Council Member when acting in the absence of their respective member.

2. Appointment of the Chair and Vice Chair of the West Yorkshire Combined Authority

Members were asked to consider nominations for the positions of Chair and Vice Chair of the West Yorkshire Combined Authority for the municipal year 2017/18.

Councillor Peter Box was proposed and seconded for the position of Chair and Councillor Tim Swift was proposed and seconded for the position of Vice Chair.

Resolved:

- (a) That Councillor Peter Box be appointed as Chair of the Authority.
- (b) That Councillor Tim Swift be appointed as Vice Chair of the Authority.

3. Chair's Comments

Councillor Box referred to the recent tragedy at Grenfell Towers and terrorist attacks in Manchester and London and, on behalf of the Authority, expressed condolences to all those affected.

The Authority was also advised that Councillor Judith Blake had received a CBE in the Queen's Birthday Honours and, in Councillor Blake's absence, members asked that their congratulations be recorded.

Members were reminded that the meeting was being filmed for live or subsequent viewing via WYCA's website and any feedback from observers would be welcomed.

4. Apologies for absence

Apologies for absence were received from Councillors Judith Blake, David Sheard and Nicola Turner.

5. Declarations of disclosable pecuniary interests

There were no pecuniary interests declared by members at the meeting.

6. Exempt Information - Possible Exclusion of the Press and Public

Resolved: That in accordance with paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972, the public be excluded from the meeting during consideration of Appendices 1 and 2 to Agenda Item 20 on the grounds that they are likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press and public were present there would be disclosure to them of exempt information and for the reasons set out in the report that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

7. Minutes of the meeting held on 6 April 2017

Resolved: That the minutes of the meeting of WYCA held on 6 April 2017 be approved and signed by the Chair.

8. Revised Committee Arrangements and Appointments

The Authority considered a report of the Director of Resources in respect of:

- To appoint West Yorkshire Combined Authority (WYCA) committees.
- To appoint members to WYCA committees, including an independent member to the Governance and Audit Committee.
- To appoint Chairs/Deputy Chairs of WYCA committees.
- To grant voting rights to some members of WYCA committees.
- To confirm the continuing appointment of Independent Persons.

Resolved:

- (a) That, in relation to **appointment of committees** –

- (i) That the following committees be appointed, each with the terms of reference set out in the relevant Appendix attached to the submitted report:
- Governance & Audit Committee (Appendix 1)
 - Leeds City Region Partnership Committee (Appendix 2)
 - Overview & Scrutiny Committee (Appendix 3)
 - Transport Committee (Appendix 4)
 - West Yorkshire & York Investment Committee (Appendix 5)
- (ii) That the following committees be appointed, each with the terms of reference set out in the relevant Appendix attached to the submitted report, with effect from 1 September 2017:
- Business Innovation & Growth Panel (Appendix 6)
 - Employment & Skills Panel (Appendix 7)
 - Green Economy Panel (Appendix 8)
 - Land & Assets Panel (Appendix 9)
- (b) That, in relation to **appointment of committee members** –
- (i) That in accordance with S17 Local Government and Housing Act 1989 the Authority appoint the following of its members to:
- the Transport Committee and West Yorkshire and York Investment Committee as set out in Appendix 10 of the submitted report, and
 - the LCR Partnership Committee as follows:
 - each of the 5 WYCA Members individually appointed by each constituent council, and
 - the non-constituent council WYCA Member.
 - Business Innovation and Growth Panel, Employment and Skills Panel, Land and Assets Panel as set out in Appendix 11 of the submitted report, these appointments to be of effect from 1 September 2017.
- (ii) That the Authority appoints its members to the Governance and Audit Committee, as set out in Appendix 10 to the submitted report, together with Andy Clayton as an independent member of the Governance and Audit Committee.
- (iii) That the Authority appoints members to the Overview & Scrutiny Committee as set out in Appendix 10 of the submitted report.
- (iv) That the Authority co-opt members to:

- the Transport Committee as set out in Appendix 10;
 - the LCR Partnership Committee as set out in paragraph 2 of the report, including substitute arrangements for those members;
 - the West Yorkshire and York Investment Committee as set out in paragraph 2 of the report; and
 - the new Panels as set out in Appendix 11, with appointments to be of effect from 1 September 2017.
- (c) That, in relation to **voting rights for committee members** –
- (i) it be noted that each member of a constituent council appointed to the Overview and Scrutiny Committee will have one vote.
 - (ii) that any non-constituent council member co-opted to the Overview and Scrutiny Committee shall be a voting member of that committee (and of any sub-committee to which they may be appointed by that committee).
 - (iii) that the independent member of the Governance and Audit Committee shall be a voting member of that committee.
 - (iv) that all co-opted members of the LCR Partnership Committee shall be voting members of that committee.
 - (v) that any constituent council member of the Transport Committee shall be a voting member of that committee (and of any sub-committee to which they may be appointed by that committee).
 - (vi) that any constituent council member or non-constituent council member on the West Yorkshire and York Investment Committee shall be a voting member of that committee (and of any sub-committee to which they may be appointed by that committee).
 - (vii) that each of the following members to be appointed to the new advisory Panels with effect from 1 September 2017 shall be a voting member:
 - each member co-opted from a local authority; and
 - each private sector representative.
- (d) That WYCA appoints a Chair and Deputy Chair to each committee, as set out in Appendix 10 and 11 of the submitted report, any such appointment in respect of any new advisory Panel to be of effect from 1 September 2017.
- (e) That Ian Brown and Carolyn Lord continue as Independent Persons available to act in relation to complaints concerning allegations of a breach of WYCA's Members' Code of Conduct on the existing terms for remuneration until WYCA's annual meeting in 2018.

9. WYCA Representation on Outside Bodies

The Authority considered a report of the Director of Resources regarding WYCA representation on outside bodies.

It was agreed that the representative on the Calder Valley Line Working Group should be amended to Councillor Tim Swift.

Resolved:

- (a) That the governance arrangements for Transport for the North and Rail North Ltd are subject to change, when TfN is established as a Strategic Transport Body.
- (b) That, subject to (a) above and the amendment to representation on the Calder Valley Line Working Group, that the appointments be made to the outside bodies for the municipal year 2017/18 as detailed in the Appendix attached to the submitted report.

10. Officer Scheme of Delegation

The Authority considered a report of the Director of Resources in respect of amendments to the Officer Delegation Scheme.

Resolved: That the amended Officer Delegation Scheme, as shown in the Appendix attached to the submitted report be approved.

11. Governance Arrangements

The Authority considered a report of the Director of Resources in respect of amendments to WYCA's Standing Orders and other governance documents.

Resolved:

- (a) That the following Standing Orders, as set out in the relevant appendices to the submitted report, be approved:
 - Procedure Standing Orders – Appendix 1
 - Access to Annex to the Procedure Standing Orders – Appendix 2
 - Code of Practice for recording meetings – Appendix 3
 - Scrutiny Standing Orders – Appendix 4
 - Contracts Standing Orders – Appendix 5
 - Financial Regulations – Appendix 6
- (b) That the Members' Code of Conduct attached as Appendix 7 and the Procedure for Considering Complaints against Members attached at Appendix 8 to the submitted report be approved.

- (c) That the Head of Legal and Governance Services be delegated authority to amend the quorum of any of the new Panels, in the event of any vacancies arising.

12. Code of Corporate Governance

The Authority considered a report of the Director of Resources in respect of a revised Corporate Governance Code and Framework and the Annual Governance Statement for inclusion in the annual statutory accounts.

Resolved:

- (a) That the revised Corporate Governance Code and Framework be approved.
- (b) That the Annual Governance Statement be endorsed.

13. Members' Allowances Scheme

The Authority considered a report of the Director of Resources in respect of the Members' Allowances Scheme.

Resolved: That the revised Members Allowances Scheme, attached as an Appendix to the submitted report, be adopted for the municipal year 2017/18.

14. Calendar of Meetings 2017/18

The Authority considered a report of the Director of Resources setting out a proposed calendar of meetings for 2017/18.

Resolved: That the Calendar of Meetings for 2017/18 be approved.

15. Capital Spending & Project Approvals

The Authority considered a report of the Director of Delivery on the progression of and funding for schemes from the West Yorkshire Plus Transport Fund (WY+TF) and Local Growth Deal projects.

The Authority approved the following 17 schemes which were detailed in the submitted report. It was noted that these had been recommended to WYCA for progression by the West Yorkshire & York Investment Committee on 16 June 2017.

Leeds Public Transport Investment Programme and LPTIP)	Decision Point 2
Leeds Bradford Airport Station	Decision Point 2
ULEV Taxi Scheme	Decision Point 2
Knottingley Rail Station P&R	Decision Point 2

Rail Park and Ride Phase 2	Decision Point 2
Elland Station (Calder Valley Line)	Decision Point 2
LCR Flood Alleviation for Growth Programme	Decision Point 2
Corridor Improvement Programme	Decision Point 2
Strategic Inward Investment Fund	Decision Point 2
Digital Sector Soft Landing Scheme	Decision Point 2
Business Growth Programme	Decision Point 2
Bradford Forster Square Station Gateway	Decision Point 3
LEP Loan - Gateway 45	Decision Point 4
LEP Loan – Fresh Pastures	Decision Point 4
Tackling Fuel Poverty Phase 4	Decision Point 5
Better Homes	Activity 6 – Change Request
Wakefield Civic Quarter	Activity 6 – Change Request

The Authority also approved the expenditure to the Districts for the DfT funding allocations for the Highways Maintenance Block and Highways Incentive funding which were outlined in the submitted report.

Resolved:

- (a) In respect of the **Leeds Public Transport Investment Programme and (LPTIP) - Decision Point 2 (Case Paper)** -
- (i) That the Leeds Public Transport Investment Programme proceeds through Decision Point 2 and the work commences on Activity 3: Outline Business Case on each of the project’s identified work streams within the programme.
 - (ii) That an indicative approval be given to the total programme value of £183.266m, with ultimate approval to spend being granted once the individual schemes have progressed through the Assurance Process to Decision Point 5.
 - (iii) That approval is given to WYCA’s contribution of £0.966m. This will be funded from the remainder of the WYCA funding, which had previously been approved for use on the NGT Project.
 - (iv) That development costs of £15.310m from the DfT’s £173.500m contribution for the development of the programme be approved, and that WYCA enter into a Funding Agreement with Leeds City Council for expenditure of up to £11.535m.
 - (v) That individual schemes within the programme are brought forward through the Assurance Process along their own Assurance Pathway.
 - (vi) That the Assurance Pathway, Approval Route and Approval Tolerance

for the Programme are approved.

- (b) In respect of **Leeds Bradford Airport Station - Decision Point 2 (Case Paper)** -
- (i) That the Leeds Bradford Airport Rail Station Scheme proceeds through Decision Point 2 and commences work on Activity 3 (Outline Business Case).
 - (ii) That an indicative approval to the total programme value of £25.0m be given with ultimate approval to spend being granted only once the scheme has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That development costs of £0.50m from the Leeds Public Transport Investment Programme for the development of the scheme be approved.
 - (iv) That the future approvals at Decision Point 3 & Decision Point 4 (Full Business Case) are made through a delegation to WYCA's Managing Director, with the scheme returning to Investment Committee and WYCA at Decision Point 5.
- (c) In respect of **ULEV Taxi Scheme - Decision Point 2 (Case Paper)** -
- (i) That the ULEV Taxi Scheme proceeds through Decision Point 2 and the work commences on Activity 5: (Full Business Case with Finalised Costs).
 - (ii) That an indicative approval to the total project value of £3.180m be given, with ultimate approval to spend being granted once the scheme has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That development costs of £25,000 in order to progress the scheme to Decision Point 5 (Full Business Case with Finalised Costs) from the OLEV grant be approved.
 - (iv) That the future approvals at Decision Point 5 are made through a delegation to WYCA's Managing Director. This Approval Route will be subject to the scheme remaining within the tolerances outlined above.
- (d) In respect of **Knottingley Rail Station P&R - Decision Point 2 (Case Paper)** -
- (i) That the Knottingley Rail Station Park and Ride project proceeds through Decision Point 2 and the work commences on Activity 4 (Full Business Case).
 - (ii) That an indicative approval be given to the total project value of £1.78m

with ultimate approval to spend being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).

- (iii) That development costs of £474,259 in order to progress the scheme to Decision Point 4 to be funded from the WY+TF be approved.
 - (iv) That the future approvals at Decision Point 4 are made through a delegation to WYCA's Managing Director following consideration and recommendation by Investment Committee. Approval at Decision Point 5 will be made through the delegation to WYCA's Managing Director. This Approval Route will be subject to the scheme remaining within the tolerances outlined above.
- (e) In respect of **Rail Park and Ride Phase 2 - Decision Point 2 (Case Paper)** -
- (i) That the Rail Park and Ride Phase 2 programme proceeds through Decision Point 2 and the work commences by the individual schemes on Activity 4 (Full Business Case).
 - (ii) That an indicative approval be given to the total programme value of £12.5m with ultimate approval to spend being granted once the individual schemes have progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs). This will be funded through WY+TF funds re-profiled from Phase 1 of Rail Park and Ride.
 - (iii) That development costs of £477,100 in order to progress the schemes to Decision Point 4 be approved.
 - (iv) That the individual schemes return to Investment Committee and WYCA for approval at Decision Point 4 (Full Business Case) where the proposed Approval Route for Decision Point 5 through a delegation to WYCA's Managing Director will be confirmed. This Approval Route will be subject to the schemes remaining within the tolerances outlined above.
- (f) In respect of **Elland Station (Calder Valley Line) - Decision Point 2 (Case Paper)** –
- (i) That the Elland Station Package scheme replace the Calder Valley Line Enhancement scheme within the WY+TF.
 - (ii) That the Elland Station project proceeds through Decision Point 2 and the work commences on Activity 3 (Outline Business Case).
 - (iii) That an indicative approval to the total project value of £22.036m be given, with ultimate approval to spend being granted once the scheme

has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).

- (iv) That development costs of £884,748 be approved in order to progress the scheme to Decision Point 3, and that WYCA enter into a Funding Agreement with Calderdale Council for expenditure of up to £834,748 to be funded from the WY+TF. The remaining £50,000 will be funded directly by Calderdale Council.
 - (v) That the future approvals at Decision Point 3 and Decision Point 5 be made through a delegation to WYCA's Managing Director. This Approval Route will be subject to the scheme remaining within the tolerances outlined above. The scheme will return to Investment Committee and WYCA at Decision Point 4 (Full Business Case).
- (g) In respect of the **LCR Flood Alleviation for Growth Programme - Decision Point 2 (Case Paper)** -
- (i) That the Leeds City Region Flood Alleviation for Growth Programme proceeds through Decision Point 2 and the work by the individual schemes commences on Activity 3 (Outline Business Case).
 - (ii) That an indicative approval to WYCA's remaining £12.2m contribution to the total programme value of £77m be given, with ultimate approval to spend being granted once the schemes have progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That the individual schemes return to Investment Committee for consideration and WYCA for approval at Decision Point 3 (Outline Business Case) or Decision Point 4 (Full Business Case), based on the level of detail produced by the Environment Agency business case process. At this stage individual Assurance Pathways and Approval Routes will be set for each scheme.
- (h) In respect of the **Corridor Improvement Programme - Decision Point 2 (Case Paper)** -
- (i) That the Corridor Improvement Programme, Phase 1 proceeds through Decision Point 2 and the work commences on the 13 individual schemes on Activity 3 (Outline Business Case).
 - (ii) That an indicative approval to the Phase 1 programme value of £67.8m be given, with ultimate approval to spend being granted once the individual schemes have progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That development costs of £4,482,500 in order to progress the 13

individual schemes in Phase 1 to Decision Point 3 (Outline Business Case) to be funded from the WT+TF be approved. This will include £0.408m of WYCA Programme Management costs. That WYCA enter into a Funding Agreement:

- with Bradford for expenditure of up to £1.245m;
- with Calderdale for expenditure of up to £0.430m;
- with Kirklees for expenditure of up to £0.800m;
- with Leeds for expenditure of up to £1.525; and
- with Wakefield for expenditure of up to £0.075.

(iv) That the individual schemes return to Investment Committee (for recommendation) and WYCA (for approval) at Decision Point 3 (Outline Business Case). As part of this approval, individual Assurance Pathways and Approval Routes will be set for each scheme.

(i) In respect of the **Strategic Inward Investment Fund - Decision Point 2 (Case Paper)** -

(i) That the Leeds City Region Strategic Inward Investment Fund proceeds through Decision Point 2 and the work commences on Activity 5 (Full Business Case with Finalised Costs).

(ii) That an indicative approval to the total scheme value of £12.45m Strategic Inward Investment Fund be given, with ultimate approval to spend being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).

(iii) That the future approvals at Decision Point 5 be made through a delegation to WYCA's Managing Director following consideration and a recommendation by Investment Committee. This Approval Route will be subject to the scheme remaining within the tolerances outlined above.

(j) In respect of the **Digital Sector Soft Landing Scheme - Decision Point 2 (Case Paper)** -

(i) That the Digital Sector Soft Landing Scheme proceeds through Decision Point 2 and the work commences on Activity 5 (Full Business Case with Finalised Costs).

(ii) That an indicative approval to the total scheme value of £1m be given, with ultimate approval to spend being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).

(iii) That the future approval at Decision Point 5 be made through a

Delegation to WYCA's Managing Director following consideration and a recommendation by Investment Committee. This Approval Route will be subject to the scheme remaining within the tolerances outlined above.

- (k) In respect of the **Business Growth Programme - Decision Point 2 (Case Paper)** -
 - (i) That the Business Growth Programme proceeds through Decision Point 2 and the work commences on Activity 5 (Full Business Case with Finalised Costs).
 - (ii) That an indicative approval to the total scheme value of £9m be given, with ultimate approval to spend being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That the future approval at Decision Point 5 be made through a delegation to WYCA's Managing Director following consideration and a recommendation by Investment Committee. This Approval Route will be subject to the scheme remaining within the tolerances outlined above.

- (l) In respect of **Bradford Forster Square Station Gateway - Decision Point 3 (Outline Business Case)** -
 - (i) That the Bradford Forster Square Station Gateway project proceeds through Decision Point 3 and the work commences on Activity 4 (Full Business Case).
 - (ii) That an indicative approval to the total project value of £17.311m be given (which includes a £17.061m contribution for WY+TF), with ultimate approval to spend being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That development costs of £3,671,314 to be funded from the WY+TF in order to progress the scheme to Decision Point 4 (Full Business Case) be approved. That WYCA issues an addendum to the existing Funding Agreement with Bradford Council for expenditure of up to £3,671,314.
 - (iv) That the scheme returns to Investment Committee (for recommendation) and WYCA (for approval) at Decision Point 4, with the intention that approval at Decision Point 5 (Full Business Case with Finalised Costs) be made through the delegation to WYCA's Managing Director, subject to the scheme remaining within the tolerances confirmed at Decision Point 4.

- (m) In respect of **LEP Loan - Gateway 45 - Decision Point 4 (Full Business Case)** -

- (i) That the Gateway 45 loan proceeds through Decision Point 4 and the work commences on Activity 5 (Full Business Case with Finalised costs).
 - (ii) That an indicative approval to the total loan value of £3.3m be given, with ultimate approval to the loan being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That Leeds City Council are instructed that the current charge held as security for the earlier £3m LEP loan is released and imposed solely on part of the site.
 - (iv) That the approval of the loan agreement at Decision Point 5 be made through the delegation to WYCA's Managing Director, subject to the scheme remaining within the tolerances set out above.
- (n) In respect of **LEP Loan – Fresh Pastures - Decision Point 4 (Full Business Case) -**
- (i) That the Fresh Pastures loan proceeds through Decision Point 4 and the work commences on Activity 5 (Full Business Case with Finalised costs).
 - (ii) That an indicative approval to the total loan value of £0.8m be given, with ultimate approval to the loan being granted once the project has progressed through the Assurance Process to Decision Point 5 (Full Business Case with Finalised Costs).
 - (iii) That the approval of the loan agreement at Decision 5 be made through the delegation to WYCA's Managing Director, subject to the scheme remaining within the tolerances set out above.
- (o) In respect of **Tackling Fuel Poverty Phase 4 - Decision Point 5 (Full Business Case with Finalised Costs) -**
- (i) That the reduction of LGF investment of Phase 1 of the Tackling Fuel Poverty Programme from £2,857,177 to £2,709,000, due to the withdrawal of the Calderdale Almshouse scheme be approved.
 - (ii) That Phase 4 of the Tackling Fuel Poverty Programme for delivery in targeted areas of Calderdale and Kirklees to progress from Activity 5 (FBC with Finalised Costs) to Activity 6 (Delivery) be approved. The reduction of Phase 1, together with the inclusion of Phase 4 projects, brings the total LGF investment in the Tackling Fuel Poverty Programme to £6m. This is in line with the indicative budget noted in the report to November 2016 Investment Committee.
 - (iii) That WYCA funding of £1,007,800 be approved and that WYCA enters

into a Funding Agreement with Kirklees for expenditure of up to £500,000 and with Calderdale for expenditure of up to £507,800, and that WYCA authorise delegation to the Managing Director to finalise the agreements.

(p) In respect of **Better Homes Activity 6 (Delivery) – Change Request –**

(i) That the exception that Year 1-3 baseline targets in respect of the following KPIs for the Better Homes programme be approved:

- Target number of homes improved revised from 12,000 to 3,580.
- Suspension of marketing and assessment targets.
- Revise target apprenticeships created, to apprenticeships supported.
- That the Better Homes Yorkshire KPIs are updated in accordance with Schedule 11 of the Framework Agreement.

(q) That in respect of **Wakefield Civic Quarter - Activity 6 (Delivery) – Change Request** the following exception be approved:

- That a condition of the approved £1.1m grant for the Wakefield Civic Quarter project is that it is repaid (to a maximum amount of £1,1m) from a 50:50 share of any disposal proceeds. If the disposal involves a complex funding package and a lesser share is proposed, a further exception report will be prepared for the Investment Committee.

(r) That in respect of **Highways Maintenance Block and Highways Incentive Funding** expenditure to the Districts of £25.971m for the Highways Maintenance Block and £2.432m for the Highways Incentive Funding, which will be funded from the DfT's allocation to WYCA be approved.

16. **WYCA Corporate Plan 2017/18**

The Authority considered a report of the Director of Policy, Strategy and Communications which sought endorsement of the organisation's Corporate Plan for 2017/18.

Councillor Box advised members that the Corporate Plan had been amended to include Inclusive Growth as one of the key priorities and it was considered that the document provided a good balance on what WYCA had achieved and outlined the plans for the forthcoming year. It was agreed that the Corporate Plan should now be published on the website and circulated to the District Councils for inclusion on their own agendas.

Resolved: That the Corporate Plan 2017/18 be endorsed.

17. HS2 Growth Strategy

The Authority considered a report of the Director of Policy, Strategy and Communications on the development of a Leeds City Region HS2 Connectivity Strategy and the proposal that oversight of its development be delegated to the Transport Committee with a view to its adoption as a daughter document to the Strategic Economic Plan.

It was intended that the Strategy would support and complement the Phase 2 Hybrid Bill and, to enable this, it was proposed that an initial submission be made to Government in Autumn 2017, followed by more detailed strategy development during 2018. It was agreed that oversight of the strategy be delegated to the Transport Committee but the final version would be brought back to a future meeting for adoption.

Members discussed the economic impact, connectivity and employment opportunities HS2 would bring to the region and also the challenges in respect of disruption during its development. It was noted details of the Government's potential scheme would not be known until later in the year but Councillor Wakefield advised members that discussions were being held at the HS2 Regional Programme Board with Network Rail and the DfT and they had been made aware of both the region's ambitions and the points raised by members in respect of disruption.

Resolved: That a Leeds City Region HS2 Connectivity Strategy be developed and that oversight of this development be delegated to the Transport Committee.

18. Transport for the North

The Authority considered a report of the Director of Policy, Strategy and Communications which:

- Provided an update on Transport for the North's development of a Transport Strategy and on road and rail priorities for Transport for the North, including the development of a Northern Powerhouse Rail network.
- Sought approval for the recommendations from the East-West Trans-Pennine corridor study to be provided as an input into the Transport for the North's further work on the Central Corridor.

Members discussed the importance of ensuring that WYCA's priorities continued to be reviewed and that they be communicated as widely as possible to the public. It was requested that the report be circulated to each constituent authority for consideration at their Executive Board to ensure there was a unified approach to the priorities. A report would be brought to the next meeting.

Resolved:

- (a) That progress on WYCA's road and rail priorities for Transport for the North

including the Northern Powerhouse Rail network be noted.

- (b) That Transport for the North's work to consider connectivity improvements across the Central Corridor be endorsed.
- (c) That the recommendations from the East-West Trans-Pennine corridor study be provided as an input into Transport for the North's further work on the Central Corridor.
- (d) That the report be circulated to each constituent council for consideration at their Executive Board.
- (e) That a report be prepared for the next meeting of WYCA to be held on 3 August 2017.

19. A Clearer West Yorkshire Combined Authority Brand Identity

The Authority considered a report of the Director of Policy, Strategy and Communications which set out options for a clearer, more compelling brand identity for the organisation and wider region that would better enable it to achieve its communications and profile-raising objectives.

The report also set out what a potential implementation plan for an organisational rebrand could look like, detailing the changes needed to be made to both communications channels and assets and non-communications activities such as processes, systems and organisational culture.

The recommendations set out in the report were not approved as members considered that the devolution agenda should be the priority and it was therefore agreed that the organisational rebranding should be deferred and considered at a future date.

Resolved: That the recommendations in the report were not accepted and the organisational rebranding be deferred to a future meeting in the context of a wider devolution agreement.

20. WYCA Accommodation Options

The Authority considered a report of the Managing Director which provided information on options for the HQ office accommodation for WYCA and to agree a way forward.

Members noted the need for improved head office facilities for WYCA and considered the options outlined in the submitted report. It was agreed that further work on detailed design and costs to refurbish Wellington House should be undertaken and a report prepared for a future meeting.

Resolved: That Option D of retaining and investing in Wellington House, until its value rises sufficiently to get a return on the investment, is progressed to a detailed design, costs and plan, and that any constraints in the building could be overcome. That an immediate sum of up to £100k is made available from reserves to progress this work which will be subject to the WYCA Project Assurance processes.

21. Minutes of the Meeting of the West Yorkshire and York Investment Committee held on 8 March 2017

Resolved: That the minutes of the meeting of the West Yorkshire & York Investment Committee held on 8 March 2017 be noted.

22. Minutes of the Meeting of the Overview & Scrutiny Committee held on 22 March 2017

Resolved: That the minutes of the meeting of the Overview & Scrutiny Committee held on 22 March 2017 be noted.

23. Draft Minutes of the Meeting of the Governance & Audit Committee held on 6 April 2017

Resolved: That the draft minutes of the Governance & Audit Committee held on 6 April 2017 be noted.

24. Draft Minutes of the Meeting of the Transport Committee held on 21 April 2017

Resolved: That the draft minutes of the meeting of the Transport Committee held on 21 April 2017 be noted.

25. Draft Minutes of the Overview & Scrutiny Committee held on 28 April 2017

Resolved: That the draft minutes of the meeting of the Overview & Scrutiny Committee held on 28 April 2017 be noted.

26. European Structural and Investment Funds (ESIF) - Sustainable Urban Development (SUD)

Further to minute 6, Exempt Information, the press and public were excluded from the meeting for this item.

The Authority considered a report of the Director of Resources on the Call for SUD (Sustainable Urban Development).

Members considered the full Call which had been produced in draft form together with a covering note.

It was expected that the Call will be published in mid-July. Members noted that the final iteration of the Call may be subject to final editing by the Managing Authority prior to formal publication but the changes would not alter the substance of the Call.

Resolved: That the SUD Call, to be published by the Managing Authority in July 2017, be approved.

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