



## **Agenda for a meeting of the Executive to be held on Tuesday, 8 January 2019 at 1030 in Committee Room 1, City hall, Bradford**

### **Members of the Executive – Councillors**

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

### **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

Phone: 01274 434580/4579

E-Mail: [jill.bell@bradford.gov.uk](mailto:jill.bell@bradford.gov.uk) / [yusuf.patel@bradford.gov.uk](mailto:yusuf.patel@bradford.gov.uk)

### **To:**

## **A. PROCEDURAL ITEMS**

### **1. DISCLOSURES OF INTEREST**

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

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

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

*Notes:*

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

### **2. MINUTES**

**Recommended –**

**That the minutes of the meetings held on 6 November and 4 December 2018 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 - 01274 434580)

#### 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 - 01274 434580)

## **B. STRATEGIC ITEMS**

<p style="text-align: center;"><b>LEADER OF COUNCIL &amp; CORPORATE</b></p>
---

<p style="text-align: center;"><i>(Councillor Hinchcliffe)</i></p>
--

#### 5. **CALCULATION OF BRADFORD'S COUNCIL TAX BASE AND BUSINESS RATES BASE FOR 2019-20**

1 - 16

The report of the Director of Finance (**Document "AF"**) estimates the Council's Council Tax and Business Rates bases for 2019-20. These bases in turn determine the amount of taxation raised in 2019-20.

Section A of this report estimates the Council Tax Base. This involves considering: total dwellings in the district; exemptions, discounts and the Council Tax Reduction Scheme among others items.

Section B estimates the Business Rates base, starting with the total rateable value of property used by businesses in the district.

Section C summarises the implications of the tax bases for the 2019-20 revenue budget.

#### **Recommended -**

- (1) **That the number of band D equivalent properties estimated by the Council as the Council Tax Base for 2019-20 for the whole of the Bradford Metropolitan District is 142,200 as set**

out in Appendix A of Document “AF”.

- (2) The Council Tax Base for 2019-20 for each Local Council is set out in Appendix B of Document “AF”.
  - (3) In 2019-20, Bradford will provide a grant of £0.161m to Local Councils as compensation for the cost of Council Tax Reduction.
  - (4) The amount provisionally estimated by the Council as the Business Rates income for 2019-20 as included on the Council’s NDR1 return (Appendix B1) is £130.5m:
  - (5) Of the total Business Rates income;-  
24% is paid to Central Government - £31.4m  
1% is paid to the West Yorkshire Fire Authority - £1.3m  
74% is retained by the Council - £97.8m
- A further cost of collection allowance is paid to the Council of £0.7m.
- (6) That authority is delegated to the Section 151 in consultation with the Leader of the Council to make any necessary amendments to the calculation of the Business Rates estimate arising from the completion of the 2019-20 NDR1 form received from the Government and to include the amended figures in the 2019-20 Budget papers for Council.
  - (7) That remaining unused amounts of the Council Tax and Business Rates earmarked reserves are held to smooth out taxation income for future years.

(Corporate Overview and Scrutiny Committee)

(Martin Stubbs – 01274 432056)

## C. PORTFOLIO ITEMS

<p style="text-align: center;"><b>NEIGHBOURHOODS &amp; COMMUNITY SAFETY PORTFOLIO</b></p>
---

*(Councillor Jabar)*

### 6. ANTI-POVERTY STRATEGY: BRADFORD DISTRICT ANTI-POVERTY CO-ORDINATION GROUP'S APPROACH FOR TACKLING POVERTY

17 - 76

Following a Corporate Overview and Scrutiny Review in 2016, Councillors and officers have been working with partners to (a) harmonise all strategies and initiatives tasked with alleviating poverty in

the district and (b) developing a partnership approach by creating the Anti-Poverty Co-ordination Group including partners from the social housing, health, voluntary and community and faith sectors.

This has developed a **'living document'** which provides an overview of what partners and the council are currently doing and planning to do to alleviate poverty in the District.

Following discussion and a recommendation at the Corporate Overview and Scrutiny Committee of the 15 November 2018, the report of the Strategic Director of Place (**Document "AG"**) presents the draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty to Executive for their consideration and approval.

Views from Executive are also requested on how we engage with the community of interest on poverty.

**Recommended -**

**That Executive approve the draft Anti-Poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach to Tackling Poverty.**

(Corporate Overview and Scrutiny Committee)

(Helen Johnston – 01274 434401)

**REGENERATION, PLANNING & TRANSPORT  
PORTFOLIO**

*(Councillor Ross-Shaw)*

**7. ILKLEY PARKING REVIEW**

77 - 92

The report of the Strategic Director of Place (**Document "AH"**) updates the Executive on the progress of the Ilkley parking review. It also details the findings from the recent public consultation on the proposed parking controls which have been developed in response to the key recommendations of the parking review, the costs of the implementation and the issues associated with the introduction. The report also seeks approval from Executive to progress with the introduction.

**Recommended -**

**(1) That the Executive notes the findings of the Public Consultation**

- (2) That Executive notes and endorses the proposals as developed as the first phase of enhancements resulting from the Ilkley Parking Review

(Regeneration and Environment Overview & Scrutiny Committee)  
(Simon D'Vali – 01535 618375)

8. **BRADFORD COMMUNITY INFRASTRUCTURE LEVY (CIL) - UPDATE, REVIEW AND ANNUAL REPORT (REGULATOIN 62)**

93 - 104

The report of the Strategic Director of Place (**Document “AI”**) provides a summary of the Bradford CIL for the first financial year 2017/2018 and an update on the total amount of CIL monies collected up to December 2018. The report outlines the future process for allocating the Strategic CIL Fund and proposes minor amendments to the Regulation 123 List.

The report also seeks approval to commence with a review of the charging rates and zones in the adopted CIL Charging Schedule, as recommended following the CIL Examination and adoption in 2017.

**Recommended –**

- (1) That the proposed minor amendments to the Regulation 123 List (as set out at Appendix 2 to Document “AI”), be approved for consultation and the final changes to be agreed by the Assistant Director (Planning, Transportation & Highways) in consultation with the Portfolio holder following consideration of any representations made, and to make any further amendments considered necessary prior to implementation of the revised Regulation 123 List.
- (2) That the Assistant Director (Planning, Transportation and Highways) be authorised to commence work towards a review of the adopted Bradford CIL Charging Schedule in 2019 alongside the preparation of the Local Plan Core Strategy Partial Review and Allocations Development Plan, with delegated authority to the Assistant Director (Planning, Transportation and Highways) to undertake any associated consultation required and make any further amendments to the CIL Charging Schedule considered necessary prior to producing a Draft Charging Schedule.

(Regeneration and Environment overview & Scrutiny Committee)  
(Alex Bartle – 01274 437471)

9. **SAFER ROADS - STRATEGIC SCHEMES**

105 -  
116

The report of the Strategic Director of Place (**Document “AJ”**) seeks to update the Executive on progress with schemes identified for inclusion in the Safer Roads strategic schemes programme.

**Recommended -**

- (1) That Executive notes the proposed schemes prioritised for progression as part of the Safer Roads strategic schemes programmes and the associated initial consultation representations.**
- (2) That approval be given to prepare and advertise Speed Limit Orders for:**
  - i. Bradford City Centre – 20mph zone**
  - ii. Farnham Road area – schools 20mph zone**
  - iii. Park Lane area – school 20mph zone**
- (3) That the Strategic Director of Place and Portfolio Holder for Regeneration, Planning & Transport give consideration to any valid objections in accordance with their delegated authority or, in the event of there being no valid objections, the Orders be sealed and implemented as advertised.**

(Regeneration and Environment Overview & Scrutiny Committee)

(Richard Gelder – 01274 437603)

**10. PROPOSED REDEVELOPMENT OF THE CITY CENTRE FOOD MARKET**

**117 -  
132**

The report of the Strategic Director of Corporate Services (**Document “AK” that contains Not for Publication Appendix 1**) will update the Executive on the review of property required for the market relocation and creation of new public realm on Darley Street.

**Recommended -**

**That the Executive approves the following recommendations -**

- (1) That the Executive is satisfied that the proposed redevelopment scheme is in the public interest and that any harm caused by the use of compulsory purchase powers to acquire and interfere with third party land and rights needed for the scheme is outweighed by the public benefits which the redevelopment scheme would generate, having also taken into account at this stage, the statutory obligations under the Equality Act 2010 in relation to the differential impact a Compulsory Purchase Order might have on various groups of persons with protected different characteristics;**
- (2) To authorise**
  - (a) a Compulsory Purchase Order to be made pursuant to**

**Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by Section 99 of the Planning and Compulsory Purchase Act 2004), Section 1 of the Localism Act 2011 and the Acquisition of Land Act 1981 and all other relevant and enabling powers, to secure the compulsory acquisition of the land and buildings shown edged red and the creation of a new right referred to at 10.2.2 in respect of the building known as Vintry House, shown coloured blue on the plan appended hereto and which land and new right is needed to facilitate and enable a viable and deliverable scheme of redevelopment to be implemented and completed in the interests of promoting the environmental, economic and social wellbeing of the community and wider area;**

- (b) a right to be created pursuant to Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 to permit the Council to enter and occupy Vintry House, shown coloured blue on the plan annexed hereto, for the purpose of using the building as a site compound for the storage of machinery, equipment and other apparatus necessary to facilitate the proposed redevelopment scheme.**
  
- (3) To delegate to the Strategic Director: Corporate Resources authority to -**
  - (a) make, if necessary, minor or technical amendments to the Compulsory Purchase Order;**
  
  - (b) modify and settle the draft “Statement” to justify the use of compulsory purchase powers, the Compulsory Purchase Order Map and Schedule and all other legal documentation necessary to support and accompany the Compulsory Purchase Order to the Secretary of State for Housing, Communities and Local Government for confirmation;**
  
  - (c) approve agreements with landowners setting out the terms for withdrawal of any objections to the Compulsory Purchase Order, including where appropriate, seeking exclusion of land from the Compulsory Purchase Order;**
  
  - (d) confirm the Compulsory Purchase Order, if satisfied that it is appropriate to do so, in the event that the Secretary of State notifies the Council that the Council has been given the power to confirm the Compulsory Purchase Order;**
  
  - (e) promote any modifications to the Compulsory Purchase Order, if expedient to do so;**

- (f) take all and any necessary action, as the case may be to continue or open negotiations with persons for the acquisition of land and the exercise of a right to occupy Vintry House to facilitate the scheme and any other interests included in the Compulsory Purchase Order and any other land needed for the redevelopment scheme and to authorise acquisitions by agreement where the use of compulsory purchase powers is in contemplation and to approve the purchase price, advance payments and all other compensation payments;
  - (g) take all necessary steps in relation to any statutory blight proceedings instituted against the Council for the acquisition of land claimed to be blighted by the threat or presence of the Compulsory Purchase Order and
  - (h) take all necessary action, should the quantum of compensation flowing from the threat or use of compulsory purchase powers be in dispute and be referred to the Upper Tribunal (Lands Chamber) or other form of arbitration.
  - (i) to take and do all things necessary or incidental to the implementation of the above resolutions;
- (4) That all land acquired for the redevelopment scheme be held for planning purposes.
  - (5) That Executive approve the recommendations contained within the confidential appendix (NFP Appendix 1 to Document “AK”).

(Corporate Overview & Scrutiny Committee)

(Ben Middleton – 07582 101816)

**HEALTHY PEOPLE AND PLACES PORTFOLIO**

*(Councillor Ferriby)*

**11. BEREAVEMENT SERVICES STRATEGY - DELIVERY PLAN UPDATE**

133 -  
146

The Strategic Director of Place will present a report (**Document “AL” which contains a Not for Publication Appendix 2**) that provides a

progress update on delivery of the adopted Bereavement Services Strategy covering:-

- Appointment of external specialists to assist with delivery of crematoria programme
- Land Acquisition
- The new Muslim burial ground lease with the Bradford 'Council for Mosques'
- Extension of Muslim burial ground at Scholemoor cemetery
- Infrastructure repair to cemeteries
- Revised Memorial Policy

**Recommended that the Executive:-**

- (1) Approve the recommendation made by the Strategic Director Place to remove Northcliffe Park from the list of potential sites for a new crematorium**
- (2) Instruct the Strategic Director Place to communicate the decision made for removal of Northcliffe Park from the list of proposed sites for a new crematorium to the Regulatory and Appeals Committee of the Council sitting as Corporate Trustees.**
- (3) Instruct the Strategic Director Corporate Services to commence land acquisition negotiations for the two sites specified within Not for Publication Appendix 2 of Document "AL" up to the option to buy stage**
- (4) Note and welcome the procurement of external specialist resources to complete the feasibility stage for the remaining 4 identified sites and subject to further approval, deliver progress to RIBA stage 3 for the design and build of two new crematoria**
- (5) Instruct the Strategic Director Place to submit a report recommending the two sites to be approved for the construction of new crematoria and the estimated costs at the earliest opportunity.**
- (6) Note and welcome the signing of the revised lease with Bradford Council for Mosques for the Muslim burial area at Scholemoor cemetery.**
- (7) Note and welcome adoption of the revised Memorial Policy**

(Regeneration and Environment Overview & Scrutiny Committee)

(Phil Barker – 01274 432616)

12. **PETITION AGAINST CONSIDERATION OF NORTHCLIFFE PARK AS A SITE FOR A NEW CREMATORIUM** 147 -  
152

The petition entitled 'Petition against Consideration of Northcliffe Park as a Site for a New Crematorium' was received by Full Council on 16 October 2018 and referred for consideration by Executive.

The petition relates to the inclusion of Northcliffe Park on a list of 3 sites under consideration for the building of a new crematorium to replace the facility at Nab Wood cemetery. The report of the Strategic director of Place (**Document "AM"**) considers the concerns raised in the petition regarding the possible use of part of the Park, which is held in trust, for the building of a crematorium.

**Recommended that the Executive:-**

**Refer the lead petitioner to the recommendations passed within the Bereavement Services Strategy Delivery Plan Update report (Document "AM").**

Regeneration and Environment Overview & Scrutiny Committee)  
(Phil Barker – 01274 432616)

**EDUCATION, EMPLOYMENT AND SKILLS  
PORTFOLIO & DEPUTY LEADER**

*(Councillor I Khan)*

13. **PROPOSED CHANGES TO NURSERY PROVISION AT LOW ASH PRIMARY SCHOOL** 153 -  
178

The report of the Interim Strategic Director of Children's Services (**Document "AN"**) asks the Executive to approve changes to the Nursery provision at Low Ash Primary School from 1 September 2019.

**Recommended -**

- (1) **That taking into account that the majority of responses received reject the proposal to close the nursery (82%) and of those the majority suggested a 26 place nursery, the Executive approves a reduction in nursery places from 30 to 26 children at any one time at Low Ash Primary School Nursery from 1 September 2019. This will also help to address some of the financial concerns of the school.**

- (2) **That if approved, Bradford Council's Childcare Sufficiency Officers will work with the school to ensure the offer is in line with community needs.**

(Children's Services Overview & Scrutiny Committee)

(Marium Haque – 01274 431078)

**14. OFSTED INSPECTION OF LOCAL AUTHORITY CHILDREN'S SERVICES (ILACS) 179 - 182**

The report of the Chief Executive/Interim Strategic Director of Children's Services (**Document "AO"**) provides updated information about the Council's response to the OFSTED ILACS judgement published on 29 October 2018.

**Recommended -**

- (1) **That the actions taken in response to OFSTED inspection findings be noted.**
- (2) **That the draft Statement of Action to be tabled at the meeting be considered.**

(Children's Services Overview & Scrutiny Committee)

(David Walmsley – 01274 431241)

**15. MINUTES OF THE WEST YORKSHIRE COMBINED AUTHORITY 183 - 194**

To receive the minutes of the meeting of the West Yorkshire Combined Authority held on 11 October 2018 (to be added)



## Report of the Director of Finance to the meeting of the Executive to be held on 8 January 2019

---

**Subject:**

**AF**

**CALCULATION OF BRADFORD'S COUNCIL TAX BASE AND BUSINESS RATES BASE FOR 2019-20**

### **Summary statement:**

This report estimates the Council's Council Tax and Business Rates bases for 2019-20. These bases in turn determine the amount of taxation raised in 2019-20.

Section A of this report estimates the Council Tax Base. This involves considering: total dwellings in the district; exemptions, discounts and the Council Tax Reduction Scheme among others items.

Section B estimates the Business Rates base, starting with the total rateable value of property used by businesses in the district.

Section C summarises the implications of the tax bases for the 2019-20 revenue budget.

---

Andrew Crookham  
Director of Finance

**Portfolio:**

**Corporate Services**

Report Contact: Martin Stubbs, Assistant  
Director, Corporate Services  
Phone: (01274) 432056  
E-mail: [Martin.Stubbs@bradford.gov.uk](mailto:Martin.Stubbs@bradford.gov.uk)

**Overview & Scrutiny Area:**

**Corporate Services**

## **1. SUMMARY**

- 1.1 This report calculates the Council Tax and Business Rates bases for 2019-20.
- 1.2 Council Tax and Business Rates are the largest funding streams that make up the authority's Net Expenditure Requirement.
- 1.3 Net Expenditure Requirement comprises the general Government funding which supports the authority's running costs for day to day expenditure.

## **SECTION A – CALCULATION OF THE COUNCIL TAX BASE**

### **2. LEGISLATIVE REQUIREMENTS**

- 2.1 Every billing authority is required to estimate its Council Tax Base in accordance with the Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012. These require that the Tax Base is set between 1 December and 31 January and also that the Fire and Police Preceptors are notified of the result by 31 January.
- 2.2 The Regulations prescribe how the Council Tax Base is calculated. Also the final result has to be expressed as a standardised measure of the average number of dwellings – Band D equivalents. It is on this measure that the Council Tax rate is then levied.
- 2.3 As a standardised measure, the Tax Base expressed in terms of Band D equivalents allows comparisons between authorities. The actual rate of Council Tax which is levied on the Base, will be set at Full Council on Thursday 21 February 2019.

### **3 CALCULATION OF THE COUNCIL TAX BASE BY REGULATIONS**

- 3.1 The calculation of the Council Tax Base for 2019-2020 is set out in Appendix A.
- 3.2 The Regulations start with the current total number of dwelling in the district. Line 1 of Appendix A shows this number was 217,399.
- 3.3 Of this number, 3,371 are exempt from paying any Council Tax, so are removed from the Council Tax Base altogether. In most cases, the dwellings are exempt because either they are occupied by students or persons with disabilities or both owned by charities and vacant for 6 months (see Appendix A, Line 2).
- 3.4 The Council Tax Base is then adjusted for Single Persons Discounts. 73,486 dwellings receive this discount because they are occupied by only one individual. There are another 1,619 properties that receive a similar rate of discount but for other reasons.
- 3.5 The Tax Base is adjusted by being reduced in proportion to the discount for those dwellings entitled to them. For example, for the 73,486 dwellings entitled to a 25% discount, the tax base is reduced by 18,371 (73,486 x 25%).
- 3.6 While the Tax Base is reduced for discounts, it is increased for premiums payable, such as the empty homes premium. This particular premium is applied to dwellings that have been empty for more than 2 years. In previous years, the owner paid a

50% premium. There are 1,408 such dwellings on which this premium is chargeable. Following the decision of the Council's Executive on 4 December 2018, this premium will be increased to 100% in 2019-20.

- 3.7 However, the net overall impact of all these adjustments on the tax base is to reduce the number of dwellings. After adjusting for exemptions, discounts and premiums, the Tax Base is now reduced to 195,758 equivalent dwellings (Appendix A, line 6).
- 3.8 Another part of the Council Tax is that dwellings of different value are charged different rates of Council Tax. By statute, this value is assessed by placing all dwellings into bands from A to H. Such dwelling valuations are as at 1 April 1991, with the price of properties built after this date backdated to the same point in time.
- 3.9 Dwellings are charged Council Tax according to their position within the banding hierarchy. The Council Tax charge is in proportion to fixed ratios against Band D, as illustrated in the table below:

<b>Band</b>	<b>Property Value at 1 April 1991</b>	<b>Ratio to Band D</b>
A*		
A	Up to 40,000	6/9ths
B	40,000 – 52,000	7/9ths
C	52,001 – 68,000	8/9ths
D	68,001 – 88,000	9/9ths
E	88,001 – 120,000	11/9ths
F	120,001 – 160,000	13/9ths
G	160,001 – 320,000	15/9ths
H	Over 320,000	18/9ths

*(Band A\* are properties in Band A entitled to disabled relief reduction)*

- 3.10 Adjusting for these different proportions of Council Tax allows the Tax Base to be expressed in terms of Band D equivalents. Expressed in this way, Bradford's Tax Base Band D is reduced because its largest number of dwellings are in Band A - charged only 6/9ths of the Band D Council Tax. The 195,758 equivalent dwellings, expressed as Band D equivalents reduces to 163,446 (see Appendix A Line 7).

#### **4 ESTIMATION OF THE COUNCIL TAX BASE PROJECTED**

- 4.1 Because the Regulations take the actual Band D Equivalents at a point in time in September and October, these actual numbers then need to be extrapolated using reasonable assumptions, to estimate the 2019-20 Tax Base.
- 4.2 These assumptions are:
  - 4.2.1 The Council Tax Reduction (CTR) scheme reduces chargeable Council Tax, based on criteria linked to ability to pay. The impact of the scheme on the 2019-20 Tax Base is estimated to be a reduction in Band D Equivalents of 18,565. Considerations around this are: the continuation of the CTR scheme introduced in 2018-19; the increase in the age to access a state pension and therefore qualify as a pensioner in the CTR scheme, and future economic activity in the district (Appendix A Line 8).

- 4.2.2 The future growth in dwellings, net of exemptions and discounts. The annualised effect in 2019-20 of the increase in dwellings is expected to be 700 Band D equivalents (Appendix A Line 9).
- 4.2.3 An increase for an extension of the Empty Homes Premium, highlighted at 3.6 above. In implementing this revised scheme, it is estimated that Bradford's tax base will increase by 440 Band D Equivalents.
- 4.2.4 Retrospective changes to banding and discounts on which chargeable Council Tax is based. Because these are backdated across multiple years, this increases the cost in the year of pay out. As a result, the Tax Base has been reduced by 400 Band D equivalents.
- 4.2.5 To account for chargeable Council Tax that is not collected. Based on current experience, this has been set at 2.3% of chargeable Council Tax, a reduction in Band D equivalents of 3,421.
- 4.3 With these adjustments the 2019-20 final Council Tax base is 142,200 Band D equivalents. This is 1,102 higher than the Medium Term Financial Strategy (Executive 10 July 2018, Medium Term Financial Strategy 2019/20 to 2021/22 and beyond) and 526 higher than the assumptions in the Budget Consultation (Executive 4 December 2018, Proposed Financial Plan updated 2019/20 to 2020/21).
- 4.4 The main reason for this are lower than projected CTR, a reduced amount of bad debt provision and the extension of the Empty Homes premium. The lower levels of CTR seen this year are likely to continue in 2019. Collection of Council Tax relating to earlier years has been beyond projections, meaning less provision is required this year.
- 4.5 The impact of Brexit is uncertain so no specific adjustments have been. However, as this could impact on house building, this will be monitored.
- 4.6 The Council also sets individual Tax Bases for its Parishes. These are calculated in the same way as for the Council as a whole and are set out in Appendix B. Appendix B also sets out the grant that the Council will pay over to Parishes in 2019-20. This grant was originally identified by the Government as a discrete element within the Council's Revenue Support Grant to compensate Parishes for the reduction in their tax bases due to CTR. However, the Council is currently consulting on stopping this grant in 2020-21.

## **5. 2018-19 ANTICIPATED COUNCIL TAX DEFICIT**

- 5.1 All income received in year from Council Tax is held in a separate ring-fenced account. From this same account is paid out the Council's and other preceptors' budgeted distributions of Council Tax. Any variance between the budgeted Council Tax and actual Council Tax, is held in this ring-fenced account as a surplus or deficit. Therefore the Council's budgeted Council Tax for 2019-20 will include an adjustment for the 2018-19 carried forward anticipated surplus or deficit.
- 5.2 Bradford's share of the 2017-18 deficit was £0.575m and if there was no variance in

2018-19, this would carry forward as a budget pressure when setting the 2019-20 Council Tax Base. The assumption in the Medium Term Financial Strategy was that this cost pressure would be neutralised by the use of earmarked reserves.

- 5.3 However, the current projection for 2018-19 is that there will be a surplus which almost clears the brought forward 2017-18 deficit, leaving Bradford's share of the deficit at just £0.033m.
- 5.4 The reasons for the 2018-19 surplus include the lower than expected cost of CTR and, a related saving against the bad debt provision.
- 5.5 Therefore, of the £0.575m set aside in earmarked reserves, only £0.033m need be applied to fund the 2017-18 deficit, leaving £0.542m remaining in the earmarked reserves. It is proposed this reserve is retained to provide a buffer against adverse variations between budgeted Council Tax and actual collections in future years.
- 5.6 The Preceptors' share of the 2017-18 deficit is just £0.00403m in the case of the Police and Crime Commissioner and £0.00155m for the West Yorkshire Fire and Rescue Service.

## **SECTION B – ESTIMATION OF THE BUSINESS RATES BASE**

### **6 BUSINESS RATES REPORTING REQUIREMENTS**

- 6.1 The purpose of Section B is to estimate the 2019-20 Business Rates Base. However this is subject to change, the final figure will be reported when the 2019-20 budget is set on 21 February 2019 at Full Council.
- 6.2 Unlike the Council Tax Base, there is no statutory requirement for the Business Rates Base to be set by Council committee. The only requirement is that the approved estimate of Business Rates income has to be notified to the Secretary of State and the West Yorkshire Fire and Rescue Authority (WYFA) by 31 January 2019.
- 6.3 As a result, there could be further changes to the estimate of Business Rates income, following this report, should either the underlying data or information from the Government change.
- 6.4 Section B also provisionally estimates the amount of some Government grants related to Business Rates and considers the Council's successful application to join another Business Rate pilot.

### **7 THE COUNCIL'S 2019-20 BUSINESS RATES BASE**

- 7.1 During 2018-19, Bradford has been part of a Business Rates Pilot with the other West Yorkshire authorities, City of York Council and Harrogate Borough Council. The main premise of the pilot is that 99% of Business Rates is retained as opposed to 49% in the standard scheme, however it is important to note that the increase in rates is offset by a corresponding reduction in the amount of Revenue Support Grant received. Therefore, the "gain in resources" locally is through the share of any growth increasing from 49% to 99%.
- 7.2 For 2019-20, Bradford successfully applied to join another pilot also in a Pool, though the terms and composition will be different compared to the current pilot. The main difference in terms is Bradford would retain a 74% share of Business Rates. The composition of Pool members with Bradford will be: Calderdale, Kirklees, Leeds, Wakefield, York, Craven, Hambleton, Harrogate, Richmondshire, Ryedale, Scarborough and Selby.
- 7.3 Unlike the 2018-19 pilot, the terms for the new pilot mean that the Government will no longer indemnify Councils in the pilot against being worse off as a result.
- 7.4 Because of the loss of this indemnity and a greater number and variety of Councils in the 2019-20 Pool, Bradford will be taking on more risk. This increase in risk brings with it the expectation of a financial gain – specifically, that Bradford and the Pool would gain from an increased share of Business Rate growth. For example, Bradford could expect a contribution back from the Pool of around £1.8m.
- 7.5 However, as noted this likely gain carries with it some risk. An unexpected loss in Business Rates income by any of the Pool members would be shared.

- 8.1 The Business Rates base is notified to the Secretary of State by 31 January 2019 on an official return. On this return (NDR1), the starting point for this calculation is the rateable value of all non-domestic property in the Bradford district at 31 December 2018. The latest available estimate of this rateable value is £391.3m, with shops, banks and post offices making the largest contribution to this amount.
- 8.2 A multiplier of £0.491 will be set for 2019-20 which is applied against the rateable value of £391.3m. This means that forecast gross rates payable will be £192.2m.
- 8.3 Based on latest trends, no net growth has been added to the forecast gross rates in 2019-20. It has been assumed that any growth during 2019-20 will be offset by other compensatory reductions in rateable value. This is roughly in line with past experience.
- 8.4 The forecast rateable value is reduced by a variety of discounts given to Business Rate Payers. These discounts are known officially as reliefs. Overall forecast gross rates payable are reduced by reliefs of £51.8m, leaving net rates payable of £140.3m.
- 8.5 Some reliefs are additional discounts awarded by the Government to businesses outside of the current funding model for Local Government. This means that Bradford would incur a loss for these additional discounts in proportion to its share of Business Rates. The compensating mechanism for this is for the Government to provide grants to Local Authorities - called Section 31 grants. The overall effect on these grants on the Council's Business Rate income, whether or not the pilot application is approved, will also be considered.
- 8.6 For example, the Government granted significant additional discounts for 2019-20 to retail businesses. The resulting reduction in net rates payable within the Bradford district has been estimated at £4.1m and Bradford will be exactly compensated for its share of this. This does mean that both Business Rate collection and Section 31 grants need to be considered together to enable comparability across years.
- 8.7 No specific adjustments have been made in relation to Brexit due to uncertainty. However, because any downturn in the economy could reduce rateable values in the future and this will be kept under review.
- 8.8 The resulting net rates payable of £140.3m is further reduced by provisions for unpaid debts and appeals against rateable values. The provision for unpaid debts, based on historical experience has been set at 1.75%, which is £2.5m. A further provision of 4.7% of net rates has been set for appeals made against the rateable values most recently listed in 2017 by the Valuation Office Agency. This percentage equates to £6.6m and is a small reduction compared to amounts set aside in previous years. No specific amount has been provided for a current legal challenge by NHS Foundation hospitals against their rateable values, but this will be kept under review.
- 8.9 There is a further deduction of £0.7m to fund the cost of collection, which covers the whole process around raising bills, reviewing rateable values and following up unpaid debt. This amount is taken out of the ring fenced account into which all Business Rates income is initially paid into. It is then transferred into Bradford's General Fund account, used to fund all day to operations, including the Business Rate collection service in Revenues and Benefits.

8.10 Following the deduction of reliefs, amounts set aside for provisions and the cost of collection, a net rates payable of £130.5m is budgeted for 2019-20.

## **9 BRADFORD'S SHARE OF THE 2019-20 BUSINESS RATES COLLECTION**

9.1 Following the successful Business Rate Pool application, Bradford's share of the net rates payable (£130.5m) is 74% or £96.6m. However, as noted, Government grants are reduced as Bradford's share of Business Rates increases. Also, now that the Pool is agreed, there will be contributions to the Pool and payments from the Pool to take into account, but a net gain overall.

9.2 As well as the above calculations, budgeted net rates for 2019-20 are adjusted for any surplus or deficit from the previous financial year. This surplus or deficit is calculated as the variance between budgeted and expected actual Business Rates in 2018-19.

9.3 The actual Business Rate shares given to Bradford, WYFA and the Government are based on budgeted Business Rates - to provide certainty for the funding of Council services. This means any surplus or deficit between the budgeted shares paid out and the actual Business Rates collected are held in a separate ring fenced account and carried forward into the following financial year.

9.4 A further complexity is that the 2019-20 Business Rates Base has to be set in January, prior to the end of the 2018-19 financial year. Therefore, the calculation of the 2019-20 Business Rates, uses anticipated actual Business Rates collection for 2018-19 as at January, as a proxy for the actual result at the end of the year. This means it is this proxy which is compared to the budget to identify a likely surplus or deficit to be incorporated in the calculation of the 2019-20 shares.

9.5 This calculation cannot include the variance between the January anticipated actual collection, which is used as a proxy and the final result. Therefore, this additional variance for any year is incorporated in the calculations of the distributed shares for the next financial year plus one.

9.6 It therefore follows that the calculation of the 2018-19 budget and the distributed shares previously excluded any variance between the anticipated Business Rates collection and final result for 2017-18; and that this variance now has to be incorporated in the calculations of shares for 2019-20. Significantly, the 2017-18 final result was £2.4m worse off at the end of the financial year than the anticipated collection, of which Bradford's 49% share creates a £1.2m pressure for 2019-20.

9.7 However, the anticipated actual Business Rates collection for 2018-2019 shows a £2.4m surplus compared to budget. Since in 2018-19, Bradford retains 99% of Business Rates, virtually all of this is included in the calculation of its 2019-20 share. Therefore less the previously mentioned £1.2m pressure from 2017-18, Bradford receives an overall benefit of £1.2m from the impact of variances in previous years (£2.4m less £1.2m).

9.8 The adjustments described above complete the calculation of the 2019-20 Business Rates budget and Bradford's share of it. However, the overall position needs to consider also the impact of any Section 31 grants and payments to and from the Pool.

9.9 This overall position is summarised in the table below. It shows that the funding position for 2019-20, including all the relevant elements is £183.7m, an improvement of £3.7 over the previously reported position.

	<b>December 04 Executive Budget consultati on</b>	<b>Revised 75% share 2019-20</b>	<b>Increase/- decrease</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
Carry forward 2017-18	-1.2	-1.2	0
Carry forward 2018-19	2.4	2.4	0
2019-20 net rates payable	64.9	96.6	31.7
<i>Localised Business Rates</i>	<i>66.1</i>	<i>97.8</i>	<i>31.7</i>
Top Up Grant	68.1	67	1.1
Revenue Support Grant	34.1	0	-34.1
<b>Total impact on Net Expenditure Requirement</b>	<b>168.3</b>	<b>164.8</b>	<b>-3.5</b>
Section 31 Grants	11.7	19.8	8.1
Payment to the Pool	0	-2.7	-2.7
Payment from the Pool	0	1.8	1.8
<b>Overall Position</b>	<b>180</b>	<b>183.7</b>	<b>3.7</b>

## **SECTION C – 2019-20 REVENUE BUDGET**

### **10 NET BUDGET REQUIREMENT**

10.1.1 Bradford's Council Tax and Business Rates are both included in its Net Budget Requirement.

10.1.2 To estimate the Net Budget Requirement, an assumption has been made that Council Tax will be increased by 2.99% in line with the Medium Term Financial Strategy. Based on a Council Tax Base of 142,200 Band D Equivalents, per the calculations in Section A, this means an additional £0.7m compared to the Budget Consultation.

10.1.3 The joint impact of the revised Council Tax and Business Rates Base on the Net Budget Requirement is summarised in the table below:

	<b>December 04 Executive Budget Consultation</b>	<b>Revised 75% share 2019/20</b>	<b>Increase/- decrease</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>Net Budget Requirement</b>			
Council Tax	194.5	195.2	0.7
Localised Business Rates	66.1	97.8	31.7
Top Up Business Rate Grant	68.1	67	-1.1
Revenue Support Grant	34.1	0	-34.1
Use of Reserves	3.5	3.5	0
<i>Sub total Net Expenditure Requirement</i>	<b>366.3</b>	<b>363.5</b>	<b>-2.8</b>
<b>Outside of Net Budget Requirement</b>			
Section 31 Grants	11.7	19.8	8.1
Payment to the Pool	0	-2.7	-2.7
Payment from the Pool	0	1.8	1.8
Overall Financial Position	<b>378</b>	<b>382.4</b>	<b>4.4</b>
<b><u>Memorandum</u></b>			
<i>Council Tax Base</i>	<i>141,674</i>	<i>142,200</i>	<i>526</i>
<i>Medium Term Financial Strategy Band D Council Tax</i>	<i>£1,373</i>	<i>£1,373</i>	<i>0</i>

10.1.4 The table above estimates Council Tax as increasing by £0.7m from £194.5m, as reported in the Budget Consultation, to £195.2m. There is a further £3.7m improvement relating to the Business Rates Base, so the overall result is £4.4m additional funding compared to the Budget Consultation.

10.1.5 Further, earmarked reserves for Council Tax (£0.575m) and NDR (£0.735m) were expected to be required in 2019-20 to fund the rolled forward deficits from 2017-18. However, of these earmarked reserves, only £0.033m is now needed, as set out in Section A. It is now proposed these reserves are retained to support either future shortfalls in Council Tax and Business Rates collection or associated risks. Such risks include the impact on the economy around the withdrawal from the European Union, outcomes on a number of Business Rate appeals and any increases in risk from potentially joining a pilot in 2019-20.

## 11. LEGAL APPRAISAL

11.1 The legal issues have been considered in the body of this report.

## **12. OTHER IMPLICATIONS**

### **12.1 EQUALITY & DIVERSITY**

12.1 None

### **12.2 SUSTAINABILITY IMPLICATIONS**

12.2 None

### **12.3 GREENHOUSE GAS EMISSIONS IMPACTS**

12.2.1 None

### **12.4 COMMUNITY SAFETY IMPLICATIONS**

12.4.1 None

### **12.5 HUMAN RIGHTS ACT**

12.5.1 None

### **12.5 TRADE UNION**

12.6.1 None

### **12.6 WARD IMPLICATIONS**

12.7.1 None

### **12.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)**

12.8.1 None

### **12.9 IMPLICATIONS FOR CORPORATE PARENTING**

12.9.1 None

### **12.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

12.10.1 None

## **13. NOT FOR PUBLICATION DOCUMENTS**

13.1 None

## **14. RECOMMENDATIONS**

- 14.1 That the number of band D equivalent properties estimated by the Council as the Council Tax Base for 2019-20 for the whole of the Bradford Metropolitan District is 142,200 as set out in Appendix A of this report.
- 14.2 The Council Tax Base for 2019-20 for each Local Council is set out in Appendix B of this report.
- 14.3 In 2019-20, Bradford will provide a grant of £0.161m to Local Councils as compensation for the cost of Council Tax Reduction.
- 14.4 The amount provisionally estimated by the Council as the Business Rates income for 2019-20 as included on the Council's NDR1 return (Appendix B1) is £130.5m:
- 14.5 Of the total Business Rates income;-  
24% is paid to Central Government - £31.4m  
1% is paid to the West Yorkshire Fire Authority - £1.3m  
74% is retained by the Council - £97.8m

A further cost of collection allowance is paid to the Council of £0.7m.

- 14.6 That authority is delegated to the Section 151 in consultation with the Leader of the Council to make any necessary amendments to the calculation of the Business Rates estimate arising from the completion of the 2019-20 NDR1 form received from the Government and to include the amended figures in the 2019-20 Budget papers for Council.
- 14.7 That remaining unused amounts of the Council Tax and Business Rates earmarked reserves are held to smooth out taxation income for future years.

## **15.0 APPENDICES**

**Appendix A - 2019-20 Council Tax Base**

**Appendix B – Parish and Town Councils 2019-20 Council Tax base**

**Appendix C – Provisional NDR1 for 2019-20 (assuming 75% share)**

## Appendix A

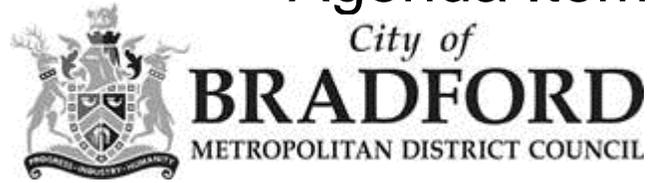
Dwellings on Valuation List	Band @	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H	Total
1. Total number of dwellings	156	91,788	45,928	39,455	17,876	12,454	5,839	3,633	270	217,399
2. Exempt properties	0	-2,079	-641	-375	-149	-70	-26	-27	-4	-3,371
3. Taxable properties	156	89,709	45,287	39,080	17,727	12,384	5,813	3,606	266	214,028
4. Discounts	-14	-10,235	-3,896	-2,810	-1,073	-566	-233	-147	-21	-18,995
5. Empty homes scheme	0	505	99	69	24	13	6	7	2	725
6. Estimated taxable properties after discounts and premiums	<b>142</b>	<b>79,979</b>	<b>41,490</b>	<b>36,339</b>	<b>16,678</b>	<b>11,831</b>	<b>5,586</b>	<b>3,466</b>	<b>247</b>	<b>195,758</b>
Ratio to band D	5/9	6/9	7/9	8/9	9/9	11/9	13/9	15/9	18/9	
Band D equivalent	<b>79</b>	<b>53,320</b>	<b>32,270</b>	<b>32,301</b>	<b>16,678</b>	<b>14,460</b>	<b>8,068</b>	<b>5,776</b>	<b>494</b>	<b>163,446</b>
8. Estimated impact of Council Tax Reduction Scheme	-26	-12,045	-3,437	-2,048	-621	-273	-79	-36	0	-18,565
9. Growth as band D	0	295	148	127	59	40	19	12	0	700
10. Empty homes premium change	0	186	93	80	36	25	12	7	1	440
11. Banding and backdated liability changes	0	-168	-84	-73	-33	-23	-11	-7	-1	-400
12. Adjustment for losses on collection and banding appeals	-1	-978	-681	-714	-378	-334	-188	-135	-12	-3,421
<b>13. 2019-20 Council Tax base (Band D equivalent)</b>	<b>52</b>	<b>40,610</b>	<b>28,309</b>	<b>29,673</b>	<b>15,741</b>	<b>13,895</b>	<b>7,821</b>	<b>5,617</b>	<b>482</b>	<b>142,200</b>

Appendix B  
**2019-20 Local Council Tax Bases**

	Starting Council Tax Base Band D Equivalents	CTR impact, Band D Equivalents	Net changes including growth in properties, & bad debt losses Band D Equivalents	Final 2019-20 Council Tax Base Band D Equivalents	Estimated Council Tax Reduction support grant for 2019-20 £
	(a)	(b)	(c)	(d)	
				(a+b+c)	
Addingham	1,842	-70	-34	1,738	4,405
Baildon	6,844	-437	-129	6,278	15,487
Bingley	9,353	-557	-169	8,627	10,263
Burley	3,146	-103	-60	2,983	7,368
Clayton	2,735	-282	-46	2,407	7,171
Cullingworth	1,327	-80	-26	1,221	2,203
Denholme	1,274	-118	-19	1,137	3,770
Harden	849	-16	-13	820	447
Haworth	2,475	-178	-30	2,267	5,322
Ilkley	7,429	-196	-138	7,095	8,806
Keighley	17,364	-2,120	-234	15,010	79,864
Menston	2,271	-46	-44	2,181	2,726
Oxenhope	1,081	-44	-21	1,016	1,326
Sandy Lane	951	-54	-15	882	1,078
Silsden	3,167	-167	-58	2,942	4,858
Steeton/Eastburn	1,819	-68	-34	1,717	2,273
Wilsden	1,863	-83	-35	1,745	2,749
Wrose	2,270	-142	-41	2,087	1,212

<b>Appendix C - Provisional NDR1 for 2019-20 assuming 75% share</b>		<b>2018-19 Budget</b>	<b>2018-19 Anticipated Outturn</b>	<b>2019-20 Budget@2.3%</b>	<b>4 Dec Budget Consultation (50% share)</b>
		£m	£m	£m	£m
<u>Collection Fund</u>					
Total Rateable Value (RV) of Properties on Valuation List	a	390.6	391.3	391.3	
Gross Rates Yield (Based on Total RV x Multiplier of 0.491 in 2019-20)	b	187.5	187.8	192.1	
Estimated Growth or Decline in Gross Rates	c				
Interest (payable)/receivable		0	0	0	
Forecast Gross Rates Payable	d	187.5	187.8	192.1	
Total Mandatory Relief	e	-37.6	-36.5	-38.8	
Total Unoccupied Property Relief	f	-8.7	-7.9	-8.1	
Total Discretionary Relief Not funded by Section 31 Grant	g	0.0	0.0	-4.3	
Total Discretionary Relief Funded by Section 31 Grant	h	-0.8	-0.7	-0.5	
Net Rates Payable	i	140.5	142.8	140.4	
Estimated Losses in Collection (Bad Debts)	j	-2.6	-2.5	-2.5	
Estimated Adjustments due to appeals	k	-8.5	-8.5	-6.6	
Forecast Collectable Rates	l	<b>129.4</b>	<b>131.8</b>	<b>131.3</b>	
Allowance for Cost of Collection	n	-0.7	-0.7	-0.8	
Amount retained in total	o	128.7	131.1	130.5	
Government	p	0.0	0.0	32.6	
Fire	q	1.3	1.3	1.3	
Bradford	r	127.4	129.8	96.6	
Anticipated 2017/18 Deficit from previous year	s	<b>-1.4</b>	<b>-3.8</b>	<b>0.0</b>	
Government share of anticipated deficit	t	-0.7	-1.9		
Fire share of anticipated deficit	u	0.0	0.0		
Bradford share of anticipated deficit	v	-0.7	-1.9		
Government 2018/19 anticipated actual (in yr+17/18 deficit)	w	-0.7	-1.9	-1.2	
Fire anticipated actual (in yr+17/18 deficit)	x	1.3	1.3	0.0	
Bradford anticipated actual (in yr+17/18 deficit)	y	126.7	127.9	1.2	
Government 2019/20	z			31.4	
Fire 2019/20	a2			1.3	
Bradford 2019/20	b3			97.8	66.1
<u>Business Rates Baseline within Net Expenditure</u>					
Top Up Grant		46.5	46.5	67.0	68.1
Revenue Support Grant		0.0	0.0	0.0	34.1
<u>Other income outside of net Budget requirement</u>					
Section 31		20.5	20.6	19.8	11.7
Section 31 Earmarked reserve application		-0.7			
Pool contribution (additional growth)				-2.7	
		193.0	195.0	181.9	179.9
From the Pool				1.8	
				183.7	





## Report of the Strategic Director of Place to the meeting of Council Executive to be held on 8 January 2018

---

**Subject:**

**AG**

**Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty.**

### **Summary statement:**

Following a Corporate Overview and Scrutiny Review in 2016, Councillors and officers have been working with partners to (a) harmonise all strategies and initiatives tasked with alleviating poverty in the district and (b) developing a partnership approach by creating the Anti-Poverty Co-ordination Group including partners from the social housing, health, voluntary and community and faith sectors.

This has developed a 'living document' which provides an overview of what partners and the council are currently doing and planning to do to alleviate poverty in the District.

Following discussion and a recommendation at the Corporate Overview and Scrutiny Committee of the 15 November 2018, the draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty is presented to Executive for their consideration and approval.

Views from Executive are also requested on how we engage with the community of interest on poverty.

---

Steve Hartley  
Strategic Director of Place

**Portfolio:**

Neighbourhood and Community Safety

Report Contact: Helen Johnston, Policy Officer  
Phone: (01274) 434401  
E-mail: [helen.johnston@bradford.gov.uk](mailto:helen.johnston@bradford.gov.uk)

**Overview & Scrutiny Area:**

Corporate

## 1. SUMMARY

Following endorsement of the recommendations of the Corporate Overview and Scrutiny Review in 2016, Councillors and officers have been working with partners to (a) harmonise strategies and initiatives tasked with alleviating poverty in the district and (b) developing a partnership approach by creating the Anti-Poverty Co-ordination Group including partners from the social housing, health, voluntary and community and faith sectors.

This has developed a 'living document' which provides an overview of what partners and the council are currently doing and planning to do to alleviate poverty in the district.

Following discussion and a recommendation at the Corporate Overview and Scrutiny Committee of the 15 November 2018, the draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty is presented to Executive for their consideration and approval.

Views from Executive are also requested on how we engage with the community of interest on poverty.

## 2. BACKGROUND

- 2.1 Given the nature of Council activity, much of what we do is focused on tackling poverty, whether this is through creating good jobs and inclusive growth through the economic strategy, improving the healthy quality of life through the health and wellbeing strategy or removing barriers to community cohesion through our stronger communities' strategy. Given the commitment of the Council, and our partners, to tackle poverty and its causes, it is important we present this activity together coherently.

### **Scrutiny Review**

- 2.2 A report on the Scrutiny Poverty Review was discussed at Corporate Overview and Scrutiny on 29 June 2016 and at Council Executive on the 19 July 2016.
- 2.3 This report made 22 recommendations and Scrutiny received reports on progress on 2 February 2017 and 21 February 2018 respectively. At these meetings, the Scrutiny Committee agreed that most recommendations have already been delivered.
- 2.4 Following scrutiny's initial review, there has been activity to oversee all existing work in the authority through one overarching approach whilst developing a multi-agency approach to tackle poverty in the district. This has included creating a Bradford District Anti-Poverty Co-ordination Group (APCG).
- 2.5 Corporate Overview and Scrutiny Committee received a further report on the 15 November 2018 that detailed the work of the APCG and presented the draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty for the Committee's comment and endorsement.

2.6 Corporate Overview and Scrutiny Committee resolved as follows:

- (1) That the final draft Bradford District Anti Poverty Co-ordination Group's Approach for Tackling Poverty 2018-2020 be accepted and endorsed.
- (2) That the draft Anti Poverty Strategy be presented to the Executive for approval taking into consideration the comments raised by this Committee.
- (3) That a progress report in relation to the work of the Bradford District Anti Poverty Co-ordination Group and progress against the delivery plan be presented to this Committee in 12 months time.

### **Working in Partnership – The Anti-Poverty Co-ordination Group (APCG)**

- 2.7 It is well understood that to have an impact on poverty in a place, it is critical that Councils take a multi-agency approach and work with partners across the district<sup>1</sup>. Therefore, following the initial scrutiny review, significant effort was made to convene a partnership approach to addressing poverty in Bradford District.
- 2.8 The Anti-Poverty Co-ordination Group (APCG) is attended by Council members and officers including the Neighbourhood & Community Safety Portfolio Holder, the Strategic Director for Place and the Member Anti-poverty Champion. The group also includes membership from statutory partners, the voluntary and community sector, including City of Sanctuary, and faith organisations. A full list of membership is available within the draft Anti-Poverty Strategy at Appendix 1.

### **Draft Anti-Poverty strategy**

- 2.9 The draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty has been developed with consideration to the Scrutiny Review recommendations and the concerns, interests and feedback of partners. The following activities have supported this process:
- Workshops and consultation with the multi-agency Bradford District Anti-Poverty Co-ordination Group (APCG)
  - A workshop with the Bradford District Voluntary and Community Services Assembly (through their Poverty and Universal Credit Summit in May 2018)
  - Wider consultation with elected representatives and representative groups across the district that included an invite to comment and three consultation three drop in sessions at Carlisle Business Centre, Keighley Civic Centre and Bradford City Hall. Appendix 3 provides a list of those consulted.
- 2.10 A number of positive comments were made from the wider consultation, with support expressly given for the plans in the strategy to:
- Work to more closely understand the experiences of those living in poverty in the district.

---

<sup>1</sup> The following JRF report highlights how partnership working is best practice for authorities  
<https://www.jrf.org.uk/report/addressing-poverty-through-local-governance>

- Consideration to be given to the use of social inclusion currency as a means of getting people involved in volunteering and other activities aimed at improving their wellbeing and opportunities, getting people socially connected within their communities and as a means of helping people, especially those with lower incomes, to take part in a range of normal social activities.

Other feedback included:

- Promote volunteering more as it supports wellbeing and can lead to employment opportunities
- Area Committees should receive regular reports about their own areas as elected members have much local knowledge and experience that would be useful in tackling poverty in their wards.
- Need to report data for specific communities of interest and those with other protected characteristics – as poverty impacts more in some communities than others
- A need to acknowledge and address the issue that being in poverty can pose a barrier to moving into work for practical reasons of presentation such as not having access to decent clothes/shoes, hairdressers./barbers etc.
- Acknowledgement of the huge anti-poverty agenda and the complexities involved in trying to address the agenda.
- A need to change the mind sets of those in poverty and decision-makers
- Concentrate efforts on areas that are most deprived
- Reflect Roma and Traveller needs in the strategy.
- That people living in poverty should be treated with dignity and respect
- Concern that some measures taken by Government that have had a positive impact on levels of poverty have not been acknowledged in the Approach
- That people should be encouraged, where ever possible, to help themselves
- Having a job is more important than having a 'well paid job'. Expectation cannot be that it is usual to join the job market at a 'higher level'.
- The Approach should not concentrate on lowering costs in Bradford – as costs here are quite low compared to other places.
- The absence of Welfare Advice providers from the Anti-Poverty Co-ordination Group
- Need for increased funding and support for Welfare Advice services
- Lack of information on the Bradford District Partnership pages about the Anti-Poverty Co-ordination Group

2.11 A total of 80 people and organisations gave their feedback through the Bradford VCS Assembly workshop with an additional eight providing detailed comments through the wider consultation exercise.

2.12 As far as possible comments and suggested amendments have been incorporated into the final draft document. However, it is recognised that following recent budget consolidations, there is a lower level of Council resources available to undertake some of this activity, including the consultation elements.

2.13 Comments received about specific services and groups through this consultation will be passed to the appropriate partnerships for consideration and response, such as to USDL group (Universal Services Delivered Locally).

- 2.14 The work also brings together a number of existing strategies and work carried out by the Council and its partners to address poverty in the district including, but not limited to, the economic strategy, the Education Opportunity Area, activity in relation to Financial Capability following the recent welfare reform changes, the Health and Wellbeing Strategy. The Council is continuing to work on embedding poverty in its partnership strategies and approaches, including the recently published Joint Health and Wellbeing Strategy; this strategy recognises the wider factors, including poverty, that influence our health and wellbeing, and has reducing inequalities at its core.
- 2.15 The Approach reflects a commitment by organisations across the district to work together to undertake additional collaborative work that will add to the wealth of anti-poverty work taking place across the district
- 2.16 Actions within the Approach will be delivered within existing resources or via funding identified and applied to from external bodies.

### **Consulting with those with a Lived Experience of Poverty**

- 2.17 The APCG is keen for those with a lived experience of poverty to inform the local agenda and be involved in co-producing interventions to address poverty. The Group is investigating options to support this, such as through a Poverty Truth Commission.
- 2.18 There is need to ensure children have a voice in this strategy. The Group is currently considering the use of existing mechanisms, such as Youth Ambassadors, to meet this need.
- 2.19 The final Approach draws, as previously, on the Joseph Rowntree 5 Point Plan for Solving Poverty, the Approach has five priorities as follows:
1. Boost income and reduce costs
  2. Deliver an effective benefits system
  3. Improve education standards and raise skills
  4. Strengthen families and communities
  5. Promote long-term economic growth benefitting everyone
- 2.20 Appendix 2 provides an overview of the draft Anti-poverty Strategy priorities and planned actions.

### **On going Challenge and Review of the Anti-poverty Strategy**

- 2.21 The strategy, **a live document**, will be reviewed regularly to ensure it continues to align with other Bradford District strategies and to allow for outcomes from engagement, and the involvement, of people with a lived experience of poverty and children to inform and support implementation of current actions and future plans.
- 2.22 The Anti-Poverty Co-ordination Group is also aware that from time to time Full Council receives motions that are aimed at alleviating poverty, such as the motion at its meeting of the 16 October concerning period poverty and, in particular, how this might negatively impact on the education of girls whose families are living in poverty.

- 2.23 Whilst it was resolved to instruct Council officers to undertake further work on this issue and report back, the APCG will also be keen to consider its role in ensuring that Council anti-poverty resolutions, such as this one, are implemented.
- 2.24 Whilst much action to address the recommendations within the Scrutiny Poverty Review has taken place across the district, there are additional actions within the strategy that aim to bring work together to improve outcomes for people such as the Anti-Poverty Co-ordination Group working together and through their own individual organisations and representative bodies to raise awareness around Universal Credit and entitlement to other welfare benefits, promoting membership of Credit Unions, trade unions etc.
- 2.25 A further action within the Approach is to involve people with a lived experience of poverty in developing local responses to it. One mechanism to support this engagement could be through a Poverty Truth Commission. Preparatory work around setting up such a Commission in Bradford has taken place throughout the summer months. In order to do this, there could be some future resource implications on the authority and partners that will need to be considered by the Executive.

Experience from other areas where Poverty Truth Commissions have operated shows that people with a lived experience of poverty have valuable insight into what would help and what does not. The Commissions are made up of local decision-makers, leaders and people. The Leeds Poverty Truth Commission reported back on the 2 February 2018 and launched its Humanifesto. –key points in this manifesto are:

- People experiencing poverty should be in the leadership of programmes to address it
  - People writing about poverty should take care to use language that is respectful to those experiencing it
  - Poverty creates isolation. People should reach to those experiencing poverty. This will help to build stronger and more resilient communities.
- 2.26 The Approach acknowledges that work is already undertaken across the district to reduce and mitigate the impacts of poverty and that this work will and should continue. Get Bradford Working, Better Start Bradford, improved education outcomes for pupils eligible for free school meals are some examples of work currently being undertaken that is having a positive impact. A round-up of other current work that is aimed at mitigating the impacts of poverty across the district is contained in the draft Anti-poverty Strategy in each of the five priority areas under the headings ‘What’s already happening here’.
- 2.27 This Approach, therefore, aims to:
- Reduce duplication in effort by maintaining a broad overview of strategy, plans and activity across the district
  - Influence and encourage strategic and delivery partnerships, groups and providers to develop and deliver their plans and actions to reflect the five anti-poverty priorities within this approach

- Concentrate effort where further collaborative partnership working would make an impact
  - Identify gaps or barriers to progress and consider how these can be filled or removed
  - Try out new approaches where gaps or barriers to progress have been identified
  - Collaborate with partners across West Yorkshire, the region, nationally, globally or virtually where this would support delivering on our priorities.
- 2.28 The Approach contains a set of actions along with a set of data that will evidence impact of activity at district and lower levels and over time. Appendix 4 provides an initial data report.
- 2.29 Once the principles and actions within the Anti-Poverty Strategy have been endorsed, the Anti-Poverty Co-ordination Group will firm up and publish its accompanying delivery plan.
- 2.30 The Approach has been endorsed by the Anti-Poverty Co-ordination Group which is now considering the implementation of each specific activity and additional data that can be used to evidence the impacts of implementation.
- 2.31 As this is a **live document**, additional activities will be added as need is identified and those actions implemented removed as issues are addressed.
- 2.32 The APCG will develop and deliver awareness and workshop sessions with partners, groups and others with a role in tackling poverty to support them to reflect the five priorities in this plan in their own plans and activities.
- 2.33 APCG will also collaborate with others to promote and provide partner and public awareness events across the district as need and capacity allows.
- 2.34 Whilst Corporate Overview and Scrutiny Committee of the 15 November 2018 endorsed the final draft Anti-poverty Strategy, the Committee expressed that they would expect the evidential data-set to be further developed and some more defined actions in the delivery plan when the Committee receives a further progress report in 12 months time.
- 2.35 The Member Anti-poverty Champion and an external partner representative to the APCG both iterated to the Committee that the Group provided an excellent base to conduct cross partner working and further collaboration along with opportunities for partners to network.
- 2.36 The final draft anti-poverty Strategy as endorsed by Corporate Overview and Scrutiny Committee is at Appendix 1 to this report.

### **3. OTHER CONSIDERATIONS**

- 3.1 Work to reduce and alleviate poverty across the district takes place through many organisations, private, public, community and voluntary services and faith

organisations. As resources available for local public services diminish further, organisations are focussing attention on our most vulnerable people and on areas where people face the most deprivation. This strategy augments what is already taking place across the district and is not intended to replace current activity.

- 3.2 The Anti-Poverty Co-ordination Group terms of reference are contained in the final draft Approach document and outline the remit and role of the Group. This is available at Appendix 1.
- 3.3 Implementation of the actions contained within the final draft strategy is within current resources across all the organisations that make up the partnership. The partnership will apply for external funding where additional resources are required to implement actions. Contained in Appendix 1 within the terms of reference is the list of organisations that are represented at the partnership.
- 3.4 Data reporting requirements will be met from within existing resource. Work continues to identify other existing data sets that could be used to evidence progress.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

Implementation of the actions within this strategy will either be from current district resources, which may involve re-aligning these resources, or through additional external funding.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

There are none arising from this report

#### **6. LEGAL APPRAISAL**

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

(1) A public authority must, in the exercise of its functions, have due regard to the need to —

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are—

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

6.2 Officers have prepared an equality impact assessment on the proposals to assist elected members in having regard to this duty a copy of which is attached as Appendix 5

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

7.1.1 The Poverty Scrutiny Review highlighted a number of equality and diversity related issues. Research has also highlighted similar issues, such as a link to poorer health, lower educational outcomes etc.

7.1.2 The Anti-Poverty Co-ordination Group will consider equality and diversity issues in relation to its work.

7.1.3 Key Performance Indicators will be used to evidence overall outcomes of anti-poverty work across the district as well as the impact on individuals, groups and communities with protected equality characteristics.

7.1.4 The Approach contributes to the following Equality Objectives:

- **Employment and skills** – promote inclusive growth through ensuring those most disadvantaged in the labour market are able to get the skills they need and access good jobs.

The final draft Approach contains actions around: promoting apprenticeships to those living in the most deprived neighbourhoods across the district and relooking at entry level jobs so that people can develop their numeracy and literacy whilst working instead of it being a pre-requisite to employment.

- **Equality monitoring** - our data better provides us with the right insight, evidence and intelligence to make well informed decisions that impact on our communities.

The Anti-Poverty Co-ordination Group will be considering data from several perspectives with the aim of evidencing that interventions taken across the district are supporting people who are experiencing poverty and those gaps between the most and least affluent citizens are not widening.

## 7.2 SUSTAINABILITY IMPLICATIONS

There are none arising from this report

## 7.3 GREENHOUSE GAS EMISSIONS IMPACTS

There are none arising from this report

## 7.4 COMMUNITY SAFETY IMPLICATIONS

There are none arising from this report

## 7.5 HUMAN RIGHTS ACT

There are none arising from this report

## 7.6 TRADE UNION

There are no trade union implications apart from a potential increase in membership of trades unions active in Bradford District linked to an action in the strategy.

## 7.7 WARD IMPLICATIONS

The Anti-Poverty Co-ordination Group intends to work directly with Council officers with a direct remit for developing and monitoring ward action plans.

## 7.8 IMPLICATIONS FOR CORPORATE PARENTING

The report does not have any implications for Corporate Parenting

## **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESSMENT**

There are no issues arising from the privacy impact assessment

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

In considering this report Executive may wish to:

- 9.1 Accept the final draft Anti-poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty and approve it.
- 9.2 Recommend changes to the final draft Anti-Poverty Strategy.
- 9.3 Both of the above options.

## **10. RECOMMENDATIONS**

That Executive:

- 10.1 Approve the draft Anti-Poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach to Tackling Poverty.

## **11. APPENDICES**

Appendix 1: Final draft Anti-Poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty.

Appendix 2: Anti-Poverty Strategy plan on a page.

Appendix 3: Those consulted.

Appendix 4: Initial data report.

Appendix 5: Equality Impact Assessment

## **12. BACKGROUND DOCUMENTS**

[Scrutiny Poverty Review report 2016](#)

[Corporate Overview and Scrutiny Committee 29 June 2016](#)

[Council Executive 19 July 2016](#)

[Corporate Overview and Scrutiny Committee 2 February 2017](#)

[Corporate Overview and Scrutiny Committee 21 February 2018](#)

[JRF 5 Point Plan for Solving Poverty](#)

[Leeds Poverty truth Commission Humanifesto](#)

[Corporate Overview and Scrutiny Committee 15 November 2018](#)

## Anti-Poverty Strategy

### Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty



## Contents

<b>Foreword</b> .....	<b>3</b>
<b>1. Executive Summary</b> .....	<b>4</b>
<b>2. Our Vision</b> .....	<b>5</b>
<b>3. What do we mean by poverty?</b> .....	<b>5</b>
<b>4. Poverty in Bradford District</b> .....	<b>6</b>
Tackling poverty in Bradford District.....	9
Delivering on our strategic approach for tackling poverty .....	10
<b>5. A strategic approach for Bradford</b> .....	<b>12</b>
<b>Priority 1: Boost incomes and reduce costs</b> .....	13
<b>Priority 2: Promote long-term economic growth, benefitting everyone</b> .....	16
<b>Priority 3: Deliver an effective benefits system</b> .....	18
<b>Priority 4: Improve education standards and raise skills</b> .....	20
<b>Priority 5: Strengthen families and communities</b> .....	22
<b>6. Data, performance and monitoring</b> .....	<b>24</b>
Appendix 1: Anti-Poverty Co-ordination Group Terms of Reference.....	27

## Foreword



Councillor Abdul Jabar

Bradford District and its local partners have agreed a vision to be a place where all our children have a great start in life, where businesses are supported to create good jobs and workers have the skills to succeed, a place where people live longer and have healthier lives and all our neighbourhoods are good places to live with decent homes for everyone.

Not all of Bradford's residents are sharing in these benefits. The significant levels of poverty which continue to exist in many parts of the district are preventing many residents from reaching their full potential. For young people in particular, growing up in poverty means they are almost four

times more likely to as adults live in poverty than their peers<sup>1</sup>.

Our multi-agency strategic approach sets out our commitment to tackling poverty and reducing inequality and the steps we and our partners will take over the next few years aimed at ensuring everyone in the district can live a decent and secure life.

In the context of the policy and financial challenges we face, it is essential that we co-ordinate what resources and community assets the district does have more effectively, to improve outcomes for as many people as possible – supporting people to contribute and benefit from all the opportunities that Bradford District offers.

Our strategy will be reviewed and refreshed regularly to be in line with other district policies, plans and strategies (such as the District Plan 2016-20) and to address changes as the UK leaves the European Union. We will also build in the outcomes from engagement with people with a lived experience of poverty to be incorporated into the approach.

I would like to take this opportunity to offer my thanks to all those involved in the development of this strategy. I look forward to working with you all to ensure its effective implementation through making the best use of resources to reduce the level and impact of poverty across Bradford District.

Cllr Abdul Jabar  
Portfolio Holder Neighbourhoods & Community Safety  
Chair of Anti-Poverty Coordination Group

---

<sup>1</sup> UK Government Child Poverty Strategy, 2014-17

# 1. Executive Summary

We have a small minority of our people who live in the most affluent areas in England, but nearly a third live in some of the most deprived areas. As a district, we are the fifth most income deprived area in the UK with just over a fifth of our children and older people living in households experiencing poverty. Living in poverty has negative impacts in other aspects of people's lives and is not just about money – it impacts educational attainment, access to good paying work, increases the risk of developing poor health conditions, reduces years of life in good health and reduces lifespans. It also means that many people are not able to take part in the normal life of a place as experienced by other residents.

This strategy has been developed through the Anti-Poverty Co-ordination Group, a district-wide partnership of representatives from the public, private, social housing, voluntary and community and faith sectors. Its aim is to add value to work already being undertaken across the district. The strategy recognises the breadth of work across the district to reduce and mitigate the impacts of poverty on our people, such as through the Get Bradford Working Programme, and seeks to add value to this through further collaborative work.

The five priority areas contained in the Joseph Rowntree Foundation's 'We Can Solve Poverty in the UK' provides the framework for this strategy. These are:

1. Boost incomes and reduce costs
2. Deliver an effective benefits system
3. Improve education standards and raise skills
4. Strengthen families and communities
5. Promote long term economic growth benefitting everyone

A separate delivery plan has been developed to support implementation of the actions in support these priorities. The Anti-Poverty monitor will be used to indicate if the sum total of interventions and actions taken across the district to reduce and mitigate poverty are having the required outcome. Progress on tackling poverty within the district will be regularly reported through the Health and Wellbeing Board, the Council's Corporate Overview and Scrutiny Committee and through Area Committees.

The strategy will be regularly reviewed to ensure continued alignment with other district policies and strategies and reflect the voices and involvement of people with a lived experience of poverty.

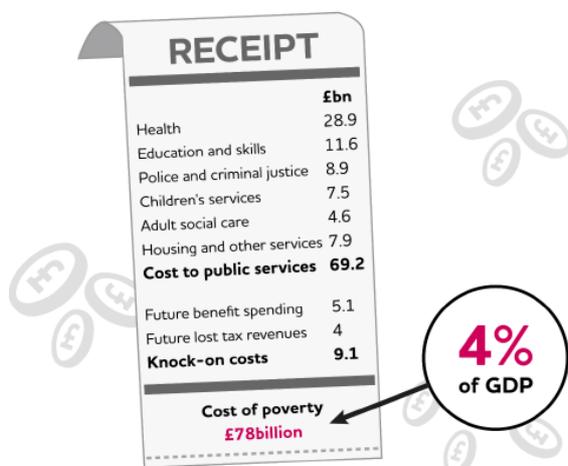
## 2. Our Vision

“By working together we aim to tackle the cycle of poverty and deprivation in the Bradford District. We aim to ensure everyone living or working in the district has the resources, opportunities and choices to live a decent and secure life.”

***Anti-Poverty Co-ordination Group***

## 3. What do we mean by poverty?

This strategy uses the same definition of poverty as used by the Joseph Rowntree Foundation (JRF). This is that poverty can be defined as when a person’s resources are well below their minimum needs, including the need to take part in society<sup>2</sup>. It means not being able to heat your home, pay your rent or buy the essentials for your children. It means waking up every day facing insecurity, uncertainty and impossible decisions about money. It means facing marginalisation – and even discrimination<sup>3</sup> – because of your financial circumstances. The constant stress it causes can overwhelm people, affecting them emotionally and depriving them of the chance to play a full part in society.



Poverty wastes people’s potential, depriving our society and economy of the skills and talents of those who have valuable contributions to make. The cost of poverty is now recognised as not only affecting individuals and families but also the whole economy<sup>4</sup>.

It has been estimated that poverty costs the UK economy £78bn per year and that one fifth of spend on public services contributes to addressing the effects of poverty on people’s lives<sup>5</sup>.

*Joseph Rowntree Foundation*

Research has demonstrated that people living in poverty are more likely to be affected by:

- under-achievement at school
- unemployment
- health problems (physical and mental), including a reduced life expectancy and reduced number of years in good health
- abuse of alcohol, drugs and other stimulants

<sup>2</sup> We Can Solve Poverty in the UK, Joseph Rowntree Foundation, 2016

<sup>3</sup> Is poverty in the UK a denial of people’s human rights?, Joseph Rowntree Foundation, 2008

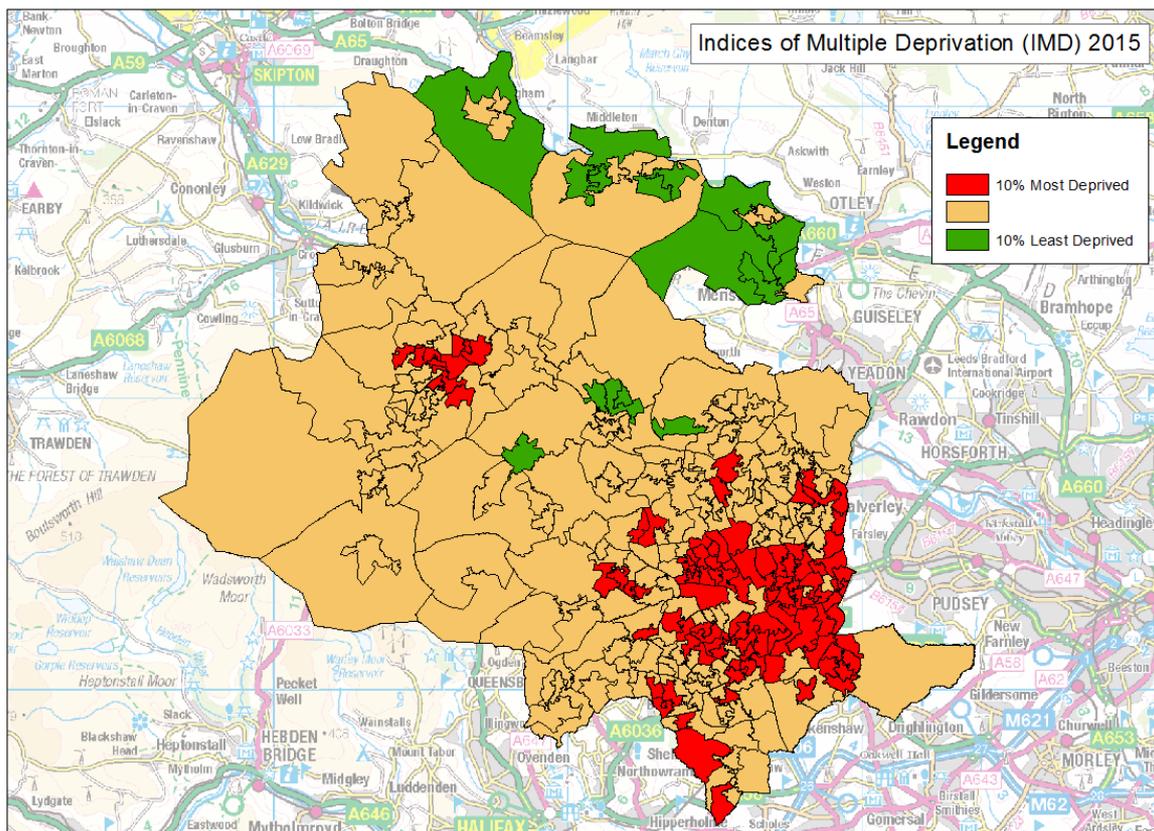
<sup>4</sup> UK Government Child Poverty Strategy, 2014-17

<sup>5</sup> Counting the Cost of Poverty in the UK, Joseph Rowntree Foundation, 2016



Bradford is a diverse district in many aspects including the relative affluence of its residents: a minority (6%) live in the most affluent areas compared to the rest of England, whereas just under a third (27% or about 150,000 people) live in the 10% most deprived areas in England.

This diversity means that the experience of people across the district is not uniform. Our district spans from: areas with poverty and a strong community and faith infrastructure equipped to help alleviate, at least, some aspects, to areas with poverty and a more limited community infrastructure, through to wealthy areas. Those living in poverty in wealthy areas can feel isolated within their geographic community. .

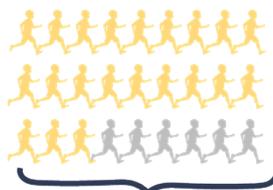


## Key Facts about Poverty in Bradford District

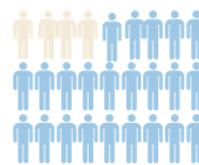
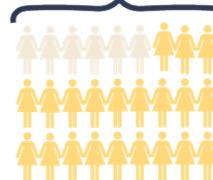
**5<sup>th</sup>** Most income deprived area in the UK

**853** Asylum seekers

**150-200** Refugees\*



23% of older people live in income deprived households



13.8% of working age people have no formal qualifications

The above data, with the exception of the asylum seeker information which is available via the link in the footnotes, is available from the District Dashboard which is updated regularly. The Dashboard also provides the source and definition for each data measure included and can be accessed via this link: <https://datamillnorth.org/products/bradford-district-dashboard/>

- 853 asylum seekers were accommodated in Bradford<sup>7</sup> at 7 September 2018 via the Home Office contract held by G4S. There are also many more appealing against the refusal of their applications for asylum, who are destitute with no recourse to public funds.
- \*150 people (mainly in families) are resettled as refugees in Bradford each year, with a rise for next year only up to 200, through the UNHCR's Gateway Protection Scheme<sup>8</sup>.
- In addition, whilst exact data is not available, there is also significant evidence of poverty experienced by Roma and Traveller families within the district<sup>9</sup> – with access to education, employment, health services and decent housing being negatively impacted<sup>10</sup>. Changes to national welfare policy have led to many EU/Roma families having no right to public funds<sup>10</sup>.

<sup>7</sup> G4S figures provided to the Bradford District Asylum Seekers and Recent Refugees Operational Group

<sup>8</sup> Information provided by Horton Housing

<sup>9</sup> EEA Briefing note: European Economic Area (EEA) Citizens / Central Eastern European Migrants, BMDC February 2017

<sup>10</sup> [Joint Strategic Needs Assessment 2014 -](#) Bradford District's Central and Eastern European Communities

## Tackling poverty in Bradford District

There is already significant action and work taking place across the district through a range of partnerships and agencies aimed at addressing poverty. This document recognises the Scrutiny Poverty Report recommendation for a comprehensive strategy that considers the multiple factors relating to poverty<sup>11</sup>. Outlined in this document are a number of key actions that need to be undertaken. These actions will be supported through a delivery plan and be monitored through key data as described in Section 6 of this document.

Following the Scrutiny Poverty Review, that was fully supported by all partners across the district (including the NHS, social housing landlords, the voluntary and community sector) a multi-agency Anti-Poverty Coordination Group (APCG) was formed to implement the recommendation made by the review with the aim to develop and implement a district-wide anti-poverty strategy. In recognition that poverty affects all aspects of people's lives and will only be addressed by all partners working together, this multi-disciplinary partnership includes representation from the public, private, faith, voluntary and community sectors.

### **BRADFORD DISTRICT ANTI POVERTY CO-ORDINATION GROUP**

Formed in recognition that poverty in the district can only be reduced and mitigated effectively by partners working collaboratively together, the Group is a direct response to the Poverty Scrutiny Review Recommendation 1.

Chaired by Cllr Abdul Jabar, the Council's Portfolio Holder Neighbourhoods and Community Safety, and overseen by the Member and Officer Anti-Poverty Champions, Cllr Cath Bacon and Department of Place Strategic Director Steve Hartley, membership includes representation from:

NHS Clinical Commissioning Groups  
Public Health  
Social Housing Providers  
City of Sanctuary  
Department of Work and Pensions  
Voluntary and Community Sector

#### **Some of the Group's activities to date:**

- Staged a national conference on large families, poverty and welfare reform in partnership with Liverpool University and the Children's Society
- Supported people, the statutory and voluntary and community sector to get prepared for the roll out of Universal Credit through road shows and workshops
- Identified some innovative approaches to explore – such as social inclusion currency
- Identified the need to meaningfully involve and support people to be involved who have a lived experience of poverty

---

<sup>11</sup> Bradford Poverty Scrutiny Review, Bradford Corporate Overview and Scrutiny Committee, 2016

The APCG does not seek to replace activity being currently undertaken, but aims to:

- Reduce duplication in effort by maintaining a broad overview of strategy, plans and activity across the district.
- Support existing strategic and delivery partnerships, groups and providers to reflect and deliver the five anti-poverty priorities within this approach in their strategies, plans and actions.
- Support people with a lived experience of poverty to be involved in developing local solutions and responses.
- Use data and research to determine the impact of interventions and to inform additional activity.
- Concentrate effort where further collaborative partnership working could have an impact.
- Identify gaps or barriers to progress and consider how these can be filled or removed.
- Explore/use new approaches where gaps or barriers to progress have been identified.
- Collaborate with partners across West Yorkshire, the region, nationally, globally or virtually where this would support delivering on our priorities.
- Understand how some government policy contributes and impacts poverty in Bradford District and consider further interventions to address these impacts.
- Determine how and when to undertake lobbying activity with the aim of reducing negative impacts of decisions taken outside of the district.

Appendix 1 provides the terms of reference for the Group.

## Delivering on our strategic approach for tackling poverty

The APCG will report to Health and Wellbeing Board, as the lead partnership in the district, and work collaboratively across its family of partnerships, organisations and agencies. The Group will also work with any other relevant bodies, organisations or agencies.

A range of local strategies, plans and programmes are currently delivering on aspects of the anti-poverty priorities described in this approach, these are:

- District Plan 2016-2020
- Happy, Healthy and at Home - A plan for the future of health and care in Bradford District and Craven 2017
- Joint Health and Wellbeing Strategy
- Economic Strategy for Bradford District 2018-30
- Get Bradford Working Programme
- Fuel Poverty: A Framework for Action for the Bradford District, 2015 and work programme 2016-2018
- Bradford Children, Young People and Families Plan 2017 – 2020
- Bradford Education Covenant
- Education Opportunity Area Programme

- Ward Plans
- Changing Places (Controlling Migration Fund)
- Stronger Communities Strategy

The APCG will actively work with those leading on developing and implementing these strategies, plans and programmes to ensure that the anti-poverty elements are joined up, complementary and reflect the priority areas within this strategic approach.

In consultation with lead officers and/or organisations responsible, the APCG will also consider how any additional externally funded programmes operating in Bradford could support delivery of the anti-poverty priorities described below in section 5: A Strategic approach for Bradford.

Whilst we want to ensure that overarching strategies and plans deliver our anti-poverty priorities we are also keen that the priorities or actions to deliver them are implemented on the ground where people live and work. To this end, the APCG are keen to work with partners with the aim of reflecting anti-poverty actions within ward plans across the district.

Organisations and people living and working in Bradford District can do much to affect positive change to support people who are experiencing poverty now, support people to get out of poverty (and in some instances to help themselves out of poverty) and to lessen the chance of people experiencing poverty in the future.

However, despite best endeavours locally, sometimes decisions that impact our people are taken elsewhere, for instance by central government or sub-regionally by West Yorkshire Combined Authority. For this reason the APCG will also seek opportunities to: respond to consultations, brief local MPs and other influential people locally and nationally and determine appropriate lobbying activity.

## 5. A strategic approach for Bradford

Poverty is seldom the result of a single factor. Through its research, the Joseph Rowntree Foundation (JRF)<sup>12</sup> has identified the five key causes of poverty in the UK today as being:

1. Unemployment, low wages and insecure jobs;
2. Lack of skills;
3. Family difficulties;
4. An inadequate benefits system;
5. High costs.

These result from an overlapping and shifting series of influences that include market opportunities, state support and individual decisions. Our strategy is guided by JRF's evidence based five point plan to solve poverty in the UK.

The five priorities within the JRF plan **that provide the framework for our strategic actions are:**



*Joseph Rowntree Foundation*

1. Boost incomes and reduce costs
2. Promote long term economic growth benefitting everyone
3. Deliver an effective benefits system
4. Improve education standards and raise skills
5. Strengthen families and communities

---

<sup>12</sup> We Can Solve Poverty in the UK, Joseph Rowntree Foundation, 2016

## Priority 1: Boost incomes and reduce costs

### *Why is this important*

The general consensus is that, for those who can, work represents the best route out of poverty.

But increasing the number of people in work does not necessarily decrease the number of people in poverty. Nationally, of the 14 million people who live in poverty in the UK, 8 million are in families where at least one person is in work<sup>13</sup>. Many people in work also rely on welfare benefits to make ends meet. A freeze on increases in benefits, a lack of increase in wages and higher costs mean that many are now struggling to cope on their income.

The government's introduction and subsequent increase of free childcare provision of up to 30 hours per week for working parents, has in particular increased mothers' capacity to work<sup>14</sup>. The increase in personal tax allowance to £11,850 means that people on lower incomes are paying less in direct taxation<sup>15</sup>. Despite these two measures, many people and families in our district continue to live in poverty<sup>16</sup>.

Work should offer a route out of poverty, but a combination of low wages, not enough hours, insecurity, the high cost of housing, poor health, discrimination and low-level skills all present considerable barriers<sup>17</sup>.

### *What will help?*

- Creating more jobs, offering a living wage, greater job security and opportunities for progression.
- Improving access to employment for those facing disadvantage in the labour market.
- Improving in-work progression for low paid workers.
- Skills, numeracy and literacy training.
- Raising and protecting family incomes to be able to afford essentials, reduce stress and give children and other family members the opportunity to participate socially and educationally in the communities around them.
- Giving access to high-quality, flexible and affordable childcare to parents on low incomes, allowing them to work and improving children's pre-school development.
- Reducing the cost of fuel.
- Greater independence and capability in managing money and access to affordable credit.

---

<sup>13</sup> UK Poverty 2017, JRF Analysis Unit, 2017

<sup>14</sup> More mothers with young children working full-time, Office for National Statistics, 2017

<sup>15</sup> Income Tax rates and allowances for current and past years, HM Revenues and Customs, 2018

<sup>16</sup> [Bradford District Dashboard](#)

<sup>17</sup> We Can Solve Poverty in the UK, JRF, 2016

## ***What's already happening here***

### **Jobs, training and progression**

- Implementing the Economic Strategy for Bradford District 2018–2030 with an aim to create more sustainable and well-paying jobs.
- Stronger Communities Strategy (Integration Pilot Programme) – developing interventions to remove barriers to work for those furthest from the job market.
- Partnership working between organisations and partners such as Incommunities and the DWP to deliver employment, job clubs and literacy and numeracy programmes in community settings.
- Partnership working between Skills House and RETAS (Refugee Education Training Advice Service) and others to assist those newly granted refugee status to access suitable employment.
- NHS Works force training and development.
- Industrial Centre for Excellence – personal social care training.
- Supporting partners and other large employers to continue to support their staff to remain and/or return to work if illness and/or other factors affect them.

### **Fuel poverty remedies** such as:

- Warm Homes Programme – providing first-time gas central heating systems to households at risk of fuel poverty.
- Strengthening the existing network of partner agencies involved in delivering affordable warmth and promoting benefits, schemes etc. to all residents.
- Promoting White Rose Energy to residents for the supply of fair and competitively priced energy where any profit is re-invested in initiatives to reduce fuel poverty and where prepayment tariffs are fairer than through other suppliers.
- Council has committed resource for a Programme Manager to oversee the District Plan decent homes priority.

### **Personal budgeting support**

- Partnership working between organisations, such as Bradford District Credit Union and community centres, to deliver events that help people to manage their money more effectively.
- Personal budgeting support in Job Centres.
- Access to welfare support.
- Making sure that families access all the support they are entitled to including welfare benefits, housing benefit, working tax credits (equivalent under UC) child benefit etc.
- Promoting take-up of free school meals.

### ***What needs to be done***

Consider different approaches to recovering statutory debt such as Council tax, rent arrears, utilities bills, court costs and fees and charges (Local Charter).

Develop a different way of recruiting to entry level jobs that delivers literacy and numeracy support on the job.

Encourage workplace representative groups to better publicise membership – as they offer a means for people to improve their working conditions and also to access a range of services, such as legal advice, and discounted services. Partner organisations to offer these groups space in their staff newsletters.

Investigate, with a view to developing and implementing, the use of social inclusion currency<sup>18</sup> in the district (this is a virtual earned through taking part in specified activities. It can be used to access discounts with local participating retailers and services).

Work with the Stronger Communities Programme (Integration pilot area) and other programmes to consider how barriers to employment experienced by those currently living in poverty might be overcome.

### ***Data measures across this priority area***

- Number of in work benefit claimants.
- Number of new jobs.
- Take up of free childcare places.
- Percentage of households in fuel poverty.
- Percentage of older people (60+) living in income deprived households.
- Percentage of people receiving low earnings
- Median rates of pay.

---

<sup>18</sup> Hull Coin, <http://www.hull-coin.org/> 2018

## Priority 2: Promote long-term economic growth, benefitting everyone

### *Why is this important*

Creating a more productive and inclusive economy is essential to addressing poverty in the long term. The district's Economic Strategy sets out an ambition to unlock Bradford's economic potential to create wealth and better jobs for the benefit of everyone in the district. The strategy aims to increase the value of our economy by £4billion, get 20,000 more people into work and improve the skills of 48,000 residents. Promoting inclusion and social mobility is central to the Economic Strategy and will help build a fairer and more cohesive district.

We recognise that, left alone, current labour and housing markets will not guarantee shared prosperity for all. Bringing down poverty levels requires a comprehensive long-term approach that includes investment in infrastructure; transport and housing along with ensuring people have the right skills to take up secure well paid work.

### *What will help*

- National, regional and local leaders setting a clear vision and co-ordinating efforts across sectors.
- Enabling 'Anchors' – the big employers and spenders across Bradford – using their purchasing power and networks to connect to local businesses and neighbourhoods, and big businesses and investors helping rebalance the economy, driving growth up in ways that drives poverty down.

### *What's already happening in Bradford*

- Economic Strategy for Bradford District 2018–2030 launched in March 2018.
- Supporting business growth through community led development, Invest in Bradford, collaborating on inward investment across Leeds City Region, SME (Small and medium-sized enterprises) hub supporting businesses with growth ambitions, scope of Business Covenant agreed.
- City centre business support including Growth Zone, Priority Streets.
- Discounted business rates.
- City Centre development – including the Odeon, Bradford markets, Broadway Phase 2 nearing completion.
- Business support through WYCA/ESIF (West Yorkshire Combined Authority/ European Structural and Investment Funds) funded programmes, Northern Max and Enterprise Europe Network.
- Core Strategy adopted – area action plans for the City Centre and Canal Road Corridor.
- Northern Powerhouse Rail (NPR) Bradford station on the map.
- Destination management plan to support tourism.
- Get Bradford Working and the ESIF STEP (Skills Training Employment Pathways) programmes supported over 3,000 disadvantaged people into sustained employment.
- Health and Wellbeing Strategy – focus on place and economics.
- A new collaboration between the HE, FE sector, our acute and community health trusts, GPs, the council and independent sector is developing routes into careers and progression pathways across the health and care economy.
- #teamBradford brand for all those in the district who share the objective to 'unlock the

full potential of our phenomenal asset base<sup>19</sup>

***What needs to be done***

Appropriate APCG members to consider how to support implementation of the Council's Social Value and Inclusive Growth Policy to ensure big local employers use their collective spending power to better connect jobs and opportunities to neighbourhoods and businesses that would benefit most.

Consider if additional support is required for the self employed who are claiming Universal Credit.

***Data measures across this priority area***

- Take up of apprenticeships by location and other equality characteristics.
- Number of jobs created locally.
- Percentage of in-work benefit claimants.
- Number of jobs for every working age person.
- Number of in-work benefit claimants.

---

<sup>19</sup> Kersten England: Collaborative leaders can cut through complexity - Local Government Chronicle, 18 October 2018  
<https://www.lgcplus.com/politics/workforce/kersten-england-collaborative-leaders-can-cut-through-complexity/7026241.article>

## Priority 3: Deliver an effective benefits system

### *Why is this important*

Good quality, stable work offers a way out of poverty. Where people cannot support themselves and their families through work the benefits system should be there to prevent them from falling into poverty. The way services are delivered makes a big difference to whether individuals are able to engage with them and get the support they need to move out of poverty.

### *What will help*

- Refocus employment support services to focus on delivering high employment, with jobs leading to higher earnings rather than simply moving people off benefits (actions covered in Priority 1 above).
- Enabling access to a range of statutory and voluntary support through single gateways in community settings.
- Ensuring the needs of vulnerable groups are met, such as refugees, asylum seekers and others who may be destitute.

### *What's already happening*

#### **Access to welfare support**

- Working with partners to ensure claimants can submit applications for Universal Credit including ensuring claimants have access to the internet and support to submit their applications on line and to maintain and provide evidence that they are meeting their claim conditions such as around job search etc. (Universal Support Delivered Locally programme).
- Ensuring those claiming Discretionary Housing Payments (DHPs) are aware of entitlement to other benefits and taking them up.
- Council tax reduction scheme for those on low incomes and/or claiming benefits.
- Continuing to support the main welfare advice delivery agencies to review and redevelop their service offer making it easier to access through a range of different media – integrating Council and welfare advice services.

#### **Sign posting to employment and skills training and other support**

- Encouraging families claiming DHPs to undertake skills and employment training.
- Working with West Yorkshire Combined Authority colleagues to develop 'poverty standards' to ensure all residents across West Yorkshire have access to a range of support wherever they live.
- Collaborative working with a range of providers including Job Centre Plus, offering initial sign-posting for vulnerable clients.
- Some co-location pilots are taking place, for instance welfare advice is offered at some food banks.

#### **Personal budgeting support**

- Budgeting support programmes being run by Incommunities and the Council.

### ***What needs to be done***

Raise the profile of financial capability, access to low-cost credit and highlight the dangers of loan sharks.

Consider measures needed to ensure all private rented sector residents are aware of and claiming benefits they are entitled to, including tax-free childcare.

Develop recommendations for action as informed by the recent mapping exercise undertaken about the needs and entitlements of refugees.

Seek information about Roma and Traveller communities on which to base future recommendations for action.

Lobby central government to increase the weekly allowance for asylum seekers and to allow them to work.

Work closely with the Stronger Communities Programme (integration area pilot) to develop and deliver awareness and information sessions for service providers about support available to help people access benefits including provision of ESOL.

Create/improve data sharing agreements with clarity of use of information across frontline agencies to ensure individuals can access appropriate support.

As is happening in the social rented sector, increase digital access and enablement to access benefits for those in the private rented sector.

Consider future joint lobbying activity and response to consultations about changes to the benefits system.

### ***Data measures across this priority area***

- Rate of benefit sanctions.
- Take up of skills and employment training of eligible adults in families claiming DHPs.
- Number of in-work claimants.
- Number of working families receiving Working Tax Credit and/or Child Tax Credit.

## Priority 4: Improve education standards and raise skills

### *Why is this important?*

Building human capital through education and training is vital not just to individuals, but to the economy as a whole. There has been a significant rise, both nationally and locally, in the number of working households in poverty over the last decade. Many low-paid workers are in insecure jobs where they are less likely to receive the training needed to progress on to higher earnings.

### *What will help*

- Ensuring that children have the same opportunities to succeed regardless of their family circumstances.
- Supporting people to gain the skills and capabilities to find a job and progress once in work.
- Identifying barriers to learning at all levels.
- Opportunities to volunteer which can present a route into paid work and employment opportunities.

### *What's already happening here:*

#### **Education**

- Bradford Education Covenant, working with local schools, parents and around 5,000 businesses to: help schools and teachers raise standards, support parents to get children ready for school, work and life, work with businesses and colleges to boost career options and champion the district's unique art and culture.
- Bradford Education Opportunity Area Programme (OA) – this is aimed at increasing social mobility for children from disadvantaged backgrounds by removing barriers to their education, supporting numeracy and literacy and helping parents to support their children's learning.
- Department of Work and Pensions schools advisors working with and in schools to provide employment advice to students.
- Promotion of early education and free childcare provision.
- Work placements, OA internships, National Takeover Challenge day.

#### **Training and skills**

- Health and Social Care Education, Employment and Skills Partnership established.
- Bradford Pathways Framework
- Bradford Apprenticeship and Employment Programme
- Carer's Resource Create Team provides carers with support around job search and finding training courses.
- Changing Places (Controlling Migration Fund Programme)
- Department of Work and Pensions employer engagement activity creating work experience opportunities and promoting disability confident.
- Incommunities is developing a 'partnership network' of local community centres from which training and job clubs can be delivered – along with numeracy and literacy classes.
- Council aims to have 500 apprentices by 2020.

#### **Volunteering**

- People Can – campaign supporting and encouraging volunteering
- Training of staff and volunteers in welfare advice settings in formal qualifications for interpretation and translation skills.

### ***What needs to be done***

Consider with Children's Services, and others, actions needed to 'poverty proof' the school day – for instance encouraging schools to provide used uniform and shoe swap shops, items of uniform to be available from high street supermarkets.

Consider data from Bradford Education Opportunity Area volunteer literacy and numeracy in schools mapping and plan appropriate actions.

Consider how to target the apprenticeship levy at the most vulnerable residents.

Consider with Education how community venues (including schools out-of-hours) could be used to run skill development sessions.

### ***Data measures across this priority area***

- Standard in reading, writing and mathematics at Key Stage 2.
- Percentage of out of work benefit claimants.
- Number of in work benefit claimants.
- Percentage of NEETs.
- Percentage of unauthorised pupil absence.
- Percentage of working-age people qualified to at least Level 3.
- Percentage of people with no qualifications.
- Take up of apprenticeships by location and other equality characteristics.
- Rate of attainment at Key Stages for those on Free School Meals compared to those not on free school meals.

## Priority 5: Strengthen families and communities

### *Why is this important*

Children who grow up in low-income households have poorer mental and physical health, and are more likely to leave school with lower educational attainment. For this reason this approach builds on the previous Bradford and District Child Poverty Strategy<sup>20</sup>.

Being socially connected within a neighbourhood or community (and cross community) can support good mental health and reduce the need for public sector and other organisations' interventions<sup>21</sup>. Being able to and confident to access local community or voluntary provision can help people to help themselves in familiar settings.

We need to make sure people in local areas have the powers, incentives and capacity to tackle poverty.

### *What will help*

- Parents supported to help support their children's early years educational development.
- Involving people with first-hand experience of poverty in shaping policies and approaches to prevent poverty and enable people to get out of poverty.
- Increasing financial and digital inclusion.
- People being able to access the right support first time.
- People being socially connected and able to take part in a range of social activities.
- People with a lived experience of poverty being involved in developing solutions.

### *What's already happening in Bradford*

#### **Supporting parents**

- Changing Places Programme (funded through the Controlling Migration Fund) – aims to reduce inappropriate use of services and link people from new communities into opportunities available across the district.
- Re-invigorating early help and access to children's social care through the Prevention and Early Help Programme.
- Stronger Communities Strategy (Integration Area Pilot) – promoting access to opportunities for all in education, work and play. Looking at provision of ESOL across the district and making sure provision is accessible to communities and individuals.
- Better Start Bradford a community partnership to help parents give their children the best start in life.
- Born in Bradford – a partnership programme that works to improve the health and life chances of children and young people particularly in the early years of life.

#### **Social connections and activities**

- A range of Voluntary and Community Sector services across the district providing opportunities for communities to come together, support their health and wellbeing, access services and support, develop and gain skills.
- People Can – Campaign to encourage and support people to volunteer, connect and do things together to improve their neighbourhoods.

---

<sup>20</sup> Bradford and District Child Poverty Strategy 2014-17, City of Bradford Metropolitan District Council Children's Services, 2014

<sup>21</sup>

### **Increasing digital inclusion**

- Credit Union – helping people without access to credit to build a personal credit rating and access responsible loans and financial capability/awareness sessions.
- Universal Support Delivered Locally multi-agency group (government programme funded by the Department of Work and Pensions), continues its work to identify action needed and put in place solutions to ensure people can apply on line for Universal Credit and other welfare benefits.

### **Accessing the basics**

- Access to food outside of term time and assessing the extent of food poverty within communities, holiday hunger work.
- Healthy Bradford Charter.
- Feeding Bradford Campaign
- Support to Food Poverty Networks
- Bradford Healthy Heat Programme provides heating measures to low income private sector households where a person with a chronic cold related condition is housed to ensure they are able to live in a warm home they can afford to heat properly.

### ***What needs to be done***

Involve people with first-hand experience of poverty in shaping policies and approaches to prevent poverty and enable people to get out of poverty – consider establishing a Poverty Truth Commission or other mechanism.

Facilitate community-led solutions to poverty through an asset-based approach within communities, recognising the strengths and skills already present (including those with a lived experience of poverty).

Work with social enterprises and voluntary and charity sector to find new and innovative solutions to address food poverty in the district.

Encourage initiatives to reduce the risk of social isolation

Identify groups with destitute members – current support available to them and unmet needs.

Consider how our multi-lingual people could be involved to support individuals in community settings to inform about interventions and gather views on proposed actions.

### ***Data measures across this priority area***

- Percentage of children living in poverty.
- Average life expectancy.
- Average life expectancy in good health in years.
- Percentage of people who agree that their local area is a place where people live together harmoniously.
- Percentage of people volunteering.

## 6. Data, performance and monitoring

An evidence review published by the Joseph Rowntree Foundation reported that anti-poverty strategies are more likely to succeed when they have<sup>22</sup>:

- Political commitment;
- Clear lines of accountability;
- Links to economic policy;
- Dedicated institutions or systems of governance;
- Co-ordination across government;
- External stakeholder involvement;
- An effective system of monitoring and review.

Delivery of this strategy will be overseen by the Anti-Poverty Coordination Group (APCG) which will report to the Health and Wellbeing Board. Progress reports for information will be provided to the Council's Corporate Overview and Scrutiny Committee and any other bodies/organisations or groups it feels appropriate in terms of their consideration and actions.

### Data

The following data will be used to consider if anti-poverty actions taken across the district and through this strategic approach have been effective. Where possible data will be reported at different levels, such as at district and ward level and will also be compared to national or regional returns. This will allow the APCG to drill down to identify where an intervention/action is or is not being effective and where additional effort may need to be targeted. This will also enable us to identify best practice so that this can be replicated across all our localities.

Priority and data measures	Data is available at these levels ●					
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics
<b>1. Boost incomes and reduce costs</b>						
• Number of in work benefit claimants			●	●		
• Number of new jobs (measure to be identified from Bradford Economic Strategy 2018-30)			●			
• Take up of free childcare places	●	●	●			
• Percentage of households in fuel poverty	●	●	●	●		
• Percentage of older people (60+) living in income deprived households			●			
• Percentage of people receiving low earnings			●			
• Median rates of pay	●		●			

<sup>22</sup> International and historical anti-poverty strategies: evidence and policy review, MacInnes, Bushee et al, New Policy Institute, 2014

Priority and data measures	Data is available at these levels ●					
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics
<b>2. Promote long-term economic growth, benefitting everyone</b>						
● Take up of apprenticeships by location and other equality characteristics ( <i>Measure to be identified</i> )						
● Number of new jobs created locally ( <i>measure to be identified from Bradford Economic Strategy 2018-30</i> )						
● Number of jobs for every working age person	●	●	●			
● Number of in work benefit claimants				●	●	
<b>3. Deliver an effective benefits system</b>						
● Rate of benefit sanctions	●	●	●			
● Take up of skills and employment training of eligible adults in families claiming DHPs. ( <i>developing PI</i> )			●	●	●	
● Number of in-work claimants			●	●	●	
● Number of working families receive Working Tax Credit and/or Child Tax Credit				●		
<b>4. Improve education standards and raise skills</b>						
● Standard in reading, writing and mathematics at Key Stage 2	●		●			
● Percentage of out of work benefit claimants	●	●	●			
● Percentage of in work benefit claimants – Universal Credit claimants	●	●	●			
● Percentage of NEETs and not known	●		●	●	●	
● Percentage of unauthorised pupil absence	●	●	●			
● Percentage of working-age people qualified to at least Level 3	●	●	●			
● Percentage of people with no qualifications	●	●	●	●		
● Take up of apprenticeships by location and other equality characteristics	●	●	●	●		
● Rate of attainment at Key Stages of those on free school meals compared to those who are not	●	●	●			
<b>5. Strengthen families and communities</b>						
● Percentage of children living in poverty	●	●	●			
● Average life expectancy in years	●	●	●	●	●	
● Average life expectancy in good health in years	●	●	●	●	●	
● Percentage of people who agree that their local area is a place where people live together harmoniously			●			
● Percentage of people volunteering ( <i>measure to be identified from People Can project</i> )			●			

Where required, data will be identified to evidence the impact of specific interventions, actions or projects undertaken through this strategy. These data measures are described in the delivery plan that accompanies this document.

The data will be monitored to determine movement is in the correct direction to evidence that interventions are reducing the impacts of poverty on people in Bradford. A traffic light system will be used where 'Red' indicates that interventions are not having the impact expected, 'Amber' where there is little change and 'Green' where interventions are having a positive impact. Please note levels of poverty will also be influenced by factors outside the district and the control or influence of the APCG or other organisations within the district.

Impacts of other strategies and plans will continue to be reported in line with the requirements of existing governance arrangements. The APCG will seek to hear from partnership groups and other bodies where their activity aimed at tackling poverty is not progressing as expected. APCG will consider how barriers can be removed or new approaches can be adopted and present these to the appropriate partnership, group or body for their consideration.

### Performance monitoring

Progress reports will be presented for consideration at each APCG meeting. These reports will describe action taken since the previous meeting, any impact and, where available, be supported by data.

Reports will be prepared and presented to the Health and Wellbeing Board. Reports will also be presented to the Council's Corporate Overview and Scrutiny Committee and the Council's Area Committees and any other partnerships and bodies the APCG considers appropriate.

Delivery of this strategy will be overseen by the Anti-Poverty Coordination Group (APCG) which will report to the. Progress reports for information will be provided to the Council's Corporate Overview and Scrutiny Committee and any other bodies/organisations or groups it feels appropriate in terms of their consideration and actions.

## Appendix 1: Anti-Poverty Co-ordination Group Terms of Reference

### 1. AIM AND OBJECTIVES

The Anti-Poverty Co-ordination Group (APCG) will provide policy direction and oversight to reduce poverty. The APCG will also ensure that this work is prioritised by partners both as individual organisations and through their work within the Strategic Delivery Partnerships, sub groups and networks.

The APCG will do this by:

- Reducing duplication in effort by maintaining a broad overview of strategy, plans and activity across the district.
- Supporting existing strategic and delivery partnerships, groups and providers to reflect and deliver the five anti-poverty priorities within this approach in their strategies, plans and actions.
- Supporting people with a lived experience of poverty to be involved in developing local solutions and responses.
- Using data and research to determine the impact of interventions and to inform additional activity.
- Concentrating effort where further collaborative partnership working could have an impact.
- Identifying gaps or barriers to progress and consider how these can be filled or removed.
- Exploring and using new approaches where gaps or barriers to progress have been identified.
- Collaborating with partners across West Yorkshire, the region, nationally, globally or virtually where this would support delivering on our priorities.
- Understanding how some government policy contributes and impacts poverty in Bradford District and considering further interventions to address these impacts.
- Determining how and when to undertake lobbying activity with the aim of reducing negative impacts of decisions taken outside of the district.

### 3. DELIVERY OUTCOMES:

The Anti-Poverty Co-ordination Group (APCG) will oversee the implementation of our shared interventions as outlined in the Bradford District Anti-Poverty Strategy and associated delivery plan.

### 4. REPORTING ARRANGEMENTS:

The Anti-Poverty Co-ordination Group (APCG) will provide reports to the Health and Wellbeing Board, the Council's Corporate Overview and Scrutiny and Area Committees on progress and developments.

### 5. MEMBERSHIP:

Membership of the Anti-Poverty Coordination Group (APCG) will consist of named representatives from district-wide public, community and voluntary, faith and business representative organisations or bodies.

Representatives are expected to be at a level where they are able to direct resources within their own organisations or have a strong influence on policy.

In order to ensure effective working, the membership of the Anti-Poverty Co-ordination Group (APCG) needs to be kept to a manageable number.

Consistency of representation is also vital, to enable the group to develop a shared understanding and commitment to the project.

**Members of the group are expected to:**

- Make policy and service delivery related decisions on behalf of their respective organisations.
- Provide leadership (champion / sponsor) and direction for thematic areas of work and key activities.
- Facilitate linking with partners who are working towards similar objectives and/or with similar client groups.
- Assess the feasibility of proposed interventions.
- Make resources available for priority areas of work.
- Share information and data about service provision and performance in relation to agreed objectives to reduce inequalities.

**Members will include representation from the following partners:**

- Council Executive member – Portfolio Holder for Neighbourhoods and Community Safety – Chair
- Council Member Champion
- Bradford Council – Senior Officer representative x4 (One of these to be the nominated officer champion)
- Voluntary and Community Sector: one representative to be appointed by the Bradford District Assembly
- Businesses / Employers representative
- Clinical Commissioning Group representative
- Department of Work and Pensions representative
- Housing representative (Social sector landlord representative)
- Faith Group representative
- Protected characteristics groups representative
- Welfare and advice organisations
- Migrant/refugee groups representative

**6. CHAIR**

The Anti-Poverty Co-ordination Group (APCG) Board will be chaired by the Portfolio Holder for Neighbourhoods and Community Safety

**7. FREQUENCY OF MEETINGS**

The group will meet on a quarterly basis. Additional meetings will be called at the Chair's discretion.

**8. SUPPORT**

The Anti -Poverty Co-ordination Group (APCG) will work closely with Strategic Delivery Partnerships and their sub groups to ensure delivery of key actions and to provide a platform for escalating issues for policy steer or the removal of barriers and blockages. The APCG will also when required commission the set up of specific task and finish groups. These groups will inform the work of the APCG and will provide regular updates and escalate issues when required.

Programme management support to the Anti-Poverty Co-ordination Group (APCG) will be provided by the Council's Office of the Chief Executive, with other support arrangements from partners when necessary.

**9. GOVERNANCE ARRANGEMENTS**

The group will provide reports for the Health and Wellbeing Board. It will also present reports to Council Overview and Scrutiny Committee, Area Committees for their comment.

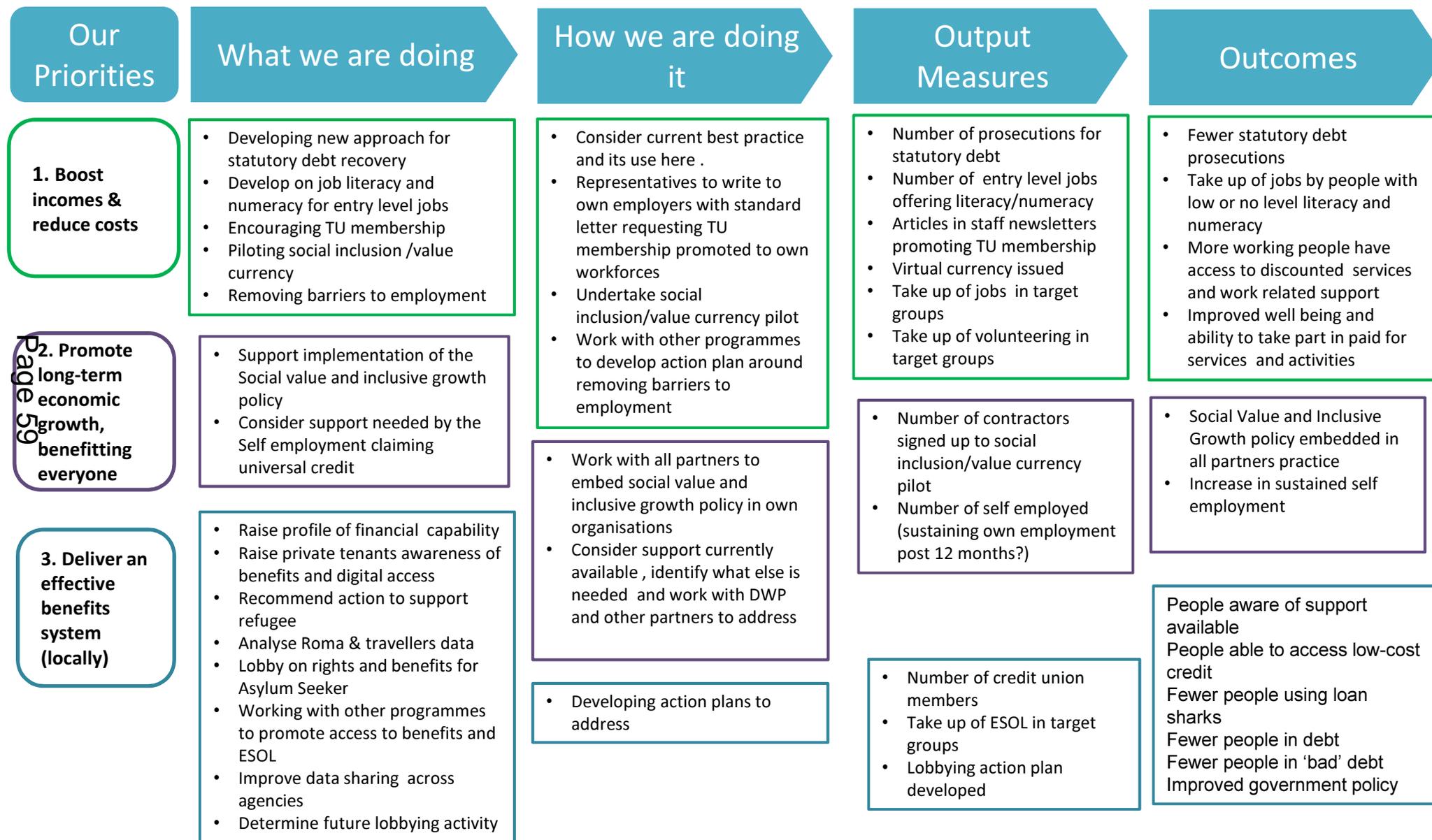
**Bradford District Anti-Poverty Co-ordination  
Group**

c/o Helen Johnston  
Office of the Chief Executive  
City of Bradford Metropolitan District Council  
3rd Floor, Margaret McMillan Tower  
Bradford BD1 1NN

Email: [helen.johnston@bradford.gov.uk](mailto:helen.johnston@bradford.gov.uk)

Telephone: 01274 434401

# Anti-Poverty Strategy: Bradford District's Approach to Tackling Poverty



# Anti-Poverty Strategy: Bradford District's Approach to Tackling Poverty



## Appendix 3: Those consulted about the draft Anti-poverty Co-ordination Group Approach to Tackling Poverty

Groups with representatives at the Anti-poverty Co-ordination Group
Community Action Bradford and District
Bradford and District VCS Assembly
Refugees support
Asylum Seekers support
Equalities Forum
Strategic Disability, Older People's, Autism and Learning Disabilities Partnerships*
Bradford District Armed Forces Covenant Partnership
Welfare and Debt advice providers
CLASP
Bradford District Credit Union
Other specific VSC groups – such as Food Banks, Homelessness providers
Central and Eastern European Working Group
Well Springs Together
Faith Forum
Children's Trust
Health and Well Being Board
Safer Communities
Stronger Communities Partnership
Economic Partnership
Housing Partnership
USDL
Food Poverty
Fuel poverty
Bradford Education Opportunity Area Programme
Stronger Communities Partnership
West Yorkshire Combined Authority – Inclusive Growth
Community led groups – such as Equality Together, Hope Rising
Older People's Forums*
Trades Union Councils
Student Unions
Council Leader
Portfolio Holder – Neighbourhoods and Community Safety Portfolio
Portfolio Holder – Regeneration, Planning and Transport
Portfolio Holder – Deputy Leader and Education, Employment and Skills
Portfolio Holder – Health and Wellbeing Portfolio
Portfolio Holder – Environment, Sport and Culture
Anti-poverty Champion

Elected Members
Five Constituency MPs
Bradford District Chamber of Trade
Bradford Chamber of Commerce
Manningham Housing
Incommunities
Horton Housing
Bradford VCS Assembly
Community Action Bradford and District
Welfare and Debt advice providers
CLASP
Other specific VSC groups – such as Food Banks, Homelessness providers
NHS – GPs
Health Watch

Appendix 4: Initial data report

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
<b>1. Boost incomes and reduce costs</b>							
<ul style="list-style-type: none"> <li>Number of in work benefit claimants (Universal credit claimants in work – August 2018)</li> </ul>	352,118	35,889	1,592	East – 368 South - 343 West - 414 Keighley – 271 Shipley - 194	Not available	Not available	Data for Universal Credit is available for in work claimants – other benefits don't distinguish between out of work, in work or pension age
<ul style="list-style-type: none"> <li>Number of new jobs (measure to be identified from Bradford Economic Strategy 2018-30)</li> </ul>							
<ul style="list-style-type: none"> <li>Take up of free childcare places</li> </ul>	89%	91%	78%				% of children in a 30 hrs place as a % of the eligibility
<ul style="list-style-type: none"> <li>Percentage of households in fuel poverty 2016</li> </ul>	11.1%	12.1%	14.3%	East – 17.6% South – 14.0% West – 17.9% Keighley – 12.2% Shipley – 9.9%	Not available	Not available	

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
<ul style="list-style-type: none"> <li>Percentage of older people (60+) living in income deprived households Indices of Deprivation 2015 – Income Deprivation Affecting Older People score</li> </ul>	No value	No value	22.7%				
<ul style="list-style-type: none"> <li>Percentage of people receiving low earnings Indices of Deprivation 2015 – Income Deprivation score</li> </ul>	No value	No value	20.5%				
<ul style="list-style-type: none"> <li>Median rates of pay Annual Survey of Earnings and Health full-time weekly gross pay – median</li> </ul>	£555.80	No value	£476.20				
<b>2: Promote long-term economic growth, benefitting everyone</b>							
<ul style="list-style-type: none"> <li>Take up of apprenticeships by location and other equality characteristics</li> </ul>							
<ul style="list-style-type: none"> <li>Number of jobs created locally (<i>measure to be identified from Bradford Economic Strategy 2018-30</i>)</li> </ul>							
<ul style="list-style-type: none"> <li>Number of jobs for every working age person (Jobs density 2016)</li> </ul>	0.85	0.8	0.7				Number of jobs/resident

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
							population 2016
<ul style="list-style-type: none"> <li>Number of in work benefit claimants</li> </ul>	352,118	35,889	1,592	East – 368 South - 343 West - 414 Keighley – 271 Shipley - 194	Not available	Not available	Data for Universal Credit is available for in work claimants – other benefits don’t distinguish between out of work, in work or pension age
<b>3: Deliver an effective benefits system</b>							
<ul style="list-style-type: none"> <li>Rate of benefit sanctions Universal Credit Sanction rate – Feb 2018.</li> </ul>	671,339	69,203	4,075				
<ul style="list-style-type: none"> <li>Take up of skills and employment training of eligible adults in families claiming DHPs.</li> </ul>			?	?	?		
<ul style="list-style-type: none"> <li>Number of in work benefit claimants (Universal credit claimants in work – August 2018)</li> </ul>	352,118	35,889	1,592	East – 368 South - 343 West - 414 Keighley – 271 Shipley - 194	Not available	Not available	Data for Universal Credit is available for in work claimants – other benefits don’t distinguish between out of work, in work or pension age

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
<ul style="list-style-type: none"> <li>Number of working families receiving Working Tax Credit and/or Child Tax Credit (data available is from 2016-17 (published 28 June 2018)).</li> </ul>			33,200 families in total with 56,000 children (10,800 families are single parent families with 17,400 children)				
<b>4: Improve education standards and raise skills</b>							
<ul style="list-style-type: none"> <li>Standard in reading, writing and mathematics at Key Stage 2 DfE performance tables 2016/17</li> </ul>	61% England		57% (Bradford)				
<ul style="list-style-type: none"> <li>Percentage of out of work benefit claimants Universal Credit claimants August 2018</li> </ul>	63%	62.6%	72.3%				
<ul style="list-style-type: none"> <li>Percentage of in work benefit claimants Universal Credit claimants August 2018</li> </ul>	37%	37.4%	27.6%				

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
<ul style="list-style-type: none"> <li>Percentage of NEETs NEET and Not Known Dec 2017-Feb 2018</li> </ul>	6%		6.5%				
<ul style="list-style-type: none"> <li>Percentage of unauthorised pupil absence 2018 Absence Tables - DfE</li> </ul>	4.7%	4.9%	5.0%				
<ul style="list-style-type: none"> <li>Percentage of working-age people qualified to at least Level 3 Annual Population Survey 2017/18</li> </ul>	57.1%	52.3%	46.6%	East – 36.7% South – 41.6% West – 37.5% Keighley – 49.5% Shipley – 64.4%			
<ul style="list-style-type: none"> <li>Percentage of people with no qualifications Annual Population Survey 2017/18</li> </ul>	7.6%	9.5%	13.1%	East – 15.2% South – 14.7% West – 17.9% Keighley – 13.3% Shipley – 5.5%			
<ul style="list-style-type: none"> <li>Take up of apprenticeships by location and other equality characteristics DfE – Apprenticeship stats 2016/17</li> </ul>	485,500	60,700	5,320	East – 1,150 South – 1,300 West – 860 Keighley – 1,140 Shipley - 880			

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
<ul style="list-style-type: none"> <li>Rate of attainment at Key Stages of those on free school meals compared to those who are not</li> <li>Average Attainment 8 scores 2016/2017</li> </ul>	FSM – 35.1%  No FSM – 50.7%	FSM – 33.5%  No FSM – 47.3%	FSM – 34.7%  No FSM – 44.2%				
<b>5: Strengthen families and communities</b>							
<ul style="list-style-type: none"> <li>Percentage of children living in poverty</li> </ul>	16.6%		21.8%	?	?		
<ul style="list-style-type: none"> <li>Average life expectancy in years (Department of Health life expectancy at birth)</li> </ul>							
2014-2016	Males – 79.5 Females – 83.1	Males – 78.7 Females – 82.4	Males – 77.5 Females – 81.5	?	?		
2015-2017	Males – 79.6 Females	Males 78.7 Females	Males – 77.7 Females 81.6				

Priority and data measures	Data is available at these levels •						Comments
	England	Region (Y&H)	District	Constituency	Ward	Communities of interest/protected characteristics	
	83.1	82.4					
<ul style="list-style-type: none"> <li>Average life expectancy in good health in years at birth (Department of Health – healthy life expectancy at birth)</li> </ul> <p>2014-2016</p> <p>2015-2017</p>	<p>Males – 63.3 Females – 63.9</p> <p>Males – 63.4 Females – 63.8</p>	<p>Males 61.3 Females – 61.5</p> <p>Male- 61.7 Females 61.5</p>	<p>Males – 61.8 Females – 61.1</p> <p>Male – 60.4 Females - 59</p>	☐	☐		
<ul style="list-style-type: none"> <li>Percentage of people who agree that their local area is a place where people live together harmoniously</li> </ul> <p>2015/16 BMDC survey</p>			62.6%				
<ul style="list-style-type: none"> <li>Percentage of people volunteering (To identify from People Can project)</li> </ul>			☐				

This page is intentionally left blank

## Equality Impact Assessment Form

Reference –

<b>Department</b>	Office of the Chief Executive	<b>Version no</b>	V0 00
<b>Assessed by</b>	Helen Johnston	<b>Date created</b>	14 December 2018
<b>Approved by</b>	Philip Witcherley	<b>Date approved</b>	14 December 2018
<b>Updated by</b>		<b>Date updated</b>	
<b>Final approval</b>		<b>Date signed off</b>	

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

## Section 1: What is being assessed?

### 1.1 Name of proposal to be assessed.

District Anti- Poverty Strategy: Bradford District Anti-Poverty Co-ordination Group's Approach for Tackling Poverty

### 1.2 Describe the proposal under assessment and what change it would result in if implemented.

The proposal aims to add value to work already taking place across the district through additional collaborative working across the district's partners. The changes sought through the strategy are aimed at reducing the negative impacts of poverty on people by:

- (1) Boosting incomes and reduce costs
- (2) Delivering an effective benefits system
- (3) Improving education standards and raise skills
- (4) Strengthening families and communities
- (5) Promoting long term economic growth benefitting everyone

## Section 2: What the impact of the proposal is likely to be

**2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.**

Yes

Actions within the strategy aim to alleviate or reduce the negative impacts that poverty can have on people for example the proposal includes action to increase access to apprenticeships for those living in the most deprived neighbourhoods – this will support people from those neighbourhoods to have opportunity to gain secure jobs in the future. The proposal also includes action to enable those on low incomes to take part in social activities alongside those who are not experiencing poverty – the intention is to de-stigmatise poverty and support people from different backgrounds meet in social settings.

**2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.**

Yes

All the actions proposed within this strategy are aimed at ensuring people and those in families with low income have access to and can benefit from education, training, skills and employment, that families and communities are supported and that people and families on low incomes can access social activities alongside others who are not on low incomes.

**2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.**

No

**2.4 Please indicate the level of negative impact on each of the protected characteristics?**

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	N
Disability	N
Gender reassignment	N
Race	N

Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N
Marriage and civil partnership	N
<b>Additional Consideration:</b>	
Low income/low wage	N

**2.5 How could the disproportionate negative impacts be mitigated or eliminated?**  
 (Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

N/A as the whole of the strategy is aimed at reducing the negative impacts of poverty (low income) on people.

### Section 3: Dependencies from other proposals

**3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.**

The Bradford District Anti-Poverty Co-ordination Group is made up of partners from across the district and includes representatives from the public, community and voluntary, faith and business sectors and has developed the strategy.

The Group includes the following representatives from within the Council itself:

- Portfolio Holder Neighbourhoods and Community Safety
- Anti-Poverty Member Champion
- Anti-Poverty Officer Champion, Strategic Director of Place
- Director of Public Health
- Senior Public Health Manager
- Assistant Director of Revenues and Benefits
- Assistant Director of Neighbourhoods and Customer Services
- Assistant Director of Economic and Development Services
- Children's Services representative

The following local organisations have also been consulted about the proposals:

- Groups with representatives at the Anti-poverty Co-ordination Group
- Community Action Bradford and District

Bradford and District VCS Assembly  
 Refugees support  
 Asylum Seekers support  
 Equalities Forum  
 Strategic Disability, Older People's, Autism and Learning  
 Disabilities Partnerships\*  
 Bradford District Armed Forces Covenant Partnership  
 Welfare and Debt advice providers  
 CLASP  
 Bradford District Credit Union  
 Other specific VSC groups – such as Food Banks,  
 Homelessness providers  
 Central and Eastern European Working Group  
 Well Springs Together  
 Faith Forum  
 Children's Trust  
 Health and Well Being Board  
 Safer Communities  
 Stronger Communities Partnership  
 Economic Partnership  
 Housing Partnership  
 USDL  
 Food Poverty  
 Fuel poverty  
 Bradford Education Opportunity Area Programme  
 Stronger Communities Partnership  
 West Yorkshire Combined Authority – Inclusive Growth  
 Community led groups – such as Equality Together, Hope  
 Rising  
 Older People's Forums\*  
 Trades Union Councils  
 Student Unions  
 Council Leader  
 Portfolio Holder – Neighbourhoods and Community Safety  
 Portfolio  
 Portfolio Holder – Regeneration, Planning and Transport  
 Portfolio Holder – Deputy Leader and Education, Employment  
 and Skills  
 Portfolio Holder – Health and Wellbeing Portfolio  
 Portfolio Holder – Environment, Sport and Culture  
 Anti-poverty Champion  
 Elected Members  
 Five Constituency MPs  
 Bradford District Chamber of Trade  
 Bradford Chamber of Commerce  
 Manningham Housing  
 Incommunities  
 Horton Housing  
 Bradford VCS Assembly  
 Community Action Bradford and District  
 Welfare and Debt advice providers  
 CLASP

Other specific VSC groups – such as Food Banks,  
Homelessness providers  
NHS – GPs  
Health Watch

The consultation resulted in actions being added that would enable the Anti-Poverty Co-ordination Group to further consider the needs and support available to refugees, the Roma and Traveller communities and those people who do not have recourse to public funds.

## **Section 4: What evidence you have used?**

### **4.1 What evidence do you hold to back up this assessment?**

Scrutiny Poverty Review 2015  
District Poverty and Deprivation Bulletins  
District Dashboard

### **4.2 Do you need further evidence?**

No

## **Section 5: Consultation Feedback**

### **5.1 Results from any previous consultations prior to the proposal development.**

The Scrutiny Poverty Review of 2015 recommended that an overarching anti-Poverty strategy be developed for the district.

### **5.2 The departmental feedback you provided on the previous consultation (as at 5.1).**

N/A

### **5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).**

N/A

### **5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.**

N/A



## Report of the Strategic Director Place to the meeting of Executive to be held on 8<sup>th</sup> January 2018

---

AH

**Subject:**

**Ilkley Parking Review**

**Summary statement:**

This report updates the Executive on the progress of the Ilkley parking review. It also details the findings from the recent public consultation on the proposed parking controls which have been developed in response to the key recommendations of the parking review, the costs of the implementation and the issues associated with the introduction. The report also seeks approval from Executive to progress with the introduction.

---

Steve Hartley  
Strategic Director -Place

Report Contact: Simon D'Vali  
Phone: (01535) 618375  
E-mail: [simon.dvali@bradford.gov.uk](mailto:simon.dvali@bradford.gov.uk)

**Portfolio:**

**Regeneration, Planning & Transport**

**Overview & Scrutiny Area:**

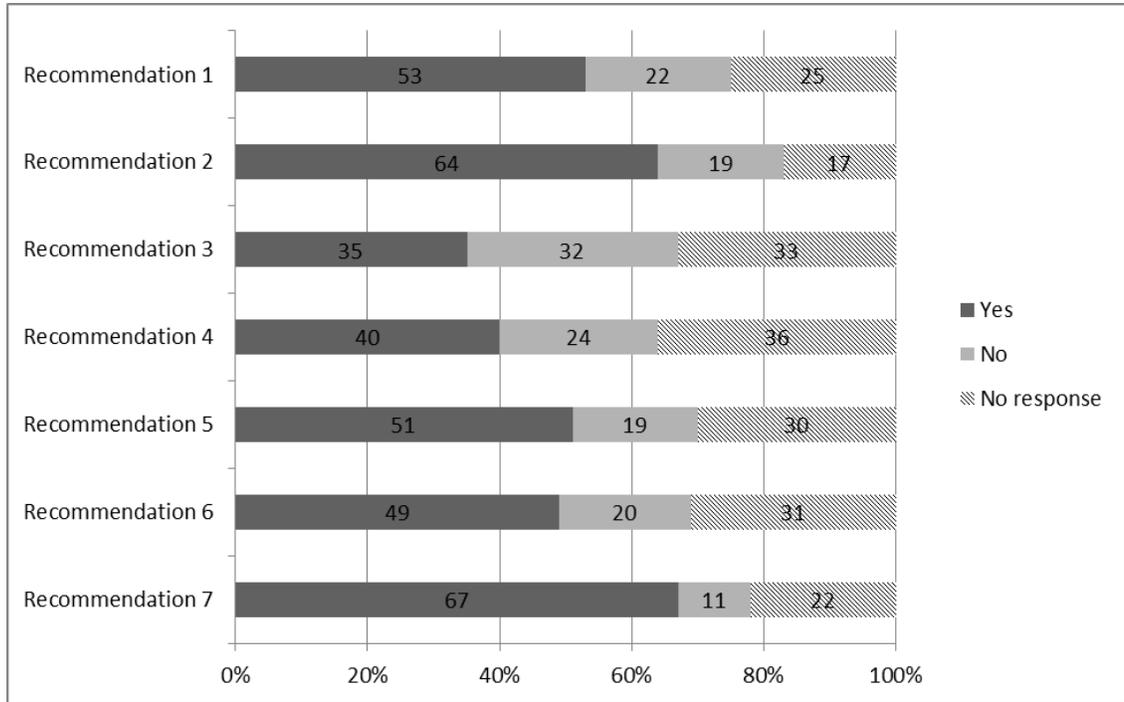
**Environment and Waste Management  
& Regeneration and Environment**

## 1. SUMMARY

- 1.1 This report updates the Executive on the progress of the Ilkley parking review.
- 1.2 The findings from the recent public consultation exercise on the proposed parking controls which have been developed in response to the Parking Review recommendations are also described together with the costs associated with their introduction and operation.
- 1.3 The report also seeks approval from Executive to progress with their introduction.

## 2. BACKGROUND

- 2.1 Following Public concern over indiscriminate, all day parking in residential streets, the Council commissioned an independent review of Ilkley parking arrangements for residents, business use, shoppers and commuters via Steers consultants. At a conclusion of this review seven key recommendations for improvements to the existing arrangements were made by the consultants.
  - **Recommendation 1:** Protect on-street parking for use by short stay shoppers and encourage turnover by introducing charges for short stay on-street bays within the town centre that are currently subject to waiting restrictions.
  - **Recommendation 2:** Introduce resident parking schemes to reduce commuter parking in residential areas. Areas of parking stress close to Ilkley station are identified as requiring controls on commuter parking to protect parking for residents.
  - **Recommendation 3:** Increase tariffs at South Hawksworth Street car park and reinvest additional income into improved parking facilities. Tariffs should be introduced at other Council operated car parks in Ilkley, but at a lower rate to reflect their distance from the main shopping area.
  - **Recommendation 4:** Improve Blue Badge parking provision through ensuring all Blue Badge parking bays are to good practice standards and convert some on street spaces to Blue Badge bays on Brook Street.
  - **Recommendation 5:** Review the business permit scheme with a view to reducing business permit parking provision.
  - **Recommendation 6:** Improve presentation and co-ordination of alternative travel options, in particular the frequent public transport routes in the Wharfe Valley corridor.
  - **Recommendation 7:** Undertake an urban realm study to identify ways of improving the pedestrian environment to facilitate and encourage more walking trips to Ilkley town centre.
- 2.2 Following publication of the study a survey of households to gauge the level of support for the report findings was undertaken. In total 712 households responded and a summary of the results of the survey are shown in Figure 1. When asked if they supported any of the recommendations in the parking study 86% of households confirmed they agreed with one or more of the recommendations listed.

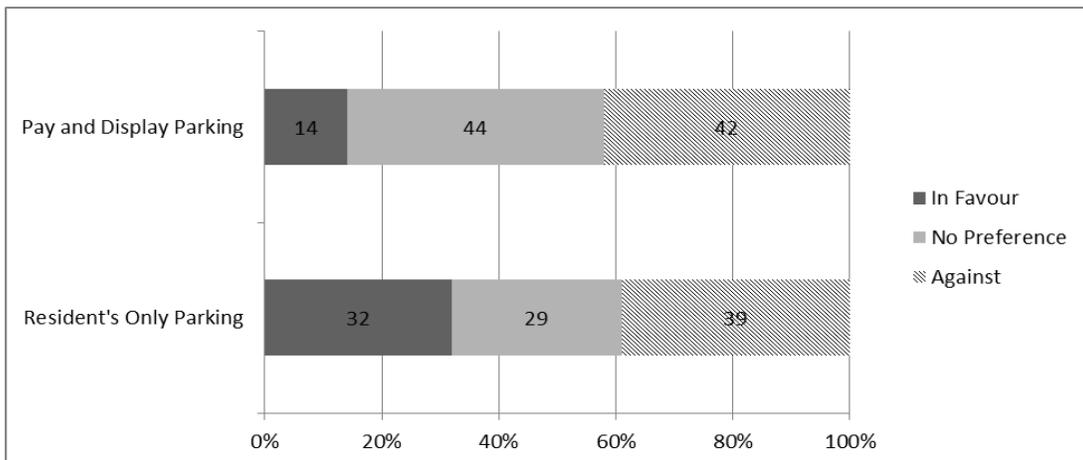


**Figure 1:** Comparison of Responses to Review Recommendations

2.3 As a first phase approach by way of alleviating concerns, designs were prepared for on-street parking for the inner business area close to the rail station and shops. These designs also encompassed some residential streets in the vicinity. The scheme was consulted on via three public exhibitions and an on-line consultation webpage. The summary of the results of this consultation are shown in paragraph 2.5 below.

2.5 Public Exhibition ‘Have your say’ responses

Three public exhibitions were held earlier this year on the proposals for dealing with parking issues in Ilkley. Each of these exhibition sessions was well attended and a large number of “Have your say” forms on the proposals were completed and returned.



**Figure 2:** Have Your Say Responses

2.6 In addition to providing responses to the main elements of the consultation specific comments were provided in relation to other parking related matters. These included:

- 13% would like to see more off street parking being made available through park and ride at Ben Rhydding, Addingham or a multi storey/second deck at Tesco's;
- 8% would like to see the proposals extended to other areas;
- 7% asked for Stockheld Road and Old Bridge Lane to be reconsidered;
- 9% expressed concerns that the proposals would have a negative impact on businesses;
- 5% expressed concern that parking problems would just be displaced;
- 5% expressed concern that the proposals would deter shoppers and visitors;
- 3% expressed concern for parking for lower paid workers in Ilkley;
- 6% raised disc parking;
- 6% raised issues regarding parking in Ben Rhydding; and
- 2% were against the proposed charges at Ilkley Lido.

## 2.7 Existing parking spaces in Ilkley

Currently there are 943 off-street parking spaces in the town, including 329 operated by the Council, and 614 by private car park operators such as supermarkets etc. Of these only one, 28 space private car park, allows use by the general public all other car parks serviced a specific shop or amenity.

There are two car parks in the town centre, which are subject to parking charges, South Hawksworth Street (60p per hour, £6.00 all day), and Boyes car park, (£1 for 2 hours and £1 for each hour thereafter).

As well as South Hawksworth Street (230 spaces), the Council operates Wharfe View Road (36 spaces) and Railway Road (23 spaces) car parks. Within 400m of the train station, 1,320 on-street spaces were identified, 200 of which were subject to some form of parking restriction, either limited waiting and/or residents parking, disabled parking, coach and taxi parking or police parking. 72% of these spaces were occupied during weekdays, whilst at weekends the occupancy rate dropped to 67%. It is worth noting however, that of those spaces closer to the town centre, which were designed for general use, demand outweighs supply significantly and occupancy figures regularly approach 100% throughout the day.

There is one car park in the town centre which is subject to parking charges, South Hawksworth Street.

## PHASE 1 PARKING PROPOSALS

### 2.8 **Short stay pay and display:**

The table below gives locations and numbers of proposed short stay pay and display parking within the study area. Short stay P&D parking charges are proposed to be £1.00 / hour with a maximum stay of 2 hours. It is also proposed that the first 30 minutes of parking is provided free.

LOCATION	METRES	NUMBER OF VEHICLES	NOTES
Railway Rd	25	5	
Station Rd	105	21	
Whitton Croft Rd	130	26	Shared residents parking
The Grove	195	39	
Riddings Rd	14	3	
South Hawksorth St	108	25	
Cunliffe Rd	75	15	
New Brook Street	40	8	
Brook St	100	20	
Bridge Lane	12	2	
Regent Rd	146	29	Shared residents parking
Station Road	45	9	
Cowpasture Road	45	9	Shared residents parking
Wells Road	50	10	
Chantry Drive	120	24	Shared residents parking
Riddings Road	25	5	
Wells Promenade	250	50	Some shared residents parking
St James Road	20	4	
	1505	304	

## 2.9 Long stay pay and display:

There are areas close to the town centre where pay and display parking could be proposed, but the demand may predominantly be for longer stays and commuter parking. As there is limited conflict in demand it is proposed that these areas become pay and display parking with no maximum stay, the table below gives locations and numbers of spaces:

LOCATION	METRES	NUMBER OF VEHICLES	NOTES
Castle Road	40	8	
Wharfe View Road	40	8	
Weston Road	30	6	
Railway Rd	200	40	
Grove Road	130	26	
Kings Road	120	24	
New Brook Street	120	24	
Bridge Lane	160	32	Shared residents parking
	840	168	

The removal of the time limit on these roads also allows the opportunity for commuter/business parking whilst still discouraging its use by price. The proposed charges of £1.00 per hour ,for up to 2 hours, and £5.00 for over two hours are consistent with proposed charges on other long stay car parks.

## 2.10 Resident's Permit Parking:

By far the highest number of complaints received about parking relate to commuters parking in residential areas, stopping residents from parking near their own properties. As there are a large number of residential streets in close proximity to Ilkley town centre, it is proposed six new residents parking zones are introduced, which are shown respectively in Appendices 1 to 6 attached:

<b>Zone 1 Chapel Lane Area</b>	<b>Zone 2 Parish Ghyll Area</b>	<b>Zone 3 Riverside Area</b>	<b>Zone 4 Leeds Rd/Little Lane Area</b>	<b>Zone 5 Cowpasture Road Area</b>
Yewbank Terrace Yewbank Close Westville Road Kingsway Drive Westville Avenue Westville Road Chapel Lane Regent Road The Grove Bolton Bridge Road Cunliffe Road South Hawksworth Street Hawksworth Street	Grove Road St James' Road Oakburn Road Parish Ghyll Road Riddings Road Wells Walk Wells Promenade The Riddings Eaton Road Westville Road Ashburn Place Back Parish Ghyll Road Albany Walk St Margarets Terrace	Castle Road Bridge Lane Alexandra Crescent Lister Street Middleton Road Castle Road Castle Hill Castle Yard Stockeld Way Old Bridge Rise Saddlers Croft	Nile Road Trafalgar Road Victory Road Nelson Road Wellington Road Golden Butts Road Wilmot Road Morningson Road Brewery Road Mayfield Road Railway Road Little Lane Lower Wellington Road Wharfe View Road Castle Road	Cowpasture Road Chantry Drive Chantry Close Whitton Croft Road Sedbergh Park Sedbergh Drive Belle View Tivoli Place Richmond Place Bridge Lane Wells Road Station Road Wells Promenade Skelda Rise Ilkley Hall Park Springs Lane Sefton Drive
<b>Zone 6 Middleton Avenue</b>				

## OTHER PARKING PROPOSALS:

### 2.11 Disabled Persons Parking Bays:

Disabled persons blue badge holders can already park on single and double yellow lines where there is no loading restriction for up to 3 hours, in car parks without time limit, and in designated disabled persons parking bays. It is proposed to provide additional or extended disabled persons parking bays on Brook Street (6 new spaces), Parish Ghyll Road (3 new spaces) and Station Road (3 additional spaces).

### 2.12 Loading Bays:

A new loading bay is proposed for Weston Road to formalise loading / unloading for the shops along Leeds Road, based on feedback from the Ilkley Business Forum and Town Council.

### 2.13 **Coach Bays:**

The coach bay on Railway Road is underused, it is proposed to replace with long stay pay and display parking. The coach bay on South Hawksworth Street is used on a regular basis; it is proposed to retain this.

### 2.14 **Commuter Parking:**

The scheme does not accommodate the level of commuter parking presently experienced in Ilkley as it aims to better balance the competing demands of commuters, shoppers and residents and therefore more provision for under-served residents and shoppers requires a reduction in the unregulated parking that commuters were using, often outside peoples homes. This may lead to a number of possible outcomes:

- Commuter parking associated with the railway station could transfer to other stations where long stay parking is more readily available and still free.
- Commuters could park further away from the centre and walk in.
- There is a modal shift and more commuters opt to take a different form of transport to their destination.

As part of the strategy to deal with displacement of commuter parking it is recommended that consideration should be given to providing extra parking at station locations. As part of the West Yorkshire+ Transport Fund's rail station car park extension programme a proposal for creation of additional parking Ben Rhydding has been identified and proposals for this extension are currently being developed by Bradford Officers in conjunction with the Combined Authority's project team.

### 2.15 **Business Users:**

Business users either park in the contract parking area in the South Hawksworth Street car park, or compete with commuters for the unrestricted parking areas around the town centre.

In line with the recommendations of the independent parking review, It is proposed to significantly increase contract parking rates in South Hawksworth Street as well as any unrestricted parking around the periphery of the centre. Whilst some businesses may be eligible for permits if they are situated within a residents only permit parking zone it is unlikely there will remain any free parking available for business users. Work is ongoing to identify the needs of local businesses with officers having visited a number of businesses to discuss their needs. Effective engagement has also taken place with the Ilkley BID Development Board over potential ways to accommodation the needs of businesses within Ilkley Town Centre.

## 3. **OTHER CONSIDERATIONS**

- 3.1 Introducing the scheme as proposed has the potential to cause migration of existing long stay parking to other residential streets currently outside of the proposed boundary. The situation will require careful management and will be monitored once the scheme goes live.

- 3.2 The proposal requires the advertisement of Traffic Regulation Orders (Residents Permit Parking, Waiting Restrictions, Loading Bays, Disabled Parking Bays, Long and Short Stay Parking). Any objections to the proposals will need to follow the democratic process and as such, implementation of the scheme could take up to six months.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

- 4.1 Capital costs of implementing the scheme described above has been estimated to be circa £268,000. These costs include all design, development and legal charges associated with implementing the required Traffic Regulation Orders as well as costs associated with installation of the necessary signing, lining and pay and display machines.
- 4.2 The annual revenue costs of operating the parking measures described above including P&D machine maintenance and operational costs would be £90,500 which would be covered through parking charges.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 There are no significant risks arising out of the implementation of the proposed recommendations.

#### **6. LEGAL APPRAISAL**

- 6.1 All actions necessary to introduce the parking controls described within the contents of this report are within the Council's powers and/or duties as Local Highway Authority.

#### **7. OTHER IMPLICATIONS**

##### **7.1 EQUALITY & DIVERSITY**

In preparing the parking proposals for Ilkley due consideration has been given to the needs of vulnerable groups and users.

##### **7.2 SUSTAINABILITY IMPLICATIONS**

There are no direct sustainability issues.

##### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

As part of the proposals, engagement with the bus companies is taking place and improvement of the routes (managed parking) may see increased bus patronage. This could in turn, reduce unnecessary or short car journeys into Ilkley improving emission levels.

##### **7.4 COMMUNITY SAFETY IMPLICATIONS**

There are no community safety implications.

## **7.5 HUMAN RIGHTS ACT**

There are no issues relating to the Human Rights Act with this proposal.

## **7.6 TRADE UNION**

There are no Trade Union issues arising.

## **7.7 WARD IMPLICATIONS**

Traffic patterns and modal shift may occur in the Ilkley Ward which would be of benefit to the residents of Ilkley. Careful monitoring of traffic will be required following the implementation of the proposals.

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

None.

## **7.9 IMPLICATIONS FOR CORPORATE PARENTING**

There are no Corporate Parenting duty implications arising from this report.

## **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

None.

## **8. NOT FOR PUBLICATION DOCUMENTS**

None.

## **9. OPTIONS**

9.1 There are a number of possible options which Executive may consider as a consequence of this report which are:

9.1.1 Executive may support the recommended first phase approach to dealing with parking issues in Ilkley.

9.1.2 Executive may wish to maintain the status quo of parking provision within Ilkley town centre.

9.1.3 Executive may wish to consider alternative approaches to dealing with the recommendations from the Ilkley Parking Review which are not listed here and for which appropriate officer advice will be provided.

## **10. RECOMMENDATIONS**

10.1 That the Executive notes the findings of the Public Consultation;

10.2 That Executive notes and endorses the proposals as developed as the first phase of enhancements resulting from the Ilkley Parking Review;

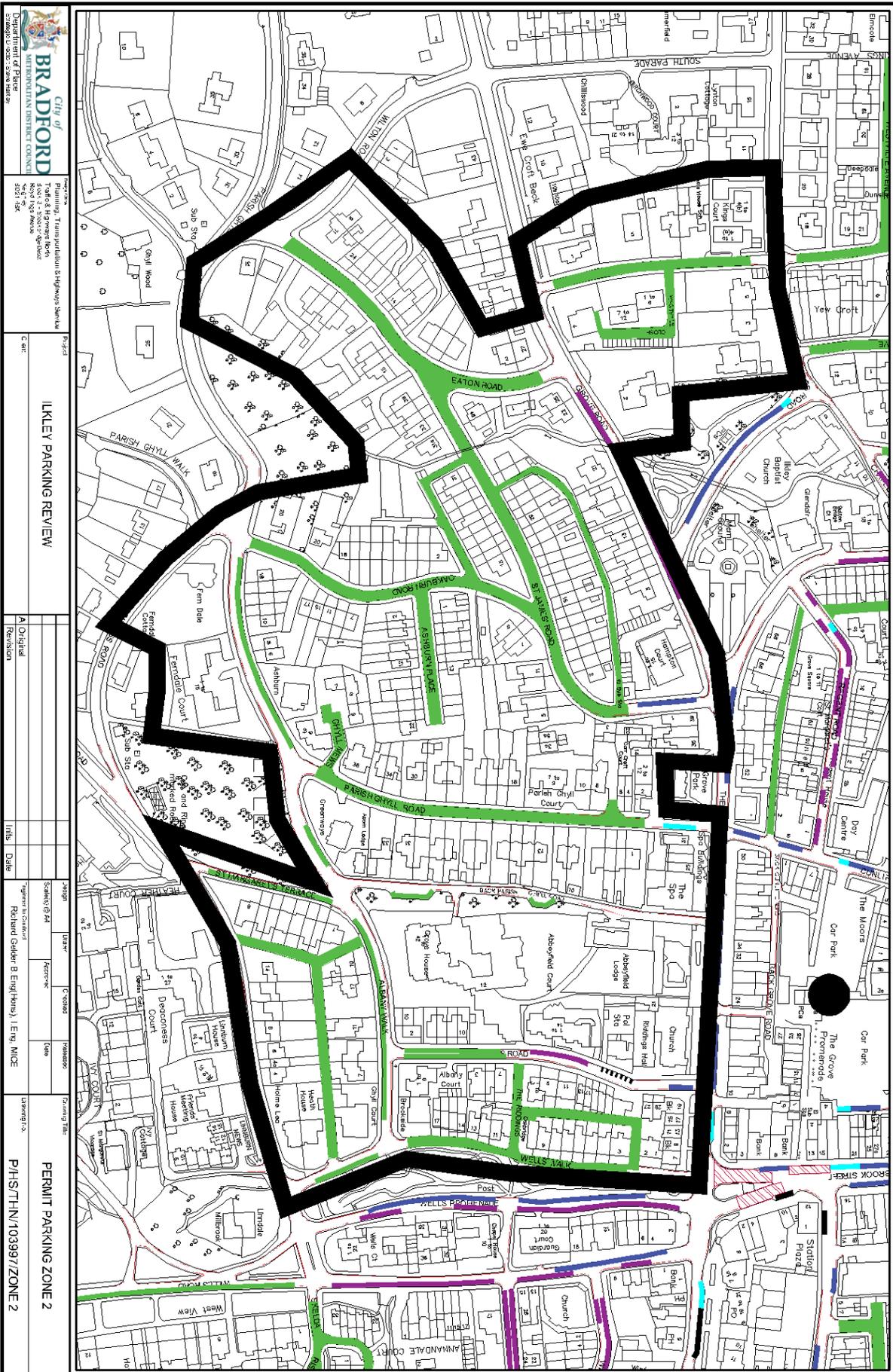
## **11. APPENDICES**

11.1 App1: Zone 1 Permit Parking Zone;  
App 2: Zone 2 Permit Parking Zone;  
App 3: Zone 3 Permit Parking Zone;  
App 4: Zone 4 Permit Parking Zone;  
App 5: Zone 5 Permit Parking Zone;  
App 6: Zone 6 Permit Parking Zone.

## **12. BACKGROUND DOCUMENTS**

12.1 Ilkley Parking Review (Steer).





**City of BRADFORD**  
 Metropolitan District Council  
 Planning, Transportation & Highways Service  
 Traffic Engineering  
 Road Network

**LKLEY PARKING REVIEW**

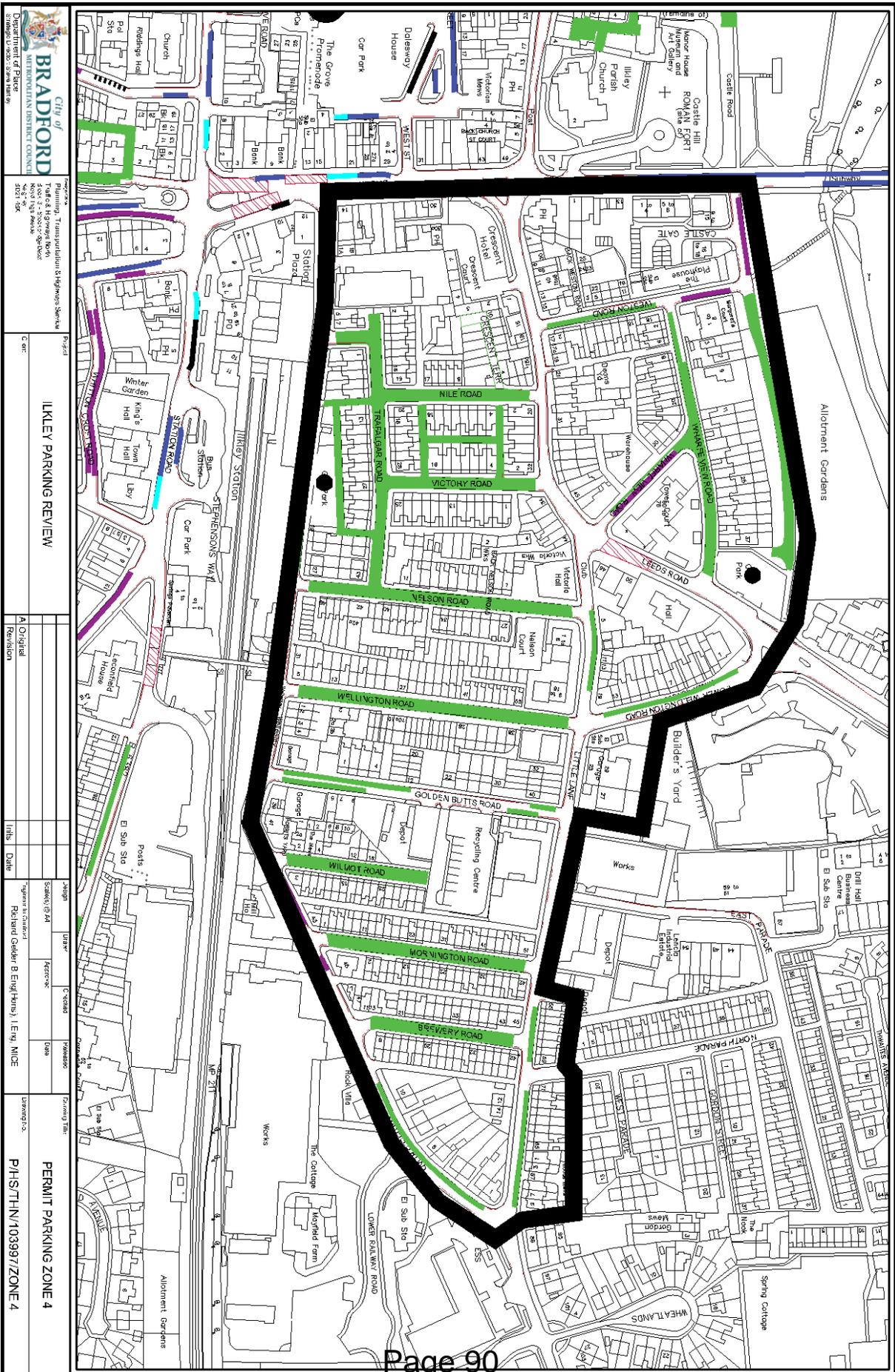
Project: LKLEY PARKING REVIEW  
 C. Ref: [ ]

Revision	Date	By	Check	Approved	Drawn
A1 Original					

Author: Richard Golder B Eng(Trans), LEg, MICE  
 Drawing No: PHS/THN/103991/ZONE 2

**PERMIT PARKING ZONE 2**



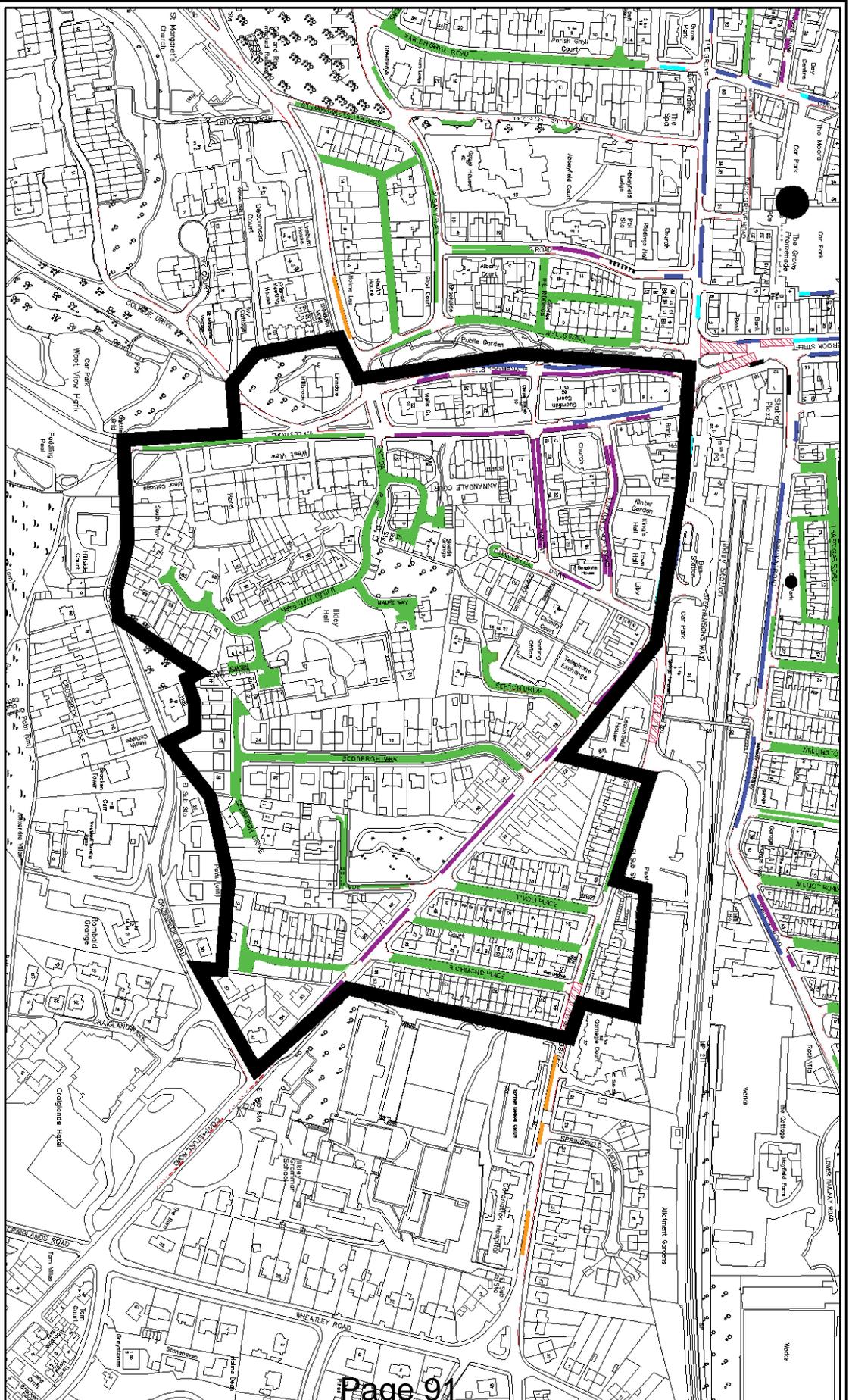


Revision	Date
A Original	

Drawn	Checked	Scale	Date
SCM/6/19 PA	RECEIVE		

Revision	Date	By	Check
A	Original		

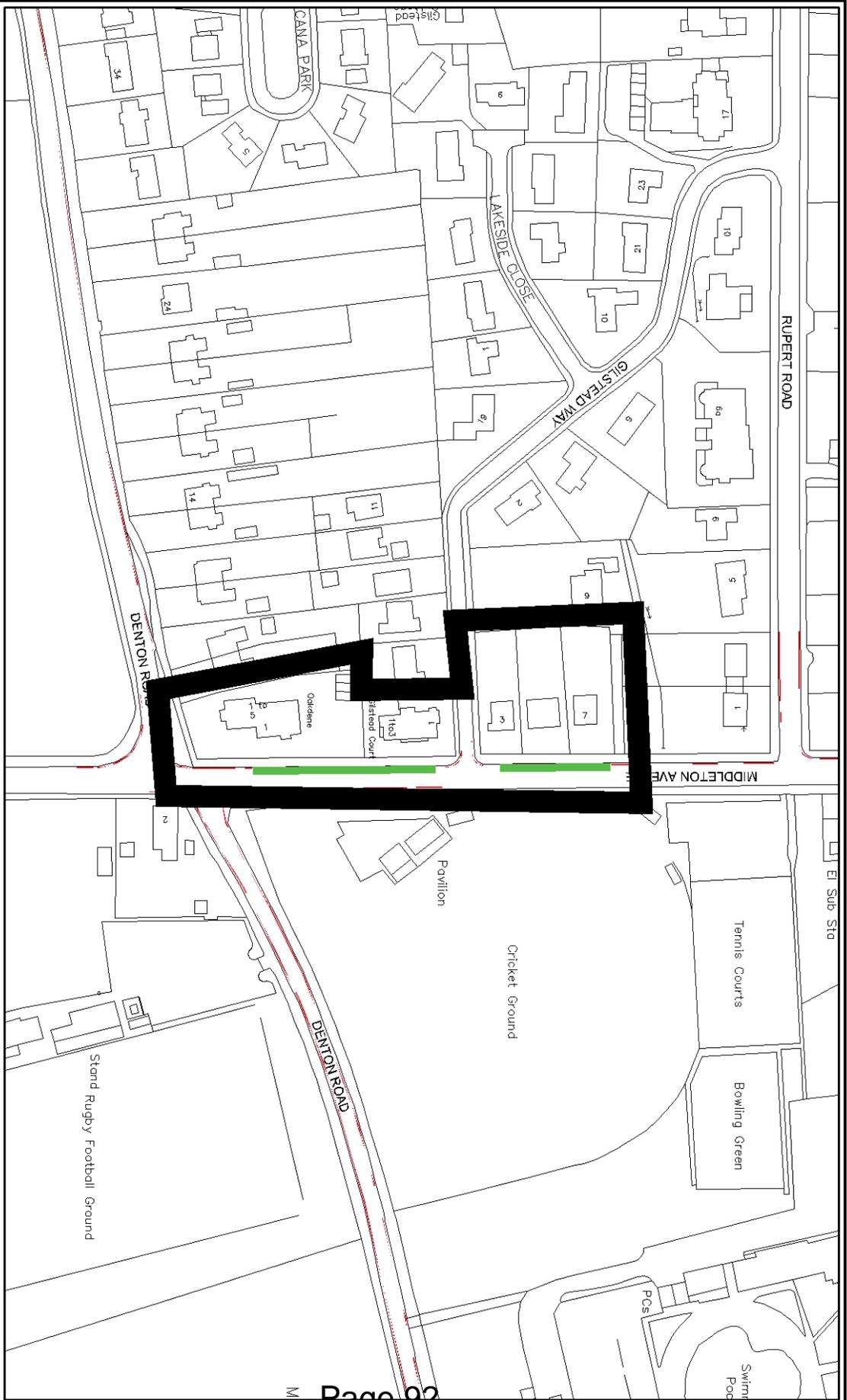
Drawn	Checked	Approved
SAWLEY, G. J. A.	ZETTERER	DOBSON

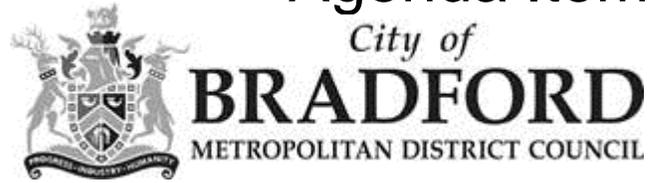


Revision	Date
A Original	

Stage	Date	Author	Checked	Approved
Scale 1:500				

Scale	Date	Author	Checked	Approved
Scale 1:500				





## Report of the Strategic Director, Place to the meeting of the Executive to be held on 8<sup>th</sup> January 2019.

---

**Subject: Bradford Community Infrastructure Levy (CIL) – Update, Review and Annual Report**

**AI**

### **Summary statement:**

This report provides a summary update on the total amount of CIL monies collected up to December 2018. The report outlines the future process for allocating the Strategic CIL Fund and proposes minor amendments to the Regulation 123 List.

The report also seeks approval to commence with a review of the charging rates and zones in the adopted CIL Charging Schedule, as recommended following the CIL Examination and adoption in 2017.

---

Julian Jackson, Assistant Director  
(Planning, Transportation and  
Highways)

**Portfolio: Regeneration Planning &  
Transport**

Report Contact: Alex Bartle, Senior  
Planning Officer  
Phone: (01274) 437471  
E-mail: [alex.bartle@bradford.gov.uk](mailto:alex.bartle@bradford.gov.uk)

**Overview & Scrutiny Area:**  
**Regeneration and Environment**

## **1. SUMMARY**

- 1.1 The Community Infrastructure Levy (CIL) is intended as a means of contributing to the funding of infrastructure required to support the delivery of the Local Plan, including the adopted Core Strategy and other Development Plan Documents. It replaces part of the system of Planning Obligations (S106 Agreements), the scope of which has been restricted since 6 April 2015. The Council adopted the Bradford CIL Charging Schedule in March 2017 and the charges took effect from 1st July 2017.
- 1.2 This report includes a summary for the amount of CIL monies collected up to December 2018 and outlines the process for allocating future CIL monies from the Strategic CIL Fund.
- 1.3 The report also covers other matters relating to the CIL implementation, namely proposed minor amendments to the Regulation 123 List, and is also seeking approval to commence a review of the CIL rates and charging zones in the adopted Bradford CIL Charging Schedule.

## **2. BACKGROUND**

- 2.1 The Bradford CIL was adopted by Full Council on 21 March 2017, and the charges were implemented across the District from 1st July 2017. The process for the collection, spending and reporting of CIL monies must be transparent and undertaken in line with the requirements set out in the CIL Regulations.
- 2.2 The report 'Governance Arrangements for the Bradford CIL Charging Schedule' to the Governance and Audit Committee on 28 February 2017, sets out the governance arrangements for allocating, spending and reporting on the Bradford CIL. CIL monies will be directed it into two main funding streams; a Strategic CIL Fund and a Neighbourhood CIL Fund. The Council will retain 5% of the total CIL receipts collected to cover administration and implementation costs.
- 2.3 **Neighbourhood CIL Fund**
  - In line with the CIL Regulations 2010 (as amended) 15% of CIL income will be passed directly to those parish and town councils where development has taken place (the neighbourhood proportion), subject to the cap set in national CIL regulations. This will increase to 25% in any areas with an adopted neighbourhood plan.
  - The neighbourhood proportion will be transferred annually by the 28th April each year.
  - In areas where there is no parish or town council communities will still benefit from the neighbourhood proportion, however the Council will retain and ring-fence the CIL receipts for these areas. The existing approach used for Planning Obligations (Section 106) will be used to direct spending of the CIL Neighbourhood Fund in areas without a parish or town council, in consultation with relevant ward councillors.

## 2.4 Strategic CIL Fund

- After the council has allocated the Neighbourhood CIL Fund monies and retained 5% for administration cost, the remaining proportion of the levy will be placed in a Strategic CIL Fund.
- The Strategic CIL Fund monies can be spent anywhere across the District on infrastructure needed to support growth.
- The Council's Regulation 123 List sets out the types of strategic infrastructure within the District that could be funded through the Strategic CIL Fund.
- Priorities for spending the Strategic CIL Fund will be agreed on an annual basis by the council's Executive, in line with the Regulation 123 List, taking into account the impact of specific and cumulative infrastructure needs arising from new development.
- To date, there have been no detailed decisions on the spending of the Strategic CIL Fund. It is proposed that a report from the Director (Place) will be taken to the Council's Executive in June each year, outlining the amount of CIL monies collected to date, the previous financial year's Annual CIL Monitoring Report and setting out recommendations for the allocation of the Strategic CIL Fund towards infrastructure priorities.
- It should be noted that a number of services and infrastructure providers will be consulted in producing the infrastructure evidence to inform any recommendations regarding allocating the Strategic CIL Fund including; education, health, parks, landscape and countryside.

## 2.5 Monitoring and Reporting

- To ensure that the levy is open and transparent the council must produce and publish on its website a CIL Annual Monitoring Report, which sets out CIL receipts, balances and spend, for the previous financial year.
- It should be noted that the Bradford CIL only came into effect on 1 July 2017. CIL is only liable for planning applications approved on or after 1 July 2017 and payment of CIL is only triggered on commencement of development, in line with the council's approved CIL instalments policy.
- The total amount of CIL monies collected up to December 2018 is £147,755.00.
- The amount of CIL monies received will increase in subsequent financial years as more planning applications become liable for CIL and development of approved CIL liable applications is commenced.

## 3. OTHER CONSIDERATIONS

### Minor Changes to the Regulation 123 List

- 3.1 The CIL Regulation 123 List was approved alongside the Bradford CIL Charging Schedule in 2017.
- 3.2 A number of minor changes to the approved Regulation 123 List are considered necessary to ensure that the Council can continue to prioritise Strategic CIL Funds to support an appropriate range of infrastructure to support growth.
- 3.3 The Regulation 123 List can be revised independently of the adopted CIL Charging Schedule, subject to appropriate local consultation. However, where a change to

the Regulation 123 List would have a very significant impact on the viability evidence that supported examination of the Charging Schedule, this should be made as part of a review of the CIL Charging Schedule.

- 3.4 Appendix 1 sets out the proposed minor amendments to CIL Regulation 123 List. The list below highlights what is proposed to be changed from the current version and provides an explanation.
- 3.5 Proposed minor changes to the Regulation 123 List:-
- Include new reference to renewable and low carbon energy schemes in addition to the specific reference to district heat networks.
  - Include specific reference to air quality improvement measures and infrastructure to support brownfield land remediation under environmental improvement infrastructure.
  - Minor changes to the wording to provide clarity about the use of CIL funds for strategic infrastructure, while not precluding site specific planning obligations from individual developments, where required by Core Strategy Policies.
- 3.6 It is considered that the proposed changes to the Regulation 123 List are minor and therefore would not impact on the viability evidence assessed at the CIL examination. The changes are also not being proposed in order that a specific infrastructure item can be funded through a new S106, but to give more clarity on specific infrastructure that could be funded through CIL. Therefore the only requirement is that 'appropriate local consultation' takes place on the proposed changes.
- 3.7 It is proposed that consultation on the changes and the opportunity for comment be made available through the Council's website and through limited targeted consultation. Given that only minor amendments are proposed to the Regulation 123 list it is suggested that the Assistant Director (Planning, Transportation and Highways) be authorised to make any further changes arising from this consultation.

### **Review of Adopted CIL Charging Schedule**

- 3.8 At the examination of the Bradford CIL Charging Schedule the Government's independent CIL Examiner recommended that the council should undertake an early review of the CIL charging rates following adoption of the charging schedule.
- 3.9 The Government consulted in March 2018 on reviewing the approach to CIL and developer contributions. The Government has responded to this consultation in October 2018. A summary of the key points from the Government's response are set out in Appendix 2. It should be noted that Legislation will be required in order to implement the changes set out in the consultation document. Therefore, the Government will be consulting on the draft regulations in the near future. However, the government still recognises CIL as an effective mechanism for collecting contributions towards addressing the cumulative impact of development and so will ensure measures are in place to incentivise uptake and the continued use of the Levy.
- 3.10 It is therefore considered that the council should undertake a review of the adopted

CIL Charging Schedule, to commence in 2019. It is proposed that the CIL review process and any associated consultation is aligned with the updated Local Development Scheme approved at Executive on 10 July 2018. This will ensure that the council's CIL rates and charging zones reflect up-to-date economic and infrastructure evidence and take account of any changes to the CIL Regulations and national planning practice guidance. This will also allow the emerging Local Plan evidence on viability and infrastructure to be aligned with the CIL review, thus giving efficiency savings.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

- 4.1 The Community Infrastructure Levy Regulations 2010 (as amended) require the Council to prepare a report for any financial year in which:
  - a) It collects CIL, or CIL is collected on its behalf; or
  - b) An amount of CIL collected by it or by another person on its behalf (whether in the reported year or any other) has not been spent.
- 4.2 CIL Regulation 62 sets out the specific requirements which must be covered by this Report, the first such annual CIL monitoring report and covers the financial year 6 April 2017 to 31 March 2018 and will be made available on the council's website.
- 4.3 The total amount of CIL monies collected up to December 2018 is £147,755.00. In line with the CIL regulations the council will transfer the neighbourhood proportion (15% or 25 with an adopted neighbourhood plan) directly to the town or parish council where development has taken place by the 28th April each year. A report from the Director (Place) will be taken to the Council's Executive in June each year, outlining the amount of CIL monies collected to date, the previous financial year's Annual CIL Monitoring Report and setting out recommendations for the allocation of the Strategic CIL Fund towards infrastructure priorities.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 The collection, spend and reporting of CIL is governed by Legislation set out in the Planning Act 2008 (as amended by the Localism Act 2011) and the CIL Regulations 2010 (as amended). If the Council does not follow appropriate governance arrangements for collecting, spending and monitoring CIL consistent with the CIL Regulations then the Council runs the risk of challenge over the use of CIL monies being upheld.
- 5.2 The report 'Governance Arrangements for the Bradford CIL Charging Schedule' to the Governance and Audit Committee on 28 February 2017 sets out the governance arrangements for allocating, spending and reporting on CIL.

#### **6. LEGAL APPRAISAL**

- 6.1 The adopted Bradford CIL Charging Schedule has been prepared and implemented in line with the appropriate, legislation (UK and EU), regulations and guidance.
- 6.2 The process for implementing the CIL Charging Schedule and spending CIL monies is set out in the CIL Regulations 2010, together with subsequent amended CIL Regulations in 2011, 2012, 2013, 2014 and 2015. Under the CIL Regulations

restrictions have come into force for existing planning obligations (Section 106 agreements) from April 2015. If the Council does not follow appropriate governance and spending arrangements consistent with the CIL Regulations then the council the Council runs the risk of challenge over the use of CIL monies being upheld.

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

These issues have been considered and no implications have been identified.

### **7.2 SUSTAINABILITY IMPLICATIONS**

CIL monies will support the delivery of infrastructure and sustainable development across the District and help to mitigate the impacts arising from of growth.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

None

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

None

### **7.5 HUMAN RIGHTS ACT**

These issues have been considered and no implications have been identified.

### **7.6 TRADE UNION**

None

### **7.7 WARD IMPLICATIONS**

In non-parished areas the decisions about spending will be delegated to the relevant ward councillor and the CIL Neighbourhood Fund ring fenced by the Council for that purpose.

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

None

### **7.9 IMPLICATIONS FOR CORPORATE PARENTING**

None

### **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

None

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

### **Make minor amendments to the approved CIL Regulation 123 List**

#### **9.1 Option 1: Make minor amendments to the approved CIL Regulation 123 List**

9.1.1 Minor changes proposed to the Regulation 123 List are considered necessary to improve clarity, provide consistency, and to reflect current strategic infrastructure priorities.

9.1.2 This will enable the council to direct future strategic CIL monies to a range of necessary infrastructure types, including infrastructure to support air quality improvement measures, renewable and low carbon energy schemes and brownfield land remediation to support growth in the District and deliver sustainable development.

#### **9.2 Option 2: Do not make minor amendments to the approved CIL Regulation 123 List**

9.2.1 The approved Regulation 123 list will remain unchanged and therefore will not reflect current strategic infrastructure priorities.

### **Undertake a review of the adopted Bradford CIL Charging Schedule**

#### **9.3 Option 1: Undertake a review of the Adopted CIL Charging Schedule**

9.3.1 The review will ensure that the council's adopted CIL rates remain appropriate and informed by the latest economic and infrastructure evidence. This will ensure that the council will continue to maximise the amount of CIL available to support investment in infrastructure and support growth, while ensuring the rates are viable and delivery of development is not put at risk. It will also ensure the Bradford CIL is in line with the latest Government CIL Legislation and Guidance.

9.3.2 This will also enable the CIL review and evidence to be twin tracked alongside the production of the Local Plan Allocations and Partial Review of the Core Strategy, ensuring that the evidence required for economic viability and infrastructure requirements can be aligned and support both the CIL and Local Plan production resulting in efficiencies.

#### **9.4 Option 2: Do not undertake a review of the Adopted Bradford CIL Charging Schedule**

9.4.1 Not reviewing the adopted CIL rates will mean the adopted CIL rates will become increasingly out of date and therefore may not reflect current market conditions or maximise the potential amount of CIL available to support investment in infrastructure to support growth in the District. The CIL and Local Plan evidence will not be aligned and therefore there may be the need to produce separate evidence

in the future with associated additional costs and resources required.

## **10. RECOMMENDATIONS**

*Recommended -*

- 10.1 *That the proposed minor amendments to the Regulation 123 List (as set out at Appendix 1), be approved for consultation and the final changes to be agreed by the Assistant Director (Planning, Transportation & Highways) in consultation with the Portfolio holder following consideration of any representations made, and to make any further amendments considered necessary prior to implementation of the revised Regulation 123 List.*
- 10.2 *That the Assistant Director (Planning, Transportation and Highways) be authorised to commence work towards a review of the adopted Bradford CIL Charging Schedule in 2019 alongside the preparation of the Local Plan Core Strategy Partial Review and Allocations Development Plan, with delegated authority to the Assistant Director (Planning, Transportation and Highways) to undertake any associated consultation required and make any further amendments to the CIL Charging Schedule considered necessary prior to producing a Draft Charging Schedule.*

## **11. APPENDICES**

Appendix 1: Proposed Minor Amendments to Regulation 123 List

Appendix 2: Government's Response to Developer Contributions Consultation

## **12. BACKGROUND DOCUMENTS**

- Bradford District CIL Charging Schedule (2017)
- Bradford CIL Regulation 123 List (2017)
- Report 'Governance Arrangements for the Bradford CIL Charging Schedule' to the Governance and Audit Committee on 28 February 2017
- Report 'Government response to supporting housing delivery through developer contributions'. October 2018. Ministry of Housing, Communities and Local Government. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachme>

## Appendix 1: Proposed Minor Amendments to CIL Regulation 123 List

Current Regulation 123 List	Proposed Change	Explanation
Education including primary and secondary provision	No change proposed.	No change necessary.
Sustainable transport improvement schemes except where improvements are required as a direct result of development <ul style="list-style-type: none"> <li>• Improvements to strategic pedestrian and cycle routes</li> <li>• The Public Right of Way network</li> <li>• Station improvements</li> </ul>	Sustainable transport schemes including: <ul style="list-style-type: none"> <li>• Improvements to strategic pedestrian and cycle routes</li> <li>• The Public Right of Way network</li> <li>• Station improvements</li> </ul> <p>except for site specific provision required by Core Strategy Policies as a direct result of development.</p>	To provide clarity on the use of CIL funds to contribute to (alongside other funding sources) sustainable transport schemes, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.
Green infrastructure and public greenspace (e.g. improvements to open space), except for on-site provision required by Core Strategy policies	Green infrastructure, recreation and open space, except for site specific provision required by Core Strategy Policies as a direct result of development.	To provide clarity on the use of CIL funds to contribute to (alongside other funding sources) green infrastructure, recreation and open space, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.
Community sports and recreation facilities (e.g. children's and young people's play areas, playing pitches), except improvements which are directly related to a development	Community sports and recreation facilities including: <ul style="list-style-type: none"> <li>• children's and young people's play areas</li> <li>• playing pitches</li> </ul> <p>except for site specific provision required by Core Strategy Policies as a direct result of development</p>	To provide clarity on the use of CIL funds to contribute to (alongside other funding sources) sports and recreation facilities, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.

<p>Habitat mitigation including Suitable Alternative Natural Greenspace, except for onsite provision required by Core Strategy policies.</p>	<p>Habitat mitigation schemes including Suitable Alternative Natural Greenspace, except for site specific mitigation required by Core Strategy Policies as a direct result of development.</p>	<p>To provide clarity about the use of CIL to contribute to funding strategic habitat mitigation infrastructure, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies</p>
<p>Cultural facilities (e.g. libraries, built community space), except improvements which are directly related to a development.</p>	<p>Cultural facilities including libraries and built community space, except for site specific provision required by Core Strategy Policies as a direct result of development.</p>	<p>To provide clarity about the use of CIL to contribute to funding strategic cultural facilities infrastructure, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies</p>
<p>Public realm improvements, except for on-site provision or where this is required as a direct result of an adjacent development</p>	<p>Public realm improvements, except for site specific provision required by Core Strategy Policies as a direct result of development.</p>	<p>To provide clarity about the use of CIL to contribute to funding strategic public realm infrastructure , while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies</p>
<p>Environmental improvements (e.g. recycling, local flood risk alleviation, pollution abatement), except improvements which are directly related to a development</p>	<p>Environmental infrastructure schemes including:</p> <ul style="list-style-type: none"> <li>• Recycling</li> <li>• Flood risk alleviation</li> <li>• Pollution abatement</li> <li>• Air quality improvements measures</li> <li>• Infrastructure to support brownfield land remediation.</li> </ul> <p>except for site specific provision required by Core Strategy policies as a direct result of development.</p>	<p>To provide clarity about the use of CIL to contribute to funding strategic environmental infrastructure schemes, including specific reference to air quality improvement measures and infrastructure to support brownfield land remediation in support of Core Strategy Policy EN8: Environmental Protection, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.</p>
<p>District heating networks</p>	<p>Renewable and Low Carbon Energy Infrastructure Schemes</p>	<p>To provide clarity about the use of CIL to contribute to renewable and low carbon schemes in</p>

	including District heating networks, except for site specific provision required by Core Strategy policies as a direct result of development.	support of Core Strategy Policies SC2: Climate Change and Resource Use and EN6: Energy, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.
Community safety and health projects, including <ul style="list-style-type: none"> <li>• Emergency services (police, fire, ambulance)</li> <li>• Public health facilities</li> </ul>	Community safety and health projects, including: <ul style="list-style-type: none"> <li>• Emergency services (police, fire, ambulance)</li> <li>• Public health facilities</li> </ul> <p>except for site specific provision required by Core Strategy policies as a direct result of development.</p>	To provide clarity about the use of CIL fund community safety and health projects, while not precluding site specific planning obligations from individual developments where required by Core Strategy Policies.

## Appendix 2: Government's Response to Developer Contributions Consultation

The Government's response to supporting housing delivery through developer contributions is now available:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/752183/Developer\\_Contributions\\_Government\\_Response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752183/Developer_Contributions_Government_Response.pdf)

The key points are as follows:-

- The Government intends to take forward the proposals on which it has consulted by making changes to planning guidance. This will support local authorities to adopt and revise Community Infrastructure Levy charging schedules.
- The Government intends to take forward a proposal to ensure that regulations continue to require charging authorities to consult on draft charging schedules, whilst removing the current statutory requirement for two separate rounds of consultation in every circumstance. This will ensure that Charging Authorities can decide the most proportionate approach to consultation, speeding up the time taken to introduce and amend charging schedules. It will also ensure stakeholders have clarity over how they can respond to proposals.
- The Government intends to lift the pooling restriction for Section 106 Planning Obligations in all areas. However, the government still sees the Community Infrastructure Levy as an effective mechanism for collecting contributions towards addressing the cumulative impact of development and so will ensure measures are in place to incentivise uptake and continued use of the Levy.
- The Government proposes to make changes to planning guidance to support local authorities to set differential rates more effectively.
- The Government has started to introduce measures to improve transparency around the system of developer contributions. The Government intends to strengthen this approach by taking forward proposals to require reporting of developer contributions from the Community Infrastructure Levy and section 106 planning obligations through the Infrastructure Funding Statement on a statutory basis.
- The Government proposes to remove restrictions in regulations that currently prevent section 106 planning obligations being used to collect contributions towards infrastructure included on a Charging Authority's 'regulation 123 list'. New reporting standards, which are set out in the Infrastructure Funding Statement, will address concerns about double dipping by ensuring that there is transparency over how developer contributions from both CIL and section 106 planning obligations are being used, rather than by placing formal restrictions in regulations.
- The Government has decided to take forward a modified proposal, to enable Combined Authorities with strategic planning powers to take forward a Strategic Infrastructure Tariff, and to encourage groups of charging authorities to use existing powers to more effectively support the delivery of strategic infrastructure through the pooling of their local Community Infrastructure Levy receipts. The Government will amend guidance to encourage other groups of charging authorities to use the Levy more effectively to support the delivery of cross boundary strategic infrastructure that benefits multiple authorities through pooling their local CIL.



## Report of the Strategic Director, Place to the meeting of Executive to be held on 8 January 2018

---

**AJ**

**Subject:**

**SAFER ROADS – STRATEGIC SCHEMES**

**Summary statement:**

This report seeks to update the Executive on progress with schemes identified for inclusion in the Safer Roads strategic schemes programme.

---

Steve Hartley  
Strategic Director -Place

Report Contact: Richard Gelder  
Highways Services Manager  
Phone: (01274) 437603  
E-mail: [Richard.gelder@bradford.gov.uk](mailto:Richard.gelder@bradford.gov.uk)

**Portfolio:**

**Regeneration, Planning & Transport**

**Overview & Scrutiny Area:**

**Regeneration & Environment**

## 1. SUMMARY

- 1.1 This report seeks to update the Executive on progress with schemes identified for inclusion in the Safer Roads strategic schemes programme.

## 2. BACKGROUND

- 2.1 At the meeting on 12 June 2018 Executive approved a revision to the Safer Roads budget allocation from 2018/19 onwards whereby a strategic schemes budget is established to enable the promotion of strategic or district-wide projects.
- 2.2 Following discussions with the Strategic Director of Place and the Portfolio Holder for Regeneration, Planning & Transport the following programme of proposed schemes has been prioritised:
- i. Bradford City Centre – 20mph zone
  - ii. Farnham Road area – schools 20mph zone
  - iii. Park Lane area – school 20mph zone
- 2.3 All people have a right to safe roads, whether they are a pedestrian, cyclist or motorist; however, the biggest killer of children and young people between the ages of 5 and 25 in England is road traffic collisions. Between 2015 and 2017, over 500 people were killed or seriously injured on roads in our District.
- 2.4 Evidence shows that reducing the speed of cars will protect some of the most vulnerable people in our communities, and save lives. Introducing 20mph limits and 20mph zones can reduce vehicle speeds and, therefore, prevent injuries or reduce their severity. In collisions at 30mph, many small children are killed or seriously injured. However, when vehicles are travelling at 20 mph or below, most children and adults survive.
- 2.5 Traffic travelling at 30mph is too fast for many children’s visual abilities. This means that the risk of accidents for children is higher in faster traffic environments because their eyes are not yet developed enough to be able to judge speeds over 20mph.
- 2.6 As one of the youngest cities, creating a safe environment for our children is important, however, it is not just children and young people who will benefit from the introduction of 20mph zones. Like many parts of the country we have an ageing population, with an increasing number of older people. Older people are particularly vulnerable as they are more likely to sustain serious injuries if hit by a vehicle than younger adults.
- 2.7 Many parts of the country have introduced 20mph speed limits and zones, however, one of the most comprehensive evaluations on the impact of 20mph zones was undertaken in Bristol and published this year (2018). The evaluation found that since the introduction of 20mph zones:
- The average road speed reduced on 94% of the roads surveyed;
  - Each year an estimated 4 fatal injuries, 11 serious injuries and 159 slight injuries were avoided each year.

- The cost of injuries was significant. The reduction in injuries was estimated to generate cost savings of £15 million.
- 2.8 The benefits of implementing 20mph speed limits in areas where a 30mph one has usually been in place, goes beyond saving lives. 20mph zones have been shown to have a positive impact on people's physical and mental health, their quality of life, community cohesion, and are important in encouraging sustainable and healthy modes of transport. The benefits are numerous, including:
- 20mph is better for drivers. Drivers cut their spacing as braking distances contract. Shorter gaps mean more vehicles can use the available road space, reducing standing traffic.
  - Filtering at junctions becomes easier. It is easier for motorists to pull into traffic travelling at 20mph than at 30mph. It is also much easier for cyclists to avoid being cut up by cars and lorries when they are travelling more slowly and turning left less rapidly.
  - Motor traffic volumes can reduce as slower speeds encourage active and shared travel. In their recently published evaluation Bristol found that since the introduction of 20mph zones, the number of people walking and cycling increased, including children walking and cycling to school.
  - Buses operate more efficiently. The reduced length of traffic queues means that bus journey times can decrease and become more reliable.
  - Feelings of safety improve and more children are likely to walk or cycle to school.
  - Older people are less fearful of going out or crossing the road. This has the potential to reduce loneliness and social isolation if people are able to go out more.
  - Neighbourhoods are better connected.
- 2.9 The benefits of creating safer, more connected communities where active and sustainable travel becomes the easiest option for people cannot be underestimated in our District. The places in which we live, learn, work and socialise have an integral role to play in promoting good mental wellbeing and physical activity. 38% of children aged 10/11 years old in Bradford District are overweight or obese, a figure which has been rising for the last decade. Accordingly, creating active environments, and in particular supporting active travel, is key for physical activity becoming a part of people's everyday lives, and reducing the number of people who are overweight or obese.
- 2.10 We have some great assets in our District in terms of parks and green spaces, but people need a safe route to access them.
- 2.11 Introducing 20mph zones has the potential to bring about a range of health and wellbeing benefits at relatively low cost compared to other interventions, particularly for children and young people who are disproportionately affected.

### Bradford City Centre – proposed 20mph zone

- 2.12 It is proposing to implement a 20mph zone in Bradford city centre to encourage vehicle speeds appropriate for the high levels of pedestrian movement. There have been a significant number of recorded collisions within the city centre resulting in personal injury. In the last 5 years there have been a total of 205 casualties of which 72 were pedestrians and 17 were cyclists.
- 2.13 The area making up the zone has been carefully selected to include only streets where there are either existing traffic calming measures in place, or the road layout and level of on-street parking and traffic and pedestrian movement already results in vehicle speeds generally around 20mph or below. The proposals would include the introduction of a significant level of signing and lining to highlight the new speed limit.
- 2.14 Some routes have been excluded from the zone that have a more dominant traffic movement function. These are the A6181 (Leeds Roads, Hall Ings, Princes Way, Godwin Street and Westgate) and the A641 (Manchester Road). We acknowledge that it would not be realistic to impose a 20mph speed limit on these routes at this time although longer term plans are being considered for these routes. Also excluded from the proposed zone are those streets which are in private ownership.
- 2.15 The proposals are shown on the location plan attached as Appendix 1.

### Farnham Road area/Park Lane area – proposed schools 20mph zones

- 2.16 Funding for the progression of schools 20mph zones has been prioritised using the child ward casualty statistics. City ward has been identified as having the highest rates of child casualties. The schools sites within that ward have been selected based on the highest level of area coverage that could be achieved within the set budget.
- 2.17 As with the city centre zone, it is expected that the zones would be self-enforcing by virtue of existing road layouts and proposed signing and lining measures.
- 2.18 The proposed schools 20mph zones are as follows:

**Farnham Road area** - includes Farnham Primary and Horton Grange Primary schools, the Khidmat community centre and adjacent playing field, Farnham Road children's centre and Margaret McMillan children's centre. There are over 1100 properties (mainly residential) within the zone. The proposals are shown on the location plan attached as Appendix 2.

**Park Lane area** - includes St Joseph's primary school, the Park Lane centre (including nursery) and the southern boundary and accesses to St Luke's hospital. There are over 800 properties (mainly residential) within the zone. The proposals are shown on the location plan attached as Appendix 3.

### 3. OTHER CONSIDERATIONS

- 3.1 Initial consultations on the proposals have been undertaken. A list of consultees for the 3 schemes is attached as Appendix 4
- 3.2 Comments received in response to the initial consultation exercise are listed in Table 1 below.

PROPOSED SCHOOLS 20MPH ZONES		
Consultee	Comments	Officer comments
Ward member	Supports an increase in the presence of 20mph zones.	n/a
Children's centre	Welcomes the proposals but requests additional traffic management measures.	The 20mph zone extents have been selected to include only streets where there are existing traffic calming measures or road layout and/or on-street parking already restrict vehicle speeds to around 20mph. Speed surveys have been undertaken on key routes within the proposed zones. Recorded mean speeds are within the Department for Transport (DfT) tolerance level. There is a limited budget available for the project which determines the level of interventions that can be promoted.
Cycle user group	Welcomes the proposals but requests the scheme extends further	There is a limited budget available for the project which determines the extents of the proposed 20mph zones that can be promoted.
PROPOSED CITY CENTRE 20MPH ZONE		
Consultee	Comments	Officer comments
No specific comments received		

GENERAL		
Consultee	Comments	Officer comments
Police	Request confirmation that proposed zones conform to DfT guidance on existing means speeds. Request post-implementation to monitor impact on vehicle speeds	Speed surveys have been undertaken on key routes within the proposed zones. Recorded mean speeds are within the Department for Transport (DfT) tolerance level. Post-implementation surveys will be carried out.

**Table 1 – consultation feedback and corresponding officer comments**

- 3.3 It is now proposed to arrange formal advertisement of the proposals along with wider consultation. Any objections received as part of that process (along with supporting representations) will then be given consideration by the Strategic Director of Place and the Portfolio Holder for Regeneration, Planning & Transport.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

- 4.1 An allocation of £120,000, from the overall Safer Roads budget, has been approved for the promotion of the strategic schemes detailed within this report.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 There are no risks associated with the proposed re-profiling of Safer Roads funding.
- 5.1 Authority for the Strategic Director of Place and the Portfolio Holder for Regeneration, Planning & Transport. to prioritise Strategic Safer Roads projects and consideration of any resulting objections was approved by Executive on 12 June 2018.

#### **6. LEGAL APPRAISAL**

- 6.1 Article 12 of the Council's constitution deals with the delegation of function and budget from the Executive to the Area Committee but makes provision for any matter to be taken back to the Executive at any time.
- 6.2 The promotion of Safer Roads projects is in accordance with the Council's general powers as Highway Authority and Traffic Regulation Authority

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

Due consideration has been given to Section 149 of the Equality Act 2010 when developing the proposed 20mph zones.

### **7.2 SUSTAINABILITY IMPLICATIONS**

Measures to reduce vehicle speeds and improve road safety encourage a shift to more sustainable transport modes.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

The proposals are not expected to have an adverse impact on emissions.

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

The 3 proposed schemes cover significant geographical areas. The anticipated community benefits are detailed in paragraphs 2.4-2.11.

### **7.5 HUMAN RIGHTS ACT**

None

### **7.6 TRADE UNION**

None

### **7.7 WARD IMPLICATIONS**

Respective ward members have been consulted on the proposals.

### **7.8 IMPLICATIONS FOR CORPORATE PARENTING**

None

### **7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

None

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

- 9.1 Members may propose alternative recommendations from those detailed in section 10 of this report, on which they will receive appropriate officer advice.

## **10. RECOMMENDATIONS**

- 10.1 That Executive notes the proposed schemes prioritised for progression as part of the Safer Roads strategic schemes programmes and the associated initial consultation representations.
- 10.2 That approval be given to prepare and advertise Speed Limit Orders for:
- i. Bradford City Centre – 20mph zone
  - ii. Farnham Road area – schools 20mph zone
  - iii. Park Lane area – school 20mph zone
- 10.3 That the Strategic Director of Place and Portfolio Holder for Regeneration, Planning & Transport give consideration to any valid objections in accordance with their delegated authority or, in the event of there being no valid objections, the Orders be sealed and implemented as advertised.

## **11. APPENDICES**

- 11.1 Appendix 1 – Bradford City Centre proposed 20mph zone plan.
- 11.2 Appendix 2 – Farnham Road area proposed schools 20mph zone plan.
- 11.3 Appendix 3 – Park Lane area proposed school 20mph zone plan.
- 11.4 Appendix 4 – List of consultees

## **12. BACKGROUND DOCUMENTS**

- 12.1 Report of the Strategic Director Place to the meeting of the Executive on 12 June 2018 – Proposed changes to the Safer Roads budget allocation







Reproduced from the OS MasterMap by permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright 2013. All rights reserved. Licence number 100019304.

<p>City of Bradford METROPOLITAN DISTRICT COUNCIL Department of Place Strategic Director: Steve Hartley</p>		<p>Project: Planning, Transportation &amp; Highway Services Traffic &amp; Highway Unit Highways Strategic Issues EDT 100</p>		<p>Client: ST. JOSEPH'S PRIMARY SCHOOL PROPOSED 20MPH ZONE</p>	
<p>Drawn by: AUS Scale: 1:10,000 Date: 10/10/18</p>	<p>Checked by: AUS Date: 10/10/18</p>	<p>Approved by: MAG Date: 10/10/18</p>	<p>Authorised by: N.T.S. Date: 10/10/18</p>	<p>Drawn by: AUS Scale: 1:10,000 Date: 10/10/18</p>	<p>Client: ST. JOSEPH'S PRIMARY SCHOOL PROPOSED 20MPH ZONE</p>
<p>Project Title: ST. JOSEPH'S PRIMARY SCHOOL PROPOSED 20MPH ZONE</p>			<p>Consultation Plan: HSTRSS/104/199/CON-2A</p>		

## **APPENDIX 4 – LIST OF CONSULTEES**

Ward members

Members of Parliament

Police

Fire & Rescue

West Yorkshire Ambulance Service

West Yorkshire Combined Authority

Bus Operators

Hackney Carriages/Taxis

Chambers of Trade and Commerce

Public Health

Cycling user groups

Schools, children's centres and other community organisations



## **Report of the Strategic Director Corporate Services to the meeting of Executive to be held on 8<sup>th</sup> January 2019**

---

**Subject:**

**AK**

**Proposed Redevelopment of the City Centre Food Market**

### **Summary statement:**

**This report will update the Executive on the review of property required for the market relocation and creation of new public realm on Darley Street.**

---

Joanne Hyde  
Strategic Director Corporate Services

**Portfolio: REGENERATION, PLANNING AND  
TRANSPORT**

Report Contact: Ben Middleton  
Assistant Director, Estates & Property  
Phone: 07582 101816  
E-mail: [ben.middleton@bradford.gov.uk](mailto:ben.middleton@bradford.gov.uk)

**Overview & Scrutiny Area:**

**Corporate**

## **1. SUMMARY**

- 1.1 This report is to provide the Executive with an update on the proposed relocation of the 'Food Market' to a new bespoke building on Darley St, which follows on from the report submitted to Exec on 10<sup>th</sup> July 2018. It is proposed to extend the scope of the development in order to maximise the regeneration impact of relocating the 'Food Market' onto Darley St and also allow the creation of an area of quality Public Realm adjacent to it.
- 1.2 This will require the acquisition of additional properties to deliver the enlarged scheme and this report is seeking Executive Approval for the Council to use its Compulsory Purchase Order (CPO) powers to acquire the necessary properties, to deliver the proposed scheme, should acquisition by private treaty fail.

## **2. BACKGROUND**

- 2.1 The overall vision for the city centre markets is to develop and sustain an attractive, inviting and vibrant city centre retail market that offers a diverse range of goods to meet the needs of our community that will add value to the economic, social, environmental and cultural fabric of Bradford City Centre and provide a shopping location that creates a dynamic vibrant and diverse experience.

The food focused market should acknowledge the heritage and history of Darley Street as a historic market street whilst meeting the needs of the modern consumer in market building that is fit for purpose in the 21st Century. The market will offer the best of local and regional fresh food and be recognised as a centre for food retailing excellence and a key shopper destination in Bradford City Centre.

Both markets will set the national benchmark for modern designed contemporary markets and their designs should allow the opportunity for new entrepreneurs to test their business ideas in a flexible trading environment.

- 2.2 Between 2014 and March 2018 vacancy rates have increased significantly from 9% to 31% in the Oastler Centre and from 16% to 35% in the Kirkgate Centre.
- 2.3 Cushman & Wakefield (formally DTZ) were appointed in 2014 to examine the Council's strategic approach to its city centre markets provision, and to provide a commercial, technical, and financial appraisal of options for the future markets provision in the city.
- 2.4 Their report recommended that both markets should remain open until the impact of the Broadway Shopping Centre on the city's shopping patterns could be fully assessed. The report went on to advocate a phased investment programme for the Oastler Centre and adjacent public realm with the aim of creating a modern market facility. Outline plans were drawn up, however, in February 2016, Morrisons, the Oastler Centre's main anchor tenant, announced the closure of its Westgate Store from April 2016, which has had a major impact on the viability of the centre and resulted in the decision not to proceed with this scheme.

- 2.5 In July 2016, a review of the Cushman & Wakefield options appraisal report looked at ways to revitalise its market offer whilst at the same time exploring how best to assist in the regeneration of Darley Street.
- 2.6 In April 2017, the Council announced plans to create a new modern fresh food market on Darley Street and in tandem refurbish Kirkgate Market.
- 2.7 Consultations with market traders took place in April 2017, with 127 tenants being contacted and given the opportunity to comments on the Council's redevelopment proposals. 120 tenants completed the survey.
- 2.8 The results of the initial consultation exercise was that 78% of traders are in favour of the Council proposals to create a food-focused market on Darley Street and an enhanced non-food offer in a refurbished Kirkgate Market.
- 2.9 In August 2017, the Council appointed Greig and Stephenson to lead a multi-disciplinary team of professionals with specialist market knowledge. The team undertook feasibility studies and prepared initial designs for the redevelopment of both city centre markets.
- 2.10 The design team has a wealth of retail experience particularly in markets having been involved in the redevelopment of London Borough Market, London Camden Market, Leicester Food Market, Leeds Kirkgate Market, Preston Market, Sheffield Moor Market as well as markets across Europe and the Far East.
- 2.11 The design team were asked to draw up plans for the building to be as light and transparent as possible, to open up the market and to strengthen links between Darley Street, Piccadilly and the Broadway Centre.
- 2.12 The design team have developed the project to RIBA stage 2.

### **3. OTHER CONSIDERATIONS**

- 3.1 Following on from July 2018 Exec report, officers have had an opportunity to reflect on the extent of the proposed scheme, and reviewed the opportunity of acquiring additional properties adjacent to the site of the proposed new 'Food Market', the former Marks & Spencer building at 16-24, Darley St, these being 10-14, Darley St and 8, Darley St. The inclusion of these properties will improve the service access for deliveries into the basement of the Food Market, and also allow the creation of a new area of quality Public Realm in the city.
- 3.2 This will have a positive impact on Darley Street, resulting in over 50% of the frontage facing the Kirkgate Centre currently unoccupied being redeveloped and improved, with the critical mass of the new 'Food Market' creating strong pedestrian flows in this part of the city.
- 3.3 The new area of Public Realm, would not only enhance the Market setting by creating an additional trading frontage, but also improve access and visibility (and rental levels) for the lower ground trading floor and augment the 'Market offer' by using the space to host 'ad hoc' events throughout the year. It will also provide

improved permeability and amenity space for visitors to the city centre and local residents, providing better access between the Kirkgate and Broadway shopping centres. The Design team will be tasked to explore ideas for the design and layout of the Public realm.

- 3.4 In order to ensure the deliverability of the proposed 'Food Market' and adjacent Public Realm, it is proposed the Council uses its Compulsory Purchase Order (CPO) powers, to acquire the properties which will guarantee the acquisition of the necessary freeholds with vacant possession, should negotiation by 'Private Treaty' fail.
- 3.5 Legal Services have confirmed that the Council has the necessary legal powers to initiate a CPO to enable this scheme to be developed, subject to the necessary criteria being met, and these are detailed below:
  - The CPO is a "last resort" if it can be demonstrated that there is little or no prospect of all the interests being acquired by voluntary negotiations;
  - Sufficient funding is available;
  - There are no planning obstacles;
  - The scheme is economically viable and there are, or are likely to be sufficient resources available to enable the scheme to be implemented and completed within a reasonable timeframe.

It is proposed that a planning application for the entire scheme will be submitted in the early part of 2019.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

- 4.1 The recommendations set out in paragraph 10 of this report have a number of financial, risk and resource implications. Further detailed financial analysis can be found in **Appendix 1** which is exempt for legal and commercial reasons as outlined in section 6 of this report.
- 4.2 The financial model that underpins the proposed new Markets is projected to restore the operations back into balance within a year of opening, thus arresting decline and ensuring a neutral effect to the Council's bottom line. The modelling assumes other Markets operation such as St James's Wholesale Market and the Keighley Market maintain favourable budget performance throughout.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 A 'Top of Town Steering Group' chaired by the Strategic Director for Place was set up to take a strategic overview of city centre development. Members of this group include the Assistant Director for Estates and Property, Assistant Director, Economy and Development and Assistant Director, Planning, Transportation & Highways.
- 5.2 In addition a Market Relocation Project Board, chaired by the Assistant Director for Estates and Property, has been established to focus on market design,

construction, media management and the legal work stream.

- 5.3 The project will be further reviewed for value for money when compared against wider financial duties. The scheme has been referred to the Council's taxation advisor in order for VAT and the Council's VAT partial exemption risks to be accounted for. Estimated costs include stamp duty levy and associated ancillary costs are included in the baseline estimates.
- 5.4 The success of this programme will depend upon the Council's ability to let space in the new property. There also risks linked to the timing of property acquisition; the move from the Oastler Centre; sustainability of markets traders in current overall economic trading climate and there is the uncertainty over market trader's appetite for new rent and service charges.
- 5.5 Before the Council legally commits to the development of the scheme the Strategic Director of Place will provide a further report to PAG (Project Appraisal Group) including a full review of the cost modelling once the detailed design work has been completed and tenders received, for sign off and authority to proceed. This will include any implications under the current regime for State Aid.

## 6. LEGAL APPRAISAL

- 6.1 **Compulsory Purchase Power** - This Report considers the consequences and justification of proceeding to authorise the use of compulsory purchase powers to facilitate a proposed redevelopment scheme. In deciding on the most appropriate power to use to enable a CPO to be made, regard must be had to the use of the specific power available for the purposes intended. As the proposed scheme involves the redevelopment of land, it is proposed to rely on the use of planning development powers under Section 226:Town and Country Planning Act 1990 (as amended) The Report also recommends that compulsory purchase powers are used to create a new right pursuant to Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 to enable the Council, if necessary, to enter and occupy Vintry House, in order to effectively use the building as a site compound to help facilitate the scheme.
- 6.2 **Compulsory Purchase Guidance** - In consideration of the potential use of compulsory purchase powers to support voluntary negotiations to acquire all the land needed for the scheme, reliance has been placed on Government guidance entitled "Guidance on Compulsory Purchase Process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of compulsion" published in 2015. Weight must be given to the Guidance to ensure that the proper compulsory procedures are followed, that the process is open and transparent and that nobody with a purported interest in the development land is prejudiced.
- 6.3 **The rights of the individual** – An important part of the compulsory purchase process is the need to ensure that the rights of the individual are recognised and taken into account by complying with the following human and equality rights -

### 6.3.1 Human Rights

Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way that is incompatible with the “European Convention on Human Rights”. Various Convention rights are likely to be relevant to the Compulsory Purchase Order, including –

- 6.3.1.1 **Entitlement to a fair and public hearing** in the determination of a person's civil and political rights (Convention Article 6) - this includes property rights and can include opportunities to be heard in the consultation process.
- 6.3.1.2 **Rights to respect for private and family life and home** (Convention Article 8) - Such rights may be restricted if the infringement is legitimate and fair and proportionate in the public interest.
- 6.3.1.3 **Peaceful enjoyment of possessions** (First Protocol Article 1) - This right includes the right to peaceful enjoyment of property and is subject to the Council's right to enforce such laws as it deems necessary to control the use of property in accordance with the general interest.
- 6.3.1.4 **Right to life** - in respect of which the likely health impacts of the proposals will need to be taken into account in evaluating the scheme (Convention Article 2).

The European Court has recognised that "*regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole*". Both public and private interests are to be taken into account in the exercise of the Council's compulsory purchase powers and duties as a local planning authority. Any interference with a Convention right must be necessary and proportionate. If compulsory purchase powers are required, project officers are of the view that in pursuing a CPO, careful consideration has been given to the balance to be struck between individual rights and the wider public interest. Any interference with Convention rights is considered to be justified in order to secure the economic, social, physical and environmental regeneration that the redevelopment scheme will bring. Appropriate compensation will be available to those entitled to claim it under the relevant provisions of the compulsory purchase national compensation code.

- 6.3.2 Project officers therefore believe that the redevelopment scheme is in the public interest and that this outweighs any harm that may be caused by the use of compulsory purchase powers to acquire and interfere with third party land and rights needed for the scheme. That any interference with any human rights protected by the Human Rights Act 1998 and the “European Convention on Human Rights” is considered to be justifiable in order to secure the public benefits that the scheme will bring to the community and wider area.”

### 6.4 Public Sector Equality Statement

- 6.4.1 In addition to the human rights legislation and requirements, project officers in formulating and promoting a CPO have so far and at this stage, also had regard to the Council's statutory duties and obligations under the Equality Act 2010 and in particular, to the Council's obligations under Sections 149 and 150 of the said Act, by taking into account the differential impact a CPO might have on various groups of persons with protected characteristics. As a result, project officers are satisfied that no negative impact upon any protected social groups has been identified.
- 6.4.2 In addition, the scheme aims to maximise public access by being, fully DDA compliant and dementia friendly, with plans to consult and engage all relevant stakeholder groups throughout the design process.

## **6.5 Compulsory Purchase Order – Justification**

- 6.5.1 As this is the first time that the Executive has been invited to consider the making of a CPO, the Executive must be satisfied prior to authorising the making of a CPO, that there is sufficient justification to make an Order and to demonstrate that the Council has exercised due diligence and probity and has been open and transparent in formulating its scheme proposals and in contacting and opening negotiations with interested parties to acquire the land needed.
- 6.5.2 Of paramount importance is for the Council to be satisfied that the following requirements have or are reasonably likely to be met, prior to a decision being taken to make a CPO -
- 6.5.2.1 That it is apparent from negotiations already undertaken, that there is little or no prospect of the land needed being acquired by voluntary means;
  - 6.5.2.2 That sufficient funding is or is likely to be available;
  - 6.5.2.3 That there are no planning obstacles;
  - 6.5.2.4 That the scheme is economically viable (i.e funding of the scheme represents "value for money");
  - 6.5.2.5 That there are sufficient resources available to implement and complete the scheme within a reasonable timeframe;
  - 6.5.2.6 That the scheme will contribute to achieve the object of either promoting or improving economic, social or environmental well-being in the locality of the scheme and wider community;
  - 6.5.2.7 That the compulsory purchase process is open and transparent;
  - 6.5.2.8 That due regard has and is being given during the compulsory purchase process to the rights of the individual under human rights and equality impact legislation, and

6.5.2.9 That there is a compelling case for the scheme in the public interest.

**6.6 Expert Advice-** it is not considered that any external specialised expert advice is needed at this stage of the compulsory purchase process, although it might be necessary to instruct Counsel should a local public Inquiry be held to consider objections if a CPO is made and published.

## **6.7 Options**

6.7.1 If the Council continues to rely on current negotiations and only seeks to authorise a CPO if negotiations break down, valuable time would be lost. By making a CPO at this stage, it demonstrates that the Council is serious in its intentions to promote the proposed development with the support of a CPO and which in turn, might encourage those whose land is affected to enter into more meaningful negotiations.

6.7.2 In essence –

6.7.2.1 The Council can either make a CPO in accordance with the recommendations below whilst continuing to explore whether the scheme land needed can be acquired by voluntary means and if not, to use compulsory purchase powers as a last resort or

6.7.2.2 Not authorise a CPO to be made to acquire the scheme land and instead to continue to rely on voluntary negotiations, notwithstanding that there is at present, little indication of all the land needed being able to be acquired by voluntary treaty and as a result - the Executive is strongly invited to authorise a CPO to be made in accordance with the recommendations below.

## **7. OTHER IMPLICATIONS**

Referred to in paragraph 6 above.

### **7.2 SUSTAINABILITY IMPLICATIONS**

A naturally ventilated building to reduce as much as possible the Council's use of energy which in turn reduces tenant costs through their service charges.

Maximum use of natural daylight to reduce the demand for electrical lighting, LED lighting and roof mounted solar panels to minimise Green House Gas (GHG) emissions.

The creation of carefully designed spaces allowing for easier maintenance which significantly reduce Facilities Management and the Operational Maintenance of the market.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

Referred to in 7.2 above.

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

N/A

### **7.5 HUMAN RIGHTS ACT**

Referred to in paragraph 6 above.

### **7.6 TRADE UNION**

There will be some redesigning, repurposing, or restructuring of staff to meet the needs of the new markets.

The cost of staffing the markets is ultimately paid for by traders. This needs to remain as cost effective as possible to reduce the financial burden on traders.

All the relevant Trade Unions will be consulted as required under Council HR procedures and will be invited to engage in any necessary staffing changes.

### **7.7 WARD IMPLICATIONS**

A briefing note has been circulated to Ward members to make them aware of the proposals

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

N/A

### **7.9 IMPLICATIONS FOR CORPORATE PARENTING**

N/A

### **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

N/A

## **8. NOT FOR PUBLICATION DOCUMENTS**

8.1 In view of the financial and business content of **Appendix 1**, the public interest in maintaining the exemption outweighs the public interest in disclosing the report.

8.2 The rationale behind this decision is based upon the fact that the report includes:

Details relating to the values to purchase the required site on Darley Street could undermine the Council's ability to negotiate the best prices for these sites. The Report contains details relating to the anticipated redevelopment plans and costs of the new market sites, which could undermine the Authority's ability to tender the works at the most reasonable price.

- 8.3 On this basis, this appendix is not for publication as its publication would prejudice the Council securing Best Value for purchase options, construction costs and assets disposal incomes.

## **9. OPTIONS**

Referred to in paragraph 6 above.

## **10. RECOMMENDATIONS**

That the Executive approves the following recommendations -

- 10.1 That the Executive is satisfied that the proposed redevelopment scheme is in the public interest and that any harm caused by the use of compulsory purchase powers to acquire and interfere with third party land and rights needed for the scheme is outweighed by the public benefits which the redevelopment scheme would generate, having also taken into account at this stage, the statutory obligations under the Equality Act 2010 in relation to the differential impact a Compulsory Purchase Order might have on various groups of persons with protected different characteristics;
- 10.2 To authorise
- 10.2.1 a Compulsory Purchase Order to be made pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by Section 99 of the Planning and Compulsory Purchase Act 2004), Section 1 of the Localism Act 2011 and the Acquisition of Land Act 1981 and all other relevant and enabling powers, to secure the compulsory acquisition of the land and buildings shown edged red and the creation of a new right referred to at 10.2.2 in respect of the building known as Vintry House, shown coloured blue on the plan appended hereto and which land and new right is needed to facilitate and enable a viable and deliverable scheme of redevelopment to be implemented and completed in the interests of promoting the environmental, economic and social wellbeing of the community and wider area;
- 10.2.2 a right to be created pursuant to Section 13 of the Local Government (Miscellaneous Provisions) Act 1976 to permit the Council to enter and occupy Vintry House, shown coloured blue on the plan annexed hereto, for the purpose of using the building as a site compound for the storage of machinery, equipment and other apparatus necessary to facilitate the proposed redevelopment scheme.
- 10.3 To delegate to the Strategic Director: Corporate Resources authority to -
- 10.3.1 make, if necessary, minor or technical amendments to the Compulsory Purchase Order;

- 10.3.2 modify and settle the draft “Statement” to justify the use of compulsory purchase powers, the Compulsory Purchase Order Map and Schedule and all other legal documentation necessary to support and accompany the Compulsory Purchase Order to the Secretary of State for Housing, Communities and Local Government for confirmation;
  - 10.3.3 approve agreements with landowners setting out the terms for withdrawal of any objections to the Compulsory Purchase Order, including where appropriate, seeking exclusion of land from the Compulsory Purchase Order;
  - 10.3.4 confirm the Compulsory Purchase Order, if satisfied that it is appropriate to do so, in the event that the Secretary of State notifies the Council that the Council has been given the power to confirm the Compulsory Purchase Order;
  - 10.3.5 promote any modifications to the Compulsory Purchase Order, if expedient to do so;
  - 10.3.6 take all and any necessary action, as the case may be to continue or open negotiations with persons for the acquisition of land and the exercise of a right to occupy Vintry House to facilitate the scheme and any other interests included in the Compulsory Purchase Order and any other land needed for the redevelopment scheme and to authorise acquisitions by agreement where the use of compulsory purchase powers is in contemplation and to approve the purchase price, advance payments and all other compensation payments;
  - 10.3.7 take all necessary steps in relation to any statutory blight proceedings instituted against the Council for the acquisition of land claimed to be blighted by the threat or presence of the Compulsory Purchase Order and
  - 10.3.8 take all necessary action, should the quantum of compensation flowing from the threat or use of compulsory purchase powers be in dispute and be referred to the Upper Tribunal (Lands Chamber) or other form of arbitration.
  - 10.3.9 to take and do all things necessary or incidental to the implementation of the above resolutions;
- 10.4 That all land acquired for the redevelopment scheme be held for planning purposes.
- 10.5 That Executive approve the recommendations contained within the confidential appendix.

## 11. APPENDICES

Appendix 1 Confidential appendix

Appendix 2 OS plan identifying the extent of the proposed scheme

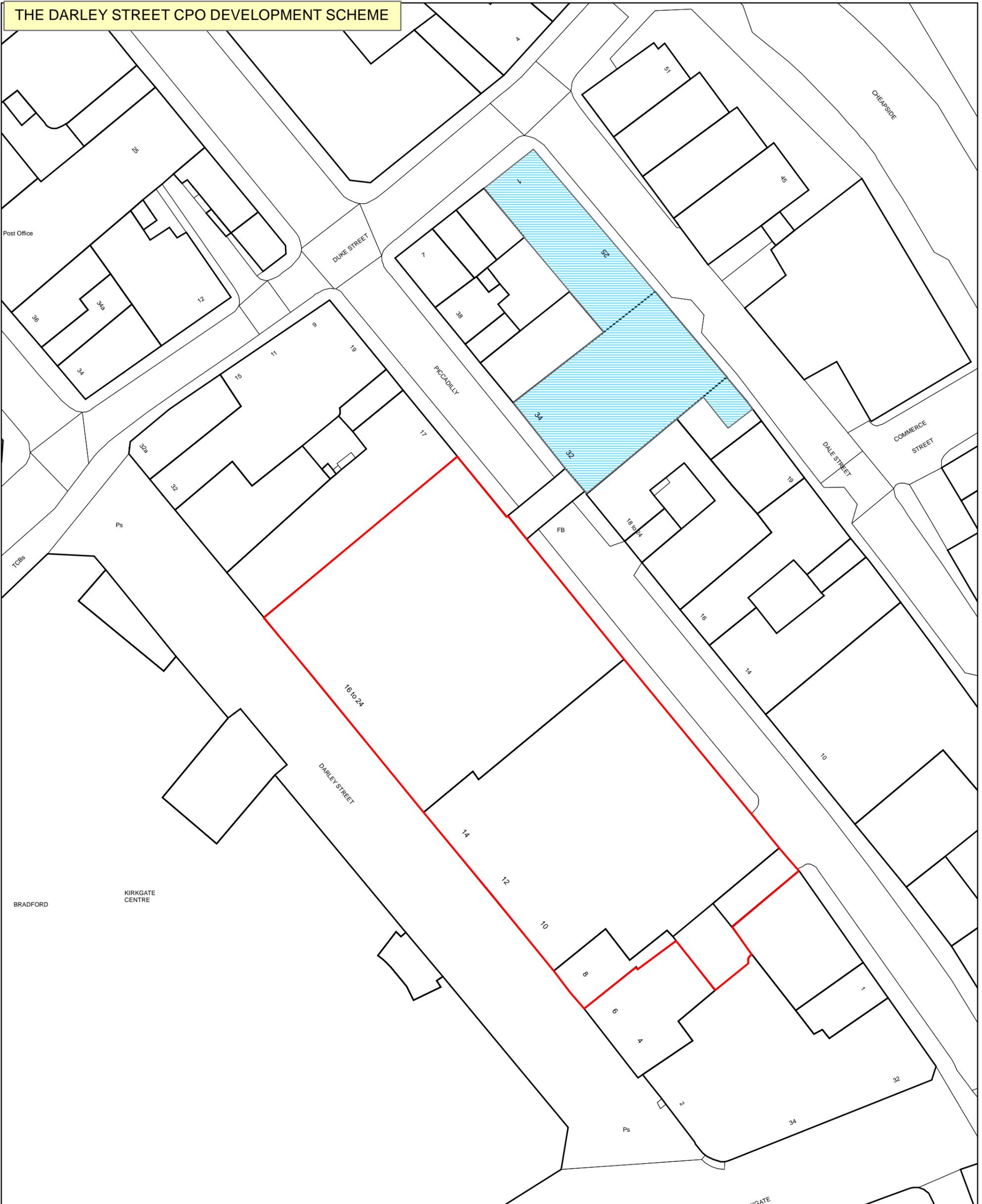


## **12. BACKGROUND DOCUMENTS**

Executive Report – 10 July 2018

This page is intentionally left blank

**THE DARLEY STREET CPO DEVELOPMENT SCHEME**



City of Bradford Metropolitan District Council

**ESTATES and PROPERTY**

[www.bradford.gov.uk](http://www.bradford.gov.uk)

1st Floor Argus Chambers, Britannia House, Bradford, BD1 1HX

Crown Copyright, Reproduced from Ordnance Survey Mapping with permission from H.M.S.O.  
0100019304 SE1633

Scale  
1/500@A3

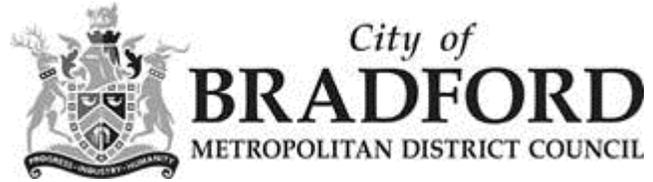
Date  
11-12-2018

Plan No.  
DCB

P-044-016-08M  
Page 131



This page is intentionally left blank



## Report of the Strategic Director of Place to the meeting of the Executive to be held on 8 January 2019

---

**Subject:**

**AL**

**Bereavement Services Strategy – Delivery Plan Update**

### **Summary statement:**

A progress update on delivery of the adopted Bereavement Services Strategy covering:-

- Appointment of external specialists to assist with delivery of crematoria programme
- Land Acquisition
- The new Muslim burial ground lease with the Bradford 'Council for Mosques'
- Extension of Muslim burial ground at Scholemoor cemetery
- Infrastructure repair to cemeteries
- Revised Memorial Policy

**Appendix 2 of this report is not for publication.**

---

Steve Hartley – Strategic Director of Place

**Portfolio:**

Healthy People and Places

Report Contact: Phil Barker  
Phone: (01274) 432616  
E-mail: [phil.barker@bradford.gov.uk](mailto:phil.barker@bradford.gov.uk)

**Overview & Scrutiny Area:**

Regeneration and Environment

## 1 SUMMARY

A progress update on delivery of the adopted Bereavement Services Strategy covering:-

- Appointment of external specialists to assist with delivery of crematoria programme
- Land Acquisitions
- The new Muslim burial ground lease with the Bradford 'Council for Mosques'
- Extension of Muslim burial ground at Scholemoor cemetery
- Infrastructure repair to cemeteries
- Revised Memorial Policy

## 2 BACKGROUND

### 2.1 Governance

The Executive adopted a strategy for the Bereavement Service in November 2016 covering future development of the Council's cemeteries and crematoria with an indicative capital requirement of £17m.

An initial progress report on delivery of the adopted Bereavement Services Strategy was received by the Executive on 10 July 2018 with the following resolutions:-

- (1) That the procurement of external specialist resources to complete the feasibility stage for all 5 identified sites and subject to further approval, deliver progress to RIBA stage 3 for the design and build of two new crematoria. (option 9.1.2 to Document "L") be approved.
- (2) That the Strategic Director Place be authorised to negotiate a revised lease with Bradford Council for Mosques by the end of 2018 (option 9.1.3 to Document "L").
- (3) Subject to the requirements of resolution 2 above being delivered, the Strategic Director Place be authorised to open negotiations with Bradford Council for Mosques to determine a lease/licence for the new burial space being developed at Scholemoor cemetery.
- (4) The Strategic Director Place be given delegated approval of spend in consultation with the S151 officer for the extension of Scholemoor Cemetery to create additional burial space at the earliest opportunity.
- (5) The Strategic Director Place be given delegated approval of spend in consultation with the S151 officer to upgrade the crematory at Oakworth Crematorium, to include mercury abatement, at the earliest opportunity (option 9.1.4 to Document "L")

This report details the progress made to date on delivery of the adopted Bereavement Services Strategy including the above resolutions.

## 2.2 Crematoria

Some 80% of the Bereavement Service's funeral activity relates to cremation (circa 3000 annually) through the 3 existing crematoria all of which are aged with all cremators beyond their recommended life span. The districts existing six cremators, three at Scholemoor, two at Nab Wood and one at Oakworth, together with the ancillary equipment, are almost 20 years old and are operating 4 years beyond the manufacturer's stated working life.

The cremators fail to comply with DEFRA's current air quality emission requirements as they are not fitted with mercury abatement equipment, requiring the Council to purchase 'credits' under the Crematoria Abatement of Mercury Emissions Organisation (CAMEO) scheme.

The key recommendations within the bereavement strategy therefore relate to the provision of sustainable, modern, fit for purpose crematoria to enhance the service provision for the District's residents. The preferred delivery method is to build two new crematoria to replace the Scholemoor and Nab Wood facilities, whilst Oakworth will be refurbished.

Table top assessment has identified two potential sites for new provision in the south of Bradford and three possible sites in Shipley/Keighley area, a total of five potential sites across the District. Options have been limited due to the Cremation Act 1902 not allowing the building of a crematorium within 200 yards of a dwelling house except with the consent of the landlord, tenant and occupier of the house or within 50 yards of any public highway.

Three of the 5 sites identified are located on privately owned land and, as detailed in section 8 below, their location is not for publication as that could prejudice the Council securing Best Value for the purchase.

The two potential southern sites are an area of privately owned land, central to the target area, and Littlemoor Park. Both sites have a number of known issues which may render either as unsuitable during detailed design and planning processes.

Three sites are under consideration for the replacement of Nab Wood crematorium, all being within 2 miles of this busiest of all the existing facilities. Two of these sites are privately owned and the third is Northcliffe Park.

The preference is to pursue the purchase of private land for the development of the crematoriums and this will be progressed in the first instance. It should be noted that Littlemoor Park and Northcliffe Park are held on separate Charitable Trusts. The area of restricted land required for the Crematoria facilities on these two sites is estimated at 20% and 5% of the total areas of Littlemoor Park and Northcliffe Park respectively. Procurement of the necessary land would require both Charity Commission & Trustee approval.

The delivery of improved and sustainable crematoria services is now business critical due to the condition and age of the existing facilities and cremators. However, the lack of ideal sites for new crematoria, particularly within the south of Bradford, is challenging and likely to exert significant pressure upon historic estimated costs.

## **2.3 Cemeteries**

Sufficient space exists within the Council's cemeteries to cover current levels of burial activity for some 30 years, with the exception of Muslim burials at Scholemoor, for which there is currently 2 to 3 years of burial space remaining. The delivery plan proposes conversion of further land at Scholemoor to increase this provision to 8-10 years.

The need for new cemetery provision beyond 10 years is recognised for both Muslim burial and more generally within the Shipley/Keighley corridor.

Existing infrastructure within the Council's 23 cemeteries requires investment and the strategy identifies the use of Better Use of Budgets (BUB) bids to carry forward elements of Service revenue surplus to fund a programme of priority projects.

## **2.4 Muslim Burials**

The majority of Muslim burials within the city area are undertaken by the Bradford Council for Mosques (CfM) under a land lease at Scholemoor Cemetery. The existing lease with the CfM originates from the mid-1980s and requires updating as the land currently being used is not explicitly covered whilst both parties recognise the need to further improve the quality of the service offer.

A further lease will be required to cover the proposed burial ground extension at Scholemoor cemetery.

## **2.5 Infrastructure repair to cemeteries**

The majority of the district's cemeteries were established well over 100 years ago and built predominantly for pedestrian access. On-going maintenance and upkeep of the districts cemeteries is therefore not only vital for the safety of the public but also integral to preserving elements of the historical and cultural development of Bradford.

Whilst reactive minor repairs to walls, paths and steps generally identified through regular public safety inspections are on-going, it has become clear that a more substantial programme of works is required as allocated revenue budgets are proving inadequate. There are growing issues in cemeteries and closed Church of England churchyards related to the repair and maintenance to paths, roads, walls, fences and drains.

The agreed action plan within the adopted Strategy identified the use of 'Better Use of Budget' (BUB) bids to transfer elements of annual revenue surplus into the following year to support the repair programme.

## **2.6 Revised Memorial Policy**

Memorials in cemeteries and closed church yards are owned by the named holder of the Exclusive Right of Burial; however the Council has overall responsibility for ensuring public safety in cemeteries, including memorials, through regular inspection and a programme of essential repair to graves where owners cannot be traced.

Whilst there is little more that can be done to reduce the liability from memorials erected prior to 1990, many of which do not carry ground anchors for headstones, a zero tolerance approach is required for new work. There remain a minority of monumental masons who continue to build without due regard to national industry standards creating not only potentially dangerous monuments but also future financial liabilities for grave owners or, by default, the Council. The adopted Bereavement Strategy requires the Memorial Policy to be reviewed and updated to allow more control on memorial activity.

The revised Memorial Strategy will also address the issue of informal memorials/memorabilia within cemeteries to determine either strict enforcement of the existing zero tolerance regime or the adoption of a less stringent and more flexible approach to memorabilia.

### **3.0 Progress Update**

#### **3.1 Appointment of external specialists**

Following a competitive tender process in September/October, Bradford based Rex Procter and Partners (RPP) was appointed on 21 November 2018 to provide external specialist advice and services throughout the entire crematoria delivery programme.

RPP will lead a multi-disciplinary team over an anticipated 4 year period, split into 4 phases with phase one specified for completion within 4 months of appointment. The main activities listed in the tender document within each phase are as follows:

Phase One:

- An immediate, short term (4 weeks), desk top appraisal of two identified sites
- A detailed feasibility study of the five identified sites for two new crematoria.
- Production, design and preparation of tender documents for the refurbishment and extension of Oakworth Crematorium.
- Provision of specialist advice, information, analysis and reports on all aspects of crematoria and associated services particularly cremator provision

Phase Two:

- Produce design and prepare tenders for the building of two new crematoria
- Administer the construction of Oakworth Crematorium extension and refurbishment:

Phase Three:

- Administer the construction of one new crematorium

Phase Four:

- Administer the construction of the second new crematorium.  
Rex Procter and partners organisations have commenced the immediate, short term (4 weeks), desk top appraisal of the two parks sites using their accumulated specialist knowledge and extensive experience to establish whether there are any factors, either absolute or in combination, that render the sites unsuitable for consideration for new crematoria.

Following an introductory meeting with RRP it was agreed that the initial desk top appraisal should be extended to all 5 possible sites with early feedback to inform the Council's decision making process.

Phase 1 activity to design the refurbishment of Oakworth crematorium is anticipated to commence early in 2019 although detailed design, estimates and tender documents are programmed for Spring 2019.

### **3.2 Land Acquisition**

Initial discussions have been held between the Councils Estates Service and landowners for each of the three private sites identified for potential new crematoria; all have expressed an initial interest in possible disposal.

The Corporate Trustees for Northcliffe Park and Littlemoor Park have been approached for a view on using part of both sites for crematoria. The Trustees have asked that the potential benefit for each Trust is quantified and public consultation carried out in each community before making any decision to progress the matter to the Charity Commission.

There has been significant public opposition to the possible use of the parks sites with Shipley residents in particular very active through an informed and sustained campaign over Northcliffe Park with a petition containing 2286 signatures presented to Full Council in October.

RPP have submitted, as requested, a preliminary 'site appraisal overview' as part of the initial four week desk top study based on high level analysis and the combined specialist team experience. Indicative strengths and weaknesses of all sites have been reported together with any identified 'severe constraints' likely to render sites unsuitable.

The results of this preliminary overview suggest that both sites to the south of the city have similar, but low levels of severe constraints. Two of the three sites currently identified to replace Nab Wood crematoria have either low level or no severe constraints identified whilst Northcliffe Park has the highest number including two which are unique to this proposed site.

RPP report that one of the two unique severe constraints relating to Northcliffe Park involves 'potentially insurmountable issues in forming safe access from a busy, steeply sloping road'. Given the nature and severity of the constraints, it is therefore proposed to recommend removal of this park from the list of potential sites for a new crematorium.

### **3.3 Lease with Bradford Council for Mosques (CfM)**

The existing lease with the CfM originates from the mid-1980s and requires updating, particularly as the land currently being used as a Muslim Burial Ground at Scholemoor is not explicitly covered. The new lease requires both parties to dedicate additional resources to the administration and management of the burial site to further improve the level of service delivery to the community. The lease is expected to be signed off before the end of January 2019.

### **3.4 Extension of Muslim burial ground at Scholemoor cemetery**

Significant site clearance work is required to allow access to this derelict allotment site for the necessary ground surveys to inform the proposed design and subsequent planning approval. An application to the Forestry Commission for a felling licence is being prepared as the site has been classified as woodland cover due to the number of self-seeded trees. Tenders for this clearance work have been prepared and will be issued on receipt of the licence. Change of use planning permission is expected to be submitted in spring 2019 with construction work planned to start in summer 2019.

### **3.5 Infrastructure repair to cemeteries**

The following significant projects have been carried out to date utilising successful BUBs for each of 2016/17 and 2017/18:-

Resurfacing access roads (£60k) – Scholemoor, Utley, Bowling & Oakworth  
Drainage installation (£35k) – Scholemoor  
Garden of Remembrance Scholemoor (£20k) – footway, walls and entrance

### **3.6 Memorials Policy**

The revised Memorials policy has been completed and will be introduced imminently following Portfolio Holder sign-off. The Policy will strengthen the Service's ability to enforce adequate and suitable standards for new formal memorials thus reducing potential future liability in terms of the need for the Service to fund repair work to ensure public safety. The issue of informal 'memorabilia' has also been addressed resulting in lighter regulation on some elements particularly those placed upon individual grave spaces.

## **4. FINANCIAL & RESOURCE APPRAISAL**

The adopted Strategy identified a compelling case for significant and immediate capital investment in the Council's Crematoria to ensure that the residents of Bradford District retain a service that is fit for purpose. A planned and phased approach to such investment is required to mitigate against the possibility of partial service failure causing further significant pressure on the quality of service delivered.

The indicative capital requirement agreed by Executive in November 2016 to deliver the Bereavement Services Strategy was £17m to cover the following service developments:-

- Extension of Muslim Burial Ground at Scholemoor Cemetery
- Refurishment of Oakworth Crematory
- Two new crematoria to replace Scholemoor and Nab Wood

The £17m identified in 2016 did not reflect the increasing complexity of the project, particularly in terms of identifying suitable sites for new facilities. The extent of resource required from external specialists and the likely increased costs for land acquisition are likely to render this figure insufficient to deliver the strategy. Updated costs and capital requirements will be revised when Phase 1 reports are received and land negotiations have been completed up to the stage where an 'option to buy' commitment is required.

Executive on 10 July 2018 resolved that the procurement of external specialist resources to complete Phase 1 be approved, including the feasibility stage for all 5 identified sites. £150k was provided for this purpose from 2017/18 year-end reserves with a further £100k identified in a 2017/18 BUB. The tender price for completion of Phase 1 is within this figure.

Further approval for the external specialists to move into Phase 2 will be required at the same time as the preferred sites for new build are confirmed by Executive. Build costs for the two new crematoria will be available at the end of Phase 2 and will need to be approved by Executive together with authorisation to move into Phase 3.

Executive on 10 July 2018 also approved spend for the extension of Scholemoor cemetery to create additional burial space at the earliest opportunity. Initial site clearance works will be funded from revenue budgets. The indicative capital budget requirement remains at £1,000,000 until detailed design has been completed and planning permission obtained.

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 Any significant and lengthy failure in the provision of a cremation service would cause both reputational and also financial damage to the Council.
- 5.2 There is a reputational risk to the Council if a revised lease cannot be completed with the Council for Mosques
- 5.3 It is likely that the estimated project costs contained within the strategy will be inadequate given the discovered issues at all of the potential crematoria sites. Proposed specialist research and design activity will provide robust and reliable project costs to allow informed decisions to be made prior to build.
- 5.4 In addition to the feasibility study, a business case is required to test that the estimated capital investment of £17m is cost neutral over a 15-20 year period when set against the projected annual financial revenues.
- 5.5 The scheme has been referred to the Council's taxation advisor in order for VAT and the council's VAT partial exemption risks to be accounted for.
- 5.6 Before the Council legally commits to each build stage of the project, a further report, including a full review of the cost modelling together with all risks and the actions proposed to mitigate these risks, will be brought to the Council's Project Appraisal Group (PAG) for consideration.

## **6. LEGAL APPRAISAL**

- 6.1 Under the Local Government Act 1972 and the Local Authorities Cemeteries Order 1977 a local authority may provide and maintain cemeteries.
- 6.2 Section 4 of the Cremation Act 1902 provides that a Burial Authority's powers to provide and maintain burial grounds or cemeteries or anything ancillary or incidental to the provision of cemeteries shall be deemed to extend to the provision and maintenance of crematoria. This legislation provides for a local authority to own and

operate cemeteries and crematoria and charge such fees as they see fit. In addition to this, the legislation extends to statutory requirements for keeping registers for burial and cremation together with site plans.

- 6.3 The Cremation (England & Wales) Regulations 2008 also requires that a cremation authority must ensure that a crematorium is maintained in good working order.
- 6.4 Further, the cremation of human remains is also governed by the Environmental Protection legislation with regard to emissions from cremator operation. The level of emissions must be recorded to allow annual certification by the local Environmental Health office. Crematoria across England & Wales have been required to abate emissions of Mercury by 50% (of 2003 levels) since 31 December 2012.
- 6.5 A full feasibility analysis including title and deed investigation, consultation with any interested parties and confirmation that planning and environmental health are satisfied in policy and regulatory terms is required before any new sites for the crematoria can be recommended for approval. .
- 6.6 All procurement activity must be undertaken in accordance with Council's Contract Standing Orders and in line with internal governance requirements.

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

The Bereavement Services Strategy aims to deliver the objectives of the Council's Organisational Equalities Culture by ensuring services are well run, fit for purpose, and fair and inclusive in their approach.

The Strategy recognises and supports equality of opportunity between different groups, particularly religious in nature, through provision of relevant, accessible and in some cases bespoke services.

An Equality Impact Assessment is included at Appendix 1

### **7.2 SUSTAINABILITY IMPLICATIONS**

The strategy seeks to deliver the most sustainable service achievable over a 15-20 year period and beyond through a programme of capital investment.

The proposed new crematoria will be designed to include energy reduction and recovery systems together with more efficient cremators to reduce both fuel use and carbon footprint.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

The Council's 6 cremators currently fail to comply with DEFRA's air quality emission requirements as they are not fitted with mercury abatement equipment. The strategy, when implemented in full, will include filtration equipment to all cremators in line with these regulations which aim to abate emissions of Mercury by 50% (of 2003 levels).

## **7.4 COMMUNITY SAFETY IMPLICATIONS**

There are no known Community Safety Implications arising from this report.

## **7.5 HUMAN RIGHTS ACT**

There are no known Human Rights Implications arising from this report.

## **7.6 TRADE UNION**

There are no significant staffing implications arising from this report although the Trade Unions will be consulted as required through the Council's IR Framework.

## **7.7 IMPLICATIONS FOR CORPORATE PARENTING**

There are no known corporate parenting implications arising from this report.

## **7.8 ISSUES ARISING FROM PRIVACY IMPACT ASSESSMENT**

Implementation of the Bereavement Service strategy will not affect the current and compliant processes in place to ensure privacy of personal data in accordance with the legislation in place.

## **8. NOT FOR PUBLICATION DOCUMENTS**

**8.1** Appendix 2 of this Report is not for publication.

**8.2** In view of the financial and business content of Appendix 2, the public interest in maintaining the exemption outweighs the public interest in disclosing the details contained within this Appendix.

**8.3** The rationale behind this decision is based upon the fact that the information contained within this Appendix includes details relating to:

- the option to acquire sites for new crematoria in the district, which could undermine the Council's ability to negotiate the best option and price for these sites.
- elements of the submitted price by the appointed external specialists within a confidential competitive tendering exercise.

**8.4** On this basis, the stated Appendix is not for publication as its publication would prejudice the Council securing Best Value for purchase options and also breach business confidentiality requirements.

## **9. OPTIONS**

There are a limited number of decisions required within this update report and they relate to the proposed sites for new crematoria.

There is little option but to remove Northcliffe Park from the list of potential sites given the officer recommendation based on the severe and unique site constraints confirmed by the external specialist team. Advice suggests that the site is unviable for such a development and should be removed from the list.

There is a similar clear need to move forward on land acquisition negotiations in order to both establish availability and also obtain more robust cost estimates for inclusion in the end of Phase 1 report seeking approval to move into detailed design/construction phase.

## **10. RECOMMENDATIONS**

It is recommended that the Executive:-

- 10.1 Approve the recommendation made by the Strategic Director Place to remove Northcliffe Park from the list of potential sites for a new crematorium
- 10.2 Instruct the Strategic Director Place to communicate the decision made for removal of Northcliffe Park from the list of proposed sites for a new crematorium to the Regulatory and Appeals Committee of the Council sitting as Corporate Trustees.
- 10.3 Instruct the Strategic Director Corporate Services to commence land acquisition negotiations up to the option to buy stage for the two sites specified within the Not for Publication Appendix 2 of this report.
- 10.4 Note and welcome the procurement of external specialist resources to complete the feasibility stage for the remaining 4 identified sites and subject to further approval, deliver progress to RIBA stage 3 for the design and build of two new crematoria
- 10.5 Instruct the Strategic Director Place to submit a report recommending the two sites to be approved for the construction of new crematoria and the estimated costs at the earliest opportunity.
- 10.6 Note and welcome the imminent signing of the revised lease with Bradford Council for Mosques for the Muslim burial area at Scholemoor cemetery.
- 10.7 Note and welcome adoption of the revised Memorial Policy

## **11. APPENDICES**

- 1 Equality Impact Assessment – Bereavement Services
- 2 Confidential Information not for publication concerning potential sites for new crematoria and price elements received within a confidential competitive tender process.
- .

## **12. BACKGROUND DOCUMENTS**

Bereavement Services Strategy 2016-2031

## Appendix 1 – Bereavement Services Strategy EIA

Equality Impact Assessment Form

Reference –BerSerStrat

<b>Department</b>	Place	<b>Version no</b>	1.0
<b>Assessed by</b>	John Scholefield	<b>Date created</b>	May 2018
<b>Approved by</b>		<b>Date approved</b>	
<b>Updated by</b>		<b>Date updated</b>	
<b>Final approval</b>		<b>Date signed off</b>	

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

### Section 1: What is being assessed?

#### 1.1 Name of proposal to be assessed.

The Bereavement Services Strategy

#### 1.2 Describe the proposal under assessment and what change it would result in if implemented.

A strategy covering the future provision of burial and cremation services beyond 2030. The main elements of the proposed delivery plan cover improved crematoria facilities, infrastructure repairs to cemeteries, continuation of an improved Muslim burial service and changes to the council's memorial policy.

The level of capital expenditure required to improve crematoria provision may result in above inflation rises in the charge for cremations.

### Section 2: What the impact of the proposal is likely to be

#### 2.1 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.

Service improvements in the partnership agreement for Muslim Burial Grounds should enhance the existing high level of opportunity for this particular community to receive a burial in line with their faith and customs.

There will be new facilities as a result of the changes proposed which will benefit the whole community and provide for several faith groups, increasing community services for people with the protected characteristics.

#### 2.2 Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

Not applicable

**2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.**

Yes

**2.4 Please indicate the level of negative impact on each of the protected characteristics?**

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

<b>Protected Characteristics:</b>	<b>Impact (H, M, L, N)</b>
Age	N
Disability	N
Gender reassignment	N
Race	N
Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N
Marriage and civil partnership	N
<b>Additional Consideration:</b>	
Low income/low wage	L

**2.5 How could the disproportionate negative impacts be mitigated or eliminated?**

Bradford's charges for cremation remain significantly lower than the West Yorkshire Council average and reflect, to an extent, the quality of the existing provision. Any potential future price increases will be determined with due consideration of those of neighbouring facilities to ensure they remain proportionate in terms of the quality of provision and also the comparative affordability of the service to the community.

**Section 3: Dependencies from other proposals**

**3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.**

None

**Section 4: What evidence you have used?**

**4.1 What evidence do you hold to back up this assessment?**

- Comparative local charges over 5 years
- Knowledge of rationale behind above inflation price changes in recent years

#### **4.2 Do you need further evidence?**

The current level of knowledge is regarded as sufficient to support this analysis

### **Section 5: Consultation Feedback**

#### **5.1 Results from any previous consultations prior to the proposal development.**

There are no known specific consultation results for the Bereavement Services Strategy although there has been corporate consultation over above inflation price rises over the past 4 years.

#### **5.2 The departmental feedback you provided on the previous consultation (as at 5.1).**

None required

#### **5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).**

Awaited

#### **5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.**

N/A



## Report of the Director of Place to the meeting of the Executive to be held on 8 January 2019

---

**Subject: Petition against Consideration of Northcliffe Park as a Site for a New Crematorium**

**AM**

### **Summary statement:**

The petition entitled 'Petition against Consideration of Northcliffe Park as a Site for a New Crematorium' was received by Full Council on 16 October 2018 and referred for consideration by Executive.

The petition relates to the inclusion of Northcliffe Park on a list of 3 sites under consideration for the building of a new crematorium to replace the facility at Nab Wood cemetery. The report considers the concerns raised in the petition regarding the possible use of part of the Park, which is held in trust, for the building of a crematorium.

---

Steve Hartley – Director of Place

**Portfolio:**

Better Health, Better Lives

Report Contact: Phil Barker  
Phone: (01274) 432616  
E-mail: [phil.barker@bradford.gov.uk](mailto:phil.barker@bradford.gov.uk)

**Overview & Scrutiny Area:**

Regeneration and Environment

## 1. SUMMARY

The petition entitled 'Petition against Consideration of Northcliffe Park as a Site for a New Crematorium' was received by Full Council on 16 October 2018 and referred for consideration by Executive.

The petition relates to the inclusion of Northcliffe Park on a list of 3 sites under consideration for the building of a new crematorium to replace the facility at Nab Wood cemetery. The report considers the concerns raised in the petition regarding the possible use of part of the Park, which is held in trust, for the building of a crematorium.

## 2. BACKGROUND

- 2.1** The Executive adopted a strategy for the Bereavement Service in November 2016 covering future development of the Council's cemeteries and crematoria including key recommendations to provide sustainable, modern, fit for purpose crematoria to enhance the service provision for the District's residents. The preferred delivery method is to build two new crematoria to replace the Scholemoor and Nab Wood facilities, whilst Oakworth will be refurbished.
- 2.2** Table top assessment has identified three possible sites for the replacement of Nab Wood crematorium, two of these sites are privately owned and the other is Northcliffe Park. Options have been limited due to the Cremation Act 1902 not allowing building of a crematorium within 200 yards of a dwelling house except with the consent of the landlord, tenant and occupier of the house or within 50 yards of any public highway.
- 2.3** The Council's stated preference is to pursue the purchase of private land for new crematoria and this will be progressed in the first instance for viable sites.
- 2.4** The area of restricted land required for a crematorium at Northcliffe Park is estimated at 5% of the total area of the Charitable Trust. Procurement of the necessary land would require both corporate Trustee & Charity Commission approval.
- 2.5** The Regulatory and Appeals Committee of the Council sitting as Corporate trustees were approached in July 2018 for a view on using part of the site for a crematorium. The Trustees asked that the potential benefit for the Trust be quantified and public consultation carried out before making any decision to progress the matter to the Charity Commission.
- 2.6** A petition entitled 'Petition against Consideration of Northcliffe Park as a Site for a New Crematorium' was received by Full Council on 16 October 2018 and referred for consideration by Executive.
- 2.7** The petition, containing 2286 signatures,(in paper and online forms), summarises the issues/background, as follows:

*'We the undersigned call upon CBDMC to withdraw Northcliffe Park from the list of sites under consideration for the construction of a new crematorium. The land is*

*held in trust as open space for the benefit and recreation of the public, and we do not believe it should be considered for development under any circumstances'*

- 2.8** The written copy of the address to Council summarises in three main messages;
- The scale of reaction including the petition numbers, 500 people linking arms around the proposed site and an active social media campaign.
  - The possible social impacts on the 'Humans of Northcliffe' and their physical and mental health and well-being.
  - .A plea for the Council to uphold the ward resident's trust and make the decision to remove Northcliffe from the list of potential sites.

### **3. OTHER CONSIDERATIONS**

- 3.1** Executive on 10 July 2018 approved the procurement of external specialist resources to complete a full feasibility study for all identified sites as part of the contract brief. An initial desktop feasibility study was also specified and due for completion by the end of December to establish whether there are any factors, either absolute or in combination, that render any sites unsuitable for consideration for new crematoria.

- 3.2** Full Council on 16<sup>th</sup> October resolved on a separate item 51, also relating to the possible use of Northcliffe Park for a crematorium, to note that:-

*The Council values the parks and green spaces of Bradford and would always by preference avoid using them for this special purpose. It will always respect the decision of trustees regarding the parks.*

*The Executive therefore awaits the findings of the feasibility study which it will then consider along with all the facts and expressed public sentiment before a decision can be reached.*

- 3.3** The external specialists have submitted, as requested, a preliminary 'site appraisal overview' as part of the initial four week desk top study based on high level analysis and the combined specialist team experience. Indicative strengths and weaknesses of all sites have been reported together with any identified 'severe constraints' likely to render sites unsuitable.

The results of this preliminary overview suggest that two of the three sites currently identified to replace Nab Wood crematoria have either low level or no severe constraints identified whilst Northcliffe Park has the highest number including two which are unique to this proposed site.

The external specialists report that one of the two unique severe constraints relating to Northcliffe Park involves 'potentially insurmountable issues in forming safe access from a busy, steeply sloping road'. Given the nature and severity of the constraints, it is therefore proposed to recommend removal of this park from the list of potential sites for a new crematorium.

#### **4. FINANCIAL & RESOURCE APPRAISAL**

The decision as to which sites to take forward for the building of two new crematoria will include consideration of the costs involved. The on-going specialist research and design activity will provide more robust and reliable project costs as part of the full feasibility study report due from the external specialist team in Spring 2019 to allow informed decisions to be made prior to build. Further work is being undertaken by the Estates Service to establish likely land acquisition costs for inclusion in the overall project costings.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

- 5.1 Any significant and lengthy failure in the provision of a cremation service would cause both reputational and also financial damage to the Council.

#### **6. LEGAL APPRAISAL**

- 6.1 The Council would have to consider any proposal to use any part of Northcliffe Park in its role as corporate trustee, which is discharged through the Regulatory and Appeals Committee. In this role the committee would have to act in the best interests of the trust, which may conflict with the interests as the Council.
- 6.2 For example if the Executive went against recommendations of this report and concluded that the Park is the best option for a crematorium site, that would not be something that should carry any particular weight with the Regulatory and Appeals committee in deciding whether it was in the best interest of the trust to proceed with the proposal.
- 6.3 Any scheme would also need approval from the Charity commission for the both the land disposal in principle under section 121 Charities Act 2011 and the fact it is being disposed of to the Council as a 'connected person' under section 118 Charities Act 2011 .

#### **7. OTHER IMPLICATIONS**

##### **7.1 EQUALITY & DIVERSITY**

The Bereavement Services Strategy aims to deliver the objectives of the Council's Organisational Equalities Culture by ensuring services are well run, fit for purpose, and fair and inclusive in their approach. The Strategy recognises and supports equality of opportunity between different groups, particularly religious in nature, through provision of relevant, accessible and in some cases bespoke services.

##### **7.2 SUSTAINABILITY IMPLICATIONS**

The strategy seeks to deliver the most sustainable service achievable over a 15-20 year period and beyond through a programme of capital investment. The proposed new crematoria will be designed to include energy reduction and recovery systems together with more efficient cremators to reduce both fuel use and carbon footprint.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

The Council's 6 cremators currently fail to comply with DEFRA's air quality emission requirements as they are not fitted with mercury abatement equipment. The strategy, when implemented in full, will include filtration equipment to all cremators in line with these regulations which aim to abate emissions of Mercury by 50% (of 2003 levels).

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

There are no known Community Safety Implications arising from this report.

### **7.5 HUMAN RIGHTS ACT**

There are no known Human Rights Implications arising from this report.

### **7.6 TRADE UNION**

There are no significant staffing implications arising from this report

### **7.7 IMPLICATIONS FOR CORPORATE PARENTING**

There are no known corporate parenting implications arising from this report.

### **7.8 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

Implementation of the Bereavement Service strategy will not affect the current and compliant processes in place to ensure privacy of personal data in accordance with the legislation in place.

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

The Executive will have already considered and confirmed its intended action over the inclusion of Northcliffe Park on the list of possible sites for new crematoria.

## **10. RECOMMENDATIONS**

It is recommended that the Executive:-

- 10.1 Refer the lead petitioner to the recommendations passed within the Bereavement Services Strategy Delivery Plan Update report.

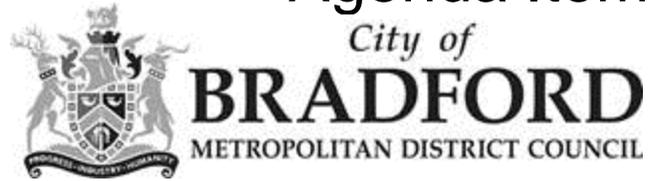
## **11. APPENDICES**

None

## **12. BACKGROUND DOCUMENTS**

➤ None

This page is intentionally left blank



## **Report of the Interim Strategic Director of Children's Services to the meeting of Executive Committee to be held on 8th January 2019**

---

**Subject:**

**AN**

**PROPOSED CHANGES TO NURSERY PROVISION AT LOW ASH PRIMARY SCHOOL**

**Summary statement:**

**This report asks the Executive to:**

Approve changes to the Nursery provision at Low Ash Primary School from 1 September 2019

---

Gladys Rhodes White  
Interim Strategic Director- Children's Services

Report Contact: Marium Haque  
Phone: (01274) 431078  
E-mail: [Marium.Haque@bradford.gov.uk](mailto:Marium.Haque@bradford.gov.uk)

**Portfolio:**

**Education, Employment and Skills**

**Overview & Scrutiny Area:**

**Children's Services**

## **1. SUMMARY**

This report asks the Executive to:

Approve changes to the Nursery provision at Low Ash Primary School from 1 September 2019

## **2. BACKGROUND**

### **2.1 Proposal to change Low Ash Primary School Nursery:**

- 2.1.1 The School and Governing Body of Low Ash Primary School asked that consultation be undertaken by the Local Authority on the possible closure of the school's nursery class.
- 2.1.2 Concerns were raised by the School that the nursery class had not completely filled over the last few years.
- 2.1.3 A promotional drive had been carried out by the school to advertise and generate more interest to try and fill their nursery.
- 2.1.4 Surveys of two cohorts of parents were carried out by the school to explore the reasons they chose not to send their children to the school nursery. The main reasons given were that the child was already settled in another nursery setting, or that additional hours or days were needed.
- 2.1.5 The equivalent of 59 children was expected to join the nursery class in academic year 2018/19.
- 2.1.6 Low Ash Primary School is due to increase its PAN from 60 to 90 from September 2019 with ongoing expansion works as agreed by the Executive Committee in March 2018.
- 2.1.7 The expansion and increase in published admission numbers is due to the growing demand for places in this and the surrounding area mainly due to a number of significant housing developments that have been approved.

## **3. OTHER CONSIDERATIONS**

### **Consultation**

#### **3.1 Low Ash Primary School**

- 3.1.1 Consultation on the proposal to make changes to the Nursery Provision at Low Ash Primary School was carried out by the Local Authority between 7 September 2018 and 19 October 2018. The consultation set out various options which were:
  - Full closure of the nursery class
  - Reduce the number of children attending from a 30 place nursery with a staffing ratio equivalent of 3, to a 26 place nursery with 2 members of staff
  - Change the opening hours of the nursery to mornings or afternoons only
  - Change the nursery to only open for 2 or 3 days a week
  - Retain the nursery as it is
- 3.1.2 The list of those consulted is shown in Appendix B. Details of the consultation was placed on the Council's website, Bradford Schools Online, Facebook and Twitter.
- 3.1.3 A total of 68 responses were received, see summary Appendix C and all comments in Appendix D.
- 3.1.4 The majority of respondents did not support closure of the nursery class but supported the nursery class staying open either in full or with a reduction in places

## **3.2 School Comments**

### **3.2.1 Headteacher's comments regarding the proposed changes to Nursery provision at Low Ash Primary School**

The Headteacher of Low Ash Primary School, has reported that the school's preference for changes to Nursery provision from September 2019 would be to:

**Reduce the number of children attending from a 30 place nursery with a staffing ratio of 3 needed, to a 26 place nursery which would require a staffing ratio of 2 members of staff.**

The Head stated that they have found it difficult to fill the Nursery due to parental preferences for alternative provision and hours, they still understand the importance of having a Nursery in the immediate locality of Wrose for the community.

The financial implications of unfilled places in Nursery is still a concern, but by reducing numbers to a 26 place Nursery the school could make budget savings as the staffing ratio is 1:13 for this age range.

With the addition of another Reception Class in September due to the expansion of the school, the current nursery staff member not required for Nursery in September 2019 would be relocated to the new Reception class.

### **3.2.2 Chair of Governor's comments regarding the proposed changes to Nursery provision at Low Ash Primary School**

The Chair of Governor's stated that the primary driver for considering closure of the nursery provision at Low Ash was the fact that they have been unable to fill places, which has a direct impact on the budget in school. The governing body recognise the fiscal responsibilities to ensure that money available to each child in school is being appropriately spent to ensure that children receive a good education.

The timing to make the proposed changes worked well because as employers we are additionally responsible for ensuring that all steps are taken to avoid redundancies of staff as a result of any proposed changes. By making the changes in September 2019 the school could ensure that any changes to staffing can be absorbed by the expansion and the creation of a new Reception class.

The reduction of places from 30 to 26 will result in lower staffing requirements, which as detailed above can be absorbed by the new Reception class. There are still some worries that the 26 places may not all fill but accept that keeping a nursery provision at Low Ash is a positive step for the community in Wrose.

## **4. FINANCIAL & RESOURCE APPRAISAL**

4.1 Bradford's Early Years Single Funding Formula (EYSFF) allocates funding to schools for 3 and 4 year olds attending nursery classes.

4.2 Low Ash Primary School could make budget savings by changing the maximum number of nursery pupils at any one time from 30 to 26 as the staffing ratio is 1:13 for this age range. There are currently 3 staff members in the nursery but this proposal would mean only 2 are needed. A nursery staff member could be relocated elsewhere in school as the remainder of the school is expanding and will require more staff for reception in September 2019.

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

None

## **6. LEGAL APPRAISAL**

- 6.1 Under section 14 of the Education Act 1996, local authorities have a statutory duty to provide sufficient school places for all pupils in its area.
- 6.2 There is no statutory pre-publication period for significant changes. However, statutory DfE guidance states that there is a strong expectation on schools and local authorities that they consult interested parties in developing their proposals prior to publication as part of their duty to act rationally and to take into account all relevant considerations. All responses received to such consultation must be considered in deciding whether to publish the necessary statutory proposals on the basis proposed.
- 6.3 Local authorities must follow a statutory process where they propose a change of age range of 1 year or more for community schools including the proposed removal of nursery provision

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

EIA form completed: see Appendix E

### **7.2 SUSTAINABILITY IMPLICATIONS**

None

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

The proposals would not impact on greenhouse gas emissions.

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

None

### **7.5 HUMAN RIGHTS ACT**

There are no direct Human Rights implications arising from this report although there may be implications for staff if the nursery closed. However, as the school is expanding there may be opportunities for staff to be moved into other areas of the school.

### **7.6 TRADE UNION**

Trade Unions have been informed of the proposals. Comments have not been received regarding either consultation

### **7.7 WARD IMPLICATIONS**

Ward Councillors have been consulted about the proposed changes to the schools in their wards.

## **7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS**

N/A

## **7.9 IMPLICATIONS FOR CORPORATE PARENTING**

There are no proposed changes to the admission arrangements for the school and therefore no implications arising from the proposed changes for the provision of places for Looked After Children.

## **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

General Data Protection Regulation principles relating to individuals' data and rights under the Data protection Act 2018 will be respected. Privacy implications arising from this proposal has been addressed by anonymising consultees' personal information together with any information which may enable them to be identified from their responses and the summary of their responses.

## **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

Considering the results of the consultations, the Executive can decide to:

### **9.1 Low Ash Primary School Nursery**

- a) Approve the publication of Statutory Proposals to close Low Ash Primary School Nursery class and change the age range of the School from 3 to 11 years (inclusive) to 4 to 11 years (inclusive) from 1 September 2019.
- b) Approve a reduction in nursery places from 30 to 26 children at any one time at Low Ash Primary School Nursery from 1 September 2019
- c) Approve a reduction in the opening hours of Low Ash Primary School Nursery to either mornings or afternoons only from 1 September 2019.
- d) Approve a reduction in the opening hours of Low Ash Primary School Nursery from 5 days a week to for 2 or 3 days a week from 1 September 2019.
- e) Retain Low Ash Nursery School Nursery class as it is.

## **10. RECOMMENDATIONS**

- 10.1 That taking into account that the majority of responses received reject the proposal to close the nursery (82%) and of those the majority suggested a 26 place nursery the Executive approves a reduction in nursery places from 30 to 26 children at any one time at Low Ash Primary School Nursery from 1 September 2019. This will also help to address some of the financial concerns of the school.
- 10.2 That if approved, Bradford Council's Childcare Sufficiency Officers will work with the school to ensure the offer is in line with community needs.

## **11. APPENDICES**

Appendix A: Sample consultation letter for Low Ash Primary School Nursery

Appendix B: List of Consultees

Appendix C: Summary of responses received for Low Ash consultation

Appendix D: All responses received for Low Ash Consultation

Appendix E: Equality Impact Assessment Form

## **12. BACKGROUND DOCUMENTS**

None



## Department of Place

Education Client Services  
Margaret McMillan Tower  
Princes Way  
Bradford  
BD1 1NN

Tel: (01274) 43 9346  
Fax: (01274) 320003  
Email: [Nina.Mewse@bradford.gov.uk](mailto:Nina.Mewse@bradford.gov.uk)

Date: 7 September 2018

Parents/Carers  
Children Attending Low Ash Primary School

Dear Parent/Carer

### **RE: Nursery Class – Low Ash Primary School**

The School and Governing Body of Low Ash Primary School have requested that the Council consults on the possible closure of their nursery class from September 2019. The age range of the school would, if the nursery closed change from 3 to 11 to 4 to 11.

The reason for this is the school are concerned that over the last few years their nursery class has not filled, the amount of funding they subsequently received therefore will be insufficient to enable them to staff and resource the nursery correctly.

The school has carried out a promotional drive in the last few months to advertise and generate more interest to try and fill their nursery.

- A large banner was placed outside the school near the crossing.
- Posters were placed on parents' boards around the school and in a variety of locations including Health Centres, local shops and businesses, the library and in Morrisons.
- The monthly newsletter and news brochure to parents also included information.

During the summer term this year the nursery class had only 42 children, 16 of these took advantage of the 30 hour offer of full time provision.

The school have surveyed two cohorts of parents whose children are attending/will be attending Low Ash but chose not to send their children to the nursery. The main reasons given were either that their child was already settled in another nursery setting, or that additional hours (typically 8am to 6pm) or days were needed.

### **Nursery to reception transition:**

**2018/19** - There were 37 eligible children in the nursery who applied for reception places in September 2018. 30 of these children (81%) have been allocated to Low Ash, 4 made first preferences for other schools, 3 applied for Low Ash but were not allocated using admission criteria, one of these applications was received after the allocations were made by which time the full 60 had been allocated.

**2017/18** - There were 44 eligible children (Page 139 75%) of whom were allocated places

at Low Ash. The remainder either made preferences for other schools (6) or were not allocated due to the admissions criteria, mainly distance to the school.

**2016/17** – There were 55 eligible children in 2016, 37 (67%) of whom were allocated places at Low Ash. The remainder either made preferences for other schools (3) or were not allocated due to the admissions criteria, mainly distance to the school.

**2015/16** - There were 57 eligible children in 2015, 45 (79%) of whom were allocated places at Low Ash. The remainder either made preferences for other schools (3) or were not allocated due to the admissions criteria, mainly distance to the school.

#### **Future demand for places:**

59 children are expected to join the nursery class in September 2018/19.

The school has 35 children on their waiting list (equivalent to 48 out of 60 places as some are full time, 30 hours places) who wish to start in the nursery in September 2019. Other nurseries in the area do currently have sufficient capacity to accommodate all these children should the nursery be closed.

The school admits 60 into each year group, reception to year 6, although as agreed by the Executive Committee of the Council, as from September 2019 it will admit 90 into reception, then incrementally over a 7 year period until all year groups can admit 90.

The expansion and increase in published admission numbers is due to the growing demand for places in this and the surrounding area mainly due to a number of significant housing developments that have been approved. Unfortunately we are unable at this stage to say when these homes would be completed and occupied, and by whom, nor whether there will be an increase in the demand for nursery places.

This letter is therefore to consult with you on a number of possible options affecting the nursery class at Low Ash Primary School:

- Full closure of the nursery class.
- Reduce the number of children attending from a 30 place nursery with a staffing ratio equivalent of 3, to a 26 place nursery with 2 members of staff.
- Change the opening hours of the nursery to morning or afternoons only.
- Change the nursery to only open for 2 or 3 days a week.
- Retain the nursery as it is.

#### **Proposals**

1. Closure of the nursery class from July 2019.

- This would affect the 35 children currently on the waiting list, although advice on alternative provision could be given by the school or Council.
- Making the decision to close the nursery in no way affects any application you might want to make for a reception place at Low Ash for September 2020, as a child attending a school nursery would not have a guaranteed place into the reception class due to the admissions criteria of the Council.
- Future demand for nursery class places from families moving into new and planned homes would need to be met elsewhere.
- Current nursery staff would be employed elsewhere within the school particularly as the school is expanding which would avoid any potential redundancies.
- Alternative use of this space would need to be made and in the interim whilst expansion construction works are being undertaken this space could be used for the additional statutory aged children for the new additional reception class.

- the age range of the school would be changed from 3 to 11 year olds to 4 to 11 year olds.
2. Reduce the nursery to a 26 place nursery.
    - This would enable the school to employ 2 rather than 3 members of staff in the nursery class. The 'spare' member of staff could be employed elsewhere in the school particularly as it increases its' published admission number from 60 to 90 starting from September 2019. This may help the school financially.
    - Up to a maximum of 52 part-time children could be catered for instead of the current 60.
    - The school would be able to admit 26 nursery children at any one time, 26 am and 26 pm those taking up the 30 hour offer would take up both a morning and an afternoon place, reducing the number of different children attending.
    - This is less likely to cause disruption for parents and children.
  3. Change the opening hours of the nursery to morning or afternoons only.
    - This would affect children who currently have 30 hours per week provision, they would either need to revert to 15 hours per week, find the additional 15 hours elsewhere or move nursery to a provider that can offer 30 hours.
    - Nursery class staff would need to work elsewhere within the school during the morning or afternoon. Some staffing restructuring would be required.
    - Parents could be affected if any working patterns or childcare arrangements did not fit in with either the morning or the afternoon sessions dependant on when the nursery was open.
    - Utility costs would remain the same but alternative part-time use of the space could be made, e.g. Community use, although resources and furniture would need to either remain or be removed and then returned to accommodate this
  4. Change the nursery to open only 2 or 3 days a week.
    - This would affect children who currently have 30 hours per week provision, they would either need to revert to 15 hours per week, find the additional 15 hours elsewhere or move nursery to a provider that can offer 30 hours.
    - Nursery class staff would need to work elsewhere within the school during the rest of the week. Some staffing restructuring may be required.
    - Parents could be affected if any working patterns did not fit in with the days the nursery was open.
    - Utility costs would remain the same but alternative part-time use of the space could be made, e.g. Community use, although resources and furniture would need to either remain or be removed and then returned to accommodate this.
  5. Retain the nursery as it is - equivalent to 30 children at any one time.
    - The finances of the school would remain challenged, possibly taking funding away from the statutory aged classes and could lead to a budget deficit and possible redundancies.

The consultation begins on 7 September 2018 until 19 October 2018 and following analysis of the responses a report will be taken to the Executive Committee of the Council with recommendations of how to proceed. If the recommendation is to close the nursery class, permission would be requested to publish Statutory Notices for a period of 4 weeks.

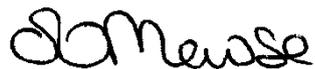
Any decision to close following analysis of responses to the Notices would need to be made by the Executive Committee of the Council subject to further recommendations.

Letters of consultation are also to be sent to all schools within the District, to parents of known Early Years children in the area, the Catholic and Church of England Diocese, the Muslim Association and other relevant bodies and Local Authorities.

Any comments or suggestions can be made on the response form which is included. This should be forwarded to Nina Mewse at the above address or alternatively emails may be sent to: [educationconsultation@bradford.gov.uk](mailto:educationconsultation@bradford.gov.uk) quoting changes to Low Ash Primary School.

Online responses can be made on the Bradford Council [consultation website](#) under current consultations.

Yours sincerely

A handwritten signature in black ink that reads "Nina Mewse". The signature is written in a cursive style with a large initial 'N'.

Nina Mewse  
Senior Provision and Places Officer

## Response form

Please complete details and return to:

**Nina Mewse**

**Senior Provision and Places Officer, Education Client Services,**

**1st Floor, Margaret McMillan Tower, Princes Way, Bradford BD1 1NN by 19 October 2018 at the very latest**

Consultation on changes to nursery class provision at Low Ash Primary School.

Name (optional)

Full postcode (of your home address) *eg BD1 1NN*

Please indicate which of the following applies to you - *please tick all that apply*

- Parent/carer of child attending the nursery class
- Parent/carer of child attending the school
- Member of school staff
- School Governor at Low Ash Primary
- School Governor at another school
- Local Councillor
- Member of the Local Community
- Parent of a younger child, not yet attending a primary school or nursery
- Other

If other please give details

Please indicate your response to this consultation below – *please tick*

- I agree that the nursery class at Low Ash Primary School should be closed.
- The size of the nursery class should be reduced to 26 children at any one time and remain open with 2 members of staff.
- The opening hours of the nursery should be either mornings or afternoons only.
- The nursery should be open for 2 or 3 days a week instead of 5 days a week.
- I disagree with the proposals and feel that the nursery class should remain as it is.

PTO

Please add any further comments below

**Please ensure that all comments are submitted by 19 October 2018 at the very latest.**

This page is intentionally left blank

## List of Consultees

Director/ADs Children's Services
Director/ADs Place
All Councillors
All Neighbourhood Forums
All Schools
Education and Learning (Formerly Bradford Achievement Service)
Bradford Youth Service
Catholic Diocese
CE Diocese
Children's Services Managers
Council for Mosques
Early Years Officers
Education Client Service
Head /Chair Governors
Media
MPs
Muslim Association
Neighbouring Local Authorities - Leeds
Other Officers: Planning; Highways
Parents/Carers
Parish Councils
Playgroups and other Early Years providers
Private/Independent schools
School Staff
Unions/OJC
Wider public audience: Bradford Schools Online (BSO), Bradford Council Website, Facebook, Twitter

This page is intentionally left blank

### Summary of responses to consultation on changes to Low Ash Primary School Nursery Provision

Consultation was open between 7 September 2018 and 19 October 2018.

A total of 68 responses were received; mainly from parents of children currently attending the school or nursery, many of whom indicated they also have younger children who are not yet attending school/ nursery. The majority of the respondents are local residents in the BD18 area of the District.

Breakdown of responses:

Group	Closure	Reduce: 26/26	Change: am/pm	Change: 2/3 days	No change	Other	Total
Parent of child attending Low Ash Nursery	2	7	0	0	8	2	19
Parent of child attending Low Ash School (incl. school Governor)	3	15	5	0	8	0	31
Staff member	3	1	0	0	0	0	4
Low Ash School Governor	2	0	0	0	0	0	2
Other School Governor	0	0	0	0	0	0	0
Councillor	0	1	0	0	0	0	1
Member of Local Community (all Included in other categories)	0	0	0	0	0	0	0
Parent of younger child	0	2	0	0	4	0	5
Other/Unknown	2	1	0	0	2	0	5
<b>Total</b>	<b>12</b>	<b>27</b>	<b>5</b>	<b>0</b>	<b>22</b>	<b>2*</b>	<b>68</b>

\*Did not state a preference but made comments.

#### Responses agreeing with the proposal to close the nursery:

- The free entitlement is now available at private nurseries which offer wrap-around care for working parents.
- There is uncertainty around school funding which puts a strain on main school budget to 'top up' any shortfall in nursery funding. Unfilled places at other nearby nurseries/schools could be filled instead.
- Parents require longer hours for nursery children.
- Lower numbers of parents taking nursery places as children are already settled at private nursery.
- One of the parents of a child in the school in agreement with the proposal to close the nursery, states that many families choose private nursery instead of school nursery and "as the school is expanding, it makes sense, both financially and space wise, to consider closing the nursery."
- Like any other business, if it costs the school to keep the nursery open than I believe it should close and the money spent elsewhere in the school.

#### Responses agreeing with the proposal to change the nursery by reducing to 26 children at one time:

- As indicated in the consultation document, proposal 2 would cause the least disruption to both parents and children.
- Proposal 2 will only require 22 out of the proposed 26 places for the schools costs to break even, therefore the existing waiting list already contain more than that (24 equivalent) and therefore funding is already more than covered by the existing waiting list for 2019/20. Closure of nursery would have a detrimental effect on local families and children.

- The nursery at Low Ash is viewed as a lovely environment for young children to be introduced to school life.
- My oldest daughter attended this nursery and came on leaps and bounds when she was there, I was so happy with the help and involvement of the teachers. I was expecting my son to be going here, would be a shame if it closed.
- Closure of the nursery will have a detrimental effect on local families and children.
- Understanding that government funding cuts mean changes need to be made and this is the most practical option available.

**Responses agreeing with the proposal to change the nursery by changing the opening hours of the nursery to mornings or afternoons only:**

- Whilst 5 respondents chose this proposal, only one commented: I would be happy with most measures taken that would keep the nursery open. We chose Low Ash School based on the nursery facility so to lose it would be a massive blow to the community.

**There were no responses agreeing with the proposal to change the nursery by offering 2/3 days per week**

**Responses disagreeing with the proposals and feel the nursery should remain as it is:**

- To find out Low Ash Nursery could be closing is disappointing and distressing...This is the school I wanted my daughter to learn, develop and make friends as I know it is a great setting for her.
- Having a nursery attached to school helps children to settle into the school environment ready for reception class and a structured school day routine.
- The school could consider options for offering flexible provision five days a week in conjunction with before and after-school wrap around care either on-site or with an off-site provider in order to meet working parents' needs.
- Concerns raised re some parents being confused about eligibility of free nursery places at the school and therefore taking young children elsewhere.

**There were two responses with no preferred option but the comments made suggest they would prefer the nursery to remain open:**

- My granddaughter goes here so will my grandson if this nursery does not close
- I have my grandson and will have another two of my grandsons attending this nursery in 2020 we don't want this to close as all my grandkids attend this school and cannot put our grandkids in different schools please I hear that this nursery remains open and how it was run before as my daughter law works and gets 30 hours and she used this at this school already and wants to still use this

**As suggested by consultees, it is our recommendation that the school is requested to explore options for a more flexible offer such as wraparound care.**

[See all responses below in Appendix D](#)

### Comments from Responses to Low Ash Nursery Consultation 7/9/18 – 19/10/18

#### Agree to close nursery (6)

I feel the Low Ash Nursery should be closed due to the following: • The uncertainty around school funding, both at present and (particularly) in the near future • The strain on the main school budget to 'top up' any shortfall in nursery place funding should not enough places be filled • The lack of interest/demand for Low Ash Nursery places despite a promotional drive and the popularity of Low Ash in all other year groups • The preference of parents/carers, following responses to a school questionnaire, for longer hours (early morning and late evening • The preference of parents/carers, following responses to a school questionnaire, who already have their child in a nursery (from an earlier age) so not to unsettle their child • Unfilled places at other nearby nurseries/schools could be filled instead. This would help finances of these schools/providers • A part-time nursery would mean underuse of a room/resources for 2.5 days per week as it wouldn't be feasible to be rearranging furniture and resources on a daily basis • The opportunity to relocate Nursery staff to the additional Reception Class in September 2019 which would avoid any possible redundancies

Its sad that this is the case, however with more families utilising private nurseries, several of whom the school already works closely with at the transition to nursery stage. And the school expanding, it makes sense, both financially and space wise, to consider closing the nursery.

I have worked with the school for a number of years now and over that time I have seen numbers in nursery classes dwindle. All 3 of my children when to the nursery at Low Ash but that was only possible because I have family locally who could provide wrap-around care; as a working parent if this had not been available they would have had to stay in paid nursery to provide the 7.30am - 6pm care that I needed. When my children were in nursery the only free provision was through a school nursery, this is no longer the case and most private nurseries now also provide free places; there is therefore very little effect

I think there are now numerous options for parents to attend nursery which probably suit any working parents better. I would like to see the space and staff used to aid the expansion of the school without taking resources away from children already at the school.

Like any other business, if it costs the school to keep the nursery open then I believe it should close and the money spent elsewhere in the school.

#### Reduce to 26/26 (13)

I think the letter is misleading as it says that 42 children were in the nursery Summer 2018 but as 16 of these were for 30 hours the nursery is nearly full (58 sessions out of 60). September 2018 59 are expected and already 48 out of 60 are taken for September 2019. In addition new housing is anticipated (which is why the school is expanding) so it's likely that the demand for nursery places would increase. I understand the staff ratio issue and that 52 places would be more affordable to run but it is disingenuous to say there is a lack of demand. To close this nursery would have a massive impact on local families

I think it would be a shame to see the nursery close as it is such a lovely environment for young children to be introduced to school life.

I strongly disagree with the option to close the nursery completely and believe that a full closure would have a huge detrimental affect on local families and children. This is the only school-run nursery in the Wrose area and does a fantastic job of helping young children transition from nursery to school. I would like the nursery to remain open, possibly increasing the catchment area to fill places, however I appreciate the government cuts to funding (which I find abhorrent) result in measures needing to be taken therefore have selected the most practical option available overleaf.

The school has a good quality nursery and an oversubscribed school. There are houses being developed in the area and the school is expanding to take more children from reception age. I think the school should re-look at the hours they offer to parents as this seems to be one of the issues for parents not using the nursery. If the school are unable to offer longer hours then consider working with local providers to offer the wraparound care that working parents require. I understand the financial pressures not being full can have on a schools budget however I think to loose such a good provision will be at the det

As indicated in the consultation document, proposal 2 would cause the least disruption to both parents and children... Proposal 2 will only require 22 out of the proposed 26 places for the schools costs to break even, therefore the existing waiting list already contain more than that (24 equivalent) and therefore funding is already more than covered by the existing waiting list for 2019/20. In addition the number of significant housing developments in the area would no doubt create f

Proposal 2 seems to be the most reasonable option for all concerned

This seems the most appropriate solution by keeping nursery open for existing and future children and reducing the financial burden on the school.

I am not hspoy about any changes being made but i understand that it maybe neccessary. I dojt agree with the arguement that tuere will be no demand. They are increasing the size of the school as lots of houses are been built in the area so surely nursery places will be needed too.

If there has to be changes it should be the reduction in numbers. I am not happy about any changes.

This is the best option. Losing the nursery would be a big loss to future children.

Seems sensible considering everything.

First Choice 26/26 Second Choice close nursery

Working in a private nursery I understand how hard it is to fill a nursery but I don't agree it should close.

My oldest daughter attended this nursery and came on leaps and bounds when she was there, I was so happy with the help and involvement of the teachers. I was expecting my son to be going here and would be a shame if it closed.

**Change to am/pm (5)**

I would be happy with most measures taken that would keep the nursery open. We chose Low Ash school based on the nursery facility so to lose it would be a massive blow to the community.

My son currently attends Low Ash Nursery on the 30 hour cohort and my daughter attended last year also the 30 hour a week scheme. We as a family absolutely wholeheartedly agree the nursery should not be closed as it is a influential part of the school and community. It is a highly important part of the school and the teaching and learning is of a truly high standard preparing children for their transition into reception and forms a highly influential part of children's development and journey into education. The staff are all so passionate and motivated and make early year so exciting and enjoyable whilst following the early years framework guidelines. Low Ash Nursery is a fundamental part of Low Ash School and should most definitely not be closed as this could lead to educational failings within the Wrose community.

**2 or 3 days per week (0)****Remain as it is (13)**

This is going to be a 3 form entry in the next year !!!!! To take away the nursery would be crazy more children mean more younger siblings. It would be a silly and In my opinion down turn for this school. We don't have nursery places of a high standard within our area. Children in wrose have no upper school so face buses when older. Surely we should be allowed provision for all our under 9s at bare minimum !!

To find out that Low Ash Nursery could be closing is disappointing and distressing, I had my daughter's name down for this school as soon as she was born hoping to have a Nursery place for September 19. This is the school I wanted my daughter to learn, develop and make friends as I know it is a great setting for her. I hope that after this consultation that this Nursery continues to stay open and help the education of all children in Wrose and surrounding areas.

No other nurseries nearby.

I feel nursery should remain how it is now. Having a nursery class attached to the school is important as it helps children to settle into the school environment ready for reception class. It gets children into a structured school day routine, compared to day nurseries. And if children continue into Low Ash reception it sets them up for the whole school life at Low Ash as they get used to staff, the building and also friends they keep until they leave in year 6. It really benefits children to have the nursery class it definitely helped my children to settle into school life.

I've just moved into the area. I rang before the summer holidays, to try and get my 3 1/2 year old into nursery, to be told it was already full, but to come in on the first day of school. I attended Low Ash on 5th September with my application to be advised that it was still full. No morning or afternoon or full days are available. Yet today when I go to register my little boy to come next September I'm told it may close cos you can't fill the places? Confused.

I feel that this should carry on how it should be as my daughter was doing the 30 hours full time and it was perfect for me as I just live around the corner to the school and it is a lovely school my son will be attending this school he is going to be 2 this November 2018 I would take full advantage of the nursery as the school is really good and the teachers are brilliant my daughter is talking more

I said my daughter to this school my son should start 2019 and do not want this closed

I am concerned at the potential impact of closing/reducing provision on local non car-owning families, and those with limited access to private transport. Although alternative provision is available in the Ward/children's centre reach, the geography of the area makes it hard for any families who need early years provision within walking distance to access their child's entitlement. Earlier research indicated that working families would be more likely to use school provision at Low Ash if it could be more flexible. Before coming to a final decision, I would like the school to consider options for offering flexible provision five days a week in conjunction with before and after-school wrap around care. This could be either on-site or with an off site provider in order to meet working parents' needs. Moving to a more flexible offer has significantly boosted take-up of places at a number of schools with low take-up.

I am concerned at the potential impact of closing/reducing provision on local non car-owning families, and those with limited access to private transport. Although alternative provision is available in the Ward/children's centre reach, the geography of the area makes it hard for any families who need early years provision within walking distance to access their child's entitlement. Earlier research indicated that working families would be more likely to use school provision at Low Ash if it could be more flexible. Before coming to a final decision, I would like the school to consider options for offering flexible provision five days a week in conjunction with before and after-school wrap around care. This could be either on-site or with an off site provider in order to meet working parents' needs. Moving to a more flexible offer has significantly boosted take-up of places at a number of schools with low take-up.

My son currently attends Low Ash Nursery on the 30 hour cohort and my daughter attended last year also the 30 hour a week scheme. We as a family absolutely wholeheartedly agree the nursery should not be closed as it is a influential part of the school and community. It is a highly important part of the school and the teaching and learning is of a truly high standard preparing children for their transition into reception and forms a highly influential part of children's development and journey into education. The staff are all so passionate and motivated and make early year so exciting and enjoyable whilst following the early years framework guidelines. Low Ash Nursery is a fundamental part of Low Ash School and should most definitely not be closed as this could lead to educational failings within the Wrose community.

I have found the 30 hour and 15 hour split beneficial to both working parents. One point I would like to highlight on is I did have 2 parents at a childrens play area discuss Low Ash Nursery intake as they asked where my son was due to begin for September start, I did inform then of Low Ash and one parent was very confused as she said she had read the intake banner advertisement the school displayed as 30+15 hour places for working parents. I pointed out that I work part time and partner is full time the same as her and she hadn't realised the actual intake of children was for both working and non working parents so she and this other parent had applied elsewhere when they wanted Low Ash. The banner advertisement seemed misleadig as it mentioned working parents- whereas other schools didn't mention this- think this may of caused some confustion + put some parents off applying.

There is many people I know that will / want to bring their kids here but think they can't due to not living within the surrounding areas.

I feel that children both my own and friends children learn a lot more at school nursery, also prepares them for starting in reception by already attending the school. I feel the staff at Low Ash Nursery have a lot more knowledge and teaching skills than a lot of private nurseries.

**No option selected (2)**

My granddaughter goes here so will my grandson if this nursery does not close

I have my grandson and will have another two of my grandsons attending this nursery in 2020 we don't want this to close as all my grandkids attend this school and cannot put our grandkids in different schools please I hear that this nursery remains open and how it was run before as my daughter law works and gets 30 hours and she used this at this school already and wants to still use this

This page is intentionally left blank

## Equality Impact Assessment Form

Reference –

<b>Department</b>	Education Client Services	<b>Version no</b>	1
<b>Assessed by</b>	Nina Mewse	<b>Date created</b>	30.10.18
<b>Approved by</b>	Marium Haque	<b>Date approved</b>	
<b>Updated by</b>		<b>Date updated</b>	
<b>Final approval</b>		<b>Date signed off</b>	

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

## Section 1: What is being assessed?

### 1.1 Name of proposal to be assessed.

Proposed Changes to Nursery Provision at Low Ash Primary

### 1.2 Describe the proposal under assessment and what change it would result in if implemented.

Consultation has been carried out to seek opinions relating to the Nursery provision at Low Ash Primary School. Options included were:

Close the nursery;

Reduce the size of the nursery to admit 26 children at any one time instead of 30;

Change opening hours to morning or afternoon only;

Change opening to 2 or 3 days each week instead of 5;

Make no changes and keep the nursery operating as it is.

The recommendation is to keep the nursery open but to reduce the size to 26 children at any one time. This will allow the school to reduce the staff in the nursery therefore reducing the operating costs, whilst keeping the provision open; there is opportunity to move a staff member elsewhere in school once the increase in Published Admission Number takes effect.

## Section 2: What the impact of the proposal is likely to be

**2.1** Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.

N/A

**2.2** Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.

N/A

**2.3** Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

N/A

**2.4** Please indicate the level of negative impact on each of the protected characteristics?

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

<b>Protected Characteristics:</b>	<b>Impact (H, M, L, N)</b>
Age	L
Disability	N
Gender reassignment	N
Race	N
Religion/Belief	N
Pregnancy and maternity	N
Sexual Orientation	N
Sex	N
Marriage and civil partnership	N
<b>Additional Consideration:</b>	
Low income/low wage	N

**2.5** How could the disproportionate negative impacts be mitigated or eliminated?

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

N/A

### **Section 3: Dependencies from other proposals**

**3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.**

None

### **Section 4: What evidence you have used?**

**4.1 What evidence do you hold to back up this assessment?**

Feedback from responses as shown in Appendix C

**4.2 Do you need further evidence?**

No

### **Section 5: Consultation Feedback**

**5.1 Results from any previous consultations prior to the proposal development.**

Low Ash Primary School surveyed two cohorts of parents whose children are attending/will be attending Low Ash but chose not to send their children to the nursery. The main reasons given were either that their child was already settled in another nursery setting, or that additional hours (typically 8am to 6pm) or days were needed.

**5.2 The departmental feedback you provided on the previous consultation (as at 5.1).**

None

**5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).**

N/A

**5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.**

N/A



**Report of the Chief Executive/ Interim Strategic Director  
of Children's Services to the meeting of Executive to be  
held on 8<sup>th</sup> January 2019**

---

**AO**

**Subject:**

**OFSTED INSPECTION OF LOCAL AUTHORITY CHILDREN'S SERVICES (ILACS)**

**Summary statement:**

This report provides updated information about the Council's response to the OFSTED ILACS judgement published on 29 October 2018.

---

**Portfolio: Leader/Children and Families**

Report Contact: David Walmsley  
Phone: (01274) 431241  
E-mail: david.walmsley@bradford.gov.uk

**Overview & Scrutiny Area: Children's  
Services**

## **1. SUMMARY**

1.1 This report provides an update on the steps the Council is taking in response to OFSTED's inspection of Bradford's Children's Services.

## **2. BACKGROUND**

2.1 OFSTED carried out an inspection of our Children's Services from Monday 17 September 2018 and published its findings on 29 October 2018. Executive has considered reports at its meetings on 6 November and 4 December in relation to our response to OFSTED's findings and the subsequent publication by the Department of Education (DfE) of an Improvement Notice on 4 December 2018.

2.2 Since the meeting of Executive on 4 December, under the leadership of the Portfolio Holder for Children & Families, and in consultation with other councillors, DfE, OFSTED and the Local Government Association (LGA), there has been further progress in establishing our approach to addressing the key areas for improvement identified by OFSTED and the necessary supporting arrangements, with the Improvement Board now meeting every fortnight.

2.3 With the voice of the child at its heart, improvement planning has been a key focus of activity, involving staff at all levels in Children's Services, with the support of corporate resources (Finance, HR, Legal and Performance) and in consultation with partners. Following discussion with OFSTED at a planning meeting on 10 December 2018, our Statement of Action will be further refined including through engagement with children, partners and staff, and reflecting the views of Children's Overview & Scrutiny. A revised draft will be tabled for Executive to consider on 8 January 2019 before submission on 4 February 2019.

### **Next Steps**

2.4 As set out in the Improvement Notice, the Council will be subject to intervention by the DfE until services improve. OFSTED will monitor our progress regularly and we will be subject to a full re-inspection within two years. Key actions and milestones include:

- Submit a full Statement of Action (Deadline for submission: 4 February 2019).
- Support a monitoring visit (which will take place 3 months after our publication of inspection i.e. January)
- Quarterly monitoring will continue until we have an inspection and move into a different pathway (i.e. are requires improvement to be good or above)

2.5 Councillors and senior officers collectively are committed to making sure that we work rapidly and effectively to improve our services to meet our ambitions for Bradford's children.

## **3. OTHER CONSIDERATIONS**

3.1. None

#### **4. FINANCIAL & RESOURCE APPRAISAL**

4.1 The financial implications of the improvement plan are set out in the Budget proposals considered by Executive at its meeting on 4 December.

#### **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

5.1. This report is for information only.

#### **6. LEGAL APPRAISAL**

6.1 The recent inspection was undertaken under the new Framework, Evaluation Criteria and Inspector Guidance for the Inspections of Local Authority Children's Services (ILACS). This contains provisions regarding actions to be taken after an inadequate inspection report. These include monitoring by Ofsted including an action planning visit, quarterly monitoring visits and a re-inspection, and also an action plan prepared by the local authority within 70 days of receiving the report.

6.2 The Secretary of State has a wide range of powers available following an inadequate judgment, including statutory and non-statutory interventions. The type of intervention is dependent on the severity of the situation, how long the authority has been underperforming, and the perceived capacity for improvement.

6.3 S497A Education Act 1996 gives the Secretary of State a wide range of statutory powers if satisfied the local authority is failing to perform its social care functions. These include statutory directions to the local authority aimed at securing adequate performance and also statutory directions requiring the functions to be taken over by others including the Secretary of State or those nominated by him.

6.4 In Bradford's case, the Secretary of State has taken a non-statutory approach, appointing an improvement adviser and on 4 December issuing a formal improvement notice. The Department for Education 'Putting Children First – Delivering Our Vision for Excellent Children's Social Care (July 2016) indicates that the Secretary of State will only take the non-statutory route if the evidence does not indicate persistent or systemic failure. The improvement notice issued to Bradford specifies the improvement required, how this will be assessed and subsequent statutory steps that may be taken if improvement is not achieved.

#### **7. OTHER IMPLICATIONS**

##### **7.1 EQUALITY & DIVERSITY**

Report is for information only. No specific issues.

##### **7.2 SUSTAINABILITY IMPLICATIONS**

Report is for information only. No specific issues.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

Report is for information only. No specific issues.

### **7.4 COMMUNITY SAFETY IMPLICATIONS**

Report is for information only. There are no specific issues.

### **7.5 HUMAN RIGHTS ACT**

Report is for information only. There are no specific issues.

### **7.6 TRADE UNION**

Report is for information only. There are no specific issues.

### **7.7 WARD IMPLICATIONS**

Report is for information only. There are no specific issues.

### **7.8 IMPLICATIONS FOR CORPORATE PARENTING**

The ILACS inspection provides a comprehensive external assessment of outcomes for Looked after Children. A plan will be produced to address areas for improvement identified by OFSTED and progress will additionally be reported to the Corporate Parenting Panel.

### **7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

There are no specific data protection implications.

## **8. NOT FOR PUBLICATION DOCUMENTS**

Not applicable

## **9. RECOMMENDATIONS**

1. That the actions taken in response to OFSTED inspection findings be noted.
2. That the draft Statement of Action to be tabled at the meeting be considered.

## **10. APPENDICES**

None

# Bradford Children's Services Improvement Plan

Page 183

**children**  
AT THE **heart** OF  
**all we do**



**BRADFORD**  
working in partnership



## **Our Vision**

Our children and young people are the future of Bradford. We are privileged to be the UK's youngest city, and want our 150,000 children and young people to be the driving force behind everything we do. We are committed to developing a Family Friendly City and an environment where all our children and young people can fulfil their potential, have high aspirations for themselves and their neighbourhoods and become adults who help to drive the prosperity of our district. The precondition for this is ensuring that every child, young person and family is safe and healthy.

## Foreword

Bradford Council is committed to ensuring that all our children have the best possible start in life. We are proud of the great work that we already do across the district to give every child the opportunity to fulfil their potential. At our recent inspection, Ofsted found that the services we deliver to protect the most vulnerable children and young people are not meeting the high standards the children in the district deserve. We fully accept Ofsted's findings and are committed to a programme of rapid and sustainable improvement.

We have taken immediate action following the inspection to ensure the safety and well-being of our children.

Our over-riding priority is to address the areas of improvement that have been highlighted by Ofsted. We are determined to focus on getting the basics right for children. Most importantly, we want to put children, and the quality of their experience, at the centre of what we do. Our aim is to move quickly to a position where our services are good or better for Bradford's children.

The experience and voices of children and young people are central to our improvement journey. Children and young people will have a strong voice in our plan through engagement activities. The test we will set ourselves is "*are our services the best they can be for our children?*"

### A shared commitment

Bradford Council, together with its partners, is committed to working together to achieve rapid and sustained improvement in the experience of children and young people who require support, protection and care. We recognise that, whilst the council is accountable for the protection of children, that for all children to be effectively safeguarded, everyone needs to work together. We will only be able to achieve this if we listen to children and put their experiences at the centre of all that we do.

Cllr Susan Hinchcliffe- Leader of Bradford Council

Cllr Adrian Farley- Portfolio Holder for Children and Families

Kersten England – Chief Executive

Bradford's Improvement Journey will be delivered through six key themes that relate to the Ofsted recommendations, with the central theme being the lived experiences and voice of the child. ( see figure 1 below)

1. The "*Lived Experience*" and the voice of the child
2. Improving the quality of social work practice
3. Improving the operating environment to create optimum conditions for success : sufficient enabler support
4. Improving the Front Door and MASH arrangements
5. Improving management oversight and quality assurance
6. Improving the sufficiency of placements for Children Looked After ( CLA)



Figure 1

## City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019

Ofsted made 10 specific recommendations for action, and also identified a number of areas for improvement that are essential to ensuring children, young people and their families consistently receive a good service, which, in turn, will lead to improved outcomes. The table below shows how the specific recommendations (R) and the areas for improvements (AFI) link to the six themes in our improvement plan. The numbers in the table below reference the recommendations e.g. R1 is the first recommendation – to improve identification and response to risk, particularly of the long term impact of domestic abuse and neglect. This is referenced under theme 1 and theme 4. AFI 2 *Screening of contacts to the MASH is ineffective* references numbered paragraph 2 in Ofsted’s report is referenced in theme 4.

Theme	R/AFI	Reference to the 10 Ofsted Recommendations and wider Areas for Improvement	
Page 187	1. <b>The “Lived Experience” and the voice of the child</b>	R1 R 4 R 5 R 6a R 6b R 7 R 8 R10 AFI 16 AFI 22 AFI 29	Improve identification and response to risk, particularly to the long term impact of domestic abuse and neglect. Improve the quality and implementation of assessments and plans. Improve all aspects of multi agency child protection work. Improve the response to 16 &17 year olds who present as homeless. Improve the response to children in private fostering. Enough local placements to meet the needs of children. Provide life story work for all children in care. Improve the quality of supervision of social work staff Written plans are not always specific in identifying the children’s needs The children in care council said that consultation was “tokenistic” Insufficient prioritisation of children’s lived experiences being at the centre of service improvements
	2. <b>Improving the quality of social work practice</b>	R 2 R 4 R 6b. AFI 6 AFI 7 AFI 7	Provide clarity for families about what needs to change when there are serious concerns. Improve quality of assessments and plans and their implementation. Improve response to children in private fostering. Social work varies in quality and impact across teams Core groups are not always regular Children are not always seen in line with their plans

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

	AFI 7 AFI 7 AFI 8 AFI 8	Children remain on CP for long periods without their situations improving Children are removed from plans too early Use of the Public Law Outline (PLO) is not robust Children are in Public Law Outline (PLO) for too long
<b>3. Improving the operating environment to optimum conditions for success : sufficient enabler support</b>		Ensuring the conditions for success are in place and all possible barriers to delivery of good social work practice are removed or mitigated. Excellent multi-agency collaborative working is established across the partnership and corporately within Bradford Council.
<b>4. Improving the Front Door and MASH arrangements</b>	R 1 R 3 AFI 2 AFI 2 AFI 3 AFI 4 AFI 5 AF! 29	Improve identification and response to risk, particularly long term impact of domestic abuse and neglect Deliver a timely proportionate response to contacts including gaining parental consent. Screening of contacts to the MASH is ineffective. Children in potentially harmful situations that had been closed by the MASH or inappropriately stepped down to early help All contacts inappropriately involve a full duty social worker review and children are inappropriately interviewed by partner agencies Strategy meetings do not always include all partners All neglect cases are identified through early help and this does not ensure children's needs and safety are at the centre of decision making Insufficient prioritisation is given to ensuring that children's lived experiences were at the centre of the service improvements.
<b>5. Improving Management oversight and quality assurance</b>	R 10 R 6a AFI 13 AFI 20 AFI 20 AFI 27 AFI 26 AFI 30 AFI 32	Improve the quality of supervision of social work staff. Improve oversight and monitoring of allegations against professionals. The quality of evidence in court reports is variable Results for Looked After Children at key stage 2 and 4 are not yet good Personal Education Plans (PEPs) are too variable Earlier improvements in performance were not being sustained Loss of experienced social workers, high use of agency staff Rapid turnover of staff leading to children have frequent changes of social worker Formal supervision inconsistent and not always reflective

<b>6. Improving the sufficiency of placements for Children Looked After (CLA)</b>	R 6a	Improve the response to '16 & 17' year olds who present as homeless.
	R 7	Enough local placements to meet the needs of children.
	R 8	Provide life story work for all children in care.
	R 8	Ensure that all foster carers complete mandatory training.
	AFI 17	Feedback from Foster Carers is variable
	AFI 17	Poor Assessments leading to placement breakdowns
	AFI 23	Not all care leavers have key documents
	AFI 23	Pathway plans are not user friendly

DRAFT

## 1. The Lived Experience and the Voice of Children

### What do we mean?

Bradford is Britain's youngest city and our services need to be shaped by listening to the voice of our children and young people. This is not just a focus of children's services, but everything the council does. We need to find a range of ways to make sure this happens. For vulnerable children who need social care intervention, we need to make sure that they get the 'right help at the right time' and are protected from harm. Social work records and reports must reflect what the world looks like for the child and wherever possible our children must have the chance to form stable and trusting relationships with their social worker. Children's lives should improve as a result of timely actions. We must make sure that all children understand their rights including those children who are in our care. We will take a corporate approach, learning from best practice, across the whole authority and with partners to become a 'Child Friendly Status' city.

### What does this mean for children?

We will listen to what you say and use this to ensure you get the right help and support to make your life better.

Page No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
190	Increase the influence of children in care in decision making in Bradford. AFI 22;	1.1.1 Undertake a review with the Children in Care Council (CiCC) to co design a revised CiCC and to make recommendations for more opportunities to participate.	"You said we did " report New strengthened CiCC arrangement in place. Survey of CLA to test response to "You said we did"	April 2019	JH	EC	
	AFI 22 & 29 Increase influence of children in care in decision making in Bradford. Insufficient prioritisations being	1.1.2 Introduce two way feedback and publish "you said, we did" every term.	You said we did " report published 3 times a year	March; July and December 2019	JH	SH	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
	given to ensuring that children's lived experience were at the centre of the service improvements.						
1.2	R 6a All children understand the services provided for them by all partners and why we are intervening and provide care.	1.2.1 Work with young people to develop age appropriate information packs, and feedback opportunities.	% of Children receiving services who have received information packs. Young people's feedback	April 2019	JH	EC	
	AFI 23 All care leavers to have access to key documents	1.2.2 Revise practice standards to make sure that all children are given this information and have a chance to talk about it.	Revised practice standards published Survey of care leavers	March 2019	JH	EC	
1.3	AFI 23 Use innovation to capture the voice of our care leavers.	1.3.1 Provide smart phones for all care leavers with Leaving Well App pre-installed	No and % using smart phones to keep in touch	December 2019	JH	EC	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
		1.4.1 Deliver and evaluate a digital story telling pilot (working with Bradford College).	Evaluation report	June 2019	JH	TT	
1.5	AFI 29 Maximise the use of Viewpoint to capture children's views and to act on these.	1.5.1 Practice guidance and management guidance leads to increased use of Viewpoint and this is reported regularly to CSMT and DMT every quarter with an action plan	¼ ly View point user report Presented to CS management teams Evidencing increased use of Viewpoint	January 2019 – baseline - % increased by January 2020	JC	IC	
1.6	R 4 ;AFI 16 Ensure that the voice of children and young people is clear in the records for each child.	1.6.1 Review and re launch Practice Standards in relation to visiting children. .	Audit sampling	February 2019	JH	DD	
		1.6.2 Provide training for staff on capturing and recording the voice of children in casework	Workforce reports	Quarterly CSMT and DMT	JH	TT	
1.7	AFI 29 Improve and embed the Corporate Parenting commitment across the council.	1.7.1 All departments asked to provide a Corporate Parenting Plan and report this through the Corporate Parenting Committee	Plan in place monitoring reports from committee	April 2019	G R-W	CM	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
1.8	R6a Improve the response to 16&17 year olds who present as homeless.	1.8.1 Social worker led team in place to assess needs of young people presenting as homeless.	Audit sampling Feedback from young people	November 2018  April 2019	JH	DB	
		1.8.2 Develop clear information for young people on their rights as homeless young people and ensure these are shared and understood.	Young People's guide published and accessible to young people	January 2019	JH	DB/EC	
		1.8.3 New management arrangement in the Youth Homelessness team in place to oversee this work		January 2019	JH	DB	
		1.8.4 Enhanced audit programme in the Youth Homeless Team	Audit report shows progress	Completed by March 2019	JC	EC	
		1.8.5 Explore linking in youth homelessness with the front door to social care.		May 2019	JH	JH	
<b>Engaging with all children in Bradford</b>							

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
1.9	Children’s Plan: Improve engagement across the system in listening to the voice of children and young people in order to become a ‘Child Friendly City’.	1.9.1 Develop a whole council, whole system approach, linked communication strategy – co produced with children and young people.	Strategy in place	2019 onwards	KE	PW	
1.10	Refresh the work of the Children’s Trust	1.10.1 Ensure that the Children’s Trust is focussed on improving evidence of listening to children and young people.	Children’s Trust actions	2019 onwards			
1.11	AFI 29 Improvements in children’s services are informed by and respond to the voices of children.	1.11.1 Grant to enabler suitable provider to engage children and young people in the development of the improvement programme.	Reporting from the contract and the group	January 2019	JC	HW	
<p><b>How will we know that Children’s Outcomes have improved?</b>                      More children telling us through case file notes, reviews , events and surveys that their outcomes have improved                      More children participating in key decisions that affect them so they can tell us how their lives are better – direct and indirect feedback</p>			<p><b>What will this look like?</b>                      The voice of the child is represented and documented in case files.                      Children know their rights and are empowered to tell us what matters to them                      Children and young people are supported to contribute to or attend their reviews                      Care and support plans reflect the identified needs and wishes of each child                      Children in care (and all children in Bradford) feel they have more say in how the council and services are run                      Clear processes are in place using a range of methods to make sure young people’s voices are routinely heard</p>				

## 2. Improving the quality of social work practice

**What do we mean?** Social work practice in Bradford is consistently and demonstrably of a high standard, meeting or exceeding national standards and compliant with guidance. Good quality assessments and plans accurately and clearly set out vulnerabilities and what actions are required to improve children's circumstances / reduce risk. These are regularly reviewed and remain accurate and purposeful. Children are seen and their voice is heard

### What does this mean for children?

Children and their families will get help when they need it and will understand what needs to change to keep them safe and well. Young people who cannot live at home get the right support when they need it. Children living with private foster carers are safe. There is clarity for families about what needs to change when there are serious concerns

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
2.1	R 4 Improve the quality of assessments, plans and their implementation.	2.1.1 Undertake a review of assessment and plans and report the findings to agree corrective action.	Audit report Review document ; Revised practice standards document in place	February 2019	JH	DD	
		2.1.2 Put in place enhanced audit to review assessments and plans and support and challenge staff.	New process in place.	March 2019			

City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 196		2.1.4 Provide training for front line Social Workers on preparing good plans	Evaluate learning programme	March 2019			
		2.1.5 <i>Lunch and learn Back to Basics</i> sessions on specific subjects, sharing best practice /what works.	Evaluate learning programme	September 2019			
		2.1.6 Review business processes in LCS to ensure that these facilitate good planning	IGE action log; LCS changes made	March 2019	JC	DB	
	R 4 Improving and strengthening CIN arrangements and ensure that effective plans are in place	2.1.7. Review CIN processes	Report Revised practice standards DASH in place	March 2019	JH	MP	
2..2	R5 Improve all aspects of multi agency child protection work AF 17 children on child protection plans – avoid drift and ensure that the plan leads to improvement in the child’s circumstances.	2.2.3 Review and revise the use of Signs of Safety within Child Protection planning ensuring that plans are SMART	Revised practice standards Multi agency guidance in place	March 2019	JC  BSCB nominated partners	JC to nominate  BSCB nominated partners	
		2.2.4 Undertake CPD with Child Protection Chairs and Team Managers in relation to good planning and escalation responsibilities.	Training completed	September 2019	JC	JC to nominate	

City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 197		2.2.5. Review CP Challenge to include time bound escalation and regular reporting to the Performance group on issues.	Revised guidance in place; Monthly review of escalations; Compliance with standards	April 2019	JH	DD	
		2.2.6. Practice standards are readily accessible to all social workers					
		2.27. Review of the 10 cases from audit where auditors expressed concern and SD to review with Team Managers and CP Chairs.	Review undertaken;  New process in place	February 2019	JH	DD/NC JC to nominate	
		2.2.8 Review Child Protection Conferences (including use of SOS) format and focus of CP Plans and Core Group Process).	Review completed;  Audit reports show processes to be effective	January 2019  2019	JC	JC to nominate BSCB nominated partners	
		3.2.7 Put in place an improved escalation process for CP Challenge.	New process in place	March 2019	JC	JC to nominate	
		3.2.8 Review of all cases of CP over 2 years and report to senior	Review report  Reduction in	January 2019	JH	Nina Chaudhry & Head of	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
		managers with case level action for TMs.	numbers on plan for over 2 years			Safeguarding and Reviewing Unit	
		2.2.9. Process implemented for TMs to review all children subject to CP Plans at 12 months, to ensure children progress is timely.	Pilot findings reviewed and guidance in place Fewer children on plans for over 2 years	Pilot January – March 2019 Then review	JH		
		2.2.10 Introduce 18 month review and audit by CP Chairs.	New process in place	June 2019	JC	JC to nominate	
3	Improving social work practice. Resources and reducing caseloads AFI 7	2.3.1. See management actions 5.1 & 5.2			JH		
		2.3.2 Introduce support and education package through the Teaching Partnership to drive practice improvement			JH	DD/TT	
		2.3.4 Establish 3 Practice Educators to support social work practice		February 2019	JH	DD	
		2.3.5 Develop smarter systems to support social workers recording allowing more focus on time spent with children.	LCS more user friendly; Social workers report less time spent on LCS	March 2019	DW	DD	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
2.4	R10 Improving the quality of supervision.	2.4.1 Develop the Practice supervisor role to support best practice (training/mentoring).	Improved audit outcomes	February 2019	JH	DD	
		2.4.2 Audit supervision and feedback learning. Revisit to test for impact	Audit report shows compliance and quality improved	July 2019	JH	TT	
		2.4.4. Provide training on reflective supervision	Training delivered	March 2019	JH	DD/TT	
		2.4.5 Revise practice guidance for managers	Revised guidance published; Supervision audit report shows compliance and quality improved	Dec 2018	JH	DD	
		2.4.6. Improve managers' induction programme and ensure completion by all new managers	Workforce reports show all managers complete induction programme	February 2019	JH	DD	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
2.5	AFI 8 Ensuring clarity and timeliness for families in PLO and pre- proceedings work.	2.5.1 Review all cases in PLO and take immediate action to address issues of drift and delay. Maintain improved performance.	Reduced average time in PLO  More timely progression of legal process through robust case handover  Legal Gateway Panel minutes	January 2019	JH	DD/DS	
		2.5.2 Put in place a revised tracker and the Service Manager for Proceedings and the Head of Social Work to review this on a regular basis to ensure no drift and delay.	Tracker in place, regularly reviewed and showing evidence of timely actions.	January 2019	JH	DD/DS	
		2.5.3 Implement Legal Workspace on LCS to provide better processes and reporting.	Legal workspace in place	February 2019	JC	DB	
		2.5.4 Provide briefing for all managers on PLO expectations.	Briefing delivered and attended by all relevant managers	February 2019	JH	DS Head of Legal Services	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
2..6	AFI 7&8 reducing drift and delay in planning for children subject to plans and improving the use and effectiveness of the Public Law Outline	2.6.1 Secure additional resources to deal with the current delays.	Revised practice guidance in place  Audit/dip sample PLO cases over 12 months	February 2019  Link to audit plan	JH	DD/DS	
		2.6.2 Formalise the role of Legal Gateway Panel in step down from PLO as well as step up.	Revised ToR for LGP	February 2019	JH	DD	
2.7	R 6 Improve response to children in private fostering.	2.7.1. Review the Private Fostering Policy Each agency needs to have an action plan to promote awareness within their organisation. Link to BSCB actions	Increased notification of private fostering arrangements Multi agency reporting of private fostering increased	July 2019	JH	D D  BSCB nominated partners	
<b>How will we know that Children’s Outcomes have improved?</b> Children and young people will tell us that they feel safe and things are better for them as a result of our interventions			<b>What will this look like?</b> Children who need to come into care do so at the right time Managers will be confident in having oversight of cases and driving improvement in their area Audit will evidence improved quality of casework Social Workers will stay in Bradford for longer and we will have more experienced workers to balance the numbers of newly qualified staff We will prioritise stability of social worker for our children and changes will be minimised. Where changes of workers have to happen the transition will be				

<p>managed with children Managers will be able to speak confidently about performance in their area and there will be evidence of support and challenge improving practice Reflective supervision will be happening and there will be evidence that this stretches social workers and helps to improve practice and keep children safe</p>
--

DRAFT

### 3. Improving the operating environment to create optimum conditions for success : sufficient enabler support

Actions to achieve improvements in front line social work with children, young people and families cannot be achieved in isolation. The council, along with its partners, will need to work collaboratively to ensure that rapid improvements can be made. Barriers to efficient working practices that allow front line staff to spend as much time as possible in face to face work with children, must be removed or reduced. This will be achieved through a combination of investments in technology, streamlined processes and procedures, additional business support and other technical support capacity. Involving front line staff, corporate colleagues, partner agencies as well as children themselves will help us to identify and systematically improve the quality and effectiveness of our services.

Ref no	What needs to change - ref to Ofsted report	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 203 3.1	Sufficient, skills, capacity and leadership across the system combined with admin support to keep trackers updated.  Use of admin support to reduce the burden on SW and TMs to reduce inefficiency across the service, allowing front line staff to prioritise work with children.	3.1.1 Review the barriers to strong performance monitoring and accountability and make necessary investments based on these findings	Improved maintenance and use of management information across the service	March 2019	Anne Lloyd	JH	
		3.1.2 Maximise the functionality and ease of use of IT systems – LCS to support administrative tasks.	Improved audit findings, feedback from Ofsted and staff	June 2019	JC	DB	
		3.1.3 Respond to feedback from Staff engagement sessions.	You said we did reports	On-going from January 2019	GRW	JC to nominate	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

3.3	Delays in achieving permanence for children.	3.3.1 More specialist legal advice to enable timely legal processes.	Timeframes for permanence planning improve	December 2019	Parveen Akhtar	David Stephens	
3.4	Improve recruitment and retention of staff.	3.4.1 HR support.	Reduced turnover of SW staff	July 2019	Anne Lloyd	TT	
3.5	Improve all aspects of workforce development and performance management.	3.5.1 HR support.	Improved overall performance /staff survey feedback	July 2019	Anne Lloyd	TT	
3.6	Maximise efficiency through mobile working, use of tablets and other devices.	3.6.1 IT support.	Improved overall performance /staff survey feedback	March 2019	DC		
3.7	Improve the use of performance analytics and management information.	3.7.1 Performance team OCX and service performance teams working collaboratively.	Improved overall performance /Ofsted Feedback	Monitoring visits throughout 2019	DW	JC	

Page 20/24

**How success will be measured**

Cost effective measures that deliver timely and measurable improvements across all themes of the plan

A 12 week plan will be developed within the first 3 months

Efficient progress is made in the delivery, and monitoring of improvement actions

### 4.Improving the Front Door and MASH arrangements

**What do we mean?**

When someone refers a child or young person to us, we quickly and thoroughly work out what needs to happen to make sure the child is safe. Children and their families are fully involved and consent to work with us from the start, unless this would increase the risks to the child. All children and young people who have been referred have their needs and vulnerability accurately assessed and responded to in a timely way. They will receive a proportionate response and a service that is individually tailored to meet their needs. Our services will be compliant with relevant statutory guidance and legislation.

**What does this mean for children?**

When you, your family or a professional working with you first asks us for help, we will quickly make sure you get the help and advice you need. We will always involve you and your family in decisions about you unless it would put you in danger to do so.

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/D MT Lead	Operational and Task Group Lead	RAG rating Progress
4.1	R 1 Improve the identification and response to risk, particularly longer-term impact of domestic abuse and neglect:	Immediate action taken- 4.1.1 All contacts (including neglect) handled by MASH. . . .	Audit sample of cases coming into the MASH  Audit observation in the contact centre  DASH in place and evidence of actions  Integrated processes in place Recruit a Head	December 2018  January 2019  December 2018 February	JH	JM	

Page 205

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/D MT Lead	Operational and Task Group Lead	RAG rating Progress	
			of Service for Front Door and MASH	2019				
Page 206	AFI 2 Screening of contacts to the MASH is ineffective. Children in potentially harmful situations that had been closed by the MASH or Inappropriate stepped down to early help	4.1.2 Review of Early Help workload and capacity; end to end performance reporting on early help intervention to improve timeliness and management oversight	Report in place, performance tracked	February 2019	JC	PW		
	AFI 2 Screening of contacts to the MASH is ineffective.	4.1.3 Protocols put in place for recording contacts and Social workers based at the Contact Centre to oversee calls and provide advice		February 2019	JH	JM		
	R1& R5 Improve identification and response to risk, particularly long term impact of domestic abuse and neglect. Improve all aspects of multi agency child protection work.	4.1.4 MASH Dashboard put in place and reviewed weekly to monitor timeliness.	MASH DASH in place; targets set, and performance improves.	Threshold document reviewed	February 2019	JC	PW	
		4.1.5 Review the interface with early help gateway and the Thresholds of Need document with specific reference to neglect and domestic abuse; clarify pathways			April 2019			
		4.1.6 Merge the Early Help Gateway and MASH and introduce an integrated process at the Front Door.	Integrated front door operational	January 2019	JH	JM		

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/D MT Lead	Operational and Task Group Lead	RAG rating Progress
4.2.	R 5; AFI 3 Too many children being subject to unnecessary and disproportionate SW processes.	4.2.1 Establish MASH Strategic Board to improve partnership understanding of thresholds, accountability and the development of shared expectations in relation to gaining consent.	Board notes  Board notes Audit reports	December 2018	G R-W	JM	
		4.2.2 Revise Thresholds of Need document , consent and referrals through the BSCB practice sub group	Revised multi agency document agreed and widely disseminated	April 2019	JH	JM BSCB nominated lead	
		4.2.3 Establish MASH Operational task Group	Task group in place	December 2018	GRW	JM	
		4.2.4 Quality Assurance of quality of contacts and responses at MASH	MASH audit	Regular audit from December 2018	JC	CA	
4.3	R3 & R5 Children who are already allocated to a SW are being opened as a new contact; Improve accuracy of data re: contacts; improve customer service experience for children, families and partners.	4.3.1 'Process map', revise and issue new guidance re telephony standards to include guidance on <i>contacts</i> on open cases.	Standards in place  All workers have a phone	February 2019	JH	DD JM	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/D MT Lead	Operational and Task Group Lead	RAG rating Progress
4.4	R1 & R3 Quality assurance of impact of improvements on timeliness and quality of Front Door responses.	4.4.1 Arrange a Peer review of Front Door inc MASH processes – by the Partner in Practice Doncaster CT	Peer review report  Audit outcomes Audit report	December 2018	GRW	JM	
Page 208		4.4.2. Following PiP Peer Review and in response to the findings- remodel Front Door arrangements	Front Door operational and partnership arrangements remodelled	February 2019	GRW	Head of Front Door & MASH JH	
	R & R 5	44.2 Undertake multi agency audits.	Audit report to the BSCB	4 times per year	GRW	MG	
	R1& R 3	4.4.3 Internal QA audit team to audit MASH responses.	Audit report to the performance meeting	December 2018 then on-going	JC	CA	
4.5	R1,R4 & R5 Improve all aspects of Multi agency child protection work	4.5.1 Review the Signs of Safety plans used for CP conferencing and ensure that these are SMART	Revised plan and training in place	February 2019	JC	IC Multi agency	
<b>What will this look like?</b> Fewer contacts to social care as children are safeguarded in universal services and the right contacts are then made to social care Fewer children come into our services following repeat referrals 100% compliance in gaining the consent of families when this is required Contacts and referrals are dealt with in a timely and proportionate manner Partners and peers are confident about our Front Door arrangements			<b>How will we know that Children’s Outcomes have improved?</b> More children will receive help through universal and early help provision to remain safe, have access to school, training or work, be healthy and living with their families or an appropriate alternative. Children and families tell us they were helped early enough Fewer children suffering significant harm				

## 5. Improving Management oversight and quality assurance

### What do we mean?

The service is well led at all levels and there is clear oversight of all children and all aspects of work with children and families. The service leadership is well informed about all aspects of the service and use this information to take timely action to anticipate and rectify problems.

Partnership working results in robust and clear plans that improve outcomes for children; all social workers receive regular high quality reflective supervision; good quality management information enables service managers and leaders to exercise robust oversight and monitoring.

### What does this mean for children?

Services that are there to support you will be well run, regularly checking that work is of the highest standards ; open to challenge and ready to adapt quickly when needed.

Page 209

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
<b>Workforce stabilisation, workable caseloads, supervision and efficiency</b>							
5.1	Workforce stabilisation and Improve supervision R10 AFI 26;30;32	5.1.1 Implement an improved recruitment and retention strategy	Reduce turnover to below national average of 15%; Higher % of experienced social workers in hard to fill posts.	January 2019	JH	DD/TT	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
		5.1.2 Review the process for conducting Exit Interviews to achieve greater take up	>66% of exiting employees complete	March 2019	JH	TT	
Page 210		5.1.3 Establish the team manager and practice supervisor development programme through the 'Teaching Partnership'.	All team managers to have commenced on the programme by October 18	January 2019	JH	TT	
		5.1.4 First-line" management course for aspiring leaders will be available to key staff.	Quarterly updates report that all first line managers have taken up training	September 2019	JH	TT	
5.2	R 10 Improve the quality of supervision.	5.2.1 Develop a protocol and timetable for audits of Supervision as part of the QA process.	Audits show progress. 100% of supervisions being carried out and recorded.	January 2019	JH	DD	
<b>Culture of High Support and High Challenge</b>							
5.3	Strengthen accountability across the service and develop a culture that	5.3.1 Review governance and accountability framework	Meeting structure and ToR	February 2019	GRW	JH	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
Page 211	supports excellent performance, through a combination of robust action planning, formal monitoring and action to ensure consistent compliance AFI 6;7;8;20;23;27;		Feedback from managers and evidence from cases through audit demonstrates effective management oversight				
		5.3.2 Introduce management standards to ensure clarity of expectation in relation to management accountability.	Management standards; Review scheme of delegation/ decision making	April 2019	GRW	JH	
		5.3.4 Agree an enhanced approach to managing performance across the service and apply this consistently. Develop a culture of continuous improvement across the service	Monthly reporting on supervision, appraisal, performance disciplinary, grievance, sickness absence and formal performance Management	From January 2019	GRW	JH	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
			tracker. Presented at DMT				
5.4	Improve staff engagement and two way communication between staff and senior leadership	5.4.1 Implement an enhanced staff engagement and communication strategy (see separate strategy for details).including staff survey, video blogs, suggestion boxes	Strategy in place; Surveys and actions; Use of the post boxes ; Feedback from staff that they feel valued and listened to	December 2018 On-going through 2019 then review	GRW	TT	
5.5	Improve the quality and accessibility of guidance across all areas of practice for practitioners/ managers and QA. R2,4,5,10 AFI 27	5.5.1 Produce ‘one minute’ guides focusing on <i>back to basics</i> approach describing what good looks like and compliance expectations.	Feedback from staff;  improvement in audit outcomes	February 2019	JH	TT	
		5.5.2 Make practice standards accessible in all work areas.	Spot checks while walking the floor	March 2019	JH	JH	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
		5.5.3 Put in place “themed months” focussing on one area of improvement per month e.g. Life Story Books; Listening and responding to the Voice of the Child.	Starting March 2019		JH	TT	
		5.5.4 Offer lunch and learn sessions on key practice areas	Feedback from staff	Starting March 2019	JH	TT	
<b>Good quality management information supports robust oversight and monitoring</b>							
Page 6 213	Improve accessibility, accuracy, comprehensiveness, and rigour through introduction of effective performance arrangements by the service.	5.6.1 Review all performance data sets, reporting schedules leading to an agreed set of key performance reports	Easy to access data sets in place for all teams	January 2019	JC	PW /performance lead for improvement	
		5.6.2 Ensure appropriate training and support to improve managers’ capacity to analyse data and use this to improve service planning.	Increased use of reporting tools by all managers	On-going through 2019 then review	JC	JC to nominate	
		5.6.3 Put in place performance clinics for all service areas.	Schedule of performance clinics, attendance Improved	On-going through 2019 then review	JC	DD/QA lead	

City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
Page 7 214	Improve the functioning and efficiency of the client records system		performance				
		5.6.5 Action the LCS health check recommendations to maximise operational effectiveness. 5.6.6. Respond to Peer review feedback in relation to client information systems usage	Business processes improved	By April 2019	JC	DB	
	Understand “what good looks like”	5.7.1 Use Peer reviews to focus on getting to good. Utilise the learning from Partners in Practice and outstanding Children’s Services	Improved performance and positive feedback from Ofsted and others	December 2018	JC	QA Lead	
5.8	A refreshed Quality Assurance strategy and action plan drives improved performance and improved outcomes for children and their families.	5.8.1 Undertake a review of all cases for children in help and protection; undertake remedial action and report and action learning.	Review completed and findings reported and disseminated	November 2018	JC	QA Lead	
		5.8.2. Ensure that performance reporting reflects practice standards across all elements of children’s services	Refreshed performance reports reflects all elements of children’s	March 2019	JC	PW	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
			social care				
		5.8.3 Apply a robust and comprehensive Quality Assurance and audit plan ( to include enhanced auditing, coaching ;regular reporting)	Plan agreed	February 2019	JC	QA lead	
<b>Improve partnership working</b>							
5.9	Improve all aspects of multi agency child protection work R5	5.9.1 Ensure ownership of improvements by all partners using the BSCB; MASH strategic group; Children's Trust	Feedback from the partnership and multi agency sign up to the Improvement Plan	January – June 2019	JC	JC to nominate	
		5.9.2. Identify and remove barriers to effective partnership working.					
5.10		5.10.1 Establish MASH Strategic Board to improve multi agency practice at the Front Door.		December 2018	G RW	JH/JM	

Page 215

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	DMT Lead	Operational Lead	Progress RAG
<p><b>How will we know that Children’s Outcomes have improved?</b> Children and young people will tell us that they feel safe and things are better for them as a result of our interventions</p>			<p><b>How success will be measured</b> Improved compliance across all areas of the service Improved management information leading to an accurate perception of quality of the service Robust and responsive management action to correct poor performance Reduced SW caseloads Reduced staff turnover- improved stability of the workforce Improved partnership working Increased innovation and collaborative working</p>				

DRAFT

## 6.Improving the sufficiency of placements for Children Looked After ( CLA)

### What do we mean?

The quality and availability of placements for looked after children is sufficient to meet the current and anticipated needs of looked after children; children understand their family background and foster carers are well prepared and trained to undertake their role.

### What does this mean for children?

If you need to be looked after away from your family you will be able to stay near home and will be well looked after.

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 217 6.1	Reduce the numbers of Children Looked After through an effective 'Edge of Care' offer. R 7	6.1.1 Continue to invest in successful Be Positive Pathways (BPP) edge of care programme. Review impact and design a sustainable service based on lessons learned from the pilot programme.	Fewer teenagers coming into care  More children returning home quickly	December 2018- September 2019	JH	DB	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 218		6.1.2 Investment in connected persons team to identify family members earlier so that more children achieve permanency through SGO.	Increase in use of SGOs	Impact September 2019	JH	DB	
		6.1.3 Identify Children Looked After with potential to be reunified with family through Permanence panel and develop intensive intervention to support reunification.	More children returning home from care	Impact September 2019	JH	DB/EC	
6..2	R8 Provide life story work for all children in care.	6.2.1 Deliver training to all social workers in relation to life story work (LSW) and its importance for children	When appropriate Children Looked After (CLA) receive/ have life story work completed in a timely way	May 2019	JH	EC/TT	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
Page 219		6.2.2 Develop one minute guides for practitioners about life story work.	Guides available	January 2019	JH	EC	
		6..2.3 Adapt LCS to provide reporting and storage for life story work.	System change logged as complete – IGE notes	February 2019	JC	DB	
		6.2.4 Implement Management standards in relation to life story work and ensure capacity to complete.	System reporting ; viewpoint All CLA have LSW offered.	June 2019	JH	DB	
6.3	Ensure that all foster carers complete mandatory training. R 8 AFI 17 feedback from foster carers	6.3.1 Review and re launch the L&D offer to all foster carers including progression and on going CPD.	L& D offer  Increased participation in training	March 2019  December 2019	JH	DB	
		6.3.2 Induction pack in place for all new foster carers	Packs available	May 2019	JH	DB/fostering SM	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
		5.3.3 Review the foster care Agreement / foster care charter. 5.3.4 Improve monitoring and reporting of foster carer training using Evolve	Revised agreement  Accurate reporting	May 2019  June 2019	JH	DB/fostering SM	
Page 220		6.3.5 Consult with Foster Talk to lead in addressing foster carers support needs.	Feedback from foster carers	March – April 2019	JH	DB/fostering SM	
	6.3.6 Re launch a fostering association in Bradford.		April 2019	JH	DB/fostering SM		
6.4	R7 Enough local placements to meet the needs of children.	6.4.1 Develop and deliver an effective sufficiency strategy that includes: <ul style="list-style-type: none"> <li>• Internal review of foster placement availability; a needs analysis to generate options to stimulate the provider market.</li> <li>• Develop local unregulated setting for emergencies.</li> </ul>	More in house beds  More use of in house foster placements  Improved recruitment	December 2018 – December 2019	JH	DB/fostering SM	

**City of Bradford Metropolitan District Council Draft Improvement Plan version 0.23 04.01.2019**

No	What needs to change Ref no – ref to Ofsted report recommendations and Areas for Improvement	Actions	Measure	When	CMT/DMT Lead	Operational and Task Group Lead	RAG rating Progress
		<ul style="list-style-type: none"> <li>• Re launch crisis care fostering scheme.</li> <li>• Explore external unregulated setting.</li> <li>• Continue to drive internal fostering recruitment.</li> <li>• Revive the shared care fostering scheme.</li> </ul>	and retention of in house carers recruited				
<b>How will we know that Children’s Outcomes have improved?</b> More children are able to stay with their family and friends. Children Looked After are doing well in school and tell us that that they have someone to support them			<b>How success will be measured</b> Reduce total number of CLA Measures for improved offer for ‘16 &17’ year olds More local placements - Reduced reliance on externally purchased placements and associated costs Improved matching / placement choice More children leave care through increased use of SGO Increase the number of nights respite				

Page 21

This page is intentionally left blank



**MINUTES OF THE MEETING OF THE  
WEST YORKSHIRE COMBINED AUTHORITY  
HELD ON THURSDAY, 11 OCTOBER 2018 AT COMMITTEE ROOM A,  
WELLINGTON HOUSE, 40-50 WELLINGTON STREET, LEEDS**

---

**Present:**

Councillor Susan Hinchcliffe (Chair)	Bradford Council
Councillor Judith Blake CBE	Leeds City Council
Councillor Peter Box CBE	Wakefield Council
Councillor Barry Collins (Substitute)	Calderdale Council
Councillor Stewart Golton	Leeds City Council
Councillor David Hall	Kirklees Council
Roger Marsh OBE	Leeds City Region Enterprise Partnership
Councillor Shabir Pandor	Kirklees Council
Councillor John Pennington	Bradford Council
Councillor Andrew Waller	City of York Council

**In attendance:**

Councillor Robert Light	Chair, Overview & Scrutiny Committee
Richard Thorpe	Ministry of Housing, Communities & Local Government (minute 54 only)
Ben Still	West Yorkshire Combined Authority
Angela Taylor	West Yorkshire Combined Authority
Dave Pearson	West Yorkshire Combined Authority
Caroline Allen	West Yorkshire Combined Authority
Heather Waddington	West Yorkshire Combined Authority (minute 54 only)
Jacqui Warren	West Yorkshire Combined Authority (minute 54 only)
Seamus McDonnell	West Yorkshire Combined Authority (minute 54 only)
Ruth Chaplin	West Yorkshire Combined Authority

**42. Apologies for Absence**

Apologies for absence were received from Councillor Tim Swift.

**43. Declarations of Disclosable Pecuniary Interests**

There were no pecuniary interests declared by members at the meeting.

#### **44. Exempt Information - Possible Exclusion of the Press and Public**

**Resolved:**

- (a) 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 the appendices to Agenda Items 11 and 13 on the grounds that it is 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.
- (b) That in accordance with paragraph 5 of Part 1 to Schedule 12A to the Local Government Act 1972, the public be excluded during consideration of Appendices 1 & 2 to Agenda Item 12 on the grounds that they contain legally privileged information and if members of the press and public were present there would be disclosure to them of exempt information. It is considered that the public interests in maintaining the content of the appendices as exempt outweighs the public interest in disclosing the information as publication could prejudice legal proceedings.

#### **45. Minutes of the Meeting of the Combined Authority held on 2 August 2018**

**Resolved:** That the minutes of the meeting of the West Yorkshire Combined Authority held on 2 August 2018 be approved and signed by the Chair.

#### **46. Capital Spending and Project Approvals**

The Combined Authority considered a report of the Director of Delivery on the progression and funding for the following schemes through the Combined Authority's assurance process:

- Warm Homes Fund round 2a
- Calderdale multi-modal transport model
- Superfast Broadband West Yorkshire and York – Contract 3
- Corridor Improvement Programme Phase 1 – A62 Smart Corridor
- Glasshoughton southern link road

Details of the five schemes were provided in the submitted report and it was noted that these had been considered and recommended for approval by the Investment Committee.

Members also considered expenditure approvals for the Business Growth Programme and Resources Efficiency Fund which were detailed in the submitted report.

**Resolved:**

(a) In respect of Warm Homes Fund round 2a -

That following a recommendation from the Investment Committee, the Combined Authority approves:

- (i) That the Warm Homes Fund phase 2a proceeds through decision point 2 and work commences on activity 5 (full business case with finalised costs):
- (ii) That an indicative approval is given to the total project value of £4.688 million and the Combined Authority funding contribution of £3.451 million with full approval to spend being granted once the scheme has progressed through the assurance process to decision point 5 (full business case with finalised costs). The remainder will be funded by local authority partners, social housing providers and with private sector match funding on a case by case basis.
- (iii) That future approvals are made in accordance with the assurance pathway and approval route outlined in the submitted report including at decision point 5 through a delegation to the Combined Authority's Managing Director following a recommendation by the Combined Authority's Programme Appraisal Team. This will be subject to the scheme remaining within the tolerances outlined in the submitted report.

(b) In respect of Calderdale multi-modal transport model -

That following a recommendation from the Investment Committee, the Combined Authority approves:

- (i) That the Calderdale Multi-Modal Model project proceeds through decision point 2 (case paper) and work commences on activity 5 (full business case with finalised costs).
- (ii) That an indicative approval is given to the West Yorkshire Combined Authority's contribution of £389,000 (which will be funded through £64,000 from the West Yorkshire plus Transport Fund and £325,000 from the other Transport Fund projects which are already approved) is given with full approval to spend being granted once the scheme has progressed through the assurance process to decision point 5 (full business case with finalised costs). The total project value is £629,000.
- (iii) That future approvals are made in accordance with the approval pathway and approval route outlined in the submitted report including at decision point 5 through a delegation to

West Yorkshire Combined Authority's Managing Director following a recommendation by West Yorkshire Combined Authority's Programme Appraisal Team. This will be subject to the scheme remaining within the tolerances outlined in the submitted report.

(c) In respect of Superfast Broadband West Yorkshire and York – Contract 3 -

That following a recommendation from the Investment Committee, the Combined Authority approves:

- (i) That the superfast broadband contract 3 project proceeds through decision point 2 (case paper) and work commences on activity 5 (full business case with finalised costs).
- (ii) That an indicative approval is given to the total project value of £16.428 million from the funding sources outlined in the submitted report for which the Combined Authority is the accountable body, with full 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 approval is given to reallocate all or part of the BET Refund funding from Contract 2 to Contract 3 as actioned at decision point 5 full business case with costs.
- (iv) That development costs of £120,000 are approved in order to progress the scheme to decision point 5 (full business case with finalised costs).
- (v) That the Combined Authority enter into a Service Level Agreement/Funding Agreement if required with Leeds City Council for expenditure up to £120,000 development funding.
- (vi) That future approvals are made in accordance with the approval pathway and approval route outlined in the submitted report including at decision point 5 (full business case with finalised costs) through a delegation to the Combined Authority's Managing Director following a recommendation by the Combined Authority's Programme Appraisal Team. This will be subject to the scheme remaining within the tolerances outlined in the submitted report.

(d) In respect of the Corridor Improvement Programme – A62 Smart Corridor -

That following a recommendation from the Investment Committee, the Combined Authority approves:



- (i) That the A62 Smart Corridor Phase 1 project proceeds through decision point 3 and work commences on activity 4 (full business case).
  - (ii) That an indicative approval is given to the total project value of £8.756 million and the Combined Authority contribution (from the West Yorkshire plus Transport Fund) of £7.906 million (£406,000 increase from approved expression of interest scheme total) with full approval to spend being granted once the scheme has progressed through the assurance process to decision point 5 (full business case with finalised costs). The remainder will be funded by £850,000 of ESIF funding yet to be confirmed.
  - (iii) That development costs of £605,000 are approved in order to progress the scheme to decision point 5 (full business case with finalised costs), and that the Combined Authority issue an addendum to the existing funding agreement with Kirklees Council for expenditure of up to £605,000 from the West Yorkshire plus Transport Fund taking the total approval to £855,000.
  - (iv) That future approvals are made in accordance with the approval pathway and approval route outlined in the submitted report including at decision point 5 through a delegation to the Combined Authority's Managing Director following a recommendation by the Combined Authority's Programme Appraisal Team. This will be subject to the scheme remaining within the tolerances outlined in the submitted report.
- (e) In respect of Glasshoughton Southern Link Road -

That following a recommendation from the Investment Committee, the Combined Authority approves:

- (i) That the Glasshoughton Southern Link Road project proceeds through decision point 4 and work commences on activity 5 (full business case with finalised costs).
- (ii) That an indicative approval to the total project value of £7.320 million is given from the West Yorkshire plus Transport Fund with full 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 £245,000 are approved in order to progress the scheme to decision point 5 (full business case with finalised costs), taking the total project approval to £978,000.
- (iv) That the Combined Authority enters into an addendum to the existing funding agreement with Wakefield Council for additional expenditure of up to £245,000 from the West



Yorkshire plus Transport Fund. This takes the total funding agreement amount to £978,000.

- (v) That future approvals are made in accordance with the approval pathway and approval route outlined in the submitted report including at decision point 5 through a delegation to the Combined Authority's Managing Director following a recommendation by the Combined Authority's Programme Appraisal Team.

- (f) In respect of the Business Growth Fund -

That the Combined Authority approves additional expenditure of £4 million for the Business Growth Programme funded through the Local Growth Fund taking the total approval to £27 million.

- (g) In respect of the Resource Efficiency Fund -

That the Combined Authority confirms approval of the total scheme costs of £1.984 million for the Resource Efficiency fund comprising £840,000 Local Growth Fund (LGF) and £1.144 million European Regional Development Fund (ERDF).

#### **47. Budget Planning 2019/20**

The Combined Authority considered a report of the Director of Resources which provided a further update on the business planning process and revenue budget planning for 2019/20.

The ongoing work in respect of the draft 2019/20 budget and progressing the business planning process was noted. The timetable and issues to be addressed in updating the draft budget were outlined in the submitted report and Members were advised that further work is being undertaken to review and clarify the figures. A detailed budget proposal will be brought to the next meeting and public engagement on the budget will take place over the Autumn.

**Resolved:** That the report be noted.

#### **48. Leeds City Region Brexit Resilience and Opportunities Assessment**

The Combined Authority considered a report of the Interim Director of Policy and Strategy on Leeds City Region Brexit resilience and opportunities assessment.

Members noted the progress on the work being undertaken to prepare and support the City Region's business and communities ahead of the UK's withdrawal from the EU. They discussed the need to support local small and medium sized enterprises (SMEs), particularly in respect of training to fill the skills gaps and the new employment opportunities which will arise.

The report also outlined a range of additional policy and funding issues post Brexit and Members discussed the key policy themes and potential future resource opportunities including the UK Shared Prosperity Fund.

Roger Marsh, who had been appointed Chair of the newly recently created Northern Powerhouse 11 (NP11), advised the meeting that NP11 was helping businesses to prepare and face the challenges ahead. It was hoped that they would be able to work with Government on future funding opportunities to ensure a smooth transition from European funding.

A progress report would be prepared for a future meeting.

**Resolved:** That the work and progress to date in supporting the City Region's businesses and communities ahead of the UK's departure from the EU be noted and endorsed.

#### **49. Strengthened Local Enterprise Partnerships**

The Combined Authority considered a report of the Managing Director which provided an update on the Leeds City Region Enterprise Partnership's (the LEP's) response to the Government's 'Strengthened Local Enterprise Partnerships' report.

It was reported that at their meeting on 20 September 2018, the LEP Board had resolved that in order to submit a 'compliant' response to Government, to propose that a new LEP be created by combining the York, North Yorkshire and East Riding LEP, except for the East Riding, and the Leeds City Region Enterprise Partnership, except for Barnsley. A copy of the LEP Board's response, which was submitted by the LEP Chair on 28 September 2018, was attached at Appendix 1 to the submitted report.

Members discussed the next steps and the LEP's position in relation to the Government's requirements on LEP leadership, capacity, accountability and performance and a summary was provided at Appendix 2. It was recognised that the Leeds City Region had good working relationships with its neighbouring areas and joint discussions would continue with partners in the York, North Yorkshire and East Riding LEP. Collaboration would also be strengthened across all neighbouring LEPs, via the NP11 and with Yorkshire Leaders.

Further reports would be brought to future meetings about the implementation implications for the Combined Authority once Government has responded to the geography proposal.

**Resolved:**

- (a) That the proposal from the LEP for a new merged LEP to cover the whole of West and North Yorkshire and York, as detailed in Appendix 1 to the submitted report, be noted and endorsed.
- (b) That the Combined Authority notes how the LEP and Combined Authority are positioned in respect of Government's



recommendations on leaderships, capacity, accountability and performance as detailed in Appendix 2 of the submitted report.

- (c) That further reports be brought to future meetings on the detail of relevant legal changes when known.

## **50. Rail Performance and Governance Update**

The Combined Authority considered a report of the Director of Transport Services which:

- Provided an update on the performance of local rail services following discussion at the last meeting which was attended by Network Rail and train operators Northern and TransPennine Express.
- Advised Members of progress with the reviews into rail performance and governance following the issues emerging in May 2018.
- Advised Member of arrangements proposed to improve engagement between the Combined Authority and the rail industry.

Members were extremely concerned that services were still failing to operate at an acceptable level and passengers and the local economy continued to be severely affected. It was reported that over-crowding on “short formed” services (ie. with fewer carriages than required) was also having a massive impact on passengers and the effect on consumer confidence was highlighted. Members were disappointed that although there was a compensation scheme for passengers, not enough people were making claims and considered that the rail operators should do more to publicise the scheme. The poor performance was also impacting on businesses and it was understood that work was being undertaken to develop business compensation packages.

Members discussed the temporary Government appointment of Richard George who would be working closely with TfN, the Rail North Partnership, Network Rail and train operators and it was suggested that he be invited to meet with the Combined Authority.

As the Combined Authority’s representative, Councillor Blake agreed to raise the Combined Authority’s serious concerns at the Transport for the North Rail North Committee. She assured Members that the voice of the City Region would be strongly and firmly heard at both the TfN Rail North Committee and nationally. Members suggested that representatives of the rail industry be invited to the February meeting of the Combined Authority.

In respect of rail governance reviews, it was reported that the Combined Authority’s response to the Rail North (Blake Johnson) Review had been submitted and the Review was expected to report its findings in December 2018. Members were also advised that the Office of Rail and Road (ORR) had published its interim findings into the national timetable disruption and the Secretary of State has launched a major review of the UK rail industry and Roger Marsh is to be part of the report panel for this review. A summary of the preliminary findings was outlined in the submitted report.



It was reported that the Chair of the Transport Committee is to establish a joint forum to enable the Combined Authority Members, train operators, Network Rail, Transport for the North and other key bodies to discuss plans and issues affecting local rail services. In welcoming the establishment of the Rail Forum, Members discussed the Terms of Reference which were attached at Appendix 1 and their comments and suggestions in respect of membership would be brought to the attention of the Chair of the Transport Committee.

**Resolved:**

- (a) That the update on the impact on passengers of the May 2018 rail timetable change be noted.
- (b) That Councillor Blake, as the Combined Authority's representative on the Transport for the North Rail North Committee, raises the concerns about the impact of prolonged rail disruption and urges further action to restore rail performance to the level required by the respective franchises.
- (c) That the establishment of a West Yorkshire Combined Authority Rail Forum be endorsed and the comments regarding membership be brought to the attention of the Chair of the Transport Committee.

**51. Corporate Planning & Performance**

The Combined Authority considered a report of the Director of Resources in respect of corporate planning and performance.

Members discussed corporate performance, including progress against priorities, risk management and budget position. Appendix 1 set out the current status of the 14 key Corporate Plan priorities and an update on the key strategic risks.

A summary of the 2018/19 current spend to budget was attached at Appendix 2 and it was noted that there were currently no areas of concern to report.

**Resolved:** That the report be noted.

**52. Channel 4**

The Combined Authority considered a report of the Executive Head of Economic Services which provided an update and sought approval of the Combined Authority's bid to attract the Channel 4 national HQ to Leeds City Region.

It was reported that Channel 4 had been holding advanced discussions with the shortlisted regions to clarify and confirm the details within the submitted proposals. Members noted those made by Leeds City Region partners which were set out in the exempt Appendix 1. It was noted that the proposals had been appraised in line with the Combined Authority's



assurance process and a final decision by Channel 4 is expected in the Autumn.

Members welcomed and supported the bid which, if successful, would provide benefits and opportunities for all districts in the City Region. They expressed their thanks and appreciation to all partners across the region who, working with the Combined Authority, had made valuable contributions in preparing the bid.

**Resolved:**

- (a) That the Combined Authority continues to support the Leeds City Region bid to attract the Channel 4 National HQ.
- (b) That, if successful, approval is given to the recommendations set out in exempt Appendix 1, including the proposal to proceed through the relevant stages of the Combined Authority's assurance process.
- (c) That approval is given to the forecast value of these proposals as set out in the exempt Appendix 1.
- (d) That future approvals are made in accordance with the assurance pathway and approval route outlined in the exempt Appendix 1, including at decision point 5 (full business case) of the assurance process through a delegation to the Combined Authority's Managing Director following a recommendation by the Combined Authority's Programme Appraisal Team. This will be subject to the scheme remaining within the tolerances outlined in the exempt Appendix 1.

**53. Corporate Update on Treasury Management**

The Combined Authority considered a report of the Director of Resources which provided an update on the legal claim issued against Barclays Bank PLC (Barclays) in respect of loans held by the Combined Authority and the 2006 regulatory findings made against Barclays on the manipulation of LIBOR.

It was reported that Hausfeld LLP had been engaged to provide legal representation to the Combined Authority. Detailed legal advice on the merits of the Combined Authority's claim was expected by 26 October 2018 which was the same date as the claim form that has been issued must be served on Barclays. A decision on whether or not to proceed with the claim would therefore have to be made before the next meeting of the Combined Authority. The legal costs associated with the claim were set out in exempt Appendices 1 and 2.

**Resolved:** That the Combined Authority's Managing Director be authorised:

- (a) To make a decision following consideration of legal advice and in consultation with the Chair of the Combined Authority and Head of Legal and Governance Services on whether or not to proceed with service of the claim form.



- (b) To take all necessary steps in relation to the proceedings.
- (c) To take such action as is necessary to protect the interests of the Combined Authority.

**54. European Structural and Investment Funds (ESIF) - Sustainable Urban Development (SUD)**

The Combined Authority considered a report of the Director of Resources on the European Structural and Investment Funds (ESIF) – Sustainable Urban Development (SUD).

It was reported that the Investment Committee had considered the outline assessments forms (attached at exempt Appendices 2-9) and the prioritisation list for SUD (attached at exempt Appendix 1).

In its role as the Intermediate Body (IB), the Combined Authority considered the advice and respective conditions included in the outline assessment forms for each of the eight projects which had been received following the Call. They approved the advice, the selection decision and the prioritisation list and noted that the Ministry of Housing, Communities and Local Government (MHCLG) will finalise its assessment and make its decision. It was agreed that in order to progress applications to avoid delays, the final selection of projects, following the reconciliation to budget, be delegated to the Director of Resources in consultation with the Chair of the Combined Authority as required.

**Resolved:**

- (a) That the Combined Authority, in its role as the Intermediate Body for the SUD part of the ESIF programme, approves the advice included in the outline assessment forms at Part 3 of each exempt Appendix 2-9, the decision and any respective conditions outlined in Part 5a, and the prioritisation list for SUD included in exempt Appendix 1.
- (b) That the agreement of the final selection of projects, once the Managing Authority has reconciled the budget, be delegated to the Director of Resources in consultation with the Chair of the Combined Authority, as required, to ensure no further delays in progressing applications under the European programme occur.

**55. Minutes for Information**

- (a) **Minutes of the Overview & Scrutiny Committee held on 13 July 2018**

**Resolved:** That the minute of the Overview & Scrutiny Committee held on 13 July 2018 be noted.

- (b) **Draft Minutes of the Governance & Audit Committee held on 30 July 2018**



**Resolved:** That the draft minutes of the Governance & Audit Committee held on 30 July 2018 be noted.

**(c) Draft Minutes of the West Yorkshire & York Investment Committee held on 5 September 2018**

**Resolved:** That the draft minutes of the West Yorkshire & York Investment Committee held on 5 September 2018 be noted.

**(d) Draft Minutes of the Employment & Skills Panel held on 11 September 2018**

**Resolved:** That the draft minutes of the Employment & Skills Panel held on 11 September 2018 be noted.

A handwritten signature in blue ink, appearing to read 'S. Mitchell', is positioned in the lower right quadrant of the page.