

Agenda for a meeting of the Executive to be held remoteley on Tuesday, 6 October 2020

Members of the Executive – Councillors

LABOUR
Hinchcliffe (Chair)
I Khan
Ross-Shaw
Ferriby
Jabar
Farley

Notes:

Notes:

- A webcast of the meeting will be available to view live on the Council's website at <https://bradford.public-i.tv/core/portal/home> and later as a recording.
- Any Councillors and members of the public who wish to make a contribution at the meeting are asked to email jill.bell@bradford.gov.uk & yusuf.patel@bradford.gov.uk by **10.30 on Friday 2 October 2020** and request to do so. In advance of the meeting those requesting to participate will be advised if their proposed contribution can be facilitated and those participants that can be will be provided with details how to electronically access the meeting. Councillors and members of the public with queries regarding making representations to the meeting please email Jill Bell & Yusuf Patel.
- Approximately 15 minutes before the start time of the Executive meeting the Governance Officer will set up the electronic conference arrangements initially in private and bring into the conference facility the Portfolio Holders, the Chief Executive and the Council's legal advisor so that any issues can be raised before the start of the meeting. The officers presenting the reports at the meeting of the Executive will have been advised by the Governance Officer of their participation and will be brought into the electronic meeting at the appropriate time.

From:

Parveen Akhtar
City Solicitor

Agenda Contact: Jill Bell / Yusuf Patel

Phone: 01274 434580/4579

E-Mail: jill.bell@bradford.gov.uk / 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. 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)

3. **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;">LEADER OF COUNCIL & CORPORATE</p>

(Councillor Hinchcliffe)

4. **PROPOSED CONSULTATION TO SUPPORT DEVELOPMENT OF BRADFORD COUNCIL'S EQUALITY OBJECTIVES AND EQUALITY PLAN**

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It is essential that equality and social justice must be at the heart of everything the Council does. It is important that we seek to operate as an Authority and in our District leadership role in a way where everyone has opportunities to achieve their full potential regardless of who they are or where they live.

Our Equality Objectives and Equality Plan and our other plans that sit alongside them are there to help ensure equality is mainstreamed throughout the organisation. By law, we need to review the Council Equality Objectives every four years. Over the summer, we have been doing this through engagement with employees and Elected Members. This has included focus groups with the Council Management Team and our staff including individuals with particular protected characteristics.

Through this process, we have recognised the need to do more and enhance our organisation's commitment to this agenda. The proposed draft Equality Objectives and Equality Plan to deliver these is included as Appendix 2 to this report.

The report of the Chief Executive (**Document "CE"**) seeks the approval of Executive to consult on the draft Equality Objectives, and Equality Plan together with the draft Council Plan, for a period of six weeks from the 7 October to the 17 November 2020.

Recommended –

The Executive is recommended to:

- (1) Approve the proposal to consult on the draft Equality Objectives and Equality Plan for a period of six weeks from the 7 October to the 17 November 2020 as outlined in Appendix 3 to Document “CE”.**
- (2) Approve that one consultation process is undertaken that covers the wider consultation on the draft Equality Objectives and Equality Plan and on the draft Council Plan with the aim of ensuring the Objectives and Plan remain aligned.**
- (3) That the Workforce Development Strategy to be presented to Executive in December 2020 should contain Key Performance Indicators and targets for staff with particular protected characteristics in senior management posts, and be aligned with the workforce KPIs and targets within the finalised Equality Plan, along with a plan for how to achieve this.**
- (4) Request that the Health and Wellbeing Board, in recognition of the link between inequality and health inequalities, consider creating a District equality group including the full set of partners such as the NHS, the Police, the Fire Service and the Voluntary and Community Sector.**

(Phil Witcherley – 01274 431241)

5. COUNCIL PLAN 2021-2025

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The Council Plan is a key document that outlines the Council’s overall strategic objectives as a Local Authority over a four year period and identifies our key priorities. The draft Council Plan for 2021 – 2025 identifies the Council’s key priorities for this period including Better Skills, More Good Jobs and a Growing Economy; Decent Homes; Good Start, Great Schools; Better Health, Better Lives; Safe, Strong and Active Communities and a Well Run Council.

These are the same priorities as in the existing Council Plan. Given that the Council has declared a climate emergency, an additional priority area “A Sustainable District” has been included in this draft Council Plan.

The report of the Chief Executive (**Document “CF”**) provides a draft Council Plan (Appendix 1) and Key Performance Indicators (KPI) and targets (Appendix 2) for Executive’s approval for consultation with the public, Council employees and partners. If approved for consultation, it is proposed that the draft Plan will be considered further by Executive following consultation.

Recommended -

That Executive approve the draft Council Plan set out in Appendix 1 to Document “CF” and draft Key Performance Indicators and targets set out in Appendix 2 to Document “CF”.

(Phil Witcherley – 01274 431241)

C. PORTFOLIO ITEMS

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

6. HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD DEVELOPMENT PLAN

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The report of the Strategic Director of Place (**Document “CG”**) concerns the Haworth, Cross Roads & Stanbury Neighbourhood Development Plan which has been prepared by the Parish Council. The Plan has now been subject of an independent examination by Rosemary Kidd and her report confirms that the Plan, subject to the incorporation of a number of modifications meets the Basic Conditions outlined in legislation. She has recommended that the Plan proceeds to local referendum.

The report recommends that the Council agree to all of the proposed modifications and that the modified plan proceeds to referendum. This will take place in May 2021.

Recommended -

- (1) That the submitted Haworth, Cross Roads and Stanbury Neighbourhood Development Plan (Appendix 1 to Document “CG”) is subject to the modifications (Recommendations 1 to 29) as set out in the Examiner’s Report (Appendix 2 to Document “CG”), together with any relevant factual changes.**
- (2) That it is then subject to a local referendum**
- (3) That should the plan be successful at referendum, the plan should be formally made via delegated decision by the Assistant Director (Planning, Transportation & Highways) in consultation with the Portfolio Holder (Regeneration, Planning & Transport) in line with the agreed governance arrangements.**

(Andrew Marshall - 01274 434050)

7. **THE RELOCATION OF HER MAJESTY'S CORONER'S OFFICE ("HMCO")**

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The Strategic Director Corporate Resources will submit a report (**Document "CI" that contains not for publication Appendix 2**) that provides an update on the proposed relocation of HMCO and associated cost implications, prompted by concerns relating to the present accommodation in the Magistrates' Court.

Recommended –

To approve the additional capital funds required to meet the current budget deficit and to authorise the Strategic Director Corporate Resources, in consultation with the Leader, to take all necessary decisions to implement the decision.

(Imran Khan – 01274 4326018)

8. **EXCLUSION OF THE PUBLIC**

Recommended –

That the public be excluded from the meeting during the discussion of the Not for Publication Document "CH" on the grounds that it is likely, in view of the nature of the proceedings, that if they were present, exempt information within paragraph 3 (financial or business affairs) and 5 (legal privilege) of Schedule 12A of the Local Government Act 1972 (as amended) would be disclosed and it is considered that, in all the circumstances, the public interest in allowing the public to remain is outweighed by the public interest in excluding public access to the relevant part of the proceedings for the following reasons:

It is in the public interest in maintaining these exemptions because it is in the overriding interest of proper administration that Members are made fully aware of the financial and legal implications of any decision.

(Jill Bell – 01274 434580)

9. **LATEST UPDATE MARKETS REDEPLOYMENT PLAN**

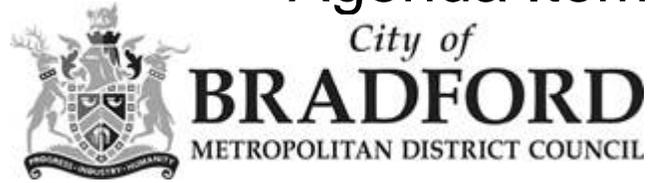
The Strategic Director's of Corporate Resources and Place will submit a report (**NFP Document "CH"**) which contains the latest update markets redeployment plan and how to support existing tenants.

Recommended –

That the recommendations contained in NFP Document "CH" be approved.

(Kirsty Reid - 07976 947814)

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Report of the Assistant Director Office of the Chief Executive to the meeting of Executive to be held on 6 October 2020

Subject:

CE

Proposed consultation to support development of Bradford Council's Equality Objectives and Equality Plan.

Summary statement:

It is essential that equality and social justice must be at the heart of everything the Council does. It is important that we seek to operate as an Authority and in our District leadership role in a way where everyone has opportunities to achieve their full potential regardless of who they are or where they live.

Our Equality Objectives and Equality Plan and our other plans that sit alongside them are there to help ensure equality is mainstreamed throughout the organisation. By law, we need to review the Council Equality Objectives every four years. Over the summer, we have been doing this through engagement with employees and Elected Members. This has included focus groups with the Council Management Team and our staff including individuals with particular protected characteristics.

Through this process, we have recognised the need to do more and enhance our organisation's commitment to this agenda. The proposed draft Equality Objectives and Equality Plan to deliver these is included as Appendix 2 to this report.

This report seeks the approval of Executive to consult on the draft Equality Objectives, and Equality Plan together with the draft Council Plan, for a period of six weeks from the 7 October to the 17 November 2020.

Kersten England
Chief Executive

Report Contact: Philip Witcherley/Helen
Johnston
Phone: (01274) 431241
E-mail: Philip.witcherley@bradford.gov.uk

Portfolio:

Corporate

Overview & Scrutiny Area:

Corporate

1. SUMMARY

- 1.1. The Council is required by law to comply with the Public Sector Equality Duty set out in S149 Equality Act 2010. Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Council is required to prepare and publish one or more Equality Objectives it thinks it should achieve to comply with its duties under S149 Equality Act 2010 (the Public Sector Equality Duty) and review these every four years. Over the summer, we have been reviewing the Objectives through engagement with employees and Elected Members. This has included focus groups with the Council Management Team and our staff including individuals with particular protected characteristics.
- 1.2. Through this process, we have recognised the need to do more and enhance our organisation's commitment to this agenda. The proposed draft Equality Objectives and Equality Plan to deliver these is included as Appendix 2 to this report.
- 1.3. This report seeks the approval of Executive to consult on the draft Equality Objectives, and Equality Plan together with the draft Council Plan, for a period of six weeks from the 7 October to the 17 November 2020.

2. BACKGROUND

- 2.1. The Council is required by law to comply with the Public Sector Equality Duty set out in S149 Equality Act 2010. It is essential that equality and social justice must be at the heart of everything the Council does and not just represent a bureaucratic 'box ticking' exercise. It is important that we seek to operate as an Authority and in our District leadership role in a way where everyone has opportunities to achieve their full potential regardless of who they are or where they live. Our Equality Objectives and Equality Plan, along with our other plans that sit alongside them, are there to help ensure equality is mainstreamed throughout the organisation.
- 2.2. Bradford is a diverse District, home to over 534,000 people, a third of whom are Black, Asian or Minority Ethnic (BAME), two in ten are of Pakistani heritage and, at the 2011 census, 25% of people were of the Muslim faith. The District is home to significant numbers of people from Eastern Europe and some 150 plus languages are spoken here. It is the UK's youngest city with almost a quarter of people aged under 16 and a third of the population aged under 20 years-old. Our District is geographically diverse, two thirds rural, with a large City and towns and villages each with their own often very strong, identities.
- 2.3. The District's youth and diversity represent significant assets offering a wide range of skills, innovation and experience, connections to global markets, huge productive potential and a rich cultural and community life. Work with and between our diverse communities has led to Bradford being assessed as among the world's leading intercultural Cities¹. There are however, some stark contrasts in outcomes with marked contrasts between different areas with some high levels of deprivation alongside areas of significant wealth and affluence².

¹ <https://www.coe.int/en/web/interculturalcities/bradford>

² Section 11 Background Documents contains evidence and reference data used throughout the report.

- 2.4. Overall, some 266,000 people live in the District's most deprived areas and nearly a third of our children live in poverty. Social, economic and health inequalities are real challenges, reflected in the fact that there are differences in life expectancy between the most affluent and the poorest parts of the District. Many people are affected by a combination of different dimensions of inequality e.g. income, ethnicity, gender, disability. For example, a third of the population is BAME with large Pakistani and Bangladeshi populations. Bradford has over 67,000 people in the lowest skilled occupational groups – national research shows that 41% of employees who are of Pakistani and Bangladeshi origin work in those same lowest paid groups, far higher than any other ethnicity.
- 2.5. Inequality comes with a social, economic and environmental price tag and has a significant impact on public services so the promotion of equality and social justice is in everyone's interests and must therefore be at the heart of decision-making. Equalities is an intrinsic part of the job of every Elected Member and Officer and this needs to be accompanied by us all understanding our District, our people, our communities and our rich cultures along with the inequity that many of our people face on a daily basis. Through this understanding we will be able to ensure our focus stays on making Bradford District a fair and equitable place for all our people.
- 2.6. In September 2016, the Council's Executive approved a set of Equality Objectives for Bradford Council. Details of these approved Objectives can be found on the Council's web site via this link: [Bradford Council's Equality Objectives | Bradford Council](#)
- 2.7. These Equality Objectives were embedded throughout our Council Plan 2016-20 with the aim of ensuring equalities remained central to the Council's work. The monitoring of the Equality Objectives was complementary to that of the Council Plan, with monitoring undertaken and discussed with the Corporate Management Team and the Portfolio Holder for equality on a quarterly basis along with a progress report to Corporate Overview and Scrutiny Committee annually.
- 2.8. The Equality Objectives were set for a four-year period covering 2016 to 2020. In line with our duties under the Equality Act 2010, we now need to review, consult on and set at least one Equality Objective for up to the next four years.

3. OTHER CONSIDERATIONS

- 3.1. As in previous years, development of the new draft Equality Objectives has run alongside the development of the Council Plan. This was to ensure that both the Objectives and the Council Plan align.
- 3.2. Whilst COVID-19 has impeded business as usual it has also exposed the level and depth of inequality experienced across the UK and across our own District. Across our District we have witnessed more negative impacts being experienced by those on low incomes compared to those who are more affluent. COVID-19 has also thrown into sharp relief the health inequalities endured by people and communities from deprived neighbourhoods when compared to those from more affluent parts of the

District³. In recognition of this, our focus is firmly on the lack of equality of opportunity and attainment experienced across our diverse communities and how we might address this.

- 3.3. In the same way, the Black Lives Matter Campaign (BLM) exposed and raised awareness of the inequality experienced by people from a Black heritage at the hands of law enforcers. Reviewing and using our internal disciplinary and grievance processes will be key in helping us to drive out all types of discrimination from our own organisation and services.
- 3.4. Development of the draft Equality Objectives has been informed by the Local Government Association Equality Framework, the Stronger Communities' Inclusive Employers project report, the Hays' report, development of the Council Plan 2021-25 and through considerable internal dialogue and engagement with staff and Elected Members as described below at 3.6. The resultant draft high level Equality Objectives are described in 3.7 below.
- 3.5. Restrictions imposed to mitigate the impacts of COVID-19 have meant that we have yet to consult and engage widely on our new draft Equality Objectives.
- 3.6. Internal engagement to support development of the draft Equality Objectives has taken place through:
 - Staff focus groups with Council Management Team (including with BAME colleagues, carers, colleagues with disabilities, LGBTQ+ colleagues and female staff)
 - Cross Department Equality Group which brings together colleagues from across the entire Authority to discuss equality issues
 - Department Management Teams
 - Council Management Team
 - Development workshops by theme including a range of colleagues at different levels in the organisation.
- 3.7. The high level draft Objectives are:
 - 3.7.1. **Leadership:** We will lead the Council and the District in an open, visible and accountable way with zero tolerance for discriminatory behaviour.
 - 3.7.2. **Workforce:** Work proactively to ensure that our workforce (at all levels) reflects the communities we serve and support all staff to achieve their full potential.
 - 3.7.3. **Communities:** We will work to ensure that all service areas are encouraged to better understand their services and actively engage our community to participate in decision-making processes to improve the services we provide. We will work together with service users, communities and local partners to co-design, commission and deliver services that are accessible, inclusive and responsive to the needs of people and communities and improve outcomes.

We will ensure through our Social Value Procurement Policy that more resources

³ Section 11 Background Documents contains evidence and reference data used throughout the report

are retained in the District to support and invest in our people and our voluntary and community sector.

- 3.7.4. **Service Design/Delivery:** We will design, commission and deliver services that are accessible, inclusive and responsive to the needs of people and communities and provide accessible information about our services. We will aim to contract and commission services locally wherever possible.
- 3.8. Feedback through the engagement process has supported the development of the Objectives across the four LGA Equality Framework themes of Leadership, Workforce, Communities and Service Delivery/Design.
- 3.9. Feedback and data showed strong evidence for the actions identified within the draft Workforce Equality Objectives and Equality Plan. A separate Workforce Development Strategy will be presented for approval to Executive in December 2020. Key Performance Indicators (KPIs) and targets to equality in workforce development will need to align with KPIs and targets within the Equality Plan.
- 3.10. Corporate Overview and Scrutiny Committee of the 24 September 2020 received a report detailing progress made against the current Equality Objectives 2016-20 along with the draft Equality Objectives and Equality Plan for 2020-24. The draft Equality Objectives and Equality Plan were presented for consultation. Feedback and comments from this Committee will be considered and reflected in the final draft Equality Objectives and Equality Plan along with feedback from the wider consultation.
- 3.11. Officers will request that the Local Government Association peer review all aspects of our overall approach to equality and to assess our position on their Equality Framework for Local Government. This peer review will be conducted by Officers and Elected representatives from another Local Authority. In order to be able to benchmark our progress on LGBTQ+ inclusion in the workplace, Officers will also consider whether we should undertake the Stonewall UK Workplace Equality assessment process in 2021.
- 3.12. The Local Government Association's recommendations will be used to further inform our Objectives. This may result in changes to our Objectives and further subsequent consultation being undertaken.

Next steps

- 3.13. This report seeks the approval of Executive to consult on the draft Equality Objectives, and Equality Plan together with the draft Council Plan, for a period of six weeks from the 7 October to the 17 November 2020 as outlined in Appendix 3 and the legal guidance on consultation timing in section 6 of this report.
- 3.14. The intention is to run one consultation process that supports both the development of the draft Equality Objectives and Equality Plan and the draft Council Plan.
- 3.15. Feedback from this consultation will be used to finalise the draft Equality Objectives and Equality Plan and the draft Council Plan before they are put before Executive and Full Council for approval.

- 3.16. Further consultation may be required in 2021 pending the recommendation of the external LGA reviews and Stonewall assessment. If necessary, permission to consult further will be made at that time.
- 3.17. Appendix 2 provides the draft Equality Objectives and the draft Equality Plan 2020-24.
- 3.18. Appendix 3 provides a draft consultation plan to enable us to engage and consult more widely on the draft Equality Objectives and Equality Plan and the draft Council Plan.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1. The revised Equality Objectives propose that there is “a renewed commitment to and investment in career development, training and progression opportunities for staff. This is to include offering more apprenticeships and providing paid support towards qualifications to develop new and existing talent, with positive action to address the disproportionately low numbers of staff progressing to higher levels who are BAME or with other protected characteristics such as LGBTQ+ and disabilities”.
- 4.2. This will include a specific HR staffing resource to focus on this issue. This will have an additional burden on Council resources that will need to be considered.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 5.1. There are no significant risk management or governance issues arising out of the recommendations of this report

6. LEGAL APPRAISAL

- 6.1. The Equality Act 2010 consolidated a wide range of equality legislation that had until then been contained in separate statutes. Section 149 of the Act introduced a Public Sector Equality Duty which requires Local Authorities and other public bodies, in the exercise of their functions, to have due regard to the need to:
 - eliminate discrimination, harassment, victimisation
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it

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 –

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- 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
- 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.

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.

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.

6.2. Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Council is required to prepare and publish one or more Equality Objectives it thinks it should achieve to comply with its duties under S149 Equality Act 2010 (the Public Sector Equality Duty) and review these every four years.

6.3. The following principles must be followed for the consultation to be fair:

- Consultation should occur when proposals are at a formative stage;
- The proposer should give sufficient reasons for any proposal to permit intelligent consideration;
- Consultation should allow adequate time for consideration and response and
- The product of consultation must be conscientiously taken into account before a decision is made.

7. OTHER IMPLICATIONS

7.1. EQUALITY & DIVERSITY

7.1.1. The Council must give due regard to the Public Sector Equality Duty in any decision making it undertakes. The Council will continue to undertake activity to ensure that equality is considered through the development and delivery of all its functions. In addition, the Equality Objectives set for the coming years will enable the Council to focus on key areas where improvement is required.

7.1.2. All reports which contribute to the delivery of an Equality Objective currently require a supporting statement acknowledging this fact. This has enabled Committee Members to appreciate more broadly the work taking place to deliver against the Equality Objectives, in addition to the annual progress updates.

7.1.3. An action linked to the new draft Equality Objectives for consultation is for the

Equality Statements in reports to be more prominent. This is aimed at ensuring equality is in the forefront and not an afterthought. A further action is to review the process for undertaking Equality Impact Assessments. The aim of this action is to ensure all Officers undertaking the assessments are clear on what is required and that all negative impacts of changes to services, policies etc. are also recorded and not just where the impact of a particular change is considered to disproportionately negatively affect individuals or communities who share a protected characteristic.

7.2. SUSTAINABILITY IMPLICATIONS

There are no sustainability implications from the proposal to consult externally on the draft Equality Objectives.

7.3. GREENHOUSE GAS EMISSIONS IMPACTS

There are no gas emission impacts from the proposal to consult externally draft Equality Objectives.

7.4. COMMUNITY SAFETY IMPLICATIONS

The Public Sector Equality Duty explicitly states that public authorities must have due regard to the need to eliminate discrimination, harassment, victimisation. This is therefore a fundamental element of the considerations that the Authority gives when assessing equality impacts on any changes to any of its functions.

7.5. HUMAN RIGHTS ACT

There are no Human Rights Act impacts from the proposal to consult on the draft Equality Objectives.

7.6. TRADE UNION

Some of the actions supporting the draft Equality Objectives and Equality Plan are in connection to the workforce, both in development, training and diversity. Trade Unions will be consulted on the equality elements of the workforce development programme along with all other aspects of the draft Equality Objectives and Equality Plan.

7.7. WARD IMPLICATIONS

There will be no specific implications on any one ward as the draft Equality Objectives have a District-wide impact.

7.8. IMPLICATIONS FOR CORPORATE PARENTING

Some of the specific actions relating to the draft Workforce Equality Objective may support our corporate parenting responsibility.

7.9. ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

This does not apply.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. RECOMMENDATIONS

Members of Executive are recommended to:

- 9.1. Approve the proposal to consult on the draft Equality Objectives and Equality Plan for a period of six weeks from the 7 October to the 17 November 2020 as outlined in Appendix 3.
- 9.2. Approve that one consultation process is undertaken that covers the wider consultation on the draft Equality Objectives and Equality Plan and on the draft Council Plan with the aim of ensuring the Objectives and Plan remain aligned.
- 9.3. That the Workforce Development Strategy to be presented to Executive in December 2020 should contain Key Performance Indicators and targets for staff with particular protected characteristics in senior management posts, and be aligned with the workforce KPIs and targets within the finalised Equality Plan, along with a plan for how to achieve this.
- 9.4. Request that the Health and Wellbeing Board, in recognition of the link between inequality and health inequalities, consider creating a District equality group including the full set of partners such as the NHS, the Police, the Fire Service and the Voluntary and Community Sector.

10. APPENDICES

10.1. Appendix 1 – Our legal equality duties

10.2. Appendix 2 – Draft Equality Objectives and Equality Plan 2020-24

10.3. Appendix 3 – Draft consultation plan

11. BACKGROUND DOCUMENTS

- Bradford Council's Equality Objectives Overview - <https://www.bradford.gov.uk/your-Council/equality-and-diversity/bradford-Council-s-equality-objectives/>
- Local Government Association Equalities Framework for Local Government - [Equality Framework for Local Government | Local Government Association](#)
- [UK Workplace Equality Index | Stonewall](#)
- Report of the Assistant Director Office of the Chief Executive to Corporate Overview and Scrutiny Committee 24 September 2020 - Annual progress report on the Council's Equality Action Plan 2016-2020 and consultation on draft Equality Objectives for 2020-2024 - [Agenda 24th September 2020](#)
- Hay's Report contained in [Talent Management a Workforce Development Programme for Bradford Council - COSC 12 August 2015](#)
- [Equality Act 2010 | Equality and Human Rights Commission](#)
- [Bradford District Public Health Joint Strategic Needs Assessment](#)
- C-SAG First 1000 BiB Covid-19 survey summary report: <https://www.bradfordresearch.nhs.uk/wp-content/uploads/2020/07/BiB-Covid-19-First-1000-Briefing-V2.0.pdf>
- Bradford Institute for Health Research: [Covid-19 - BIB research findings and resources](#)

Appendix 1 – Our legal equality duties

The Council has a legal responsibility to discharge its Public Sector Equality Duty under the Equality Act 2010.

The Public Sector Equality Duty sets out a number of matters (listed below) that public authorities should have regard to in their operation. This is supported by some specific duties which include the requirement on public authorities to set and publish at least one specific and measurable equality objective at least every four years and to publish information on how they are complying with the Equality Duty annually.

In light of COVID-19, the requirement for public authorities to produce their annual report was removed. Despite this, we think it is critical to provide an annual report on our Equality Objectives.

Public authorities, such as Bradford Council, must in the exercise of their functions have due regard to the need to:

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

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 –

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- 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
- 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.

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.

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.

The defined set of protected characteristics as set out in the Equality Act 2010 are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; and (in relation to discrimination) marriage and civil partnership. In recognition of the Council's commitment to addressing poverty, Bradford's approach to equality also looks at equality more broadly and taking into account the impact of our decisions on people on low income or with a low wage. In addition, where a community, not formally protected by the Equality Act 2010 but whose members, could face disadvantage, the Council will also consider how its decisions impact on those communities. For example, the Council in its signing of the Armed Forces Covenant, pledged to ensure the Armed Forces Community did not face any discrimination in accessing services.

Appendix 2 – Draft Equality Objectives and Equality Plan 2020-24

Bradford District Draft Equality Objectives

Overview

Bradford is a diverse District, home to 534,000 people, a third of whom are Black, Asian or Minority Ethnic (BAME), two in ten are of Pakistani heritage and, at the 2011 census, 25% of people were of the Muslim faith. The District is home to significant numbers of people from Eastern Europe and some 150 plus languages are spoken here. It is the UK's youngest city with almost a quarter of people aged under 16 and a third of the population are aged under 20 years-old. Our District is geographically diverse, two thirds rural, with a large City and towns and villages each with their own often very strong, identities.

The District's youth and diversity represent significant assets offering a wide range of skills, innovation and experience, connections to global markets. huge productive potential and a rich cultural and community life. Work with and between our diverse communities has led to Bradford being assessed as among the world's leading intercultural cities. There are however, some stark differences in outcomes with marked contrasts between different areas with some high levels of deprivation alongside areas of significant wealth and affluence.

Overall, some 266,000 people live in the District's most deprived areas and 30.9% of children live in poverty. Social, economic and health inequalities are real challenges, reflected in the fact that there is an average of 9.1 (9.5 England) years' difference in life expectancy for male residents in the most affluent and the poorest parts of the District and 8 (7.5 England) years for women. Many people are affected by a combination of different dimensions of inequality e.g. income, ethnicity, gender, sexuality, faith or disability. For example, a third of the population is BAME with a large Pakistani and Bangladeshi populations. Bradford has over 67,000 people in the lowest skilled occupational groups – research shows that nationally 41% of Pakistani and Bangladeshi employees work in those same lowest paid groups, far higher than any other ethnicity.

In order to maximise the benefits of our youth and diversity we must build an inclusive organisation and District that actively recognises the contribution that people from different backgrounds make to all aspects of life. But being truly inclusive is not just about welcoming different contributions. Inclusion also means actively tackling inequalities and advancing greater equality, as well as fostering good relations between different people. Inequality comes with social, economic and environmental costs and has a significant impact on the delivery of public services. Inclusion means removing the barriers – physical, economic or social– that hold people back, so that everyone is and feels a part of the District.

The promotion of equality and social justice is clearly in everyone's interests and must therefore be at the heart of decision making.

Equality is an intrinsic part of the job of every Elected Member and Officer and this needs to be accompanied by us all understanding our District, our people, our communities and our rich cultures along with the inequity that many of our people face on a daily basis. Through this understanding we will be able to ensure our focus stays on making Bradford District a fair and equitable place for all our people.

Equality and social justice must be at the heart of everything the Council does because they are key to the successful and effective delivery of services, the achievement of better outcomes for everyone and the development of a sustainable and inclusive economy. Our Equality Objectives and the plans that sit alongside them are there to help ensure equality is mainstreamed throughout the organisation.

The Equality Act 2010

The Equality Act 2010 requires us to have Equality Objectives, which are monitored and refreshed every four years. The general equality duty requires us to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation, and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

Our Equality Objectives and Equality Plan set out both how we will meet our statutory obligations under this duty and how we plan to go further than those obligations. Creating a successful inclusive place also means recognising that inequality is complex and there are other causes of inequality and exclusion than just those characteristics protected by law.

Tackling inequality

Many people in Bradford District live with the affects that significant inequality brings, from a lack of opportunity through to reduced lifespans, that is linked to one or more of their characteristics that are protected under the Equality Act 2010. These protected characteristics are age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In addition to this, Bradford added low income as an additional protected characteristic, reflecting the fact that many people in our District live in poverty.

The COVID-19 pandemic has brought existing inequalities in opportunity, health and life chances into sharp relief and threatens to

widen existing gaps and create new inequalities.

The Black Lives Matter Campaign (BLM) has raised awareness of the often negative and disproportionate use of force and deadly force by some law enforcement officers against people from a Black heritage. That some public sector employees, through their actions, believe this treatment is justified indicates there is an additional layer of discrimination and inequality faced by people from these communities.

A District Wide Commitment

Promoting diversity, preventing inequality and tackling discrimination is not solely the responsibility of the Council. Our approach will also consider the wider partnerships we operate in. Whether this is with other public sector bodies, such as the NHS or the Police, our community and faith sector partners or our business community. As part of our new Wellbeing Board, will create a new cross partnership, multi-agency, equality group that will work to promote an equal and inclusive approach across the whole of the District.

Our key themes

Our headline objectives are focused on four themes. These themes reflect the Local Government Association (LGA) Equality Framework for Local Government 2020 which is designed to help Councils plan, implement and deliver equality outcomes.

Our Equalities Themes			
<p>Leadership and Organisational Commitment</p> <p>The overall approach the council takes to ensure that equalities is at the heart of decision making and promotes equal opportunities for everyone in the District to achieve their full potential.</p>	<p>Workforce</p> <p>Ensure that our employees feel equal and included and more comfortable. That employees are supported to reach their potential, are not subject to any unfair disadvantages regardless of their background and / or characteristics and are representative of the communities that they serve.</p>	<p>Community</p> <p>Action to support the creation of a place where everyone feels that they belong, are understood, feel safe and are able to fully participate in and contribute to the economic, social and civic life of the District</p>	<p>Service design –</p> <p>Ensure that all our services are designed in an accessible and an inclusive way including co-production with local people and organisations. This includes an approach to procurement and commissioning that values equality and diversity and Everyone in the district has the information they need to access services</p>

Our objectives

Our objectives cut across our four themes.

Objective 1:

We will lead the Council and the District in an open, visible and accountable way with zero tolerance for discriminatory behaviour

Our Ambition:

An organisation with good leadership invites challenge and creates an environment where people can be comfortable that they can reach their full potential, no matter what their background is. We must all live and breathe this agenda if we are to deliver change and everyone has a part to play. This means that whilst we need to eliminate any unconscious bias and lack of cultural awareness at the top of the organisation, we also need to ensure that everybody has access to training and education on these issues. We need policies that promote better cultural understanding but also eliminate workplace discrimination including racism, homophobia, transphobia, sexism and disability discrimination.

We will be a Council that:

- provides open, visible and accountable leadership on the issues of equality and diversity across Council services and more widely across the District.
- has an environment where our people are empowered and can be confident they can offer their opinions and raise concerns in a safe, neutral environment.
- has a workforce that understands the District and the communities we serve and champions equality strategically ensuring this is a key goal throughout organisation and partnerships.
- ensures decision making is consulted on appropriately and communicated clearly and underpinned by evidence.

How we will achieve this?

Over the next four years, we will take a number of actions to achieve this. **A detailed action plan is included in Annex A**. Our key actions include:

- 1) **Developing open and accountable leadership** – Equality and fairness must be at the heart of everything the Council does because the successful delivery of services and better outcomes depends on it. Equality will be a regular item for discussion at all

levels of the organisation. To ensure we are understanding our strengths and weaknesses as an organisation, we will invite the LGA to conduct a peer review of our organisational approach on equality and action the subsequent recommendations. Performance management procedures to be reviewed and made more robust, incorporating best practice from other organisations, including consideration of linking performance to pay starting with Strategic Directors and Assistant Directors. All managers will have a performance measure in their appraisals on how well they have delivered on equality and empowered their staff to succeed. We will also work with our partner organisations including the NHS, the Police, the Fire Service and the Voluntary Sector to create a group to champion equality across the District.

- 2) **Creating Safe places to speak, be heard and build trust** – we will increase visibility of senior management to listen to our workforce with lived experience of protected characteristics. Review the Council’s disciplinary, grievance and whistleblowing procedures and look to implement best practice and monitor performance. Ensure that staff are supported to form and sustain self-organised groups configured round protected characteristics.
- 3) **Supporting our workforce to understand the District and champion equality** – including implementing enhanced equality training that is available for all staff and Elected Members incorporating lived experience in training.
- 4) **Ensuring there is zero tolerance for discriminatory behaviour** – we will ensure our review of disciplinary procedure reflects that discriminatory behaviour is wholly unacceptable, imposing the most severe sanctions for proven serious cases or repeated behaviour.
- 5) **Ensuring decision making is informed by engagement, consulted on appropriately and communicated clearly and underpinned by evidence** – We will develop an easy to use corporate toolkit to help to ensure all services and consultations with the public have equality and fairness as a fundamental principle. This will lead to a revised approach to Equality Impact Assessments.

Objective 2:

Work proactively to ensure that our workforce (at all levels) reflects the communities we serve and support all staff to achieve their full potential.

Our Ambition

Our aim is to create an environment where equality and inclusion is at the heart of everything that every employee does. We seek to foster a workforce culture that is inclusive, transparent and accountable, and one in which there is zero tolerance for discriminatory behaviour, unconscious or not.

We do not want services full of employees who think and sound alike. Therefore, we must look beyond bias and seek out talent from all areas and backgrounds so that our talented employees are valued irrespective of who they are and any visible or non-visible differences in order to allow everyone to reach their full potential. We want to see an open, inclusive environment where the best people, full of ideas and enthusiasm, can thrive irrespective of who they are.

We will ensure that every talented, committed and hard-working employee has the opportunity to rise to the top, whatever their background and whoever they are.

We will develop our workforce, support and encourage our employees to share their lived experience through staff engagement sessions and periodic surveys. We will listen, and act to remove barriers to success and create an environment and development that supports our workforce to flourish.

We want every employee to know and understand our Equality Objectives. Whilst we are already on this journey and have begun to embed some of the recommendations from recent reports, such as the Hay Report. We recognise there is more to do and this is reflected in this action plan.

How we will achieve this

Our key actions will include:

- 1) Ensure that every employee feels included, are able to bring their whole self to work and that barriers to success are removed.** This will be done through staff engagement, review and refresh of policies, procedures and effecting culture change. We will develop and implement a new People Strategy and a people (HR) policy review cycle and consult widely with staff networks and trade unions.
- 2) Supporting every employee to reach their full potential** through our approach to learning and development. We will Achieve a minimum number of 5 learning and development days per year per employee. We will increase diversity in senior grades (Special Grades and above) through talent development programmes. We will also refresh our management and leadership development programmes, which will equip our managers and leaders with the knowledge and confidence to support their staff. We will produce ethnicity Pay Gap Reporting alongside the existing mandatory requirement for employers with 250 or more employees to publish their gender pay gap. We will also increase completion of equalities awareness through mandatory equality and diversity training.
- 3) Achieve a workforce that represents the communities we serve** across all levels through our approach to talent attraction, recruitment and selection and talent development. We will work to ensure we have diverse interview panels. We will review job descriptions, adverts and selection practices that can act as a barrier to some groups. We will increase the representation of BAME employees at senior grades (special A and above), with more representative LGBTQ+, Disability and ethnically diverse

backgrounds, and to increase the proportions of staff self-declaring. This will include monitoring and reporting our performance on recruitment and workforce diversity to monitor increased diversity through attraction, recruitment and selection processes and development programmes.

- 4) Provide a central budget to allocate resource to support learning and talent development.** We will put forward a business case for additional Human Resources resource investment to focus on organisational learning and development and talent.

Objective 3:

We will work to ensure that all service areas are encouraged to better understand our communities and actively engage our communities to participate in decision-making processes to improve the services we provide and to enable more people to take part in the life in the District.

Our Ambition

We aim to be a Council that works closely with and for our communities in a way that has the greatest possible impact given our resources and influence to tackling inequalities, challenging discrimination and racism. We will work to support zero tolerance to hate crime in all its forms.

We know that when we understand and work closely with our communities and empower them to be involved in design and delivery we can provide better and more equitable services. We have seen this in our work already through the development of the new Sedbergh Centre. This involved all stakeholders from across all protected characteristics. It has meant that provision is aligned with the needs of and accessible to all who may use the centre.

We recognise we need more examples like this and need to create space for participation and involvement that goes beyond consultation, seeking opportunities for continuous dialogue and where all voices and their different perspectives and backgrounds are heard and recognised at every level.

Our ambition is that we will become a council that fosters trust of, and between communities, and that increases our own interaction and engagement with communities to improve our own understanding. We will also up skill our workforce to do this better, utilising local and community expertise where we have it.

We will work with communities to build their confidence to take more active roles in the life of the District, enabling them to benefit from what the District has to offer.

We will aim to retain as much resource in the District as possible to support and invest in our people and our voluntary and community

sector.

How we will achieve this

Our key actions will include:

- 1) Ensuring people are engaged, involved and consulted and are able to participate.** We will have a review of our existing approach to engagement and consultation. This will aim to ensure that space is provided for people to be heard at all levels and barriers to participation are removed; whilst creating opportunities for people to fully participate and get involved in decisions that affect them. We will ensure that staff receive the appropriate training to facilitate this.
- 2) Bridging the gap between staff and the people we serve;** Create space for staff to engage and interact with people who are different from them, through volunteering across services or in the local Voluntary and Community Sector where engagement with communities is regular, sharing stories of our communities and the impact we make.
- 3) Empowering people to challenge discrimination, prejudice and racism;** We will increase mutual respect and understanding as well as tackle victimisation, harassment and discrimination by having a zero tolerance policy in all of our public spaces. Staff will understand different ways to engage communities, join up and share learning from different services, learn how to challenge respectfully through our Anti-Rumour and Critical Thinking and report hate speech and crime training.
- 4) Providing space for children and young people to contribute –** We will use mechanisms to encourage children and young people to contribute to discussions in a safe and supported way.

Objective 4:

We will design, commission and deliver services that are accessible, inclusive and responsive to the needs of people and communities and provide information about services in a range of accessible formats so that people know what services are available to support them and how to access them.

We will aim to contract and commission locally where ever possible so that we can support our local economy and build a local supply chain connected to its wider social responsibilities and offering high-quality employment and training opportunities to local people, while delivering equitable services that are value for money.

Our Ambition:

We aim to provide services that meet the needs and are accessible to individuals across all our communities, regardless of whether we provide these services directly or procure them through contracts and commissions, by involving stakeholders in their design and commissioning through co-productive mechanisms.

We will actively consider the needs of children and young people in the design and delivery of our services by ensuring we follow Child Friendly criteria and encouraging direct input, where appropriate, from children and young people into service design. We will use our knowledge of Bradford District and our communities in conjunction with engaging with stakeholders to create the best services possible within our resources.

We will provide information about our services in a range of accessible formats so that all our communities and individuals have the information they need to find and access the services available to them.

How we will achieve this

Our key actions will include:

- 1) **Developing an inclusive service and policy design guide** that will provide service managers with a suite of tools to: ensure appropriate engagement and involvement with all stakeholders, use of existing information and data, and other criteria to be considered, such as 'Child Friendly' criteria, when designing, contracting or commissioning, services or policies.

- 2) **Adopting the Accessible Information Standard across the whole of the Council** to ensure that information about services is easily understandable by our residents and enables them to learn about services that might support them and how to access those services
- 3) **Ensuring our suppliers and commissioned providers of services** adhere to relevant equality legislation and use good practice required by us. As part of this, we will also aim to ensure we increase our spend on external services with suppliers in the District.
- 4) **Ensuring our suppliers and commissioned providers of services, as far as possible, reflect our diverse communities in their workforce and are based in the District.**
- 5) **Improving our understanding of service users and their needs.**

Monitoring, reporting on progress and further review of objectives

It is essential that we monitor our performance against our Equality Objectives and continue to challenge progress over time. We intend to monitor our progress against a number of KPIs, including:

- Percentage of senior staff (special A and above) with equality targets
- Increased diversity and representation of protected characteristics in our workforce in all grades. This includes increasing the representation of BAME employees at senior grades (special A and above), with more reflective LGBTQ+, Disability and ethnicity data, and to increase the proportions of staff self-declaring.
- Increased staff satisfaction results (to be baselined).
- Completion of equalities awareness training
- Number of protected staff groups supported
- % of staff at different grades
- Equality data collected in services showing a wider spread of usage by people across all our communities.
- Reduction in the number of complaints about service provision
- We meet our target to increase Council procurement spend going to local suppliers.

To report on this, we plan to:

- Publish an annual report on our progress against our Key Performance Indicators (KPIs) with a summary of what we have achieved against our action plan
- Hold an annual event with staff, partners and our communities to celebrate success and challenge where we need to go further.

- At a political level, this work will be scrutinised at Corporate Overview and Scrutiny committee annually
- As part of our annual reporting of equality and inclusion, identify socio-economic trends which can focus our future efforts and reduce socio-economic inequalities. This will be linked to our wider Council Plan.

External challenge

It is clear that our management against progress has the danger of being subjective. We need to ensure that we are open to challenge from outside. Therefore, we will be inviting the Local Government Association to conduct a peer review on all aspects of our overall approach to equality by Spring 2021 and to assess our position on the Equality Framework for Local Government. We will amend our Equality Objectives to reflect any recommendations that are made by this review.

Annex A: DRAFT Equality Action Plan

Objective 1: We will lead the Council and the District in an open, visible and accountable way with zero tolerance for discriminatory behaviour

Desired outcome	Action	Success measure
Open and accountable leadership.	<p>Equality and diversity performance targets will be agreed with all members of senior management (service head level and above).</p> <p>Performance management procedures to be reviewed and made more robust, incorporating best practice from other organisations, including consideration of linking performance to pay starting with Strategic Directors and Assistant Directors.</p>	<p>Percentage of overall performance appraisals with an equality and diversity target.</p>
	<p>Renew focus at the Health and Wellbeing Board on equality and develop a shared vision of equality across all partners.</p> <p>Use our partnerships to drive businesses and organisations in the District to look at their own Diversity and Inclusion objectives</p>	<p>Equality group set up and work is embedded and monitored through the District plan.</p>
Safe places to speak, be heard and build trust	<p>Self-organised staff groups to be encouraged, resourced and facilitated by the Council, in particular for officers who share protected characteristics or other challenges or interests in common. Each group to be sponsored by Council Management Team and feed into wider equality work.</p>	<p>Staff groups created and feedback/ survey from these groups demonstrate they are valued by their members and are having an impact.</p>
	<p>Review Council's disciplinary, grievance and whistleblowing procedures and implement best practice. Publicise the existing progress, the review and any future changes to it through the internal communications processes</p> <p>Ensure robust accountability of grievance process to reflect this is a shared responsibility for all, including monthly reports from Strategic Directors to the Chief Executive and Leader on grievance processes by directorate.</p>	<p>Grievance review completed</p> <p>Reduction in average time to complete grievances</p>

Objective 1: We will lead the Council and the District in an open, visible and accountable way with zero tolerance for discriminatory behaviour

Desired outcome	Action	Success measure
	<p>Increase visibility of senior Council staff.</p> <p>Hold a series of sessions to connect people with different backgrounds to senior leaders share lived experiences. Proactively look to create safe spaces to support difficult conversations to take place so that the organisation can seek to address any unequal treatment in whatever form that might take.</p>	
<p>A workforce that understands the District and champions equality</p>	<p>Invest in and introduce innovative equality and diversity training or awareness methods as soon as possible. These methods should effectively challenge attitudes, behaviours and bias (conscious and unconscious).</p> <p>Review our induction programme to ensure that all officers are aware of Bradford District and its diverse communities when they enter a role at the Council.</p>	
	<p>All staff volunteer one day a year across the service where staff can interact and engage with communities.</p>	
	<p>Capture stories of our communities and the impact we make, particularly emphasising where finance, legal and procurement play a role to make this happen.</p>	

Objective 2 - Work proactively to ensure that our workforce (at all levels) reflects the communities we serve and support all staff to achieve their full potential.

Desired outcome	Action	Success measure
<p>Ensure that every employee feels included, are able to bring their whole self to work and that barriers to</p>	<p>Undertake staff engagement through staff surveys and also, re-establishment of self-organised/directed staff networks groups.</p>	<p>Improved satisfaction results</p> <p>Improved workforce diversity particularly at senior grades</p>

Objective 2 - Work proactively to ensure that our workforce (at all levels) reflects the communities we serve and support all staff to achieve their full potential.

Desired outcome	Action	Success measure
success are removed.		
	Review and refresh of policies and procedures and in-sourced HR Advisory approach	Employee Relations case durations reduced
	Develop and implement a new People Strategy and policy review cycle	
Supporting every employee to reach their full potential through our approach to learning and development.	<p>Complete refresh of talent development programmes</p> <p>Refreshed equality and diversity training that includes unconscious bias and cultural awareness</p> <p>Management training programme developed</p> <p>Refresh our management and leadership development programmes</p> <p>Introduce mandatory Ethnicity Pay Gap Reporting alongside the existing mandatory requirement for employers with 250 or more employees to publish their gender pay gap</p>	<p>Minimum number of 5 learning and development days per year per employee</p> <p>Increase percentage of diversity in Special Grades achieved through talent development programme</p> <p>Increased completion and equalities awareness through mandatory equality and diversity training</p> <p>Management and leadership development programme/s in place and performance reported</p>
Achieve a workforce that represents the communities we serve across all levels through our approach to recruitment and	<p>Review approach to attraction, recruitment and selection and remove barriers.</p> <p>Mandatory diverse interview panels are expected.</p>	<p>Increase diversity in senior grades</p> <p>Increase self-declaration rates</p> <p>Improve recruitment processes</p> <p>Monitor and report performance on recruitment and workforce diversity and increases through</p>

Objective 2 - Work proactively to ensure that our workforce (at all levels) reflects the communities we serve and support all staff to achieve their full potential.

Desired outcome	Action	Success measure
selection and talent development.		recruitment and selection and promotion with specific targets for the % of BAME staff at each of the grades of SpA, SpB, SpC and SpD and overall targets for % of staff with specific protected characteristics at senior manager level (SpA and above), with targets as follows: <ul style="list-style-type: none"> • 33% of employees from BAME backgrounds • 27.8% of top 5% employees by income from BAME backgrounds • 65% of top 5% employees who are female • 2% of employees from LGBTQ+ backgrounds • 5.4% of employees who have self-declared they are disabled.
Learning and talent development supported	Develop business case for additional Human Resources resource investment to focus on organisational learning and development and talent	Additional resource agreed and workforce objectives achieved

Objective 3: We will work to ensure that all service areas are encouraged to better understand our communities and actively engage our communities to participate in decision-making processes to improve the services we provide and to enable more people to take part in the life in the District.

Desired outcome	Action	Success measure
People are consulted, involved and participation is enabled.	Easy to Read Guide (check list) is provided on how to effectively carry out consultations and surveys.	Statistically valid response rate increased Geographic and diversity of respondents is reflective of population.
	Review and publicise more effectively the different routes in which communities can get involved in the Council and this is promoted widely via People Can and BDMC website.	Website tracks engagement levels through traffic data and enquiries sent.
	Review our decision making processes and how we involve diverse communities.	Involvement of diverse communities is increased.
	Work with commissioning and procurement on different ways to involve people in decision making such as participatory budgeting.	Involvement of communities in decision making is increased.
	All Boards will commit to a set of diversity, equality and inclusion principles and measures for example, all will need to appoint local people that reflect the make-up of the District.	Target is set for each partnership and monitored.
	Mechanisms in place to encourage and enable under-represented groups to contribute to discussions in a safe and supported way	Involvement of communities in decision making is increased.
Decision making is communicated Build capacity and understanding of working with communities Decision making is communicated	All staff volunteer two days a year in the VCS.	Social value indicator
	Deliver and promote accessible services for all; by reviewing bi-annually accessibility and equality needs through peer to peer service reviews, for example a day interviewing staff.	Services reach satisfactory, good or excellent.
	We will understand the impact of our decisions and develop clear mitigation reducing any negative impact by logging all decisions clearly with their equality impact. All staff are trained and supported on how to complete Equality Impact Assessments.	
Hate crime is reduced/	Communicate our decisions in a balanced and sensitive way by ensuring that staff understand what could be interpreted	Increased confidence.

eradicated	as inciting community tensions and using up to date terminology.	Increase understanding.
People are empowered to challenge discrimination, prejudice and racism Hate crime is reduced/ eradicated People are empowered to challenge discrimination, prejudice and racism	Continue to work with partners to operate zero tolerance to hate crime in all its forms across our District	Hate crime decreases. Hate crime reporting increases.
	Ensure that our communities and staff that work in customer service facing roles are trained on effective facilitation, reassurance and mediation.	Increased confidence Number of complaints reduced.
	All staff actively promote the use of 'District Shared Values'. Staff are held accountable to the values in their annual appraisals. Communities and District Partnerships sign up to these.	Number of appraisals successfully completed. Reduction of discrimination cases.
	All staff feel confident to report hate speech and hate crime. Staff are trained on the Anti-Rumour and Critical Thinking campaign. All staff know how to implement a zero tolerance policy if they see or hear a service user or resident being affected.	Increased confidence. Increase understanding. Reduction of discrimination cases. Hate crime decreases. Hate crime reporting increases.
	Promote good relations between and across communities by ensuring that services do not exclude groups and where possible opportunities for social mixing are created.	Increased confidence. Demographics of participants accessing services.
Data and intelligence is gathered and shared to inform and improve services People get along together across communities Data and intelligence is gathered and	Carry out a review service by service on what data is currently being held and what intelligence is collected and where it is stored.	
	Agree a minimum data set and measures for each service particularly protected characteristics.	
	A central platform is developed enabling the Council and partners to access information.	

shared to inform and improve services		
Retain resources locally to support our people and voluntary and community sector		

Objective 4: We will design, commission and deliver services that are accessible, inclusive and responsive to the needs of people and communities and provide accessible information about our services.

We will aim to contract and commission services locally where ever possible.

Desired outcome	Action	Success measure
Services meet the needs and are accessible to our communities	Develop an inclusive service and policy design guide	Participation in the design stage Equality data collected by services on usage Complaints about access to services Complaints about delivery of services
Children's needs are reflected in our services	Include Child Friendly criteria in the design guide	Newly designed services/policies meet UNICEF's Child Friendly criteria
	Develop mechanisms to enable children and young people to directly input into service and policy design	Participation in the design stage
Service design and delivery has been informed by knowledge and evidence	Ensure knowledge and evidence is available to support service and policy design	Equality data collected by services on usage
	Review the Equality Impact Assessment process	Equality data collected by services on usage
Communities are aware of services available to them and how to access them	Adopt the Accessible Information Standard across the Council	External review of a bundle information we provide – via service leaflets, targeted information, , social media, web sites etc.
Externally provided services and	Ensure contracts and commissions are monitored	Rate of compliance with equality requirements in contracts/commissions

Objective 4: We will design, commission and deliver services that are accessible, inclusive and responsive to the needs of people and communities and provide accessible information about our services.

We will aim to contract and commission services locally where ever possible.

Desired outcome	Action	Success measure
commissions adhere to equality legislation and our own requirements		
External providers reflect diversity in their workforce/are based in the District	Reflect in commissioning and procurement processes	Workforce data/location of offices/factories
More of our commissions and contracts are awarded locally	Reflect in commissioning and procurement processes	% of commissions/contracts awarded locally Increase in proportion of local procurement spend to 50% over the four years to 2024

Appendix 3 – Draft Consultation Plan

Table 1: Timeline

Date	Audience	Activity
October 6 th	All	<p>Executive committee discusses draft Council Plan</p> <p>Easy read versions of the Draft Equality Objectives and Equality Plan and the Council Plan published on the Council webpage and intranet alongside a consultation questionnaire seeking the views of the public and employees.</p> <p>Consultation launch promoted internally via the intranet, and externally via social media and other local news channels (including Telegraph and Argus, Keighley News, Asian Sunday, BCB, etc).</p>
October 7 th – November 17 th	Public and wider stakeholders (see table 2 below)	<p>DISTRICT CONSULTATION</p> <p>Online consultation and other consultation methods used to get further feedback on the draft Council Plan and the draft Equality Objectives and Equality Plan.</p>
During October	Council Plan and Equalities discussed with key stakeholder groups.	Both the draft Equality Objectives and Equality Plan and the draft Council Plan will be taken as an item to partnerships, staff networks and wider interest groups as outlined below.
November 17 th	Consultation Deadline	Consultation closes.
December	Council Executive	Final draft Council Plan and Equality Objectives and Equality Plan presented to Executive alongside a report outlining the key messages of this consultation exercise.

Table 2 – Stakeholders for consultation

Stakeholder
1. Community, engagement or delivery partnerships
Bradford and District VCS Assembly
Women’s Health Network
Bradford Hate Crime Alliance
Equalities Forum (CNet)
Race Equality Network (REN)
Faith Groups
2. Strategic Partnerships
Health & Well Being Board
Economic Recovery Board

	Bradford Education Opportunity Board
	Children's Trust Board
	Sustainable Development Partnership
	Stronger Communities Together Partnership (Bradford For Everyone - BFE) BFE Ambassadors
	Safer Communities Partnership
	Equalities & Communities Strategic Group
3.	Programmes and other partnerships
	Anti-Poverty Co-ordination Group
	Armed Forces Covenant Partnership
4.	Internal Staff
	Cross Department Equality Group
	Management and staff across the whole organisation
	Self-directed staff networks – launch in inclusion week

Methods of consultation and data gathering

Key stakeholders will be engaged throughout the consultation period via

- Online short survey with published documents via <https://www.bradford.gov.uk/consultations/current-consultations/consultation-and-engagement/> promoted via CBMDC social media accounts and some targeted email shots
- Internal management and staff meetings
- Via self directed staff networks
- Partnership and partners' meetings

The consultation will be led and supported by staff from the Office of the Chief Executive.

Special arrangements during Covid-19 restrictions

All consultation will be developed and run in line with Covid-19 restrictions.

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Report of the Chief Executive to the meeting of Executive to be held on 6th October 2020

Subject:

CF

Draft Council Plan 2021-2025

Summary statement:

The Council Plan is a key document that outlines the Council's overall strategic objectives as a Local Authority over a four year period and identifies our key priorities. The draft Council Plan for 2021 – 2025 identifies the Council's key priorities for this period including Better Skills, More Good Jobs and a Growing Economy; Decent Homes; Good Start, Great Schools; Better Health, Better Lives; Safe, Strong and Active Communities and a Well Run Council.

These are the same priorities as in the existing Council Plan. Given that the Council has declared a climate emergency, an additional priority area "A Sustainable District" has been included in this draft Council Plan.

This report provides a draft Council Plan (Appendix 1) and Key Performance Indicators (KPI) and targets (Appendix 2) for Executive's approval for consultation with the public, Council employees and partners. If approved for consultation, it is proposed that the draft Plan will be considered further by Executive following consultation.

Kersten England, Chief Executive

Report Contact: Phil Witcherley
Head of Policy and Performance

**Portfolio:
Leader**

Overview & Scrutiny Area:

Corporate

1. SUMMARY

- 1.1 The Council Plan is a key document that outlines the Council's overall strategic objectives as a Local Authority over a four year period and identifies our key priorities. The draft Council Plan for 2021-2025 identifies the Council's key priorities for this period.
- 1.2 The existing Council Plan period came to an end earlier this year. A report was considered by Executive in July 2020 which outlined our performance against the Council Plan.
- 1.3 The draft Council Plan for 2021-2025 includes all of the same priorities as in the existing Plan. In addition, a new priority has been added to promote "A Sustainable District". This follows the Council's declaration of a climate emergency in 2019.
- 1.4 The draft Council Plan is underpinned by a number of principles, including equalities, embedding prevention and early help across the District, making sure every pound we spend counts, working together with partners across the District.
- 1.5 The draft Council Plan also reflects on the challenges that the COVID-19 pandemic has led to, both in terms of our operational delivery and on the impact on our businesses and communities.
- 1.6 For each priority area, a series of new performance indicators are identified including proposed targets.
- 1.7 This report provides a draft Council Plan (Appendix 1) and Key Performance Indicators (KPI) and targets (Appendix 2) for Executive's approval for consultation with the public, Council employees and partners alongside the Equality plan. Full details of the consultation process are included in the report to this Executive meeting on the Equality Plan.
- 1.8 Following the consultation process a further Report and draft Council Plan will be brought to Executive in December for approval prior to the draft Plan being considered and adopted by Full Council

2. BACKGROUND

- 2.1 A draft Council Plan for 2021-2025 is included in Appendix A of this report.
- 2.2 This draft Council Plan sets out the Council's priorities for the next four years. At the heart of this is a fair, inclusive and sustainable recovery. Each of our priority areas are divided into two sections in terms of activity:

- **Living with COVID-19** – how we help our residents, businesses and places overcome the ongoing challenges presented by COVID-19.
- **Building a Better Future** – how we work to secure a better long-term future for the District, its people, communities and businesses.

2.3 The Council's priority areas are as follows:

- **Better Skills, More Good Jobs and a Growing Economy** - We will grow our local economy in an inclusive and sustainable way by increasing productivity and supporting businesses to innovate, invest and create great jobs in the District.
- **Decent Homes** - We want everyone in the District to have a comfortable home which meets their needs and helps them lead fulfilling lives.
- **Good Start, Great Schools** - We will help our children to have the best start in life by improving educational attainment for all young people.
- **Better Health, Better Lives** – We will help people from all backgrounds to lead long, happy and productive lives by improving their health and socio-economic wellbeing.
- **Safe, Strong and Active Communities** – We want the District to be a place where everyone can play a positive role in the community and be proud to call Bradford their home.
- **Well Run Council** – We will be a Council that is a great place to work and reflects the communities we serve. Our people will have the tools to do their jobs effectively. We will manage our resources well and seize all opportunities to bring funding into the District. We will provide good, accessible services.

2.4 Following the Council's declaration of a climate emergency, we have created a new outcome area. "A Sustainable District". Here our ambition is to play a part in making it easier for individuals, households and businesses in the District to adapt, change and innovate to address the challenges presented by climate change.

2.5 Our work will be underpinned by the following cross-cutting principles:

- **Equalities must be at the heart of all we do:** To secure the benefits of diversity we are building an inclusive organisation that actively recognises the contribution that people from different backgrounds make to all aspects of the Council's work and the District's communities.
- **Embedding prevention and early help across the system:** This means we will support people early and in their communities to prevent their needs from escalating and to improve their outcomes. This will reduce demand on statutory services and demonstrate return on investment of localised prevention and early help. It will also enable and grow the strength in communities to support each other to survive and thrive.
- **Every pound counts:** We will continue to adopt effective and value-for-money approaches to service delivery. We will increase the proportion of Council resources spent in the District to help grow the Bradford economy and develop our local supply chains. We will ensure that services are

creative, innovative and effective to provide the best outcomes for our residents and businesses. Working with others across the District, we will ensure we get the best and most effective value for every pound spent in Bradford.

- **Working together:** We will collaborate as a Council with other public sector organisations and our communities to ensure residents and businesses across the District have the best opportunity to reach their potential. Together we will be strong, creative, innovative and effective, delivering the very best services for all. We recognise no single body or agency can achieve our priority outcomes alone and partnership and co-production will be central to success.
- **Living Well:** We will work alongside our communities and our partners in the NHS, independent sector and VCS, to embed the Bradford's Living Well, whole systems' approach to improving health and wellbeing for all across the District. With energy and commitment, we will actively pursue the Living Well mission - to make it easier for people in the District to adopt healthier lifestyle behaviors' - and in doing so, to reduce preventable health conditions, (including childhood obesity), reduce premature deaths and increase the number of years that people in Bradford live in good health and wellbeing.

Performance Indicators

- 2.6 For each priority area, a series of new performance indicators are identified including proposed targets. These are outlined in Appendix 2

Consultation

- 2.7 As outlined in the separate report to this Executive on the Equality Plan. We plan to consult staff, the public and partners on the draft Council Plan and the draft Equality Objectives before they come to executive in December. In our consultation, we will make every effort to adhere to the principles outlined in section 4 of this paper.
- 2.8 Following Executive approval on the 6th October, we will invite colleagues to comment on this. We will also consult through staff equalities networks, specially arranged consultation events and partner meetings (such as the Health and Wellbeing Board) through the process outlined as for the Equality objectives paper at this Executive meeting.

3 FINANCIAL & RESOURCE APPRAISAL

The priorities set in this report will feed into our prioritisation as part of the annual budget setting process for the period of this Council Plan.

4 LEGAL IMPLICATIONS

- 4.1 The final draft of the Council plan will need to be considered and adopted by full Council in accordance with the Council's constitution. Following the consultation process a further report and draft Council Plan will be

considered by Executive before being considered and adopted by full Council.

4.2 The following principles must be followed for the consultation to be fair:

- Consultation should occur when proposals are at a formative stage;
- The proposer should give sufficient reasons for any proposal to permit intelligent consideration;
- Consultation should allow adequate time for consideration and response and,
- the product of consultation must be conscientiously taken into account before a decision is made.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The final draft of the Council plan will need to be considered and adopted by full Council in accordance with the Council's constitution. Following the consultation process a further report and draft Council Plan will be considered by Executive before being considered and adopted by full Council.

6. OTHER IMPLICATIONS

6.1 EQUALITY & DIVERSITY

Equalities must be at the heart of all we do. To secure the benefits of diversity we are building an inclusive organisation that actively recognises the contribution that people from different backgrounds make to all aspects of the Council's work and the District's communities.

Our Equality Objectives and the plans that sit alongside them are presented at this Executive Committee as a separate item.

6.2 SUSTAINABILITY IMPLICATIONS

Following the Council's decision to declare a climate emergency, the draft Council Plan includes a new outcome area on sustainability. This underpins the seriousness in which the Council takes this issue.

6.3 GREENHOUSE GAS EMISSIONS IMPACTS

As in 6.2.

6.4 COMMUNITY SAFETY IMPLICATIONS

The Draft Council Plan provides a high level overview of our work on the Safe, Strong and Active objective. The intention of this objective is to build safe communities, working with partners such as the Police. This underpins the importance in which the Council places on community safety for our residents and businesses.

6.5 HUMAN RIGHTS ACT

No direct issues arising from this report.

6.6 TRADE UNION

No direct issues arising from this report

6.7 WARD IMPLICATIONS

No direct issues arising from the report.

6.8 IMPLICATIONS FOR CORPORATE PARENTING

No direct issues arising from the report.

7. ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

No direct issues arising from the report.

8. NOT FOR PUBLICATION DOCUMENTS

None

9. RECOMMENDATIONS

That Executive approve the draft Council Plan set out in Appendix 1 and draft KPIs and targets set out in Appendix 2

13. APPENDICES

Appendix 1 – Draft Council Plan
Appendix 2- Draft KPIs and targets

12. BACKGROUND DOCUMENTS

Appendix 1: Draft Council Plan

Foreword from Susan Hinchliffe and Kersten England

Council Plan Foreword

The Council Plan has been developed amidst unprecedented levels of challenge, complexity and uncertainty as we work alongside our partners and communities to tackle the COVID-19 pandemic.

What's crystal clear, despite the clouds of uncertainty, is the critically important role that Council staff, services and resources have played in those efforts to get our schools, businesses and services back to work while keeping people supported and safe, preventing the spread of infection and maintaining essential services.

In rising to the challenge Council staff have taken their place among the nation's key worker heroes, gaining long overdue recognition for the things they do day in and day out that contribute to the quality of life of everyone yet often taken for granted. Caring for the vulnerable, collecting our waste and recycling, keeping our streets safer and cleaner, supporting communities to be stronger.

Less visible, but no less important, is the work we do to help our businesses, city and town centres and economy to stay open; to support skills, schools, children and young people; to provide access to green space, homes to the homeless and plans for the future.

Council services will keep playing a key role as we adapt to living alongside COVID-19 and as we build a better future.

We have little certainty with which to plan for that future so must be responsive to changing circumstances. But the fundamental challenges we faced before the pandemic are the challenges we continue to face throughout it and beyond and have shaped the priorities in this plan.

Advancing educational attainment, raising skills and productivity and attracting new jobs and investment. Tackling the climate emergency, improving transport connectivity and capitalising on our cultural assets. Keeping communities safe, clean and active, sustaining quality local services and addressing long-standing issues of poverty, inequality and poor health and housing. These issues are central to achieving our ambitions for an inclusive and sustainable District offering opportunities to everyone.

While COVID-19 hasn't dampened our ambition, it has increased the scale of the challenge. It's impact has been disproportionate on the poorest and most vulnerable, BAME communities, disabled people, women and carers. It has widened inequality so we must ensure that working to secure equality and social justice is at the heart of all we do.

Resources will remain under pressure and the Council has to transform the way it does things in order to sustain services and improve outcomes. We must focus on early help and prevention to reduce pressure on expensive crisis services, be bold and inventive and work to ensure that every pound, every ounce of effort and every day at work has the maximum impact.

We will of course, make little progress working alone. Collaboration with others to understand the District and design services and solutions is essential to our prospects for success.

The vast majority of Council staff live here. Few Councils have a workforce so rooted in and connected to the place that they serve. The tremendous asset that this represents has been evident in the commitment, ingenuity, passion and pride that has characterised the response to COVID-19. These are the qualities that will keep us on course through the crisis and beyond to deliver this Council Plan and progress towards a fairer, more prosperous Bradford District.

Our District

Bradford Council, working alongside partners, business and communities, delivers services and democratically accountable leadership to a diverse population of over half a million people and around 16,000 businesses and strives to secure better outcomes and equality of opportunity for everyone. It employs over 8,000 staff, 82% of whom make their home here representing a significant asset rooted in our communities.

The Bradford District is big, the 5th biggest urban Local Authority District in the UK; it's young – the youngest in the UK with nearly a third of the population aged under 20; and it's diverse – ethnic minorities form a third of the population with over 150 languages spoken within the District. Geographically, it is home to the city of Bradford itself, the large town of Keighley and a number of smaller towns and villages many with strong and distinctive identities.

Outstanding landscapes complement historically important architecture alongside a rich cultural heritage and vibrant contemporary cultural scene which together attract 10 million visitors a year.

The District's scale, diversity, innovation and productive potential are reflected in its strong and broad-based business community which is part of an overall economy worth £9.5 billion, the 11th largest in England. We are proud to be identified as the best place in Britain to start a business, named as one of the Sunday Times' top 20 places to do business, and identified as the most improved city in the Price Waterhouse Cooper's Good Growth 2019 Index.

The District is home to high-value production businesses across a wide range of sectors including food manufacturing, engineering, chemicals, digital technologies, energy and utilities. Many businesses in the District support international supply chains in sectors such as automotive, construction, finance and health, making us one of the most internationally connected cities in the UK. Our University is a hive of technological innovation.

Public services and the voluntary and community sector have a strong track record of working together in mature and effective partnerships and the District's work to bring communities together and promote participation is among the most innovative to be found anywhere in the world.

So the Council and its partners have plenty of assets to work with, however the District, like anywhere of its size and complexity, faces some significant and persistent challenges.

- **Poverty:** Whilst we have some of the wealthiest areas in northern England, Bradford is the 5th most income deprived District in the country. Some 266,000 people live in the poorest areas and nearly one third of our children are living in poverty. Fuel poverty affects over 13.5% of households. Health inequalities persist and the gap in life expectancy between the wealthiest and poorest areas of the District is around nine years for men and around eight years for women. These levels of poverty and inequality are unacceptable and generate demand for public services.

- **Connectivity:** We need to do more to improve transport connectivity to Bradford, Keighley and Shipley. Bradford is the largest city in the UK not on a mainline rail station and travel times are too long between all parts of the District and the wider north.
- **Education and skills:** While progress has been made in closing the gap in educational attainment between Bradford and the national average it has not gone far enough or fast enough and the adult skills base remains relatively low which affects productivity and potential inward investment decisions.
- **Resources:** The Council has limited ability to raise income locally. Our Band D Council tax is 8% below the average for Metropolitan authorities and 80% of our households are below Band D. However, the District is home to high levels of need and demand for public services.

Living with COVID-19

In recent months, the Coronavirus pandemic has presented additional challenges and tests to our organisation, communities, public sector partners and businesses.

COVID-19 has intensified the deep inequalities that already existed in our society. The Coronavirus pandemic has had a disproportionate impact on our most disadvantaged people, including young people in the District, large and persistently deprived communities, Black, Asian and Minority Ethnic (BAME), women, migrants, people in poverty and the elderly. As we are UK's youngest city we are understandably concerned about the impact the COVID-19 lockdown has had on children's health and future prospects. Addressing this is a key priority for the next four years.

The full implications of COVID-19 on the District and its economy are still to be fully understood. Modelling commissioned by the West Yorkshire Economic Recovery Board demonstrates the significant impact this crisis could have on businesses and communities. Even in the event of a relatively strong recovery, the District economy is still set to shrink by up to 10% in 2020. If we see a slower uneven recovery, modelling suggests our economy could shrink by almost 30% by the end of 2021. This will have an impact not only on businesses in the District, but people's jobs and livelihoods.

The way in which we deliver Council services and operate has changed during lockdown. Aside from front line positions, most of our staff and members are now working remotely with video conferencing replacing physical Council meetings. The pandemic has affected our overall financial position significantly. There are many new costs in tackling the pandemic and increased demand in a range of services. Alongside these new cost pressures, our ability to raise income and funds collected in fees and charges has reduced.

Our Priority Outcome Areas

This Council Plan will help set the priorities and inform our future budgets and medium-term financial strategies. At the heart of this is a fair, inclusive and sustainable recovery. Each of our priority areas are divided into two sections in terms of activity:

a) Living with COVID-19 – how we help our residents, businesses and places overcome the ongoing challenges presented by COVID-19.

b) Building a Better Future – how we work to secure a better long-term future for the District, its people, communities and businesses.

Our priority areas are as follows:

- **Better Skills, More Good Jobs and a Growing Economy** - We will grow our local economy in an inclusive and sustainable way by increasing productivity and supporting businesses to innovate, invest and create great jobs in the District.
- **Decent Homes** - We want everyone in the District to have a comfortable home which meets their needs and helps them lead fulfilling lives.
- **Good Start, Great Schools** - We will help our children to have the best start in life by improving educational attainment for all young people.
- **Better Health, Better Lives** – We will help people from all backgrounds to lead long, happy and productive lives by improving their health and socio-economic wellbeing.
- **Safe, Strong and Active Communities** – We want the District to be a place where everyone can play a positive role in the community and be proud to call Bradford their home.
- **A Sustainable District** – We will make it easier for individuals, households and businesses in the District to adapt, change and innovate to address the challenges of climate change.
- **Well-Run Council** – We will be a Council that is a great place to work and reflects the communities we serve. Our people will have the tools to do their jobs effectively. We will manage our resources well and seize all opportunities to bring funding into the District. We will provide good, accessible services.

Our work will be underpinned by the following cross-cutting principles:

Equalities must be at the heart of all we do: To secure the benefits of diversity we are building an inclusive organisation that actively recognises the contribution that people from different backgrounds make to all aspects of the Council’s work and the District’s communities. Our equality objectives are published alongside this Plan and feature across our outcome areas.

Embedding prevention and early help across the system: This means we will support people early and in their communities to prevent their needs from escalating and to improve their outcomes. This will reduce demand on statutory services and demonstrate return on investment of localised prevention and early help. It will also enable and grow the strength in communities to support each other to survive and thrive.

Every pound counts: We will adopt effective and value-for-money approaches to service delivery. We will increase the proportion of Council resources spent in the District to help grow the Bradford economy and develop our local supply chains. We will ensure that services are creative, innovative and effective to provide the best outcomes for our residents and businesses. Working with others to across the District, we will ensure we get the best and most effective value for every pound spent in Bradford.

Working together: We will collaborate as a Council with other public sector organisations and our communities to ensure residents and businesses across the District have the best opportunity to

reach their potential. Together we will be strong, creative, innovative and effective, delivering the very best services for all. We recognise no single body or agency can achieve our priority outcomes alone and partnership and co-production will be central to success.

Living Well: We will work alongside our communities and our partners in the NHS, independent sector and VCS, to embed the Bradford's Living Well, whole systems' approach to improving health and wellbeing for all across the District. With energy and commitment, we will actively pursue the Living Well mission - to make it easier for people in the District to adopt healthier lifestyle behaviors' - and in doing so, to reduce preventable health conditions, (including childhood obesity), reduce premature deaths and increase the number of years that people in Bradford live in good health and wellbeing.

PRIORITY AREA: Better Skills, More Good Jobs and a Growing Economy

Our ambition:

We will grow our local economy in an inclusive and sustainable way by increasing productivity and supporting businesses to innovate, invest and create great jobs in the District.

Our economic growth will be inclusive, sustainable and resilient. We will make sure everyone can contribute to and benefit from growth, helping the long-term unemployed, people with long-term conditions and care leavers into the labour market. We will build a fairer and more cohesive District.

We will make sure growth protects and enhances our physical and natural environments meeting this generation's needs without compromising those of future generations. We will make sure our recovery solves our immediate sustainability challenges and unlocks new opportunities in the low-carbon, digital economy. This will make us stronger and more resilient to future economic trends and shocks.

Our context:

Our local economy has many powerful assets. These include a vibrant small and medium enterprise sector, a number of nationally significant businesses and a growing reputation as a great place to start a business within the UK.

We have a number of challenges including:

- Helping businesses and individuals adapt to the changes in the economy and nature of work as a result of COVID-19 so the economy can recover safely and effectively and people can access good jobs.
- Creating jobs in the District in new growth sectors.
- Helping people in the District to get the education and training they need to secure highly skilled jobs.
- Tackling transport connectivity across the District and beyond.
- Improving employment outcomes in the District for everyone. This has been made worse as a result of COVID-19 as businesses close, which has hit young people, low-paid workers and BAME residents hardest.
- Supporting our businesses to make the transition as the UK exits the European Union, with or without a deal.

Our priorities:

a) Living with COVID-19

- We will help people into work and give them the skills to succeed. To do this we will create a flexible and agile skills service to retrain local residents who find themselves unemployed, are entering the job market for the first time or are considering self-employment. We will work with businesses to support workforce mental health and wellbeing, which will help boost productivity.
- We will help businesses access support to innovate and adapt to the challenges of COVID-19. We will connect businesses to financial and other support packages. We will help businesses to

embrace new digital ways of working. We will use our local procurement powers to increase the social value of contracts and develop our local supply chain.

b) Building a Better Future

- We will ensure our young and enterprising population is equipped with the skills and confidence to succeed. We will connect our population to employment opportunities across the District, the North and the UK.
- We will support people furthest from the labour market, including those with learning disabilities, into work. We will create new employment opportunities in the District, particularly in sectors with workforce shortages such as Health and Social Care.
- We will provide digital platforms and infrastructure to support employment growth and retraining via remote learning, access to peers and wider networks.
- We will make the most of our distinctive features and use our unique architecture, heritage and cultural assets to create an environment for growth.
- We will develop an outstanding bid to become the UK City of Culture in 2025.
- We will create a strong city-centre business destination through investment in the One City Park office scheme and other developments.
- We will work with the Towns Fund to improve the prosperity of Keighley, Shipley and other places in the District.
- We will develop and deliver our cultural strategy, Culture Is Our Plan, in recognition of Bradford's rich contribution to economic and social wellbeing.
- We will work with Arts Council England and National Heritage Lottery to win funding and support for projects.
- We will use our cultural assets to attract more visitors, drive economic growth and create new jobs in the cultural, creative and tourism industries.
- We will build on our strong and diverse economy to increase innovation, creativity, productivity and prosperity.
- We will make the most of the "Bradford District Pound" and ensure that an increasing proportion of our £475 million third party spend goes to local businesses and community organisations.
- We will provide enterprise support to our thriving business community and help people who want to start their own businesses.
- We will support social enterprises and social entrepreneurs through the Local Access Fund and Impact Hub investments in the District.
- We will improve our transport infrastructure by securing support and investment in key projects including the city centre Northern Powerhouse Rail station, Northern Connect, City Centre and Rail Station Masterplans, Calder Valley Rail Line Upgrade and Skipton-Colne rail link.
- We will improve digital connectivity to speed up business growth and connect more people to opportunities in the digital economy. We must ensure businesses are able to access high-speed broadband wherever they are in the District.

- We will help businesses to increase exports and grow global trade links. We will ensure businesses have the information and support available to tackle the challenges posed by Brexit.

How will we measure success:

1. Increase the years of healthy life expectancy (at birth) in both males and females and close the gap with the National Average (shared target with Better Health, Better Lives)
2. Increase the percentage of people in the District with NVQ Level 3 and above and close the gap with the National Average.
3. Increase the amount of Council spending on resources locally to 50% of total by 2024
4. Increase employment overall and close the gap with the National Average trend.
5. Increase the earning of employees in the area and close the gap with the National Average

PRIORITY AREA: Decent Homes

Our ambition:

We want everyone in the District to have a comfortable home which meets their needs and helps them lead fulfilling lives.

We will increase the supply of homes of the right type, quality and location to meet the needs and aspirations of our diverse and growing population. We want more high quality homes in neighbourhoods where people want to live and can thrive. We want more developments of the highest quality. We will retrofit existing stock to create homes that are energy efficient and adaptable.

We will work with partner agencies and communities to improve management of our neighbourhoods and ensure the District has green, safe, inclusive, and cohesive places where people are proud to call home.

We will support vulnerable residents to live independently. We will make sure elderly and vulnerable people can access specialist housing that meets their needs. We will help homeless people into permanent accommodation.

Our context:

Bradford District offers a range of housing choices including attractively priced terraces in close-knit city neighbourhoods, quality social housing in well-kept estates, unique Victorian Squares with spacious family accommodation, city centre apartments in new-build schemes or listed buildings in architecturally renowned locations like Little Germany, executive family homes near beautiful countryside, and homes of character in some of the most prosperous towns and villages in the country.

We have a number of challenges including:

- Financial viability of developing housing that meets the needs of specific users such as older people and those with disabilities.
- Impact of COVID-19 on housing market, particularly on incentive to invest to improve quality of housing.
- Impact of COVID-19 in delaying the delivery of capital investment schemes, on both large and small scale.
- Large number of empty homes in the District.
- Lack of large family accommodation to meet the needs of extended families.
- Changing needs and aspirations of an ageing society.

Our priorities:

a) Living with COVID-19

- We will maintain social distancing and infection control measures in social housing as much as possible.
- We will ensure we keep rough sleepers in accommodation where possible, helping to prevent the spread of infection.
- We will work with Government, developers and partners to maximise funding opportunities and the delivery of new homes and improved homes by managing the impact of additional COVID-19 precautions.
- We will work with the Government, Leeds City Region and delivery partners to make the most of energy efficiency measures in the Government's new green voucher scheme and other programmes.

b) Building a Better Future

- We will increase the supply of homes of the right type, quality and location to meet the needs of our population, including those with specialist needs.
- We will improve the quality of poor housing stock by encouraging and supporting private sector owners and landlords to bring properties, including empty homes, into good repair.
- We support help our residents who have a range of specific and specialist needs by improving access to suitable housing and help them sustain tenancies.
- We will use land and buildings owned by the Council to create good quality new homes for the District.

How we will measure success:

1. Achieve at least 1,703 net new home completions per year.
2. Achieve at least 411 affordable housing units per year.
3. Increase the number of private sector homes with improved housing conditions as a result of our interventions.
4. Continue to be above regional and national average rate for homelessness preventions.

PRIORITY AREA: Good Start, Great Schools

Our ambition:

We will improve educational attainment for children and young people from all backgrounds across the District. We will strengthen leadership, management and governance in our schools.

Our context:

Success at school is a product of what happens inside and outside the classroom. A number of things impact on educational success for children. These include the quality of home learning environment, housing, health and the level of deprivation. All are as important to a child's success as the quality of the education offered in school.

The pandemic brings a renewed urgency to our Council Plan to improve the life chances of our children and young people. They will disproportionately bear the impact of the economic, social and cultural changes brought about by the pandemic. We know time away from school has a negative impact on all children but it affects the poorest and most disadvantaged children the most. We know from research that children who are disadvantaged are already behind their peers at 16, and the pandemic is making this worse.

We have a number of challenges including:

- Getting all our children and young people safely back in education, ensuring schools are COVID-19 safe places and parents have confidence in sending their children to school.
- Educational attainment and progress across all stages of education from early years onwards.
- Educational and social outcomes for our most vulnerable and disadvantaged children and young people.

Our priorities:

a) Living with COVID-19

- We will develop a strategy that sets out our approach at all ages and key stages of delivery and covers school attendance, mental health and well-being, direct learning, classroom delivery, and one-to-one support for young people.
- We will support schools with clear infection control and response procedures to protect their staff, pupils and families.
- We will provide children and young people with the equipment and support to learn flexibly, including at home.
- We will provide enough childcare to help service providers continue to operate under COVID-19 restrictions.

b) Building a Better Future

- We will improve attainment of children and young people in Bradford District at all Key Stages so they can secure employment and be active and positive citizens.

- We will improve levels of attendance in Bradford District schools so children and young people can achieve their academic potential.
- We will maintain enough safe and secure childcare places so parents and carers can contribute to the economy and promote child development and early achievement.
- As a good and responsible corporate parent, we will improve and increase apprenticeship and training opportunities in the Council and District for young people in care and care leavers.
- We will help young people in care to achieve their full potential in education and learning.

How we will measure success:

1. GCSE Level 4 English and Maths results close the gap with the National Average
2. Reduce persistent absence faster than national trend.
3. Improve Key Stage 2 results in line with national trends in Reading, Writing and Maths.
4. Improve Key Stage 1 Phonics in line with national trends.

PRIORITY AREA: Better Health, Better Lives

Our ambition:

We will help people from all backgrounds to lead long, happy and productive lives by improving their health and socio-economic wellbeing.

We will strive to provide personalised health and care services to support quality of life at every stage. We will intervene when necessary to keep our children safe and ensure that residents in need can access services to maintain dignity and independence.

Our context:

COVID-19 has had a devastating impact on health and social care provision. It has meant that services and resources focused on self-care, prevention and early intervention to reduce demand on public services have had to be shifted to manage the pandemic.

COVID-19 has disproportionately affected those facing financial hardship and vulnerable people in our communities, as well as people from BAME groups, widening health inequalities.

The gap between the most deprived and least deprived remains large in the District and will require sustained effort and targeted investment in the most deprived communities and neighbourhoods.

We will need to shift resources and investment towards prevention and early intervention activities and make sure allocation is based on need. This will help citizens make long-term positive behaviour changes to improve their health and wellbeing.

Addressing historic health and wellbeing inequalities will require a collective, whole system effort from all partners within the health and social care system across the District. It is vital that common areas of need - or interdependencies - across the system are identified and that resources are used to complement and add value.

We recognise the challenges made by Ofsted in 2018 about the quality of children's social care services. We are currently working through our plan to improve children's social care services and aim to be out of special measures by 2024.

Our priorities:

a) Living with COVID-19

- We will ensure robust control measures are in place to reduce infection rates and prevent future outbreaks of COVID-19, including Test and Trace, information, advice and guidance for residents and service providers and respond to COVID-19 outbreaks swiftly and effectively.
- We will ensure timely interpretation and localise implementation of national guidance to ensure our plans and approach continue to protect and support residents.
- We will maintain provision and support to meet the health and wellbeing needs of all adults and children, while ensuring the most vulnerable and high risk groups are prioritised.
- We will use our learning and experience from COVID-19 to accelerate our transformation plans to redesign services to continue our support for communities to help themselves and each other. This will improve outcomes for individuals and families and avoid increased demand on statutory services.

b) Building a Better Future

- We will use a targeted approach to reduce health and socio-economic inequalities by providing support to our service users that is appropriate to their needs and culture and focusing on interventions to improve air quality, reduce obesity and improve physical activity levels.
- We will work with partners including education providers, NHS, the police and the voluntary and social sectors to shift budgets to prevention and early intervention for all ages. As part of this work, we will deliver a prevention and early help offer for families to support children from conception to five years.
- We will improve self-care and personalisation services for adult social care and tailor support to the long-term health and wellbeing needs of individuals.
- We will transform how services are delivered with a digital-first, citizen-centred approach. Our services will remain accessible to all those for whom using the internet will never meet their needs.
- We will work closely with our partners across the health and social care system to ensure that resources are pooled, prioritised and channelled to address shared outcomes. This is being enacted through the 'Act as One' strategy and formalised through the section 75 agreement with the NHS.
- We will improve the mental wellbeing and resilience of adults and children through our partnership approach to prevention and early intervention with education providers, NHS, the police and the voluntary and social sectors.
- We will strive to make sure that all children are safe in the District. We will prevent and reduce the impact of adverse childhood experiences. We will achieve an improved Ofsted assessment for our children's services. We aim to become a Unicef Child Friendly District where children and child welfare are at the heart of everything we do.

How will we measure success:

1. Increase the years of healthy life expectancy (at birth) in both males and females and close the gap with the National Average (shared target with Better Skills, More Good Jobs and a Growing Economy)
2. Reduce levels of childhood obesity.
3. Increase levels of physically active adults and close the gap with the National Average.
4. Bring percentage of referrals to Children's Social Care in the year which were within 12 months of previous referral closing in line with our Statistical Neighbours
5. Reduce percentage of children in care with 3 or more placements during the previous year to be in line with our Statistical Neighbours.
6. Improve the emotional well-being of Children in Care.
7. An increase in people with learning disabilities in settled accommodation. To move up 1 quartile based on 18/19 published national data (Adult Social Care Outcomes Framework data)

8. Increased proportion of adults with a learning disability in paid employment. To move up 1 quartile based on 18/19 published national data (ASCOF data)
9. Permanent Admissions to residential and nursing homes 65+ per 100,000 population. Maintain the 2019/20 performance of 555 admissions per 100,000 population (or below)

PRIORITY AREA: Safe, Strong and Active Communities

Our ambition:

Our ambition is to make the District a great place for everyone to live: where each one of us can play an active role in, be part of, be enriched by, and feel proud of calling Bradford their home.

Our context

We have significant experience of promoting integration and cohesion over the last three decades. With additional integration funding, we have been able to invest in innovations like the nationally renowned Linking Network for schools which has benefited more than 5,550 children locally and helped bring different communities together. The higher incidence of road casualties in the more deprived parts of the city has been directly addressed with positive, pro-active interventions.

Dangerous driving is a big challenge for Bradford. In response, we launched Operation Steerside as a partnership-led initiative which focusses both on enforcement and on changing road safety behaviours. The project has seized 1,103 vehicles since the project started. The Partnership has also collectively funded Theatre in Education at 10 high schools, delivered over 450 road safety inputs in schools to more than 63,000 pupils across the district. Through collaboration on road safety schemes, bicycle training, school education and road safety publicity messages on billboards, social media and radio, Bradford has continually pushed road casualty numbers down.

Our world has changed with the outbreak of COVID-19. We have had to significantly change the way we deliver services and work with our communities. The pandemic has increased economic insecurity, social isolation, mental health problems, domestic abuse and community pressures.

We need to make sure we continue to work together with communities and align our local and District services so we can all play a part in creating and sustaining strong, active and safe places.

Our priorities:

a) Living with COVID-19

- We will reduce social isolation as a result of COVID-19 and support the building of community resilience and cohesion.
- We will ensure residents of all communities have access to the support they need.
- We will increase the awareness and confidence among victims of domestic violence and hate crimes to report incidents and seek help.

b) Building a Better Future

- We will improve equality of opportunity by addressing factors affecting economic participation and poverty including language skills and educational attainment.
- We will help people get on better with each other by promoting greater interaction, dialogue and understanding to address residential and educational segregation in the District.
- We will make sure people understand fully their rights, freedoms and responsibilities.
- We will create opportunities for people to take part in community and civic life and strengthening leadership. We will nurture and grow a resilient and vibrant voluntary and charitable sector.

- We will tackle crime and the fear of crime so everyone feels safe.

How we will measure success:

1. Improve the percentage of people from different backgrounds who get on well together and close the gap with the West Yorkshire average.

2. Increase the overall value of Council commissioning spend on charity and voluntary sector contracts. Target is an increase on current spend of £22.2m per year.

3. Reduce the number of people killed or seriously injured in road accidents in Bradford District.

4. Increase in percentage of Your Views survey respondents who say they feel safe in their local area (rolling year) including an improvement in comparison with West Yorkshire average.

PRIORITY AREA: Sustainable District

Our ambition:

We want to lead by example and become one of the best Councils in the country for our record on climate change. We want to make it easier for individuals, households and businesses in the District to adapt, change and innovate to address the challenges presented by climate change.

Our context:

The climate emergency is a defining issue for local government. Our Council declared a Climate Emergency in 2019.

Effective climate action presents challenges but also offers opportunities to generate sustainable, clean and fair economic growth, improve health and well-being and environmental quality. We want our District to be at the forefront in taking advantage of these opportunities.

Tackling this emergency will require urgent and significant steps to limit our collective impact on the climate and ensure our residents, businesses and public sector partners can adapt to the challenges of the future.

The District currently has relatively low levels of CO2 emissions – In 2018, the last year where we have data, Bradford District CO2 emissions – 3.8 tonnes per capita, compared to 6.5 tonnes for Yorkshire and Humber, and a UK average of 5.2 tonnes.

The District is home to around 10,000 environmental sector jobs and exemplar businesses including Texpelt, a manufacturer using recycled fibres and plastics, Yorkshire Water, Morrisons and the pioneering Ecology Building Society.

The District has a strong and committed network of voluntary and community organisations with an estimated 100,000 citizens who are actively engaged with the climate and environmental agenda.

We have a strong research base in the District. Bradford University is a global leader in the circular economy and has a centre for sustainable environment which is tackling civil engineering climate challenges. The Bradford Institute for Health Research is researching health and wellbeing and undertaking national evaluation work on air quality improvements.

Our business and research strengths offer growth potential in areas including food and non-food crops, renewable energy, flood alleviation, soil management and carbon capture. Research suggests that clean growth could add £11 billion to the Leeds City region economy and create an additional 100,000 jobs across our wider region.

Our priorities:

a) Living with COVID-19

- We will encourage the use of digital technology to reduce carbon emissions, support business activities and maximise the environmental benefits of home and remote working.
- We will improve active travel infrastructure and help people move round the District for business or leisure safely, quickly and sustainably, even with reduced public transport capacity.

b) Building a Better Future

- We will encourage more recycling by households.

- We will help households access funding to improve energy efficiency.
- We will support local food production and food security efforts.
- We will improve air quality through our Breathe Better Bradford clean air plan.
- We will expand the network of electric vehicle charging points and number of electric vehicles.
- We will increase renewable energy usage and reduce greenhouse gas emission reduction in the Council's business activities.
- We will reduce energy use and emissions from the Council fleet and street lighting.
- We will increase the efficiency of our buildings and operational assets to reduce energy use and emissions.
- We will improve green space in the District with initiatives such as a 'Tree for Every Child' to plant more than 55,000 new trees, one for each primary school pupil.
- We will help businesses and households to be more sustainable and embrace the principles of the circular economy.
- We will identify risks from extreme weather events and work with local and national partners to strengthen infrastructure and buildings.
- We will improve waste recycling rates.
- We will set up an active Sustainable Development Partnership to drive forward a District approach to change.
- We will work closely in partnership with West Yorkshire Combined Authority on sustainable development within the devolved region.

How we will measure success:

1. The Bradford Clean Air Plan will achieve compliance with UK limits by 2022 and maintain this performance in future years
2. Increase the percentage household waste sent for reuse, recycling or composting and close the gap with the National Average
3. Reduction in CO2 from Council Buildings below the 2019 level.

PRIORITY AREA: Well-Run Council

Our ambition:

We will be a Council that is a great place to work and reflects the communities we serve. Our people will have the tools to do their jobs effectively. We will manage our resources well and seize all opportunities to bring funding into the District. We will provide good, accessible services.

We will lead the digital transformation of public services, not just putting existing services online, but rewiring the local system to take advantage of shared, common digital components. The Council will collaborate with all public service providers on a digital platform for genuinely joined-up service delivery.

Our Context

We are delivering our Procurement Strategy to provide a first class, end-to-end buying service, which is effective, efficient and respected. It will deliver improved outcomes for the Council and the District.

We are proactively supporting economic development and growth throughout the District using the Council's financial strength. We are funding the redevelopment of key iconic sites directly or indirectly to attract new businesses, cultural, retail and leisure facilities to the District.

Schemes include Bradford Live, the new Darley Street Market and associated public realm and the proposed 56,000 sq ft office development at One City Park, which will provide much-needed work space to attract new employers and entrepreneurs to the District.

We are developing creative and innovative solutions for digital service redesign to deliver better outcomes for our residents and businesses and make the most of funding and partnership opportunities.

We are supporting local democracy by encouraging all to register for local elections and ensuring elections are delivered effectively and safely.

Our priorities:

a) Living with COVID-19

- We will continue to pay our suppliers quickly and efficiently to help cash flow.
- Our Asset Management Team works closely with HR and public health colleagues to ensure our buildings are COVID-19 secure and safe for colleagues and members of the public to use.
- Facilities Management (FM) Catering is working hard to deliver healthy meals to around 145 schools throughout the District. It is minimising the use of salt and sugar in food production and also reducing the use of plastics in packaging and using sustainable alternatives wherever possible. FM Catering is providing school meals wherever needed, particularly for the most vulnerable children.
- We will manage our finances effectively and make sure we take advantage of opportunities to secure funding to support our COVID-19 response.
- We will make sure we have a strong baseline budget to deliver services where needed and attract income and investment to support frontline delivery.

b) Building a Better Future

- We will make sure all employees feel included, are able to bring their whole self to work and barriers to success are removed. This will be done through staff engagement, review and refresh of policies, procedures and effecting culture change.
- We will help every employee to reach their full potential through our approach to learning and development.
- We will achieve a workforce that represents the communities we serve across all levels through our approach to recruitment and selection and talent development including a renewed commitment to diverse interview panels.
- We will seize all opportunities to bring funding into the District.
- We will work with partners to make sure we use all of our money in a joined-up way where we can.
- We will achieve value for money through innovative procurement and contract management practices while ensuring robust transparent governance.
- We will make best use of the Bradford pound by committing to using District-based organisations, directly or indirectly, to deliver supplies, services and works wherever possible.
- We will deliver improved social value and inclusive growth outcomes from procurement procedures.
- We will work with our partners in the procurement community through collaborative arrangements.
- We will develop digital access to all our services. Our services must remain accessible to all those for whom using the internet will never meet their needs.
- We will provide great customer service to people in Bradford.
- We will connect with our local suppliers, particularly the voluntary, community and social enterprise community, to improve understanding of our local supply chains.
- We will modernise our procurement platform to enable efficient and effective payments to suppliers.

How we will measure success:

1. Ensure Council spending is within budget and year on year savings agreed by council are delivered
2. Increase percentage of top five percent of employees who are female
3. Increase percentage of employees from LGBTQ+ backgrounds
4. Increase percentage of employees from BAME backgrounds

Increase percentage of top five percent employees by income who are from BAME backgrounds

Improve staff satisfaction, measured through the staff survey

Bradford District Shared Values



We **PROTECT** each other and the world we share so that everybody can be happy, healthy and safe



We **RESPECT** ourselves, each other and our communities



We **SHARE** ideas, resources, knowledge and skills as well as our challenges and opportunities



We **CARE** for each other and treat each other with kindness



Appendix 2: Draft KPIs and Targets

Outcome Area	Performance indicator	Target	Current Performance
Better Skills, More Good Jobs and a Growing Economy	Healthy life expectancy (at birth) in males (shared with Better Health, Better Lives)	Increase the years of healthy life expectancy (from birth) in males and close the gap with the National Average National Average - 63.4	60.1 (2016-2018 data)
	Healthy life expectancy (at birth) in females (shared with Better Health, Better Lives)	Increase the years of healthy life expectancy (at birth) in females and close the gap with the National Average National Average – 63.9	60 (2016-2018 data)
	Percentage of people in the District with NVQ Level 3 and above	Increase the percentage of people in the District with NVQ Level 3 and above and to close the gap with the National Average National Average – 58.5%	41.4% (Gap 17.1%)
	Percentage of total third party spend with suppliers operating from within the District	Increase the amount of Council spending on resources locally to 50% of total by 2024	42.1%
	People in work (aged 16 – 64)	Increase the earning of employees in the area and close the gap with the National	66.2%

		Average trend <i>National Average – 76.2%</i>	
	Median earnings of employees in the area	Increase the earning of employees in the area and close the gap with the National Average <i>National Average - £591.30</i>	£500 (Gap with the English National Average £91.30)

Outcome Area	Performance indicator	Target	Current Performance
Decent Homes	Net number of additional homes provided	Achieve at least 1,703 net new home completions per year	1,690
	Number of affordable housing units	Achieve at least 411 affordable housing units per year	309 <i>Provisional</i>
	Number of private sector homes improved	Increase the number of private sector homes with improved housing conditions as a result of our interventions	99 homes improved
	Homelessness preventions	Continue to be above regional and national average rate for homelessness preventions	<i>Latest percentage of homelessness preventions:</i> <i>Bradford - 72.64</i> <i>England - 58.51</i>

Outcome Area	Performance indicator	Target	Current Performance
Good Start, Great Schools	Percentage of pupils achieving 9-4 pass in GCSE English and Maths	GCSE Level 4 English and Maths results close the gap with the National Average National Average – 59.8%	54.7%
	Persistent absence rates	Reduce persistent absence faster than the National trend National Average – 10.9%	14.9%
	Key Stage 2 Reading, Writing and Maths results	Improve Key Stage 2 results in line with national trends in Reading, Writing and Maths National Average – 65%	63%
	Percentage of Year 1 pupils achieving the Phonics standard	Improve KS1 phonics in line with national trends National Average – 82%	82%

Outcome Area	Performance indicator	Target	Current Performance
Better Health, Better Lives	Obesity in primary school age children in Year 6	Reduce levels of childhood obesity National Average - 20.2%	24.4%
	Percentage of physically active adults	Increase levels of physically active adults and close the gap with the National Average National Average – 67.2%	62.4%
	Percentage of referrals to Children’s Social Care in the year which were within 12 months of previous referral closing	Bring percentage of referrals to Children’s Social Care in the year which were within 12 months of previous referral closing in line with our Statistical Neighbours Statistical Neighbour (2018/19) 21.85%	31.98%
	Percentage of children in care with 3 or more placements during the previous year	Reduce percentage of children in care with 3 or more placements during the previous year to be in line with our Statistical Neighbours. Statistical Neighbour (2018/19) 8.9%	8.45%
	Emotional and Behavioural health of children and young people in care for at least a year and aged	Improve the emotional wellbeing of Children in Care	13.2%

	between 5 -16 years old (average score from the total of SDQ scores)		
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Outcome Area	Performance indicator	Target	Current Performance
Better Health, Better Lives	Percentage of people with an learning disability living in their own home or with family	To move up 1 quartile based on 18/19 published national data (ASCOF data) Target 90%	88.2%
	Percentage of adults with an learning disability in paid employment	To move up 1 quartile based on 18/19 published national data (ASCOF data) Target 4.5%	3.9%
	Permanent Admissions to residential and nursing homes 65+ per 100,000 population	Maintain the 2019/20 performance of 555 admissions per 100,000 population (or below)	555

Outcome Area	Performance indicator	Target	Current Performance
Safe, Strong and Active Communities	Percentage of people from different backgrounds	Improve the percentage of people from different backgrounds who get on well together and close the gap with the West Yorkshire average West Yorkshire Average – 57.2%	55.7%
	Local (VCSE) Voluntary, Community and Social Enterprise (sector)	Increase the overall value of Council commissioning spend on charity and voluntary sector contracts. Target is an increase on current spend of £22.2m per year	£22.2m
	Number of people killed or seriously injured in road accidents in Bradford District	[As per Operation Steerside Targets] 2020 – 172 2021 - 165	168
	Percentage of people who feel safe in their local area (Suspended due to COVID-19)	Increase in percentage of Your Views survey respondents who say they feel safe in their local area (rolling year) including an improvement in comparison with West Yorkshire average	77.43%

		West Yorkshire Average – 81.3%	
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Outcome Area	Performance indicator	Target	Current Performance
A Sustainable District	UK Air Quality legal limits*	The Bradford Clean Air Plan will achieve compliance with UK limits by 2022 and maintain this performance in future years	
	Percentage of household waste sent for reuse, recycling or composting	Increase the percentage household waste sent for reuse, recycling or composting and close the gap with the National Average National Average – 41.6%	40.7%
	Greenhouse gas emissions from Council operations	Reduction in CO2 from Council Buildings below the 2019 level	47,446 Tonnes

Outcome Area	Performance indicator	Target	Current Performance
Well Run Council	Achievement of Council wide budget savings	Ensure spending is within budget. Target to be set as part of the budget process.	
	Delivery of budgeted savings	Ensure year on year savings agreed by Council are delivered. Target to be set as part of the Budget process	
	Equality targets (to match with final equality)	Percentage of top 5% employees who are female Target 65%	48.2%
	Equality targets (to match with final equality)	Percentage of employees from LGBTQ+ backgrounds Target 2%	0.6%
	Equality targets (to match with final equality)	Percentage of employees from BAME backgrounds Target 33%	27.8%

	Equality targets (to match with final equality)	Percentage of top 5% employees by income who are from BAME backgrounds Target 27.8%	18.4%
	Annual staff survey	Improve staff satisfaction measured through the staff survey	Baseline to be set when staff survey is created.

*https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update.pdf



Report of the Strategic Director Place to the meeting of Executive to be held on 6th October 2020

CG

Subject: Haworth, Cross Roads & Stanbury Neighbourhood Development Plan

Summary statement:

This report concerns the Haworth, Cross Roads & Stanbury Neighbourhood Development Plan which has been prepared by the Parish Council. The Plan has now been subject of an independent examination by Rosemary Kidd and her report confirms that the Plan, subject to the incorporation of a number of modifications meets the Basic Conditions outlined in legislation. She has recommended that the Plan proceeds to local referendum.

The report recommends that the Council agree to all of the proposed modifications and that the modified plan proceeds to referendum. This will take place in May 2021.

Julian Jackson
Assistant Director (Planning,
Transportation & Highways)

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Portfolio:

Regeneration, Planning and Transport

Overview & Scrutiny Area:

Regeneration & Economy

1. SUMMARY

- 1.1 This report concerns the Haworth, Cross Roads and Stanbury Neighbourhood Development Plan (the Plan), prepared by the Haworth, Cross Roads and Stanbury Parish Council (the Parish Council).
- 1.2 The Plan has been developed over several years and has been subject to extensive community consultation and engagement. City of Bradford Metropolitan District Council (CBMDC) officers have provided assistance and input to the Plan.
- 1.3 In accordance with legislation, the Plan has been the subject of an independent examination by Rosemary Kidd, a suitably qualified and experienced examiner. Her report confirms that the Plan has met all relevant legal requirements and that, subject to the incorporation of a number of modifications, meets the Basic Conditions for neighbourhood plans defined in legislation.
- 1.4 One of these conditions is that it should be in general conformity with the strategic policies set out in the development plan for Bradford district – the Core Strategy DPD (adopted 2017) and the saved policies of the Replacement Unitary Development Plan (adopted 2005). The Examiner recommends the modified plan proceeds to a local referendum.
- 1.5 This report recommends that the Council agree to all of the proposed modifications and that the modified plan proceeds to a referendum in the Parish Council area.
- 1.6 Should a simple majority in favour of the plan be achieved in the referendum, the Plan would then be “made” and become part of the statutory development plan for Bradford District, alongside the Local Plan Core Strategy DPD (2017), Bradford City Centre and Shipley and Canal Road Area Action Plans (both 2017), Waste Management DPD (2017) and saved policies of the Replacement Unitary Development Plan (2005) as well as any future planning policies.
- 1.7 The Plan would then be used by CBMDC officers and elected members in making decisions on planning applications within the Haworth, Cross Roads and Stanbury Parish area.

2 BACKGROUND

- 1.1 The Localism Act 2011 (the 2011 Act) gives communities the opportunity to shape how their areas grow and develop through the use of a number of tools. One of these tools is the production of a neighbourhood plan, which when formally “made” will form part of the statutory development plan for the local authority area.
- 1.2 Neighbourhood plans cannot be used to stop development and should not promote less growth than the levels set out in the Local Plan or undermine its strategic policies. Plans also cannot deal with strategic planning matters or other excluded matters such as mineral extraction.
- 1.3 The content of plans is determined by the community. The plan can be a means of setting out more detailed policies for their community over and above the Local Plan, to start to shape the choices over the use of land and the designation of land for housing, employment or community uses. They should only cover land use planning issues.

- 1.4 Whilst Neighbourhood Plans are produced by relevant qualifying bodies, there is also a significant role for Local Planning Authorities. In addition to a general legal duty to support (usually by the provision of advice and feedback, sharing of information and evidence etc.), the Council is required to issue the draft plan for regulation 16 consultation, organise and fund an independent examination of the plan, organise and fund a referendum (assuming the examination finds that the plan meets legal requirements and a number of Government defined 'basic conditions').
- 1.5 Under the 2011 Act, the Parish Council is considered to be qualifying body for the purposes of neighbourhood planning. In line with the provisions of the 2011 Act and the Neighbourhood Planning (General) Regulations 2012 (as amended) (the 2012 Regulations), the Parish Council have prepared a neighbourhood plan for the Haworth, Cross Roads and Stanbury parish area.
- 1.6 The starting point for the Plan was the decision taken by the Parish Council in November 2012 to prepare it. An application to have their parish area formally designated as a "neighbourhood area" for the purposes of preparing a neighbourhood development plan was submitted to CBMDC on 12 March 2013. This was the subject to an eight week public consultation exercise (22 July to 16 September 2013). The application was approved by CBMDC's Executive on 5 November 2013.
- 1.7 The Plan has been prepared and developed between 2014 and 2019. This has involved a mixture of community and stakeholder engagement and evidence gathering during this period. This led to the publication of a Policy Intentions Document in Spring 2015, as well as an informal consultation on sites.
- 1.8 A Pre-Submission Draft Plan was then prepared and issued for a formal six week consultation under Regulation 14 of the 2012 Regulations. This took place between 26 October and 7 December 2018, and was led by the Parish Council.
- 1.9 CBMDC officers, under the duty to support, have worked constructively with the Parish Council. This has involved providing advice and support for the neighbourhood plan, including providing formal comments, where necessary. Details of the consultation process are included in the Consultation Statement submitted alongside the Plan.
- 1.10 A final draft of the Plan, together with the required supporting documents (Basic Conditions Statement, Consultation Statement and Strategic Environmental Assessment/Habitat Regulations Assessment Screening Report) was submitted to CBMDC in September 2019, who issued it for a formal consultation (under Regulation 16). This consultation took place between 17 September and 28 October 2019. The submitted neighbourhood plan is included at Appendix 1 to this report.
- 1.11 The Plan sets out a vision for the future growth and development of parish area together with a number aims to achieve this.
- 1.12 It also contains a range of planning policies that seek to deliver the vision and aims. They also seek to address a number of local issues identified through community engagement and evidence gathering as well as seeking to inform development

proposals. There are also a number of community actions, which are non-land use planning related.

1.13 The planning policies cover:

- Built Heritage, Development & Design
- Green Environment
- Community Facilities & Services
- Housing
- Employment & Tourism
- Highways & Travel

1.14 The plan does not make allocations for housing or employment. However, it does support the development of four sites identified in the Replacement Unitary Development Plan (RUDP) (2005) and Strategic Housing Land Availability Assessment (2015), should it be determined that they are included by CBMDC in the emerging Allocations DPD. Work to decide which sites are allocated through the Local Plan is on-going.

1.15 As highlighted, above, CBMDC undertook a formal six week consultation of the Plan. During the consultation, a total of 38 representations were received from 10 groups, organisations and individuals, including statutory bodies, local residents and the development sector. CBMDC also submitted comment as part of this process.

1.16 These representations related to

- Overall direction and wording of the proposed neighbourhood plan policies;
- Non-designated heritage assets and impact of potential designations
- Conformity with national and local planning policy;
- The suitability of the sites identified for housing;
- Local Wildlife Site designations
- Promotion of land for development ;

1.8 In line with legislation, the Plan must be the subject of an independent examination undertaken by a suitably qualified and experienced person, independent of the Council. Rosemary Kidd, an independent Planning Consultant was appointed to this role. The examination took place in June/July 2020, with her final report being issued on 18 August 2020.

1.9 The Examiner's role is to ensure that the Plan has been prepared in line with, and complies with relevant legislation and meets the Basic Conditions. The Basic Conditions are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan;
- the making of the plan contributes to the achievement of sustainable development;

- the making of the neighbourhood plan is in general conformity with the strategic policies of the development plan for the area of the authority;
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
 - prescribed conditions are met in relation to the plan and the prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the 2012 Regulations (as amended by the Conservation of Habitats and Species and Planning (various amendments) Regulations 2018) sets out a further basic condition in addition to those set out in the primary legislation: that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 1.1 The Examiner was provided with copies of the submission documents – Submission Draft Plan, Basic Conditions Statement, Strategic Environmental Assessment, and Consultation Statement – together with all representations (see paragraphs 2.15 and 2.16, above) received as part of the formal Regulation 16 consultation.
 - 1.2 She gave full consideration to the contents of the submission draft plan, supporting documentation and the various issues raised by the representations received together with the responses provided by CBMDC and the Parish Council in response to her questions. Her assessment is set out in her report, issued to the Council on 18 August 2020. The report has also been issued to the Parish Council.
 - 1.3 The Examiner concluded that, subject to a number of modifications to the plan’s policies, reasoned justification and supporting documentation, the Plan meets the Basic Conditions (see paragraph 2.18) and that once modified should proceed to Referendum. The Examiner’s report is included at Appendix 2 and includes a schedule of proposed modifications.
 - 1.4 The Council’s officers have considered the Examiner’s report and consider that it is a thorough and professional assessment of the Plan and the issues raised by respondents. The conclusions made are reasonable and justified and it is considered that the proposed modifications to the Plan should be made. It is therefore suggested that the Neighbourhood Plan proceeds to referendum in line with the changes set out in the Examiner’s Report.
 - 1.5 The referendum would be organised by the Council’s elections unit and would apply to the area covered by the Neighbourhood Plan which is the whole of the Haworth, Cross Roads and Stanbury Parish. The Examiner has confirmed and recommended that the referendum should cover this area and that there are no reasons to extend the referendum to areas beyond that covered by the Plan.
 - 1.6 If members accept this recommendation a Decision Statement (as required under Regulation 18 of the 2012 Regulations) would be issued and published to that effect and preparations for the referendum would commence. The precise date will be determined in collaboration with the Council’s elections unit.

- 1.7 It should be noted that due to the Covid 19 pandemic, the Government introduced new guidance and regulations regarding neighbourhood plan referendums. In line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020, all neighbourhood plan referendums that were/are scheduled to take place between 16 March 2020 and 5 May 2021 are postponed until at least 6 May 2021.
- 1.8 Due to the above, Government have amended national planning practice guidance to state that once the Council issue the Regulation 18 statement, mentioned in paragraph 2.24 above, detailing its decision to send the modified plan to local referendum, the modified plan can be given significant weight in decision making, as far it is material to the planning application being considered.
- 1.9 Should the referendum result in a “yes” vote, the agreed Governance arrangements (agreed by Executive on 9 March 2012 and updated on 6 February 2018) would mean that the Assistant Director (Planning, Transportation & Highways) in consultation with the Portfolio Holder (Regeneration, Planning & Transport) would decide whether to “make” the Plan.
- 1.10 In the event of a “yes” vote the Council are required in law to make the Plan unless it considers that this would breach or be incompatible with any EU obligation or any Convention Rights. Therefore subject to a simple majority in favour of the Plan, the Plan would become “made” which means it would become a part of the statutory development plan for the Neighbourhood Plan area.

3. OTHER CONSIDERATIONS

- 1.10 Once “made”, the Plan will ensure planning decisions reflect the priorities and aspirations of the local community. It will contribute to the achievement of well-designed quality developments.
- 1.11 The making of the Plan will allow the Parish Council to secure 25% of any Community Infrastructure Levy payments for qualifying developments such as new homes and this money will be able to be spent on local priorities and infrastructure by the Parish.
- 3.3 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a post-examination draft neighbourhood development plan, so far as material to the relevant planning application.

4. FINANCIAL & RESOURCE APPRAISAL

- 4.1 There are potentially significant financial and resource implications from the discharge of the duties under the Localism Act and these have been outlined in earlier reports to the Council’s Executive including that of 9th October 2012.
- 4.2 The Council is required to pay for arranging and conducting the local referendum. The Government have made funding available to Local Planning Authorities in the form of payments when neighbourhood plans reach specified stages. Should the

Neighbourhood Plan be approved at referendum and be subsequently 'made' the Council would be able to claim for a payment of £20,000 later in the year.

5 RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The report sets out the implications of the recommendations being approved including the associated costs of holding a referendum.

5.2 The main risks are that the Plan may not receive more than 50% yes votes in the referendum and that the plan is subject to a legal challenge/review.

5.3 The Neighbourhood Plan has been prepared in line with the legal and regulatory framework and in line with the governance arrangements agreed in October 2012 and subsequently revised in February 2018

6. LEGAL APPRAISAL

6.1 The legal requirements associated with neighbourhood planning as they apply to the Local Planning Authority and the qualifying body are set out in the report above. The Neighbourhood Plan has been prepared in line with Town and Country Planning Act 1990 (as amended by the Localism Act 2011), and the Neighbourhood Planning (General) Regulations 2012 (as amended).

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

Both the qualifying body and Bradford Council have carried out extensive consultation and engagement with the local community and followed all legal procedures and Government regulations in preparing the plan. The qualifying body have carried out an Equality Impact Assessment of the Plan and have produced policies and proposals which will improve the quality of development for the local community. The Plan's policies reflect National Planning Policy and the Core Strategy which have themselves been subject to equalities impact assessments

7.2 SUSTAINABILITY IMPLICATIONS

The basic conditions to which the Neighbourhood Plan must comply with have been met and this includes a requirement that the plan is in general conformity with the adopted Core Strategy DPD (which itself was subject to sustainability appraisal) and that it contributes to the achievement of sustainable development.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

All Neighbourhood Plans have to reflect national and local policies which promote sustainable development and seek to minimise the impacts of climate change.

7.4 COMMUNITY SAFETY IMPLICATIONS

There are no community safety implications.

7.5 HUMAN RIGHTS ACT

The Neighbourhood Plan has been prepared and consulted upon in accordance with relevant planning legislation and Government regulations. The Neighbourhood Plan has been subject to extensive consultation over an extended period and at multiple stages. Those who had concerns about the content of the Plan had the right to make representations and those were fully considered by the Examiner.

7.6 TRADE UNION

There are no trade union implications.

7.7 WARD IMPLICATIONS

The Neighbourhood Plan relates specifically to the Haworth, Cross Roads and Stanbury Parish area and the policies and proposals are described in the report above and set out in the plan which is attached (see Appendix 1).

7.8 IMPLICATIONS FOR CORPORATE PARENTING

There are no corporate parenting implications.

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

There are no issues arising from privacy impact assessment

8. NOT FOR PUBLICATION DOCUMENTS

8.1 None

9. OPTIONS

8.2 The Executive is requested to consider the recommendations set out in the Examiner's Report. The options for consideration are:

- **Option 1** – in accordance with the guidance in this report to approve the modifications recommended by the Examiner and approve the amended plan to be subject of a local referendum
- **Option 2** – do not approve the modifications recommended by the Examiner and do not approve the amended plan to be subject of a local referendum.

8.3 The Executive are recommended to follow **Option 1** as set out above.

10. RECOMMENDATIONS

10.1 The submitted Haworth, Cross Roads and Stanbury Neighbourhood Development Plan (Appendix 1) is subject to the modifications (Recommendations 1 to 29) as set out in the Examiner's Report (Appendix 2), together with any relevant factual changes.

10.2 It is then subject to a local referendum

10.3 Should the plan be successful at referendum, the plan should be formally made via delegated decision by the Assistant Director (Planning, Transportation & Highways) in consultation with the Portfolio Holder (Regeneration, Planning & Transport) in line with the agreed governance arrangements.

11. APPENDICES

- Appendix 1a: Haworth, Cross Roads & Stanbury Neighbourhood Development Plan – Submission Draft

[https://www.bradford.gov.uk/Documents/DesignatedNeighbourhoodAreas/Haworth%20Cross%20Roads%20and%20Stanbury/Regulation%2016%20-%20Public%20Consultation//HCRS%20Neighbourhood%20Plan%20\(June%202019\).pdf](https://www.bradford.gov.uk/Documents/DesignatedNeighbourhoodAreas/Haworth%20Cross%20Roads%20and%20Stanbury/Regulation%2016%20-%20Public%20Consultation//HCRS%20Neighbourhood%20Plan%20(June%202019).pdf)

- Appendix 1b: Haworth, Cross Roads & Stanbury Neighbourhood Development Plan – Submission Draft – Policies Map

[https://www.bradford.gov.uk/Documents/DesignatedNeighbourhoodAreas/Haworth%20Cross%20Roads%20and%20Stanbury/Regulation%2016%20-%20Public%20Consultation//HCRS%20NDP%20-%20Policies%20Map%20\(June%202019\).pdf](https://www.bradford.gov.uk/Documents/DesignatedNeighbourhoodAreas/Haworth%20Cross%20Roads%20and%20Stanbury/Regulation%2016%20-%20Public%20Consultation//HCRS%20NDP%20-%20Policies%20Map%20(June%202019).pdf)

- Appendix 2: Haworth, Cross Roads & Stanbury Neighbourhood Development Plan – Examiner's Report

12. BACKGROUND DOCUMENTS

- Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020
- Localism Act 2011 (as amended)
- Neighbourhood Planning (General) Regulations 2012 (as amended)
- Town & Country Planning Act 1990 (as amended)

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HAWORTH, CROSS ROADS & STANBURY NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to the City of Bradford Metropolitan
District Council
into the examination of the
Haworth, Cross Roads & Stanbury
Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

Rosemary Kidd, Dip TP, MRTPI
NPIERS Independent Examiner
19 August 2020

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1.0 Summary

- 1.1 The Haworth, Cross Roads & Stanbury Neighbourhood Plan has been prepared to set out the community's wishes for the three villages in Haworth, Cross Roads and Stanbury parish.
- 1.2 I have made a number of recommendations in this report in order to make the wording of the policies and their application clearer, including improvements to the mapping of sites referred to in policies to ensure that the Plan meets the Basic Conditions. Section 6 of the report sets out a schedule of the recommended modifications.
- 1.3 The main recommendations concern:
 - The inclusion of a section in the Introduction setting out the strategic framework for the Plan;
 - The amalgamation of policies to avoid unnecessary repetition;
 - The deletion of Policy HT4;
 - Clarification of the wording of policies and supporting text;
 - Ensuring that the boundaries of sites are clearly shown on the Policies Map or background evidence.
- 1.4 Subject to the recommended modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Haworth, Cross Roads & Stanbury Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

Background Context

- 2.1 This report sets out the findings of the examination into the Haworth, Cross Roads & Stanbury Neighbourhood Plan.
- 2.2 The Parish of Haworth, Cross Roads & Stanbury lies 3 miles to the southwest of Keighley and 10 miles west of Bradford. The parish lies in the Worth Valley amid the South Pennine hills. Haworth is a tourist destination known for its association with the Brontë sisters and the preserved heritage Keighley and Worth Valley Railway. At 2011 there were 6994 people living in 6916 households in the parish.

Appointment of the Independent Examiner

- 2.3 I was appointed as an independent examiner to conduct the examination on the Haworth, Cross Roads & Stanbury Neighbourhood Plan (HCR&SNP) by the City of Bradford Metropolitan District Council (CBMDC) with the consent of Haworth, Cross Roads & Stanbury Parish Council in April 2020. I do not have any interest in any land that may be affected by the HCR&SNP nor do I have any professional commissions in the area currently and I possess appropriate qualifications and experience. I am a Member of the Royal Town Planning Institute with over 30 years' experience in local authorities preparing Local Plans and associated policies.

Role of the Independent Examiner

- 2.4 As an independent Examiner, I am required to determine, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether the legislative requirements are met:
- The Neighbourhood Development Plan has been prepared and submitted for examination by a qualifying body as defined in Section 61F of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Development Plan has been prepared for an area that has been designated under Section 61G of the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004;
 - The Neighbourhood Development Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004, that is the Plan must specify the period to which it has effect, must not include provisions relating to 'excluded development', and must not relate to more than one Neighbourhood Area; and
 - The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A.

- 2.5 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to neighbourhood plans:
 - Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended by the Conservation of Habitats and Species and Planning (various Amendments) Regulations 2018) sets out a further Basic Condition in addition to those set out in the primary legislation: that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 2.6 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to comment on how the plan could be improved but rather to focus on whether the submitted Neighbourhood Plan meets the Basic Conditions and Convention rights, and the other statutory requirements.
- 2.7 It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings. I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the Basic Conditions and the other requirements.

The Examination Process

- 2.8 The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.

- 2.9 I have sought clarification on a number of factual matters from the Qualifying Body and/or the local planning authority in writing. I am satisfied that the responses received have enabled me to come to a conclusion on these matters without the need for a hearing.
- 2.10 I had before me background evidence to the plan which has assisted me in understanding the background to the matters raised in the Neighbourhood Plan. I have considered the documents set out in Section 5 of this report in addition to the Submission draft of the HCR&SNP 2019 – 2030.
- 2.11 I have considered the Basic Conditions Statement and the Consultation Statement as well as the screening statement for the Strategic Environmental Assessment and Habitats Regulation Assessment and the Sustainability Assessment. In my assessment of each policy I have commented on how the policy has had regard to national policies and advice and whether the policy is in general conformity with relevant strategic policies, as appropriate.
- 2.12 In view of the restrictions on travel due to Covid-19, I have not undertaken a site visit to the Plan area.

Legislative Requirements

- 2.13 The neighbourhood plan making process has been led by Haworth, Cross Roads & Stanbury Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process.
- 2.14 The Neighbourhood Plan area is co-terminus with the parish of Haworth, Cross Roads & Stanbury. The area was designated by the City of Bradford Metropolitan District Council on 5 November 2013 as a Neighbourhood Area. The Qualifying Body has confirmed that there are no other neighbourhood plans relating to that area.
- 2.15 A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan and text within the Plan show the date 2019 - 2030.
- 2.16 The Plan does not include provision for any excluded development: county matters (mineral extraction and waste development), nationally significant infrastructure or any matters set out in Section 61K of the Town and Country Planning Act 1990.
- 2.17 The Neighbourhood Development Plan should only contain policies relating to the development and use of land. The HCR&SNP policies are compliant with this requirement.
- 2.18 The Plan includes Community Actions and Approaches which are summarised on pages 61 – 62 of the Plan. These are clearly indicated as

complementary actions and aspirations to be delivered by the community through other organisations and agencies. This section should make it clear that they do not form part of the statutory development plan.

- 2.19 The Basic Conditions Statement confirms all the above points and I am satisfied therefore that the HCR&SNP satisfies all the legal requirements set out in paragraph 2.4 above.

Recommendation: 1

Add the following on page 13, 7th paragraph under Chapter 5: The Plan Policies and Community Actions: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

Add the following on page 61 under the first paragraph - Chapter 5 of this plan: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

The Basic Conditions

Basic Condition 1 – Has regard to National Policy

- 2.20 The first Basic Condition is for the neighbourhood plan *“to have regard to national policies and advice contained in guidance issued by the Secretary of State”*. The requirement to determine whether it is appropriate that the plan is made includes the words *“having regard to”*. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be *“consistent with national policy”*.
- 2.21 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan *“must not constrain the delivery of important national policy objectives.”*
- 2.22 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:
“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”
- 2.23 The NPPF of February 2019 (as amended) is referred to in this examination in accordance with paragraph 214 of Appendix 1, as the plan was submitted to the Council after 24 January 2019.

- 2.24 The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic policies set out in the Local Plan or spatial development strategy and should shape and direct development that is outside of those strategic policies*” and further states that “*A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum, the neighbourhood plan becomes part of the statutory development plan.*”
- 2.25 Table 1 of the Basic Conditions Statement includes comments on how the policies of the HCR&SNP have had regard to national policy and guidance. The paragraph numbers of the NPPF of July 2018 and NPPG of October 2018 are referred to in this table. I consider the extent to which the plan meets this Basic Condition No 1 in Section 3 below.

Basic Condition 2 - Contributes to sustainable development

- 2.26 A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The NPPF as a whole constitutes the Government’s view of what sustainable development means in practice for planning. The NPPF explains that there are three dimensions to sustainable development: economic, social and environmental.
- 2.27 Section 5 of the Basic Conditions Statement includes the summary table from the Sustainability Assessment and highlights how the HCR&SNP has sought to deliver the three arms of sustainable development and the potential impacts of each policy.
- 2.28 I am satisfied that the Plan contributes to the delivery of sustainable development and therefore meets this Basic Condition.

Basic Condition 3 – is in general conformity with strategic policies in the development plan

- 2.29 The third Basic Condition is for the neighbourhood plan to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan relevant to the area comprises the Bradford Core Strategy (CS) adopted in 2017 and the saved policies of the Replacement Unitary Development Plan (RUDP), originally adopted in 2005.
- 2.30 A partial review of the Core Strategy is underway. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft programmed for 2021. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.
- 2.31 Table 3 of the Basic Conditions Statement assesses the HCR&SNP policies against the relevant policies of the Core Strategy and the saved policies of the RUDP, where applicable.

- 2.32 I consider in further detail in Section 3 below the matter of general conformity of the Neighbourhood Plan policies with the strategic policies.

Basic Condition 4 – Compatible with EU obligations and human rights requirements

- 2.33 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.34 Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination from the responsible authority (The City of Bradford Metropolitan District Council) that the plan is not likely to have “significant effects.”
- 2.35 A screening opinion was carried out by the CBMDC on the draft HCR&SNP in July 2018. The results of this are contained in a document entitled ‘Haworth, Cross Roads & Stanbury Neighbourhood Plan Strategic Environmental Assessment & Habitat Regulations Assessment Screening Report’.
- 2.36 The Screening Report concluded in paragraph 4.1 that ‘SEA is not required’. The reason for this conclusion was as follows:

“The assessment in tables 3.1 and 3.2 indicates a range of possible minor positive and negative environmental effects as a result of the draft plan policies. No likely significant environmental effects have been identified.”

However, paragraph 4.2 stated that *“This is a preliminary view reached prior to consulting Natural England, the Environment Agency and Historic England.”*

- 2.37 Consultation was carried out with the statutory environmental bodies on the SEA Screening Report in July 2018. Natural England, the Environment Agency and Historic England all confirmed that they considered that from the information supplied, the HCR&S NP was unlikely to have significant environmental effects.
- 2.38 The HRA Screening Assessment assesses the likely significant effects of the Plan’s policies on four SPA/SAC sites and concluded in paragraph 7.1 that:

“The assessment undertaken in section 6 of this report concludes the draft NP is not likely to have a significant effect on a European site either alone or in combination with other plans or projects. This is a preliminary view reached prior to consulting Natural England.”

The 2018 report took account of the European Union Court of Justice Judgement in ‘People over Wind’ dated 12 April 2018.

- 2.39 In response to the consultation on the HRA Screening Assessment in July 2018, Natural England confirmed that they welcomed the assessment and stated that provided the Plan cannot be interpreted to be promoting allocations that have not been adopted in a higher level plan, they concurred with the conclusions of no significant effects. .
- 2.40 An update to the HRA screening was published in May 2019 following changes to habitats regulations through The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which came into force on 28 December 2018. The re-screening considers whether the Plan meets the Basic Conditions or breaches the requirements of Chapter 8 of Part 6 of the above Regulations.
- 2.41 The report reviewed the impact of the Plan on the South Pennine Moors SPA/SAC. It concluded in paragraph 4.1 that *“none of the policies in the Haworth, Cross Roads and Stanbury NP are likely to have a significant effect on the South Pennine Moors SPA/SAC, and therefore the NP does not give rise to, or include, any mitigation measures. Bearing in mind the conclusions of the HRA of the Bradford Core Strategy, it is concluded that there are no likely significant effects in combination with other plans or projects.”*
- 2.42 Paragraph 4.2 adds that *“The Council has considered the Bradford HRA Assessment and the contents of the NP and it is satisfied that measures intended to avoid or reduce the harmful effects of the plan have not been relied on in order to screen out the neighbourhood plan under the Conservation of Habitats and Species Regulations 2017 and that the draft plan meets the revised Basic Condition.”*
- 2.43 No further consultations were carried out with Natural England on the May 2019 update report. No concerns were raised about the HRA in their response to the Regulation 16 consultation.
- 2.44 I am satisfied that the SEA and HRA screening opinions have been carried out in accordance with the legal requirements.
- 2.45 The Basic Conditions Statement does not consider the impact of the Plan on Human Rights. I have asked the Qualifying Body to provide me with an assessment. They have stated that:
- “The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. In preparing the plan, the parish council has consistently taken steps to ensure that the views of all sections of the community including hard to reach groups have been canvassed and taken into account. This approach to consultation is summarised in Chapter 3 of the plan itself and fully detailed in the Consultation Statement.”*
- 2.46 From my review of the Consultation Statement, I have concluded that the HCR&SNP has had appropriate regard to Human Rights.

2.47 I am not aware of any other European Directives which apply to this particular Neighbourhood Plan and no representations at pre or post-submission stage have drawn any others to my attention. Taking all of the above into account, I am satisfied that the HCR&SNP is compatible with EU obligations and therefore with Basic Conditions Nos 4 and 5.

Consultation on the Neighbourhood Plan

2.48 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.

2.49 The key stages of consultation on the preparation of HCR&SNP were:

- Spring 2014 - an initial newsletter was sent to all homes alongside other publicity, leading to village consultation meetings and face-to-face/written engagement with a range of stakeholders.
- September 2015 – consultation was undertaken with the community, stakeholders and CBMDC on a 'Policy Intentions Document', including 3 supporting community drop-in events;
- February/March 2018 – informal sites consultation with landowners and the wider community, including 3 community drop-in events;
- October-December 2018 – statutory Regulation 14 consultation on the Pre- Submission Neighbourhood Plan, including 3 community drop-in events.

2.50 Consultation meetings were held in all three village centres so that every part of the community had an opportunity to be involved in the process. Banners, posters, press releases, social media and a specially designed website were the tools used to provide maximum exposure for the project. The parish council's newsletter that is delivered to every household in the parish also carried information and requests for information.

2.51 Approaches were also made to businesses, developers, landowners, environmental groups, heritage groups, churches/chapels, school heads and pupils and senior citizens. Feedback was received from 16 business representatives and 3 school heads.

2.52 The Policy Intentions Document was consulted on in spring 2015. It set out what the parish council was minded to include in the draft neighbourhood plan. The document was circulated with a questionnaire (which was also available on Survey Monkey) to all households, local businesses and CBMDC. Three supporting drop-in events were also held attended by 49 people. The questionnaire was completed by 286 respondent households.

2.53 Following a period of evidence gathering the first draft of the plan emerged in late 2017. This plan contained a number of policies and proposals relating to individual sites and buildings within the Neighbourhood Area. It was

considered necessary to carry out a targeted informal consultation with those with legal interests in these sites/buildings, as well as giving local people the opportunity to comment on these detailed proposals. The draft was also submitted at this stage to CBMDC for informal comment.

- 2.54 The Informal Sites Consultation ran from 19 February - 12 March 2018. Those with identified legal interests were consulted by e-mail, post or hand-delivered correspondence. Three 'drop-in' consultation events were held in the three villages from 6 – 8 March. These were attended by 17 people. The consultation attracted responses from 35 separate sources, together covering 40 of the 125 consultation sites and additionally putting forward 6 further sites for consideration.
- 2.55 The Pre-Submission consultation on the draft HCR&SNP took place for 6 weeks between 26 October and 7 December 2018 in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 and the Localism Act 2011. The Consultation Statement sets out details of the organisations consulted and the responses received. All households and businesses in the parish received notification of the consultation. A display of information was also made available. Forty four responses were received during the consultation period. They have been recorded in Appendix 11 of the Consultation Statement, together with the Qualifying Body's responses and consequential amendments to the Plan.
- 2.56 The Regulation 16 consultation on the Submission draft Plan was carried out by the CBMDC between 17 September and 29 October 2020. Ten responses were received.
- 2.57 Section 6 of the Consultation Statement reflects on the consultation process and identifies that more effort could have been given to garnering the views of the young, old and disabled. The section acknowledges that the interests of younger people are clearly identified under 'community actions' in the 'Community Facilities and Services' section of the Neighbourhood Plan and in Policy CF2 – Provision of New Community Facilities. Both the older population and disabled interests were felt to be already well-catered for and their facilities clearly protected through the provisions of Policy CF1.
- 2.58 It is clear from the evidence presented to me in the Consultation Statement, that extensive consultation has been carried out during the preparation of the HCR&SNP.
- 2.59 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14, 15 and 16 in the Neighbourhood Planning (General) Regulations 2012.
- 2.60 This report is the outcome of my examination of the Submission Draft Version of the HCR&SNP. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions. My report makes recommendations based on my findings on whether the Plan

meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. If the plan receives the support of over 50% of those voting then the Plan will be made following approval by the City of Bradford Metropolitan District Council.

3.0 Neighbourhood Plan – As a whole

- 3.1 The Neighbourhood Plan is considered against the Basic Conditions in this section of the Report following the structure and headings in the Plan. Given the findings in Section 2 above that the plan as a whole is compliant with Basic Conditions No 4 (EU obligations) and other prescribed conditions, this section largely focuses on Basic Conditions No 1 (Having regard to National Policy), No 2 (Contributing to the achievement of Sustainable Development) and No 3 (General conformity with strategic policies of the Development Plan).
- 3.2 Where modifications are recommended, they are presented and clearly marked as such and highlighted in bold print, with any proposed new wording in italics.
- 3.3 Basic Condition 1 requires that the examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State. Before considering the policies individually, I have considered whether the plan as a whole has had regard to national planning policies and supports the delivery of sustainable development.
- 3.4 The PPG states that “*a policy should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area*”. I will consider this requirement as I examine each policy.
- 3.5 The community is to be congratulated on the amount and quality of the work that they have undertaken in identifying and assessing the local heritage assets. My recommendations are made to ensure that the relevant policies and evidence are clearly presented so that they can be applied consistently by decision makers.
- 3.6 The Plan is on the whole clearly presented with policies addressing the built heritage, green environment, community facilities housing, employment, tourism and highways and travel. The policies are clearly distinguishable from the supporting text by surrounding coloured boxes. I make a number of recommendations to improve the clarity of the wording of the policies and their justifications.

- 3.7 The Plan contains 5 Maps and a Policies Map. There are maps of views in the conservation areas in Appendix 1. The viewpoints on the Stanbury map are unnumbered. They should be numbered to correspond to the subsequent photographs.
- 3.8 The non designated heritage assets and community facilities are shown on the Policies Map with coloured circles. Decision makers will find it difficult to determine the precise location of the properties and their site boundaries from this map. Location maps showing the boundaries of the properties should be included in a new background evidence report on non designated heritage assets (expanded from Appendix 3) and Appendix 7 to show the boundary of the properties identified.
- 3.9 The key to the Policies Map includes a heading “Non Neighbourhood Plan Designations” and lists the policies addressing the conservation areas, the potential housing sites and public car parks. These relate to area specific policies in the plan and it is suggested that the map would be clearer by deleting this heading and including the policy locations under topic headings of Built Heritage, Housing and Highways and Travel as appropriate.
- 3.10 The shading colour on the key to the Policies Map for the South Pennines SPA/SAC should be adjusted to match that on the map.
- 3.11 The Plan includes eleven Appendices which contain a considerable amount of information usually contained in background evidence reports to support the designations in the plan. I have recommended under recommendation 8 that Appendix 3 should be expanded and presented as a separate evidence report. When the plan is finalised, the Qualifying Body may wish to consider whether to place the evidence contained in the other Appendices in separate background evidence reports in order to ensure that the HR&SNP is focused on the policies. The maps of views from Appendix 1 should be included within the Plan.
- 3.12 It is suggested that criteria in policies and paragraphs in the justification should be numbered for ease of reference by plan users. Ensure punctuation of criteria is correct by placing the word “and” at the end of the penultimate criterion where all criteria are to be applied

Recommendation 2: Improve the mapping of the Plan by:

Number the viewpoints on the Stanbury map in Appendix 1 of the Plan to correspond to the subsequent photographs. Place the maps of views within the text of the Plan itself.

Ensure that the Non-Designated Heritage Assets are shown in numeric order within each category in the key to the Policies Map and the assessment report. (See Recommendation 8)

Delete the heading “Non Neighbourhood Plan Designations” from the key to the Policies Map. Place the notation under topic headings of Built Heritage, Housing and Highways and Travel.

Ensure the colouring in the key for the South Pennines SPA/SAC is consistent with that on the map.

Prepare a background evidence report for the Non Designated Heritage Assets to include the assessment details currently in Appendix 3 and include site location maps showing the boundaries of the properties designated and buildings referred to.

The Neighbourhood Plan

Introduction - Strategic Context

- 3.13 The introductory sections of the Plan set out a concise introduction to the plan area and the process of plan preparation. However, in view of the decision not to allocate housing sites in the Plan, but to set out matters to be taken into account should any of the four potential sites be selected for allocation in the emerging Bradford Site Allocations Plan, it would be helpful to plan users to set out the context for this by including a paragraph about the strategic framework and timescales for progress. CBMDC has supplied the text included in the recommendation.

Recommendation 3: Include a new section in the Introductory section of the Plan to explain the Strategic Planning Context for the Plan and the timescales for preparing the emerging Core Strategy Partial Review and Allocations DPD. Explain the status of the villages in the settlement hierarchy and the level of growth anticipated in the strategic plan to provide the context for the housing and employment policies in the HCR&SNP. Explain how it is intended that the requirements set out in Policies H1 – H4 are to be taken forward.:

“The adopted local plan for the area comprises

- *“the Bradford Core Strategy (CS) adopted in 2017 which sets out the broad scale and distribution of growth as well as policies to protect and enhance the natural and built environment, and guide/manage development across Bradford district for the period 2011 to 2030; and*
- *“the saved policies of the Replacement Unitary Development Plan (RUDP), adopted in 2005 which includes a number of policies that are relevant to the neighbourhood plan, including the defined Green Belt boundaries.*

“CBMDC is currently undertaking a partial review of its Core Strategy. This review is due to various changes to national planning policy and

local circumstances, and covers several subjects including a proposed new plan period (2020 to 2037), revised housing and employment land requirements and spatial distribution as well as various environment and transport policies. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft being published in 2021.

“Work is also on-going to prepare an Allocations DPD that will identify sites to meet the requirements of the Core Strategy Partial Review. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.”

“Strategic Planning Context for the Neighbourhood Plan - Level of Growth & Development

“For spatial planning purposes, CBMDC has split its area into four sub-areas (City of Bradford; Airedale; South Pennine Towns & Villages; and Wharfedale). The neighbourhood plan area is situated within the South Pennine Towns & Villages sub-area.

“The settlement hierarchy is defined in Core Strategy Policy SC4. Under this policy, Haworth is classed as a Local Service Centre, where the emphasis will be on a smaller scale of development comprising both market and affordable housing, together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions. Cross Roads is not specifically referred to as a separate settlement within the hierarchy. Figure SS2 within the Core Strategy shows the extent of Haworth and Cross Roads.

“Stanbury is classed under saved RUPD policy K/GB3.5 as being washed over by the Green Belt. It is not specifically referred to in the Core Strategy settlement hierarchy.

“Under Core Strategy Policies PN1 and HO3, Haworth will see the development of 400 homes over the adopted plan period (2011 to 2030). Within the Core Strategy Partial Review, it is proposed to reduce this requirement to 275 dwellings over the revised plan period (2020 to 2037). The sites to accommodate this growth will be identified in the emerging Allocations DPD. A specific level of employment development is not identified for the neighbourhood plan area.

“In terms of the retail hierarchy (Core Strategy Policy EC5), Main Street and Mill Hey in Haworth, and Cross Roads are identified as Local Centres. The policy states that these centres should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people’s day to day needs and minimise their need to travel.

“Development in Stanbury is restricted by saved RUDP Policy GB3 to infill development, provided that it falls within the infill boundary of the settlement, as defined on the Proposal Map, fills a small gap in a small group of buildings and is related to the scale of the settlement and does not adversely affect the character of the settlement or its surroundings. Also it should not result in the loss of open space which is important to the character, visual amenity and local identity of the settlement. Proposals for the extension of the settlement will not be permitted.

“Implementation of Policies H1 to H4

“The policies, as drafted, leave any formal designation/allocation of these sites to the Local Plan Allocations DPD which CBMDC is in the process of preparing. Work is underway on assessing the suitability of all sites within the Strategic Housing Land Availability Assessment (SHLAA), including those listed in Policies H1 to H4 of the Haworth, Cross Roads & Stanbury Neighbourhood Plan, using an agreed site selection methodology. The results of this work, together with the evidence base, Sustainability Appraisal and Habitat Regulations Assessment will inform which sites are identified in the Preferred Options version of the Allocations DPD, due for publication later in 2020.

“Should all or any of these sites be allocated in the Allocations DPD, it would be expected that the policy considerations set out in the neighbourhood plan Policies H1 to H4 will be used in determining planning applications on them.

“It should be noted the Ebor Mills site (Policy H4) is the subject of a pending planning application (Application Ref: 19/04426/MAF). It is for the conversion and refurbishment of Ebor Mills into 14 dwellings, construction of 24 new dwellings within the curtilage of the site, landscaping, biodiversity and environmental enhancements, highway and footway improvements to Ebor Lane and demolition of the weaving sheds and partial demolition and reconstruction of the boiler house. An application for Listed Building Consent (Application Ref: 19/04425/LBC) is also pending.”

Vision and Aims

- 3.14 The Vision and Aims have been developed and tested through community consultation. There are ten aims which are linked to relevant policies in the introductions to each section of the Plan.

The Policies

Policy BHDD1: Haworth Conservation Area – Development and Design

- 3.15 The policy sets out 12 design principles to seek to ensure that development in the Haworth Conservation Area reflects the distinctive local characteristics of the conservation area. The policy seeks to build on Core Strategy Policy EN3 which sets out the principles for conserving the historic environment and Policy DS3 which sets out design principles to encourage a strong sense of place in new development.
- 3.16 The justification to the policy refers to the Haworth Conservation Area Appraisal (HCAA) which was approved in 2007 and notes that it is out of date and a review of this document is overdue. Unless there are matters in the CAA that are inaccurate or incorrect, it is considered that this is not helpful to understanding the application of the policy and it is recommended that the sentence is deleted and a statement included noting that a review is due. It is noted that the views and vistas referred to in bullet point two are those identified in the HCAA. There is a Community Action to seek a review of the HCAA.
- 3.17 The second paragraph on page 17 refers to the conservation area designation setting “a standard of development in the area”. It is considered that this is not a correct interpretation of the purpose for designating a conservation area that it is “*an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*”. NPPF paragraph 185 states that “*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.*” A revision to the wording of this paragraph is recommended.
- 3.18 The first paragraph of the policy refers to the bullet points in the policy as “objectives”, however the points are worded as design principles. I am recommending the replacement of the word “objectives” with “design principles”. Other minor revisions are recommended to improve the clarity of the wording of the policy.
- 3.19 A representation has been received concerning bullet point two that “*development must maintain and respect the significant views and vistas, into, out of and through the conservation area*”. Appendix 1 shows 54 views in Haworth and 26 in Stanbury which have been derived from the Conservation Area Appraisals. Photographs and brief descriptions of the views are included in the Appendix. Most of the views are along the streets in the conservation areas or of particular buildings or locations. No attempt has been made to identify the “significant” views, that is those that are particularly outstanding or to explain why these views are important. In the circumstances, I am recommending that the views should not be described as significant and that the principle should be revised to ask developers to show the impact that their proposals would have on any identified views.

- 3.20 Bullet point 4 refers to the use of materials that “reflect the interest of the area”. I have asked the Qualifying Body to explain their intentions with this wording and how it should be interpreted by users of the Plan. They have explained that it is the “architectural and/or historic interest” of the area. To improve the clarity of the wording of the policy I have recommended the inclusion of the additional wording.
- 3.21 Bullet points 2, 3, 10, 11 and 12 are set out as requirements, whereas the other points include some flexibility. It is recommended that those points that are worded as requirements are reviewed and a degree of flexibility is introduced, where appropriate.
- 3.22 Bullet points 9 and 10 set out brief guidance on shopfronts. It would be helpful to plan users to made reference to the Council’s Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs which provide more detailed guidance on the design and retention of shop fronts in historic areas. The reinstatement of original features may not be possible if they have been lost and revision to the wording of point 9 is recommended.
- 3.23 The penultimate paragraph of the policy on modern architectural design is poorly worded and a revision is recommended.

Recommendation 4: Revise Policy BHDD1 as follows:

Revise the first paragraph of the policy to read: “..... Policies Map, *development including*local characteristics and *have regard to the following design principles:*”.

Revise the second bullet point to read: “*The need to maintain and respect the views and vistas into, out of, and through the conservation area shown on the maps in Appendix 1 and demonstrate the impact of their proposal on any views.*”

Revise bullet point 3 to read: “Reflect, *where possible,*”

Revise bullet point 4 to read: “...that reflect the *architectural and/or historic* interest of the area.....”

Revise bullet point 9 to read: “....the reinstatement of traditional features *of a similar design to the original* should be.....”

Revise bullet point 10 to read: “*Retain* traditional shopfronts; any new or replacement shopfronts *reflecting*.....”

Revise bullet point 11 to read: “*Retain* important trees.....”

Revise bullet point 12 to read: “*Retain* key open spaces.....”

Revise the penultimate paragraph of the policy to read: “....respects the distinctiveness of the conservation area.”

Replace the fourth sentence from the first paragraph on page 17: “This appraisal however is now out of date.....development” with “A review of this appraisal is due.”

Revise the second paragraph on page 17 to read: “*The designation of the conservation area recognises its historic and architectural importance. New development proposals within or adjacent to it should be designed to be sympathetic to the area’s special character and avoid the destruction of....*”

Add a new paragraph in the justification: “*The City of Bradford MDC Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs set out detailed guidance on the design of shopfronts in historic areas.*”

Policy BHDD2: Stanbury Conservation Area – Development and Design

- 3.24 The policy sets out development and design principles to be applied to the Stanbury Conservation Area. However, the policy has identical wording to Policy BHDD1. In the circumstances it is recommended that the policies are amalgamated and retitled. The supporting text should be retained for each area.

Recommendation 5: Delete Policy BHDD2

Retitle Policy BHDD1 as “Haworth and Stanbury Conservation Areas – Development and Design”.

Replace the fourth sentence of the second paragraph on page 21: “As with Haworth, this appraisal is now out of date.....development.” with “A review of this appraisal is due.”

Correct the typographical error in the 6th bullet point on page 21 to “dependent”.

Amalgamate the duplicated text on pages 17 and 21.

Policy BHDD3: Local Heritage Areas

- 3.25 The policy identifies four areas as Local Heritage Areas. The justification to the policy explains that the purpose of the policy is to provide interim guidance on development and design in the areas whilst the Parish Council pursues their designation as conservation areas by CBMDC. Appendix 2 sets out the community’s assessment of the areas taking account of guidance from Historic England. I make no comment on the suitability or otherwise of

these areas as candidate conservation areas; this will be a matter for the CBMDC to determine.

- 3.26 Historic England’s guidance advises that local communities working on neighbourhood plans may consider identifying areas which have special interest and character or appearance possibly meriting consideration for designation by the local planning authority.
- 3.27 NPPF paragraph 185 states that “*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment.*” Historic England’s guidance suggests that a ‘positive strategy’ could include specific, more detailed, policies for individual conservation areas, possibly alongside design policies. These non strategic policies can also be included in neighbourhood plans.
- 3.28 NPPF paragraph 200 states that “*Local planning authorities should look for opportunities for new development within Conservation Areasand within the setting of heritage assets, to enhance or better reveal their significance.*”
“*Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably*”.
- 3.29 In addition to the designation of the four areas, Policy BHDD3 states that the sympathetic enhancement of the areas will be encouraged. In order to reflect national guidance on the historic environment, it is recommended that the policy should also refer to their “conservation” and “to better reveal their significance”.
- 3.30 Policies BHDD4 – 7 set out design policies for each of the four local heritage areas. It would be helpful to plan users to add reference in Policy BHDD3 to the design principles set out in the subsequent policies as revised.

Recommendation 6: Revise Policy BHDD3 as follows:

Revise the final line of the policy to read: “The *conservation* and *sympathetic enhancement* of these areas *to better reveal their significance* will be encouraged *in accordance with the design principles set out in Policy BHDDX.*”

Policy BHDD4: Haworth Brow Local Heritage Area

Policy BHDD5: Haworth Coldshaw Local Heritage Area

Policy BHDD6: Cross Roads Centre Local Heritage Area

Policy BHDD7: Murgatroyd Local Heritage Area

- 3.31 These policies set out the design principles that will be applied to the consideration of development proposals in the local heritage areas. All four

policies contain the same principles with some additional ones that are area specific. To reduce the amount of repetition in the plan it is recommended that the policies should be amalgamated setting out the general principles that are applicable to all areas and those which are area specific.

Recommendation 7: Amalgamate Policies BHDD4 – BHDD7 and entitle the new policy Local Heritage Areas – Development and Design.

Policy BHDD8: Protection and Enhancement of Non-Designated Heritage Assets

- 3.32 The policy proposes the designation of 68 properties as Non Designated Heritage Assets. The justification to the policy states that they have been assessed in accordance with Historic England’s Local Heritage Listing Guidance by the Steering Group and a summary of the features of interest and significance as well as the reasons for designation is included in Appendix 3 of the Plan. These properties are in addition to the “key unlisted buildings” that have been identified in the Conservation Area Appraisals.
- 3.33 NPPF paragraph 197 states that *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*
- 3.34 The PPG on Historic Environment (040 Reference ID: 18a-040-20190723) states that neighbourhood plans may identify non-designated heritage assets. It goes on to say that *“it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence. Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets. It is important that all non-designated heritage assets are clearly identified as such.”*
- 3.35 Policy EN3 (F) of the Core Strategy requires proposals to protect or enhance the heritage significance and setting of locally identified non designated heritage assets.
- 3.36 The properties are shown on the Policies Map by coloured dots and it is difficult to identify the precise location of each property and its curtilage. To ensure that the policy can be applied consistently by decision makers it is recommended that a more detailed assessment report is prepared by expanding Appendix 3 to include full details of the process of identifying and assessing the properties: how the properties were identified, the criteria used

for assessment, plans showing the location of the property and its curtilage. Photographs would also be helpful. The properties that are not to be designated should be removed from the report.

- 3.37 The Qualifying Body has confirmed that this is acceptable to them. Most of the owners and occupiers were consulted on the proposed designation at the Regulation 14 stage. As ownerships may have changed since then, it would be helpful to notify them all of the proposed designation.
- 3.38 CBMDC has confirmed that they do not have a process in place for identifying or designating non designated heritage assets.
- 3.39 CBMDC has commented that land at Ebor Mills has been designated as a Local Wildlife Site and this should be recognised in the assessment. I agree that this would be helpful.
- 3.40 I am making recommendations to modify the wording of the policy to better reflect the national guidance and to improve the assessment report to include the assessment criteria and clear details of the location of each property to ensure that the assessment report presents sound evidence.
- 3.41 I make no comments on whether or not the properties are worthy of designation as non-designated heritage assets.
- 3.42 The final paragraph of Policy BHDD8 states that the “sympathetic enhancement will be encouraged”. It is recommended that the policy should also refer to the “conservation” of the property to better reflect national and strategic policy and that the paragraph should be included in the opening paragraph of the policy.

Recommendation 8: Revise Policy BHDD8 as follows:

Revise the first paragraph and amalgamate with the last paragraph of the policy to read “.....Policies Map and described in the Non Designated Heritage Asset Assessment Report, will be taken.....such an asset. A balanced judgement will be made having regard to the scale of any harm or loss caused by any development and the asset's significance. Their conservation and sympathetic enhancement will be supported.”

Prepare a more detailed assessment report of the non-designated heritage assets including the assessment contained in Appendix 3 and include full details of the process of identifying and the criteria for assessing the properties, plans showing the location of each property and its curtilage. Photographs would also be helpful.

Revise the assessment on the former Mill pond at Ebor Mills to refer to the Local Wildlife Site designation.

Policy GE1: Green Infrastructure

- 3.43 The policy identifies the area and boundaries of four areas already identified in strategic assessments as green infrastructure. Core Strategy Policy SC6 sets out the principles for the selection of district level Green Infrastructure and notes that further work is required to identify the boundaries of areas.
- 3.44 Appendix 4 of the HCR&SNP sets out the considerations that have been taken into account in the assessment and defining the boundaries of the four Green Infrastructure areas.
- 3.45 The wording of the policy requirements in Policy GE1 refers to the areas being protected from development which would sever it or harm its operation as part of a multifunctional green space. It is considered that this wording is imprecise and lacks clarity about what may or may not be acceptable. It adds nothing to the strategic policies and it is recommended that these should be referred to in the policy.
- 3.46 The second paragraph of the justification on page 31 is negatively worded and a revision is recommended to improve this.
- 3.47 The third paragraph on page 31 refers to the 2009 “Yorkshire and Humber Green Infrastructure Mapping Project” which CBMDC has noted is out of date. This should be updated to reference the Bradford Ecological Habitat Network.
- 3.48 CBMDC has commented that there are some references in the plan to Bradford Wildlife Areas and that the following sites have been designated as Local Wildlife Sites.
- Brow Moor with Sugden End
 - Penistone Hill
 - Airedale Spring Mill Pond (listed in the draft plan as Local Green Space site 127)
 - Baden Street, Haworth (listed in the draft plan as Local Green Space site 126, Policy H3 and supporting text to Policy GE5).
- 3.49 I agree with the Council’s observations that this information should be updated throughout the plan, the Local Green Space Assessment and the SEA, to acknowledge the up to date terminology and the increased importance of Local Wildlife Sites over Sites of Ecological & Geological Importance and Bradford Wildlife Areas, and the citation documents appended.
- 3.50 The final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure should be amended to refer to the Local Wildlife Sites and they should be shown as such on the Policies Map.

Recommendation 9: Revise Policy GE1 as follows:

Add the following to the end of the final paragraph of the policy: “...in accordance with the Core Strategy policies.”

Revise the final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure (page 30) to read: “Further designated sites of regional or local interest include *the four Local Wildlife Sites (LWS) of Airedale Spring Mill Pond, Baden Street (Haworth), Brow Moor with Sugden End, and Penistone Hill. The last of these is also a Country Park*”. These sites should be identified on the Policies Map.

Revise the second paragraph of the justification on page 31 to read: “*The Core Strategy sets out a comprehensive suite of policies on national and strategic green infrastructure. The neighbourhood plan can build on this by.....*”

Update the third paragraph on page 31 to refer to the Bradford Ecological Habitat Network and the sites identified.

Update the Plan, SEA and background documents to refer to the four following sites as Local Wildlife Sites and to consider and acknowledge the potential conflicts that may occur with other designations and possible proposals on the sites.

- **Brow Moor with Sugden End**
- **Penistone Hill**
- **Airedale Spring Mill Pond**
- **Baden Street, Haworth.**

Policy GE2: Local Green Space

- 3.51 The policy proposes the designation of 23 sites as Local Green Spaces. The assessment of the sites is contained in Appendix 5 of the Plan.
- 3.52 CBMDC has commented that a number of the sites are protected under other designations. The NPPG advises that where land is already protected by Green Belt policy, (or other designation) then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
- 3.53 NPPF paragraph 101 states that “*Policies for managing development within a Local Green Space should be consistent with those for Green Belts*”. It is considered that there is no planning policy benefit in designating sites in the Green Belt as LGS. However, there may be value to the community of a comprehensive assessment of all the sites that are important to the

community for their recreational value or landscape importance. The LPA has confirmed that the following sites are within the Green Belt:

- LGS 2: Haworth Cricket Pitch (also identified under saved RUDP policy OS3 as a playing field)
- LGS 3: Mytholmes Recreation Ground
- LGS 4: Longacres Park (Massey Fields Play Area)
- LGS 8: Stanbury Playground
- LGS 13: Stanbury Cemetery
- LGS 126: Baden Street Woodland (also designated as Local Wildlife Site)
- LGS 139: West Lane Methodist Chapel Burial Ground
- LGS 160: Brow Top Road.

- 3.54 Sites may also be identified for their nature conservation or historic value, whereas the designation of a site as a LGS recognises the importance of the sites to the local community. I am satisfied that the sites proposed satisfy the criteria for designation as LGS in NPPF paragraph 100.
- 3.55 CBMDC has highlighted some inaccuracies in the numbering of the sites in Policy GE2, Appendix 5 and the Policies Map at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds.
- 3.56 CBMDC has commented that site LGS160 at Brow Top Hill has been identified as a site in the SHLAA (2015). I see no conflict with this as the site was assessed as “Not currently available or unachievable” in the SHLAA and is not being taken forward. The local community has assessed the value of the site as a LGS under the NPPF guidance and I am satisfied that it meets the criteria to be designated. The proposed LGS designation should be taken into account when reviewing the SHLAA.
- 3.57 CBMDC has commented that as site LGS137 has been deleted from the Plan reference to it should be deleted from the LGS assessment for site LGS133. I agree that this should be carried out to correct the assessment for this site.
- 3.58 The NPPF confirms that “*Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.*” It is not appropriate for policies in neighbourhood plan to state whether development should or should not be permitted. Modifications are recommended to avoid the use of this phrase. Otherwise subject to this modification, I am satisfied that the policy wording accords with paragraph 101 of the NPPF.

Recommendation 10: Revise Policy GE2 as follows:

**Revise the second sentence of the first paragraph of the policy to read:
“Development on these areas will not be *supported* except in very special circumstances that justify the development.”**

Correct the numbering of the sites at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds in the Policy, Appendix 5 and the Policies Map.

Delete “(NB proposed LGS 137”) from the LGS assessment for site LGS133.

Policy GE3: Local Green Space Enhancement

- 3.59 The policy encourages the enhancement of LGS where improvement is needed. CBMDC has suggested that the policy could be amalgamated with Policy GE2.
- 3.60 I consider that the wording of the policy as proposed is vague and could be misinterpreted. I have recommended a revision to the wording of the policy to improve its clarity and recommend that it be added to the end of Policy GE2 and Policy GE3 should then be deleted.

Recommendation 11: Revise the wording of Policy GE3 to read:

“The enhancement of a designated Local Green Space to improve the quality or usability of the open space will be supported.”

Amalgamate the policy with Policy GE2 by adding the above paragraph to the end of Policy GE2 and deleting Policy GE3. Amalgamate the justifications to the policies.

Policy GE4: Provision of New Green Space

- 3.61 Deficiencies in four types of open space have been identified in background studies. The policy encourages appropriate development that would help to deliver new open space to meet these deficiencies. It is not clear what types of development will be encouraged or how they will deliver open space. A recommendation is made to improve the clarity of the policy.
- 3.62 The second paragraph of the policy uses the phrase “particularly encourages”. To improve the clarity of the part of the policy it is recommended that this should be revised to “supports”.

Recommendation 12: Revise Policy GE4 as follows:

Revise the first paragraph of the policy to read: “The provision of new open space in the following categories will be *supported*.”

Revise the second paragraph of the policy to read: “.....north Haworth *will be supported*.”

Policy GE5: Land at Sugden Reservoir

- 3.63 The policy proposes new open space at Sugden Reservoir for water based biodiversity/nature conservation with associated public access, angling and car parking.
- 3.64 CBMDC has noted that the area is designated as a Local Wildlife Site and it is important to balance the policy of additional public access with the enhanced status of Local Wildlife Site.
- 3.65 The second paragraph on page 35 notes that the area is part of a candidate Local Wildlife Site. This should be updated to reflect the designation of the site. It would be helpful to plan users to emphasise the importance of balancing the additional public access with the safeguarding of the Local Wildlife Site. The third criterion of the policy requires an ecological assessment and agreement on action and therefore provides safeguards in this respect.
- 3.66 All four criteria are to be applied in considering proposals relating to this development. The word “and” should be added at the end of the penultimate criterion.

Recommendation 13: Revise Policy GE5 as follows:

Add the word “and” at the end of the penultimate criterion in Policy GE5.

Revise the last sentence of the 2nd paragraph on page 35 to read: “....Sugden End Local Wildlife Site, details of which are included in Appendix 6.”

Policy CF1: Protection and Enhancement of Community Facilities

- 3.67 The policy seeks to resist development that would result in the loss of a community facility unless it were to be replaced or it was demonstrated that there was no longer a need for the facility or it was financially unviable. The policy is negatively worded. A modification is recommended to overcome this and to create a third bullet point on financial viability.
- 3.68 It would be helpful to explain in the justification to the policy how marketing and viability assessments are to be carried out and the evidence required to support applications that involve the loss of community facilities. Further guidance could be added on local requirements and best practice on this subject if this has been published by CBMDC.
- 3.69 The facilities are shown on the Policies Map with numbered circles. Appendix 7 includes an unnumbered list of the facilities. It is recommended that the list in Appendix 7 is numbered to correspond to the Policies Map. Site locations

plans should be included in the Appendix so that the properties and their boundaries can be readily identified.

- 3.70 A representation has questioned whether pubs are community facilities as they are profit making businesses. There are 17 pubs, inns and social clubs listed in Appendix 7. I have some concerns about whether it will be feasible to safeguard all the public houses and thus whether the policy will be deliverable. However, the Qualifying Body has pointed out that the plan covers a number of settlements and each has its own facilities that are important and contribute to the social life of each community.

Recommendation 14: Revise Policy CF1 as follows:

Revise the first paragraph of the policy to read: “....Policies Map, will only be supported, where:”

Divide the second bullet point into two and create a third bullet point: “it is financially unviable.”

Revise the second paragraph of the policy to read: “The *improvement of these facilities for the benefit of Haworth, Cross Roads or Stanbury communities will be supported.*”

Add the following after the third paragraph on page 37:

“Where proposals involve the loss of a community facility, developers will be expected to demonstrate that the facility, and its continued use, is no longer economically viable, and that all reasonable efforts have been made to market the site/facility for its current use without success.”

In Appendix 7 add the numbers to the Community Facilities as shown on the Policies Map. Include site locations plans in the Appendix.

Policy CF2: Provision of New Community Facilities

- 3.71 The policy identifies the type of new community and recreational facilities that have been highlighted through consultations. The justification notes that CBMDC’s Local Infrastructure Plan recognises the need for a new multifunction community hub in Haworth.
- 3.72 The policy states that the particular facilities will be encouraged. It is recommended that this be revised to “supported” to improve the clarity of the policy.

Recommendation 15: Revise Policy CF2as follows:

Revise the first paragraph of the policy to read: “...will be *supported*, in particular:”

Policy CF3: High Speed Broadband

- 3.73 The policy supports the provision of superfast broadband. I make no comments on the policy.

Housing Sites – Development Requirements and Aspirations

- 3.74 Bradford Core Strategy Policy HO3 identifies Haworth as a Local Service Centre and sets a target of 400 dwellings to be completed in Haworth from 2011 to 2030. It is noted that there is a proposal in the Partial Review of the Core Strategy that the housing requirement should be reduced to 275 over the revised period 2020 – 2037. The Allocations DPD is in the early stages of preparation and will allocate housing sites in the area.
- 3.75 The PPG encourages neighbourhood planning bodies to plan to meet their housing requirement, and where possible to exceed it. However, neighbourhood plans are not obliged to contain policies addressing all types of development.
- 3.76 The plan makers have chosen not to allocate specific sites for housing development in the HCR&SNP. They have instead chosen to set out design and layout principles for three sites that have been safeguarded or previously identified in the RUDP which could provide for a minimum of 128 dwellings and a further brownfield opportunity site of the former mill buildings. Sites H1 to H3 are shown in the SHLAA as deliverable and developable and site H4 is shown as developable.
- 3.77 It is considered that in principle this approach accords with national planning guidance. However, paragraph 34 of the NPPF states that where plans set out the contributions expected from development, such policies should not undermine the deliverability of the plan.
- 3.78 A representation has been made that highlights potential issues of deliverability on all four sites and proposes that Policy H5 should be used in considering development on all housing sites.
- 3.79 The Qualifying Body has confirmed that they have not undertaken any masterplanning or other assessment of the potential housing sites to consider whether the requirements are deliverable and how they would impact on the viability of the sites as required by NPPF para 34.

- 3.80 The criteria under each policy are termed “requirements” however, they are in effect “design principles”. They address matters such as trees, biodiversity, heritage, flood risk, access, footpaths and specialist housing. Until further work is undertaken on the masterplanning and possible layout of the sites it will not be possible to determine whether all the criteria are deliverable or whether any would unduly affect the viability of the development of the site.
- 3.81 It is therefore recommended that some flexibility should be introduced into the wording of the policy. The criteria should be referred to as “design principles” and a sentence should be added at the end of each policy to require developers to demonstrate their reasons for non-compliance with any of the principles.
- 3.82 The Qualifying Body has confirmed that it is intended that all the criteria should be satisfied by development proposals. It is therefore recommended that the word “and” is added to the end of the penultimate criterion.

Policy H1: Worsted Road, Cross Roads

- 3.83 It is considered that criterion 4 on specialist housing is imprecise. It may be helpful to plan users to include a reference to the strategic Policy HO8 on the subject.

Policy H2: Lees Lane North, Cross Roads

- 3.84 The SHLAA refers to a Tree Preservation Order on the site which should be referred in the first criteria.

Policy H3: Baden Street, Haworth

- 3.85 The site has extensive tree cover protected by a Tree Preservation Order. The site has also been designated as a Local Wildlife Site and reference to it being a Bradford Wildlife Area should be revised. It will however be for the Allocations DPD to determine whether the development of housing on the site is compatible with the tree and wildlife designations.
- 3.86 The Plan highlights concerns with the lack of off-street parking in the adjacent housing area resulting in a narrow access road. However, the suitability of the local road network to serve any development on the site has not been assessed.
- 3.87 Criteria 6 and Policy HT4 proposes a local parking standard higher than that in the Core Strategy Policy TR2 and Appendix 4. The Council has commented that it would be helpful to refer to section 2.15 on parking in their “Homes and Neighbourhoods Design Guide 2020”. I consider that this guidance should enable developers to provide a suitable standard of parking on this site. I am not satisfied that satisfactory evidence has been provided to justify setting a local parking standard solely for this site.

Policy H4: Ebor Mills, Ebor Lane, Haworth

- 3.88 A representation has been made highlighting issues concerning the development of this site for housing: the loss of greenspace, the maintenance of the nature conservation interests on the site, flood risk and access. All these matters are addressed in the criteria of the policy and it will be for the Allocations DPD or the determination of a planning application to determine whether the development of housing on the site is compatible with the nature conservation interest and flood risk and whether a satisfactory access can be achieved.
- 3.89 The first paragraph of the policy is an explanation and not a policy requirement. It should be deleted.
- 3.90 The paragraph in the justification under Policy H4 headed “Development on Allocated Housing Sites” states that “*This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided.*” It is considered that this statement is incorrect and should be deleted. Under national planning guidance, the plan makers did have the option to allocate housing sites in the neighbourhood plan but they have chosen not to. In addition, the Parish Council and the community have the opportunity to comment on the site options during the preparation of the Allocations DPD.

Recommendation 16: Revise Policies H1 to H4 as follows:

Revise the first paragraph of each policy to read: “..... Policies Map, should be laid out and designed in accordance with the following design principles:”

Add the word “and” to the end of the penultimate criterion in Policies H1 – H4.

Add the following at the end of each policy: “Where it is not possible to satisfy any of the design principles, developers will be required to demonstrate the reasons for non-compliance in their Design and Access Statement.”

Add the following to the fourth bullet point in Policy H1: “in accordance with the strategic policy”.

Revise the first bullet point of Policy H2 to read: “Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5.”

Revise bullet points 3 and 4 of Policy H3 to read “Bradford Local Wildlife Site”.

Revise the sixth bullet point in Policy H3 to read: “Provision of off-road parking in accordance with, or in excess of, section 2.15 of the Bradford

Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.

Delete the first paragraph of Policy H4: “The site of Ebor Mills....new housing.”

**Add the following to the justification on page 42 before Policy H1:
“Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.”**

Delete “This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided” from the paragraph in the justification under Policy H4.

Policy H5: New Housing Development – Key Guiding Principles

- 3.91 The policy sets out the principles to be taken into account in considering all new housing development in the Plan area. The justification to the policy should make it explicit that the policy is applicable to both allocated and windfall sites.
- 3.92 The first three criteria seek “the avoidance of adverse effects”. It may not be possible to avoid all adverse effects and to improve the clarity of the policy and to ensure consistency with the NPPF, it is recommended that the wording is revised to “seek to avoid significant adverse effects” in criteria 1 and 2 and “unacceptable adverse effects” in criterion 3.
- 3.93 The second criterion on heritage assets should refer to the settings of these assets to accord with national policy.
- 3.94 A representation has been made to the fourth criterion that the timing of highway improvements will be agreed as part of the planning application and it may not always be feasible to carry them all out in advance. CBMDC has confirmed that the programme of highways works is normally set out as a planning condition and has proposed revisions to the wording of criterion 4 to reflect this.
- 3.95 Criteria 5 and 8 refer to “quick and easy access” being provided to public transport network and local community facilities. It is considered that this term is vague and imprecise. The Qualifying Body has confirmed that the criteria should be revised to refer to the Accessibility Standards set out in Appendix 3 of the Core Strategy.
- 3.96 Criterion 6 seeks to protect the rights of way network and cyclepaths. There is separate legislation on rights of way which includes provision for the diversion of routes, if necessary. I am therefore recommending that the criterion is revised to accord with the legislation and Core Strategy Policies TR3 and DS4.

- 3.97 Criterion 9 is vague and imprecise. A revision is proposed to ensure that adequate parking provision is made in accordance with the Council's parking standards. The Council has commented that it would be helpful to refer to section 2.15 on parking in their "Homes and Neighbourhoods Design Guide 2020" and to Core Strategy Policy TR2 and Appendix 4. I consider that this policy and guidance should enable developers to provide a suitable standard of parking.
- 3.98 There may be occasions where protected and unprotected trees may require felling as part of development proposals. A recommendation is made to include a degree of flexibility in this criterion.
- 3.99 A representation has been made that supports the use of an overarching policy to set out the principles of new development across the plan area and suggests that Policies H1 to H4 should be deleted as they pre-determine allocations ahead of the Allocations DPD.
- 3.100 Policy H5 sets out design principles applicable to all sites. I am satisfied that Policies H1 – H4 set out site specific requirements for the specified sites drawing on the general principles set out in Policy H5. Policies H1 – H4 are clearly worded so as not to pre-determine the allocation of the sites ahead of the Allocations DPD.

Recommendation 17: Revise Policy H5 as follows:

Revise the first and second criteria to read: "The avoidance of *significant* adverse impacts...."

Revise the third criterion to read: "The avoidance of *unacceptable* adverse impacts...."

Add "*and their settings*" at the end of the second criterion.

Revise criterion 4 to read: "*The programme of highway improvements shall be clearly set out in a planning condition before development commences on the site*".

Combine the fifth and eight criteria and revise to read: "*Accessibility to the public transport network and local community facilities, including educational and health facilities, should be in accordance with the Accessibility Standards set out in Appendix 3 of the Core Strategy;*"

Revise criterion 6 to read: "The protection of existing Public Rights of Way and cycle paths on the site, *where possible, and their integration into the development. Where this is not feasible, the diverted route should not be substantially less convenient for the public to use than the existing route.*"

Revise the ninth criterion to read: "*Adequate in-curtilage off street parking shall be provided in accordance with, or in excess of, the*

indicative standard of 1.5 spaces per dwelling for non-town/city centres (as set out in Core Strategy Policy TR2 and Appendix 4)."

Revise criterion 10 as follows: "Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5."

Add "and" at the end of the penultimate criterion.

Add the following to the justification on page 45 before Policy H5: "Policy H5 will be taken into account in considering all housing development whether on allocated or non-allocated sites. Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020."

Policy H6: New Housing Development on Non-Allocated Sites

- 3.101 The policy sets out three principles to be applied to considering housing development on non allocated or windfall sites. Development is considered to be acceptable in principle provided that the three principles are met:
1. Development is not on a site that is safeguarded or makes a valuable contribution to the environmental designations in the plan. I have concerns that this does not reflect strategic policy to direct development to sites within the settlement boundary of Haworth and Cross Roads and the exceptional reasons for development of dwellings in the countryside set out in the NPPF.
 2. The development does not exceed the capacity of the infrastructure in respect of transport, education and health. I have concerns about how this aspect of the policy is to be applied by decision makers particularly with small housing developments. CBMDC has provided me with an explanation of how infrastructure needs are addressed by the Council. It would be helpful to plan users to add additional text in the justification to explain how this aspect of the policy is to be applied. Reference may be included to relevant Council documents on the Community Infrastructure Levy.
 3. The third principle seeks to ensure that developments of 5 or more dwellings are in locations that accord with the Accessibility Standards which are set out in the Core Strategy Appendix 3. These standards provide guidance in the application of CS Policy PN1 used in the assessment and selection of sites to be allocated in the Local Plan. These are major development sites of 10 or more dwellings. The guidance sets out that housing development should be within 400 metres of a bus stop served by a half hourly service. Mitigation measures are to be provided as part of the development proposals if the standards cannot be satisfied.

- 3.102 The justification to the policy notes the relevant policies of the Core Strategy and the expectation that development should be focused in Local Service Centres such as Haworth. However, the policy wording does not make reference to the strategic locational principles or to national policy on the location of development in the countryside. I have recommended additional wording to improve the clarity of the policy in this respect.
- 3.103 CBMDC has suggested additional wording to reflect the requirements of strategic policies. That the development is compatible with the character of the settlement, in terms of scale, layout, design and massing as well as making the most appropriate use, where possible, of previously developed land. The development should also be well related to existing services and facilities.
- 3.104 It is considered that it would be helpful to plan users to include an additional paragraph in the justification to make reference to these matters as set out in the strategic design policies.
- 3.105 By their nature, windfall sites are opportunity sites for housing development. Whilst it may be advisable to prioritise sites with easy access to bus stops and community facilities, there may be reasons that a site outside the accessible locations may be acceptable such as to make good use of previously developed land or to convert a vacant building. It is considered that it would be unnecessarily restrictive to limit windfall housing development only to locations that satisfy the Accessibility Standards. A modification is proposed to revise the policy to set out a preference for these locations.
- 3.106 A representation has been received that states that windfall sites will be covered by the NPPF and the Core Strategy.

Recommendation 18: Revise Policy H6 as follows:

Revise the first paragraph of the policy to read: “....acceptable in principle *in locations within the settlement boundary of Haworth and Cross Roads and where the national and strategic policy exceptions for development in the countryside are satisfied, providing that:*”

Revise the third paragraph of the policy to read: “For developments of 5 or more dwellings, a *location which accords with the applicable Core Strategy Accessibility Standards will be preferred.*”

Add a new paragraph in the justification: “*The Core Strategy Accessibility Standards are set out in Appendix 3 of the Core Strategy.*” Further advice may also be included in the justification on the application of these Accessibility Standards to windfall housing development to assist plan users.

Add a new paragraph in the justification to explain how the capacity of infrastructure will be assessed and the mechanisms for delivering

improvements to infrastructure eg through Community Infrastructure Levy.

Add a new paragraph to the justification to make reference to relevant strategic design policies.

In the 3rd para on page 47, delete “unexpectedly proposed sites” and replace with “windfall sites”.

Policy H7: Housing Density

- 3.107 The policy proposes a net density in excess of 30 dwellings to the hectare with certain provisos. It is noted that much of the built up area in Haworth is at a density higher than 30 dwellings to the hectare. It is considered that this policy accords with national and strategic policies to minimise the loss of Green Belt / greenfield land by maximising densities on new development sites where appropriate.

Policy H8: Housing Mix

- 3.108 A Housing Needs Assessment has been undertaken to provide a fine grain assessment of the types, sizes and tenures of property needed by residents of the parish. The summary of the findings is included in the justification to the policy, although the final bullet point that “*there is a relatively small local need for social and affordable rented housing*” does not reflect the findings of the study which identified 49 households in need for such housing.
- 3.109 Core Strategy Policy HO8 provides the strategic policy on housing mix. The parish Housing Needs Assessment provides a snapshot of the need at 2017 and will assist developers and decision makers in determining the appropriate mix of housing in the parish for the immediate period (usually 5 years). The Plan should recognise that the Housing Needs Assessment will need to be reviewed and updated regularly.
- 3.110 I am concerned that the policy is not clearly worded and would be difficult for decision makers to apply consistently. The LPA and Qualifying Body have agreed to the revised policy wording. The justification should be revised to be consistent with the wording of the policy.

Recommendation 19: Revise Policy H8 as follows:

Amalgamate first four paragraphs of Policy H8 to read:

“Subject to the findings of the latest housing needs assessment, development of larger housing sites (of 0.4ha or above or 10 or more dwellings) will be expected to provide a mix of market and affordable housing of: two bullet points.”

“*The development of Build to Rent housing will also be encouraged.*”

“The development of sites consisting primarily of large dwellings (4 or more bedrooms) will not be supported.”

Final paragraph not changed.

Revise the first bullet point on page 49 of the justification to read “2-3” bedrooms.

Add a new bullet point on page 49 “*Supporting the provision of Build for Rent housing.*”

Employment and Tourism

- 3.111 The introduction to the section notes the Core Strategy policies and their support for sustainable economic growth in the area. The last sentence on page 51 is worded negatively and I have recommended revisions to it. Reference in this and the subsequent paragraph to “the parish council” should be amended to “the Plan”.
- 3.112 The plan seeks to support the local tourism economy by supporting the development of hotel and visitor accommodation.

Recommendation 20:

Replace the last two sentences on page 51 with: “*These policies will provide the framework for considering proposals for new employment development or the diversification of existing rural businesses in the plan area. No employment land allocations are proposed in the Plan.*”

Revise the second sentence of the first paragraph on page 52 to read: “...during consultation, and the *Plan supports the development of appropriate hotel and visitor accommodation within the Neighbourhood Area.*”

Policy E1: Hotel Development

- 3.113 The policy supports hotel development and sets out the criteria for considering proposals. Revisions are recommended to improve the clarity of the policy wording. The policy makes no reference to the design of the development or consideration of its impact on the conservation areas and I have therefore recommended the inclusion of a reference to Policy BHDD1.

Recommendation 21: Revise Policy E1 as follows:

Revise the first paragraph to read: “*Hotel development will be supported in the Plan area. Any such....*”

Revise the final bullet point to read: “*It should not have an unacceptable adverse impact on residential amenity, including noise and light intrusion.*”

Add a new bullet point: “*Where applicable, the development shall be laid out and designed taking into account the principles of Policy BHDD1.*”

Policy E2: Visitor Accommodation

- 3.114 The policy encourages the development and retention of locally based visitor accommodation subject to it respecting the important landscape and heritage designations.
- 3.115 Neighbourhood plan policies will be used in considering development proposals. They will not be applied to the retention of a particular use unless there are reasons to safeguard it. The Qualifying Body has suggested that their intention was that hotels should be safeguarded in the same way as community facilities under Policy CF1. However, the policy has not been worded in a way to achieve this. I am therefore recommending that reference to “retention” should be deleted.
- 3.116 It is not clear what “locally based” accommodation is. I am recommending that reference to “locally based” should be deleted.
- 3.117 It is considered that the final paragraph of the policy is vague and imprecise. It is acknowledged that Core Strategy Policy EC4(F) encourages the development of tourism and leisure based activities whilst “*having regard to accessibility and sustainable transport, local character and design*”. It is the role of neighbourhood plan policies to provide locally specific details to aid in the application of strategic policies. It is therefore recommended that the second paragraph should refer to the development being well designed and should take account of the principles set out in Policy BHDD1. It is not clear what factors are to be taken into account in having “regard to accessibility and sustainable transport” in considering development proposals so I am recommending that the terms should be deleted.

Recommendation 22: Revise Policy E2 to read:

***“The development of visitor accommodation will be supported where it respects the character of the local landscape of the South Pennines and conserves and enhances the heritage of Haworth and the conservation areas.*”**

“New accommodation should be well designed to reflect the built character of the area and have regard to the principles set out in Policy BHDD1 and relevant development plan policies.”

Delete the second paragraph of the policy.

Policy HT1: Haworth Centre Public Parking

- 3.118 The policy seeks to safeguard 11 public car parking areas which are shown on the Policies Map. Compensatory car parking provision within Haworth centre is “expected” should any development result in the loss. In view of the importance of the public car parks in serving the town centre and tourism locations and the likely impact of their loss, to improve the clarity of the policy it is recommended that this should be a requirement.
- 3.119 The car parks should be named and numbered in the policy as listed on the Policies Map key for consistency and clarity.
- 3.120 The second paragraph of the policy seeks to encourage appropriate development that provides additional centre car parking. It is considered that this wording is unclear. The Qualifying Body has confirmed that it is the intention of the policy to encourage development that provides additional public car parking.
- 3.121 The policy includes the imprecise term “*acceptable in principle*”. It is not appropriate for a policy to indicate that proposals will be permissible as all planning applications “*must be determined in accordance with the development plan, unless material considerations indicate otherwise*”. The term “*will be expected to*” does not provide a basis for the determination of planning applications. I have recommended a modifications to improve the clarity of the wording of the policy so that decisions makers can apply it consistently as required by national policy.

Recommendation 23: Revise Policy HT1 as follows:

Revise the first sentence of the policy to read: “...public car parking areas, as listed below and shown on the Neighbourhood Plan Policies Map should not result in the loss of car parking capacity.”

Revise the second sentence of the policy to read: “...capacity will be required within Haworth centre.”

Include the numbered list of public car parks in the policy.

Revise the second paragraph of the policy to read: “Development which would provide for additional centre public car parking capacity, will be supported.”

Policy HT2: Protection of Private Non-Residential Parking Areas

- 3.122 The policy seeks to safeguard 12 private car parking areas which are shown on the Policies Map. These serve churches, community halls, social clubs and the railway. Any development proposals would have to demonstrate that

their loss will not impact on parking in the nearby area and compensatory car parking provision nearby would be provided.

3.123 The policy is negatively worded and modifications are proposed to improve its clarity.

3.124 Car park 7 Damside Mill has been plotted incorrectly on the Policies Map.

Recommendation 24: Revise Policy HT2 as follows:

Revise the first paragraph of the policy to read: “.....Policies Map, *should demonstrate*.”

Revise criterion i) to read “that the loss will not have an adverse impact on parking issues in the nearby area; or”

Correct the location of Car Park 7 Damside Mill on the Policies Map.

Policy HT3: Primary School Parking and Drop-Off Areas

3.125 This policy encourages the development of parking to serve the primary schools in the plan area. It is not clear how this aspiration is to be delivered; nevertheless, there is a clear need for improved parking to serve the schools. A recommendation is made to replace “encouraged” with “supported” for consistency and clarity.

Recommendation 25: Revise Policy HT3 as follows:

Replace “will be encouraged” with “will be *supported*”.

Policy HT4: Car Parking Standards for New Housing Development at Baden Street, Haworth

3.126 The policy is linked to criterion 6 of Policy H3. It is considered that the requirements are vague and imprecise as they do not set out the standard of parking required other than it should be “in excess of 1.5 spaces per unit”.

3.127 I have made a recommendation to revise the sixth bullet point under Policy H3 to read: “*Provision of off-road parking in accordance with section 2.15 of the Bradford Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.*” It is considered that as a consequence Policy HT4 is unnecessary and should be deleted.

Recommendation 26: Delete Policy HT4.

Policy HT5: Improved Public Transport

- 3.128 The policy seeks contributions to new and improved bus services and associated infrastructure from developments that are likely to be served by and increase patronage of public transport. It also highlights the importance of new routes to Bradford Royal Infirmary and Halifax.
- 3.129 CBMDC has explained that they consult the West Yorkshire Combined Authority on all major applications to identify any improvements to public transport infrastructure required to serve the development, usually bus stops and shelters. The requests are considered in terms of the overall viability of the scheme.
- 3.130 It is not possible to define which developments are likely to be served by or increase patronage of public transport. To clarify the policy it is recommended that the policy should refer to “major developments” in line with the local authority practice. This term is defined in the Glossary in Appendix 10.
- 3.131 The aspirations for new routes are also included as a Community Action.

Recommendation 27: Revise Policy HT5 to read:

“Major developments should contribute to improving public transport services, and associated infrastructure, where necessary to serve the development.”

“New bus routes between the Neighbourhood Area and Bradford Royal Infirmary and Halifax will be supported.”

Policy HT6: Improved Walking, Horse Riding and Cycling Provision

- 3.132 The first part of the policy expects development directly affecting the public rights of way and cycleway network to be compatible with it and contribute to it.
- 3.133 The second paragraph of the policy seeks contributions from development likely to increase pedestrian footfall and /or horse or cycle usage to contribute to improvements or new provision in the vicinity and to provide connections to the network. A list of routes is included in the Community Actions.
- 3.134 The third paragraph encourages development proposals that comply with other policies of the plan that would add to or improve the rights of way or cycling network. It is unclear what types of development proposals are to be encouraged. I have proposed a modification that gives support to the extension and/or improvement of the network.
- 3.135 The term “will be expected to” is unclear and does not provide a basis for the determination of planning applications. The second paragraph of the policy

requires development likely to increase usage of the network to provide connections or to contribute to new provision. This would affect development with only a marginal impact on the network and is both too onerous and not justified by the evidence, I have recommended the addition of the word “significant” and the word “should” to clarify the application of the policy and to introduce some flexibility.

Recommendation 28: Revise Policy HT6 as follows:

In the first paragraph, replace “will be expected to” with “must”.

Revise the second paragraph to read: “Development likely to *significantly* increase pedestrian footfall and or horse/cycle usage within the network *should* contribute to the improvements to the *cycle routes and rights of way network listed in the Community Actions* and shown on the Neighbourhood Plan Policies Map,”

Replace the third paragraph with: “*The improvement of the rights of way, bridleway and cycle network will be supported.*”

Policy HT7: Keighley and Worth Valley Cycleway

- 3.136 The first paragraph of the policy seeks to safeguard the route of the Keighley and Worth Walley cycleway. A modification is recommended to clarify the wording of the policy to refer to it being safeguarded.
- 3.137 The second paragraph encourages development that would contribute to the delivery of the proposed route. It is not clear what type of development may be appropriate. I am recommending a modification that supports the development of the route as a cycle route.

Recommendation 29: Revise Policy HT7 as follows:

Revise the first paragraph to read: “...Neighbourhood Area, shown on the Neighbourhood Plan Policies Map *is safeguarded*. Development *should not* prevent or harm the development of a cycle route along the identified route. *The delivery and improvement of the safeguarded route as a cycle way will be supported.*”

Monitoring and Review

- 3.138 I make no comments on this section.

4.0 Referendum

- 4.1 The Haworth, Cross Roads & Stanbury Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of the community.
- 4.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the Basic Conditions namely:
- has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies contained in the Development Plan for the area; and
 - does not breach, and is otherwise compatible with, EU obligations and human rights requirements
- 4.3 **I am pleased to recommend to The City of Bradford Metropolitan District Council that the Haworth, Cross Roads & Stanbury Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**
- 4.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area designated by the City of Bradford Metropolitan District Council on 5 November 2013.

5.0 Background Documents

5.1 In undertaking this examination, I have considered the following documents

- Haworth, Cross Roads & Stanbury Neighbourhood Plan Submission Draft Version 2019- 2030 including Appendices
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Basic Conditions Statement June 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan SEA / HRA Screening Report July 2018
- Haworth, Cross Roads & Stanbury Neighbourhood Plan HRA Screening Update Report May 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Sustainability Assessment June 2019
- Haworth, Cross Roads & Stanbury Neighbourhood Plan Consultation Statement June 2019
- National Planning Policy Framework 2019
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Bradford Core Strategy 2017
- Saved Policies of Bradford Replacement UDP 2005
- Haworth Conservation Area Appraisal 2007
- Stanbury Conservation Area Appraisal 2008
- Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs
- Bradford Homes and Neighbourhoods Design Guide 2020

6.0 Summary of Recommendations

Recommendation: 1

Add the following on page 13, 7th paragraph under Chapter 5: The Plan Policies and Community Actions: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

Add the following on page 61 under the first paragraph - Chapter 5 of this plan: *“It should be noted that the Community Actions and Approaches do not form part of the statutory Development Plan.”*

Recommendation 2: Improve the mapping of the Plan by:

Number the viewpoints on the Stanbury map in Appendix 1 of the Plan to correspond to the subsequent photographs. Place the maps of views within the text of the Plan itself.

Ensure that the Non-Designated Heritage Assets are shown in numeric order within each category in the key to the Policies Map and the assessment report. (See Recommendation 8)

Delete the heading “Non Neighbourhood Plan Designations” from the key to the Policies Map. Place the notation under topic headings of Built Heritage, Housing and Highways and Travel.

Ensure the colouring in the key for the South Pennines SPA/SAC is consistent with that on the map.

Prepare a background evidence report for the Non Designated Heritage Assets to include the assessment details currently in Appendix 3 and include site location maps showing the boundaries of the properties designated and buildings referred to.

Recommendation 3: Include a new section in the Introductory section of the Plan to explain the Strategic Planning Context for the Plan and the timescales for preparing the emerging Core Strategy Partial Review and Allocations DPD. Explain the status of the villages in the settlement hierarchy and the level of growth anticipated in the strategic plan to provide the context for the housing and employment policies in the HCR&SNP. Explain how it is intended that the requirements set out in Policies H1 – H4 are to be taken forward.:

“The adopted local plan for the area comprises

- *“the Bradford Core Strategy (CS) adopted in 2017 which sets out the broad scale and distribution of growth as well as policies to protect and enhance the natural and built environment, and*

guide/manage development across Bradford district for the period 2011 to 2030; and

- *“the saved policies of the Replacement Unitary Development Plan (RUDP), adopted in 2005 which includes a number of policies that are relevant to the neighbourhood plan, including the defined Green Belt boundaries.*

“CBMDC is currently undertaking a partial review of its Core Strategy. This review is due to various changes to national planning policy and local circumstances, and covers several subjects including a proposed new plan period (2020 to 2037), revised housing and employment land requirements and spatial distribution as well as various environment and transport policies. Work reached the Preferred Options stage in July 2019. Further consultation (a revised Preferred Options) is due to take place in 2020, with a submission draft being published in 2021.

“Work is also on-going to prepare an Allocations DPD that will identify sites to meet the requirements of the Core Strategy Partial Review. The Allocations DPD is at an early stage of preparation: the Issues and Options paper was consulted on in 2016 and the Preferred Options is currently being prepared.”

“Strategic Planning Context for the Neighbourhood Plan - Level of Growth & Development

“For spatial planning purposes, CBMDC has split its area into four sub-areas (City of Bradford; Airedale; South Pennine Towns & Villages; and Wharfedale). The neighbourhood plan area is situated within the South Pennine Towns & Villages sub-area.

“The settlement hierarchy is defined in Core Strategy Policy SC4. Under this policy, Haworth is classed as a Local Service Centre, where the emphasis will be on a smaller scale of development comprising both market and affordable housing, together with the protection and enhancement of those centres as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social conditions. Cross Roads is not specifically referred to as a separate settlement within the hierarchy. Figure SS2 within the Core Strategy shows the extent of Haworth and Cross Roads.

“Stanbury is classed under saved RUPD policy K/GB3.5 as being washed over by the Green Belt. It is not specifically referred to in the Core Strategy settlement hierarchy.

“Under Core Strategy Policies PN1 and HO3, Haworth will see the development of 400 homes over the adopted plan period (2011 to 2030). Within the Core Strategy Partial Review, it is proposed to reduce this requirement to 275 dwellings over the revised plan period (2020 to 2037). The sites to accommodate this growth will be identified in the

emerging Allocations DPD. A specific level of employment development is not identified for the neighbourhood plan area.

“In terms of the retail hierarchy (Core Strategy Policy EC5), Main Street and Mill Hay in Haworth, and Cross Roads are identified as Local Centres. The policy states that these centres should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people’s day to day needs and minimise their need to travel.

“Development in Stanbury is restricted by saved RUDP Policy GB3 to infill development, provided that it falls within the infill boundary of the settlement, as defined on the Proposal Map, fills a small gap in a small group of buildings and is related to the scale of the settlement and does not adversely affect the character of the settlement or its surroundings. Also it should not result in the loss of open space which is important to the character, visual amenity and local identity of the settlement. Proposals for the extension of the settlement will not be permitted.

“Implementation of Policies H1 to H4

“The policies, as drafted, leave any formal designation/allocation of these sites to the Local Plan Allocations DPD which CBMDC is in the process of preparing. Work is underway on assessing the suitability of all sites within the Strategic Housing Land Availability Assessment (SHLAA), including those listed in Policies H1 to H4 of the Haworth, Cross Roads & Stanbury Neighbourhood Plan, using an agreed site selection methodology. The results of this work, together with the evidence base, Sustainability Appraisal and Habitat Regulations Assessment will inform which sites are identified in the Preferred Options version of the Allocations DPD, due for publication later in 2020.

“Should all or any of these sites be allocated in the Allocations DPD, it would be expected that the policy considerations set out in the neighbourhood plan Policies H1 to H4 will be used in determining planning applications on them.

“It should be noted the Ebor Mills site (Policy H4) is the subject of a pending planning application (Application Ref: 19/04426/MAF). It is for the conversion and refurbishment of Ebor Mills into 14 dwellings, construction of 24 new dwellings within the curtilage of the site, landscaping, biodiversity and environmental enhancements, highway and footway improvements to Ebor Lane and demolition of the weaving sheds and partial demolition and reconstruction of the boiler house. An application for Listed Building Consent (Application Ref: 19/04425/LBC) is also pending.”

Recommendation 4: Revise Policy BHDD1 as follows:

Revise the first paragraph of the policy to read: “..... Policies Map, *development including*local characteristics and *have regard* to the following *design principles*:”.

Revise the second bullet point to read: “*The need to maintain and respect the views and vistas into, out of, and through the conservation area shown on the maps in Appendix 1 and demonstrate the impact of their proposal on any views.*”

Revise bullet point 3 to read: “Reflect, *where possible*,”

Revise bullet point 4 to read: “...that reflect the *architectural and/or historic* interest of the area.....”

Revise bullet point 9 to read: “....the reinstatement of traditional features *of a similar design to the original* should be.....”

Revise bullet point 10 to read: “*Retain* traditional shopfronts; any new or replacement shopfronts *reflecting*.....”

Revise bullet point 11 to read: “*Retain* important trees.....”

Revise bullet point 12 to read: “*Retain* key open spaces.....”

Revise the penultimate paragraph of the policy to read: “....respects the distinctiveness of the conservation area.”

Replace the fourth sentence from the first paragraph on page 17: “This appraisal however is now out of date.....development” with “*A review of this appraisal is due.*”

Revise the second paragraph on page 17 to read: “*The designation of the conservation area recognises its historic and architectural importance. New development proposals within or adjacent to it should be designed to be sympathetic to the area’s special character and avoid the destruction of....*”

Add a new paragraph in the justification: “*The City of Bradford MDC Shop Front Design Guide and the Shopkeepers Guide to Securing the Premises SPDs set out detailed guidance on the design of shopfronts in historic areas.*”

Recommendation 5: Delete Policy BHDD2

Retitle Policy BHDD1 as “Haworth and Stanbury Conservation Areas – Development and Design”.

Replace the fourth sentence of the second paragraph on page 21: “As with Haworth, this appraisal is now out of date.....development.” with “*A review of this appraisal is due.*”

Correct the typographical error in the 6th bullet point on page 21 to “dependent”.

Amalgamate the duplicated text on pages 17 and 21.

Recommendation 6: Revise Policy BHDD3 as follows:

Revise the final line of the policy to read: “*The conservation and sympathetic enhancement of these areas to better reveal their significance will be encouraged in accordance with the design principles set out in Policy BHDDX.*”

Recommendation 7: Amalgamate Policies BHDD4 – BHDD7 and entitle the new policy Local Heritage Areas – Development and Design.

Recommendation 8: Revise Policy BHDD8 as follows:

Revise the first paragraph and amalgamate with the last paragraph of the policy to read “.....Policies Map and described in the Non Designated Heritage Asset Assessment Report, will be taken.....such an asset. *A balanced judgement will be made having regard to the scale of any harm or loss caused by any development and the asset's significance. Their conservation and sympathetic enhancement will be supported.*

Prepare a more detailed assessment report of the non-designated heritage assets including the assessment contained in Appendix 3 and include full details of the process of identifying and the criteria for assessing the properties, plans showing the location of each property and its curtilage. Photographs would also be helpful.

Revise the assessment on the former Mill pond at Ebor Mills to refer to the Local Wildlife Site designation.

Recommendation 9: Revise Policy GE1 as follows:

Add the following to the end of the final paragraph of the policy: “....in accordance with the Core Strategy policies.”

Revise the final sentence of the third paragraph under the sub-heading Landscape, Biodiversity/Geodiversity and Green Infrastructure (page 30) to read: “Further designated sites of regional or local interest include *the four Local Wildlife Sites (LWS) of Airedale Spring Mill Pond, Baden Street (Haworth), Brow Moor with Sugden End, and Penistone Hill. The last of these is also a Country Park*”. These sites should be identified on the Policies Map.

Revise the second paragraph of the justification on page 31 to read: “*The Core Strategy sets out a comprehensive suite of policies on*

national and strategic green infrastructure. The neighbourhood plan can build on this by.....”

Update the third paragraph on page 31 to refer to the Bradford Ecological Habitat Network and the sites identified.

Update the Plan, SEA and background documents to refer to the four following sites as Local Wildlife Sites and to consider and acknowledge the potential conflicts that may occur with other designations and possible proposals on the sites.

- Brow Moor with Sugden End
- Penistone Hill
- Airedale Spring Mill Pond
- Baden Street, Haworth.

Recommendation 10: Revise Policy GE2 as follows:

Revise the second sentence of the first paragraph of the policy to read: “Development on these areas will not be *supported* except in very special circumstances that justify the development.”

Correct the numbering of the sites at West Lane Methodist Chapel Burial Grounds and West Lane Baptist Church Burial Grounds in the Policy, Appendix 5 and the Policies Map.

Delete “(NB proposed LGS 137”) from the LGS assessment for site LGS133.

Recommendation 11: Revise the wording of Policy GE3 to read:

“The enhancement of a designated Local Green *Space to improve the quality or usability of the open space* will be supported.”

Amalgamate the policy with Policy GE2 by adding the above paragraph to the end of Policy GE2 and deleting Policy GE3. Amalgamate the justifications to the policies.

Recommendation 12: Revise Policy GE4 as follows:

Revise the first paragraph of the policy to read: “The provision of new open space in the following categories will be *supported*.”

Revise the second paragraph of the policy to read: “.....north Haworth *will be supported*.”

Recommendation 13: Revise Policy GE5 as follows:

Add the word “and” at the end of the penultimate criterion in Policy GE5.

Revise the last sentence of the 2nd paragraph on page 35 to read:
“....Sugden End Local Wildlife Site, details of which are included in Appendix 6.”

Recommendation 14: Revise Policy CF1 as follows:

Revise the first paragraph of the policy to read: “....Policies Map, will only be supported, where:”

Divide the second bullet point into two and create a third bullet point: “it is financially unviable.”

Revise the second paragraph of the policy to read: “The *improvement of* these facilities for the benefit of Haworth, Cross Roads or Stanbury communities will be *supported*.”

Add the following after the third paragraph on page 37:

“Where proposals involve the loss of a community facility, developers will be expected to demonstrate that the facility, and its continued use, is no longer economically viable, and that all reasonable efforts have been made to market the site/facility for its current use without success.”

In Appendix 7 add the numbers to the Community Facilities as shown on the Policies Map. Include site locations plans in the Appendix.

Recommendation 15: Revise Policy CF2as follows:

Revise the first paragraph of the policy to read: “...will be *supported*, in particular:”

Recommendation 16: Revise Policies H1 to H4 as follows:

Revise the first paragraph of each policy to read: “..... Policies Map, *should be laid out and designed in accordance with the following design principles:*”

Add the word “*and*” to the end of the penultimate criterion in Policies H1 – H4.

Add the following at the end of each policy: “*Where it is not possible to satisfy any of the design principles, developers will be required to demonstrate the reasons for non-compliance in their Design and Access Statement.*”

Add the following to the fourth bullet point in Policy H1: “*in accordance with the strategic policy*”.

Revise the first bullet point of Policy H2 to read: “*Trees that are subject to a Tree Preservation Order and other mature trees shall be*

safeguarded and protected during development, in accordance with Core Strategy Policy EN5.

Revise bullet points 3 and 4 of Policy H3 to read ***“Bradford Local Wildlife Site”***.

Revise the sixth bullet point in Policy H3 to read: ***“Provision of off-road parking in accordance with, or in excess of, section 2.15 of the Bradford Homes and Neighbourhoods Design Guide 2020, Core Strategy Policy TR2 and Appendix 4.”***

Delete the first paragraph of Policy H4: ***“The site of Ebor Mills....new housing.”***

Add the following to the justification on page 42 before Policy H1: ***“Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.”***

Delete ***“This Neighbourhood Plan cannot influence the outcome or vary from whatever is finally decided”*** from the paragraph in the justification under Policy H4.

Recommendation 17: Revise Policy H5 as follows:

Revise the first and second criteria to read: ***“The avoidance of significant adverse impacts....”***

Revise the third criterion to read: ***“The avoidance of unacceptable adverse impacts....”***

Add ***“and their settings”*** at the end of the second criterion.

Revise criterion 4 to read: ***“The programme of highway improvements shall be clearly set out in a planning condition before development commences on the site”***.

Combine the fifth and eight criteria and revise to read: ***“Accessibility to the public transport network and local community facilities, including educational and health facilities, should be in accordance with the Accessibility Standards set out in Appendix 3 of the Core Strategy;”***

Revise criterion 6 to read: ***“The protection of existing Public Rights of Way and cycle paths on the site, where possible, and their integration into the development. Where this is not feasible, the diverted route should not be substantially less convenient for the public to use than the existing route.”***

Revise the ninth criterion to read: ***“Adequate in-curtilage off street parking shall be provided in accordance with, or in excess of, the indicative standard of 1.5 spaces per dwelling for non-town/city centres (as set out in Core Strategy Policy TR2 and Appendix 4)”***

Revise criterion 10 as follows: “Trees that are subject to a Tree Preservation Order and other mature trees shall be safeguarded and protected during development, in accordance with Core Strategy Policy EN5.”

Add “and” at the end of the penultimate criterion.

Add the following to the justification on page 45 before Policy H5: “Policy H5 will be taken into account in considering all housing development whether on allocated or non-allocated sites. Developers should take account of the guidance set out in the Bradford Homes and Neighbourhoods Design Guide 2020.”

Recommendation 18: Revise Policy H6 as follows:

Revise the first paragraph of the policy to read: “.....acceptable in principle in locations within the settlement boundary of Haworth and Cross Roads and where the national and strategic policy exceptions for development in the countryside are satisfied, providing that:”

Revise the third paragraph of the policy to read: “For developments of 5 or more dwellings, a location which accords with the applicable Core Strategy Accessibility Standards will be preferred.”

Add a new paragraph in the justification: “The Core Strategy Accessibility Standards are set out in Appendix 3 of the Core Strategy.” Further advice may also be included in the justification on the application of these Accessibility Standards to windfall housing development to assist plan users.

Add a new paragraph in the justification to explain how the capacity of infrastructure will be assessed and the mechanisms for delivering improvements to infrastructure eg through Community Infrastructure Levy.

Add a new paragraph to the justification to make reference to relevant strategic design policies.

In the 3rd para on page 47, delete “unexpectedly proposed sites” and replace with “windfall sites”.

Recommendation 19: Revise Policy H8 as follows:

Amalgamate first four paragraphs of Policy H8 to read:

“Subject to the findings of the latest housing needs assessment, development of larger housing sites (of 0.4ha or above or 10 or more dwellings) will be expected to provide a mix of market and affordable housing of: two bullet points.”

“The development of Build to Rent housing will also be encouraged.”

“The development of sites consisting primarily of large dwellings (4 or more bedrooms) will not be supported.”

Final paragraph not changed.

Revise the first bullet point on page 49 of the justification to read “2-3” bedrooms.

Add a new bullet point on page 49 “Supporting the provision of Build for Rent housing.”

Recommendation 20:

Replace the last two sentences on page 51 with: “*These policies will provide the framework for considering proposals for new employment development or the diversification of existing rural businesses in the plan area. No employment land allocations are proposed in the Plan.*”

Revise the second sentence of the first paragraph on page 52 to read: “...during consultation, and the *Plan supports the development of appropriate hotel and visitor accommodation* within the Neighbourhood Area.”

Recommendation 21: Revise Policy E1 as follows:

Revise the first paragraph to read: “*Hotel development will be supported in the Plan area. Any such....*”

Revise the final bullet point to read: “*It should not have an unacceptable adverse impact* on residential amenity, including noise and light intrusion.”

Add a new bullet point: “*Where applicable, the development shall be laid out and designed taking into account the principles of Policy BHDD1.*”

Recommendation 22: Revise Policy E2 to read:

“*The development of visitor accommodation will be supported where it respects the character of the local landscape of the South Pennines and conserves and enhances the heritage of Haworth and the conservation areas.*”

“*New accommodation should be well designed to reflect the built character of the area and have regard to the principles set out in Policy BHDD1 and relevant development plan policies.*”

Delete the second paragraph of the policy.

Recommendation 23: Revise Policy HT1 as follows:

Revise the first sentence of the policy to read: “...public car parking areas, *as listed below* and shown on the Neighbourhood Plan Policies Map *should not result in the loss of car parking capacity.*”

Revise the second sentence of the policy to read: “...capacity will be *required* within Haworth centre.”

Include the numbered list of public car parks in the policy.

Revise the second paragraph of the policy to read: “Development which would provide for additional centre public car parking capacity, will be *supported.*”

Recommendation 24: Revise Policy HT2 as follows:

Revise the first paragraph of the policy to read: “.....Policies Map, *should demonstrate.*”

Revise criterion i) to read “that the loss will not have an adverse impact on parking issues in the nearby area; or”

Correct the location of Car Park 7 Damside Mill on the Policies Map.

Recommendation 25: Revise Policy HT3 as follows:

Replace “will be encouraged” with “will be *supported*”.

Recommendation 26: Delete Policy HT4.

Recommendation 27: Revise Policy HT5 to read:

“*Major* developments should contribute to improving *public transport* services, and associated infrastructure, *where necessary to serve the development.*”

“New *bus* routes between the Neighbourhood Area and Bradford Royal Infirmary and Halifax *will be supported.*”

Recommendation 28: Revise Policy HT6 as follows:

In the first paragraph, replace “will be expected to” with “must”.

Revise the second paragraph to read: “Development likely to *significantly* increase pedestrian footfall and or horse/cycle usage within the network *should* contribute to the improvements to the *cycle routes and rights of way network listed in the Community Actions* and shown on the Neighbourhood Plan Policies Map,

Replace the third paragraph with: “*The improvement of the rights of way, bridleway and cycle network will be supported.*”

Recommendation 29: Revise Policy HT7 as follows:

Revise the first paragraph to read: “...Neighbourhood Area, shown on the Neighbourhood Plan Policies Map *is safeguarded*. Development *should not* prevent or harm the development of a cycle route along the identified route. *The delivery and improvement of the safeguarded route as a cycle way will be supported.*”

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Report of the Strategic Director Corporate Resources to the meeting of Executive to be held on 6th October 2020

CI

Subject:

The Relocation of Her Majesty's Coroner's Office (HMCO).

Summary statement:

Update on the proposed relocation of HMCO and associated cost implications, prompted by concerns relating to the present accommodation in the Magistrates' Court.

Joanne Hyde
Strategic Director
Corporate Resources

Portfolio: Leader of Council

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Overview & Scrutiny Area: Corporate

1. SUMMARY

- This report is updating the Executive on the proposed relocation of HMCO to alternative and independent premises in Little Germany and to confirm the financial implications of technical design development. The existing premises, co-located with the Bradford Magistrates' Court, are not fit for purpose and do not comply with current Health & Safety and DDA requirements.

2. BACKGROUND

- Bradford Council has a lease for use of certain rooms within the Bradford Magistrates' Court building for use by HMCO. The demised area consists of one court room, an office adjoining the court room (inner room), a corridor/waiting area and two small offices. The lease commenced on 31 March 2005 and is for 999 years; however, accommodation additional to the court room remains subject to termination by the Ministry of Justice at 28 days' notice.
- The existing HMCO accommodation is no longer fit for purpose. Any death can have a devastating impact on the bereaved, but when that death is sudden, unexplained or of an unknown cause it can only add to the negative impact on families. A Coroner's inquest can be a traumatic, distressing and difficult experience for anyone involved and the prescribed standard is to provide a welcoming and safe environment for the bereaved. The existing accommodation does not provide this. Additionally:
 - The families and witnesses access HMCO through the main Magistrates' Court entrance, where they are required to queue to enter and are searched alongside other Magistrates' Court attendees.
 - The waiting area for HMCO is a corridor with little privacy; there are no meeting rooms available to adjourn for private and confidential conversations.
 - The location of the current HMCO, facing City Park, is not commensurate with the privacy required for grieving families. Noise generated by visitors to City Park can seem inappropriate and distracting to families during inquest proceedings.
 - There is insufficient office accommodation for the existing staff and files with teams working in cramped conditions across a number of small offices.
 - Additional accommodation is required as Coroner's Officers employed by West Yorkshire Police will relocate to work under the supervision of HM Coroner in the same facility, irrespective of employer.
- To meet the objective of providing a new, purpose-built, independent HMCO which meets the needs of the service, the report of the Strategic Director Corporate Resources to the meeting of Executive held on 10th July 2018 recommended the purchase of a freehold property for development of a new HMCO at a total cost of circa £2.35m. This recommendation was approved and £2.35m was made available in capital funds.

- At the meeting of Executive held on 9th July 2019, following a site search, the Strategic Director Corporate Resources recommended the purchase of the former Digital Health Enterprise Zone Building (DHEZ), dividing the building back into two separate entities to provide a self-contained block for the new HMCO, as outlined in red on **Appendix 1 – Site Location Plan**, with the balance remaining as a self-contained building for existing tenants and incubator space for businesses. This recommendation was approved and the £2.35m capital fund was allocated towards acquisition and redevelopment of this building into the new HMCO.

3. OTHER CONSIDERATIONS

- **Section 24 Coroners and Justice Act (CJA) 2009** – In deciding how to discharge its duties regarding the accommodation, Bradford Council must take into account the views of HM Coroner. HM Coroner considers that the proposed new premises are vital to enable the Coroner’s Service to provide the necessary facilities and services to the bereaved. HM Coroner is fully supportive of the proposals.
- There is strong stakeholder support and engagement for this scheme. Both Calderdale and Kirklees Councils are wholly supportive of the proposals and there has been an encouraging visit to the proposed site by the Deputy Chief Constable and Assistant Chief Constable of West Yorkshire Police. Further, the involvement of HM Coroner and his team during the design development stages has been crucial in ensuring the needs of the service are reflected in the proposals.
- The Coroners’ Service provides a vital provision for families and the new HMCO will offer innumerable benefits to the communities of Bradford, Kirklees and Calderdale, transforming delivery of the service for the better. HM Coroner is keen to begin community engagement to raise awareness of the proposed changes and the benefits they will bring.
- The key risk and main driver to this project and its programme is the urgent need for HMCO to relocate away from its shared accommodation arrangement with Magistrates Service. HM Coroner has publically lobbied for new premises since July 2016 and is keen to relocate as soon as possible. Subject to all necessary approvals, the current timeline for the project is as follows:
 - Tendering – November and December 2020
 - Contractor Appointment – February 2021
 - Works Commencement – March 2021
 - Works Completion – November 2021
 - HMCO Relocation – December 2021

4. FINANCIAL & RESOURCE APPRAISAL

- The original £2.35m capital allocation to support the relocation of HMCO was based upon the original business case for the purchase of 4 Cater Street. Subsequent to the decision to alternatively relocate HMCO into the DHEZ building, the project scope has been redefined.

- Whilst the budget of £2.35m approved by Executive in July 2018 included expenditure towards site acquisition, shell works, and limited fit out works concerned with loose and fixed fixtures, fittings and equipment, the business case specifically excluded ICT, audio-visual or interactive installations, along with third party professional fees and finance costs.
- It was always envisaged that once the project scope was fully defined, the acquired building was fully surveyed and the specific requirements of the service were fully reflected in technical design development, the budget position would be revisited.
- Through numerous site surveys and developing understanding of HMCO requirements, there has emerged a more comprehensive list of elements which were excluded from previous cost plans, such as:
 - ICT passive and active network infrastructure;
 - Audio-visual interactive, communication and recording systems;
 - Security systems, including CCTV and access control;
 - Professional fees associated with the design team, consultants and surveys;
 - Dividing the former DHEZ building back into two self-contained entities;
 - Replacement of existing mechanical and electrical plant and installations;
 - Rectification of existing building condition and maintenance matters;
 - Dilapidation of existing HMCO accommodation and relocation/transition costs for the service;
 - External works and signage in a conservation area;
 - Works to achieve acoustic standards in order that the business of the courts can operate without undue disturbance;
 - COVID-19 impacts on preliminaries, risk and inflation costs.

Appendix 2 – Cost Build-Up (Not for Publication) details the estimations of cost arrived at as result of technical design development at the end of RIBA Stage 4.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

- Any new accommodation will meet the current concerns regarding safety, availability, efficiency and ambience of HMCO. If the proposal is accepted, the Project Management Team will ensure delivery of the proposals in accordance with HMCO requirements, approved budget and established governance arrangements.

6. LEGAL APPRAISAL

- Section 24 Coroners and Justice Act (CJA) 2009 – the relevant authority (previously called the Lead Authority [Bradford]) for a coroner area:
 - a) must secure the provision of whatever officers and other staff are needed by the coroners for that area to carry out their functions;
 - b) must provide, or secure the provision of, accommodation that is appropriate to the needs of those coroners in carrying out their functions;
 - c) must maintain, or secure the maintenance of, accommodation provided under paragraph (b).
- The Coroners (Inquests) Rule 2013 – R8: a coroner must complete an inquest

within six months of the date on which the coroner is made aware of the death, or as soon as is reasonably practicable after that date. There is currently a lengthy backlog of inquests which will see a reduction through the additional courtrooms proposed in the new HMCO.

- Section 16 CJA 2009 – any investigation not completed/discontinued within a year must be reported to the Chief Coroner together with the reasons for the delay. The Chief Coroner keeps a register and publishes the figures per coronial area. The Chief Coroner has indicated he will also publish the reasons for the delay per coronial area. The Chief Coroner provides an annual report on the Coronial system, which includes the number and length of investigations, reasons for the length of investigations/delays and measures he is taking to keep investigations from becoming unnecessarily lengthy, to the Lord Chancellor to be laid before Parliament.
- Coroners (Investigation) Regulation 2013 – R4: a coroner must be available at all times to address matters relating to an investigation into a death which must be dealt with immediately and cannot wait until the next working day.
- The coronial area covers the local authority areas of Bradford, Kirklees and Calderdale. There is no capital contribution from Kirklees Council and Calderdale Council; however, it is anticipated that Kirklees and Calderdale will contribute towards initial set-up revenue costs and increased annual revenue costs. Currently Bradford Council funds HMCO 44.98 per cent, Kirklees Council 37.1 per cent and Calderdale Council 17.92 per cent.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

The new accommodation will assist in the promotion of equality.

7.2 SUSTAINABILITY IMPLICATIONS

The new accommodation will assist in the promotion of sustainability. Innovations in the efficient use of services and utilities consumption are an integral part of the current design.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

Not applicable.

7.4 COMMUNITY SAFETY IMPLICATIONS

Not applicable.

7.5 HUMAN RIGHTS ACT

The new accommodation will assist in the promotion of human rights.

7.6 TRADE UNION

The new accommodation will assist in the improvement of staff welfare.

7.7 WARD IMPLICATIONS

Not applicable.

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

Not applicable.

7.9 IMPLICATIONS FOR CORPORATE PARENTING

Not applicable.

7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

Not applicable.

8. NOT FOR PUBLICATION DOCUMENTS

Appendix 2 – Cost Build-Up is not for publication because it contains exempt information under paragraphs 3 and 5 of Schedule 12A of the Local Government Act 1972 (information relating to the financial or business affairs and legal privilege), and in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

9. OPTIONS

- a) To approve additional capital funds required to meet the current budget deficit and safeguard project delivery;
- b) To seek a reduction in the project scope (and risk further delay in completing inquests to add to those required to be reported under Section 16 CJA 2009).

10. RECOMMENDATIONS

To approve the additional capital funds required to meet the current budget deficit and to authorise the Strategic Director Corporate Resources, in consultation with the Leader, to take all necessary decisions to implement the decision.

11. APPENDICES

Appendix 1 – Site Location Plan
Appendix 2 – Cost Build-Up (**Not for Publication**)

12. BACKGROUND DOCUMENTS

None.

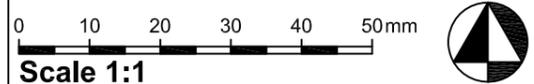


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Rev	Description	Date	By
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Construction Design Management Regulations 2015



Status: For Information
 Client: Bradford Met Council

Project: Cater building, No. 1 Cater St.

Title: Site Location Plan

Drawing No.: 309_042-FC-01-06-DR-A-0110
 Rev.:

Scale: 1:1250@A3 Date: 06/11/19
 Drawn: AF Check: PJ

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