

## Report of the Strategic Director, Place to the meeting of the Executive to be held on 5 November 2019

**AA**

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### **Subject:**

Bereavement Services Strategy – Crematoria Provision Update.

### **Summary statement:**

A progress update on delivery of the adopted Bereavement Strategy relating to crematoria provision covering:-

- Land acquisition for the first new crematorium including the use of a Compulsory Purchase Order if required.
- Construction of the crematorium
- Procurement of cremators
- Approval of the current funding profile for delivery of the crematoria programme
- Implementation of the final phases of the contract with external specialists

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Steve Hartley – Strategic Director, Place

### **Portfolio:**

Healthy People and Places

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### **Overview & Scrutiny Area:**

Regeneration and Environment

## 1 SUMMARY

A progress update on delivery of the adopted Bereavement Strategy relating to crematoria provision covering:-

- Land acquisition for the first new crematorium including the use of a Compulsory Purchase Order if required.
- Construction of the crematorium
- Procurement of cremators
- The current funding profile for delivery of the crematoria programme
- Implementation of the final phases of the contract with external specialists

## 2 BACKGROUND

### 2.1 Governance

The Bereavement Services Strategy was adopted in November 2016 covering future development of the Council's cemeteries and crematoria. An initial progress report on delivery of the adopted Bereavement Services Strategy was received by the Executive on 10 July 2018 including the following resolutions relating to crematoria provision:-

*(1) That the procurement of external specialist resources to complete the feasibility stage for all 5 identified sites and, subject to further approval, deliver progress to RIBA stage 3 for the design and build of two new crematoria be approved.*

*(5) The Strategic Director Place be given delegated approval of spend in consultation with the S151 officer to upgrade the crematory at Oakworth Crematorium, to include mercury abatement, at the earliest opportunity*

At its meeting on January 8<sup>th</sup> 2019, Executive further approved the following resolutions:-

*(1) That the recommendation made by the Strategic Director Place to remove Northcliffe Park from the list of potential sites for a new crematorium be approved*

*(3) That the Strategic Director Corporate Services be instructed to commence land acquisition negotiations for the two sites specified within Not for Publication Appendix 2 of Document "AL" up to the option to buy stage*

*(5) That the Strategic Director Place be instructed to submit a report recommending the two sites to be approved for the construction of new crematoria and the estimated costs at the earliest opportunity.*

At its meeting on June 11<sup>th</sup> 2019, Executive further approved:-

*(1) That the revised cost estimate for the refurbishment of Oakworth crematorium at £2.75m be approved*

*(2) That the implementation of Phase II works by Rex Procter & Partners to administer the refurbishment of Oakworth Crematorium and produce detailed design and tenders for the building of two new crematoria be approved*

## **2.2 Current Provision**

Some 80% of the Bereavement Service's funeral activity relates to cremation (circa 3000 annually) through the 3 existing crematoria all of which are aged with cremators 6/7 years beyond their 16 year recommended life span. The cremators fail to comply with DEFRA's current air quality emission requirements as they are not fitted with mercury abatement equipment.

The delivery of improved and sustainable crematoria services is now not only business critical due to the condition and age of the existing facilities and cremators but also central to the Council's aspirations to provide the best level of service to its residents. The preferred delivery method is to build two new sustainable, modern, fit for purpose crematoria to replace the Scholemoor and Nab Wood facilities, whilst Oakworth crematorium will be refurbished.

## **2.3 Sites for New Crematoria**

Nab Wood crematorium remains the busiest facility within the District suggesting that its replacement should be similarly located close to the City/ShIPLEY border particularly bearing in mind the intended refurbishment of Oakworth crematorium. Consequently, the main areas of population to the north of Bradford City Centre will enjoy adequate provision resulting in the need for further consideration of the geographical location of the proposed replacement for Scholemoor Crematorium.

Over the past 6 years, 21 sites have been considered for the replacement of Nab Wood and 23 for Scholemoor. Options are limited due to the Cremation Act 1902 not allowing building of a crematorium within 200 yards of a dwelling house except with the consent of the landlord, tenant and occupier of the house or within 50 yards of any public highway.

Furthermore guidance from The Federation of Burial and Cremation Authorities (FBCA) includes a minimum requirement of two hectares (approximately five acres) at a location that is both quiet and secluded. The FBCA further advise that ideal sites are rarely to be located in urban areas and emphasise that suitability of setting is of greater importance than its location in close proximity to population centres. There is a growing recognition that new crematoria will be built in a countryside location close to the urban fringe which will involve the consideration of sites within the Green Belt.

The 44 sites were assessed against the legal criteria and best practice advice together with consideration of the desired geographical location to arrive at a short list of 5 sites which were initially reported to Executive in July 2018. Executive resolved to remove Northcliffe Park from this list in January 2019 and continues to actively prioritise the use of privately owned sites for the new facilities.

## **3.0 Progress Update**

### **3.1 Refurbishment of Oakworth Crematorium**

Planning permission has been granted for the refurbishment of this facility including partial demolition and rebuilding of the crematory to provide enhanced services for the public. Preparation of a detailed design in advance of a tender package is underway with a programmed start date on site currently spring 2020.

Disposal of a small strip of land to the Gate Lodge owners at Oakworth Crematorium has been agreed to provide a more realistic and better defined buffer zone between the property and the improved access for hearses. The owners have no objection to the proposed improvements at this site and there are no other interested parties in terms of the legal requirements covering living distances from crematoria.

### **3.2 Cremator Procurement**

The significant lead time for manufacture and supply of individual abated cremators determined that a procurement exercise was required well in advance of the building work commencing at Oakworth. In order to deliver best value to the Council, a tender for the staged procurement of all of the necessary cremator equipment has been issued under a Yorkshire Purchasing Organisation framework. The opportunity was also taken to include planned preventative maintenance over a 15 year period.

Highly competitive and comprehensive bids were received from two of the 3 suppliers currently registered on the framework and evaluation of the bids is ongoing with a decision anticipated before the end of October

### **3.3 Land Acquisition & Disposal**

The current activity within the 'developed design' stage together with the accompanying cost estimates continue to support the previously held view of the two preferred sites for the new crematoria.

Negotiations to acquire these two privately owned sites are continuing, however it is also proposed that the Council should use its Compulsory Purchase Order (CPO) powers to acquire the necessary land to deliver the schemes, should acquisition of the land by private treaty fail – see section 6 Legal Appraisal.

This report therefore seeks approval to proceed with a CPO for the private land within Heaton (Bradford West) required for the first new proposed crematorium. Following receipt of outstanding information and resolution of some matters of detail, a similar proposal for the second new facility on private land to the south of the city centre will be brought to Executive in the near future.

### **3.4 New Crematoria**

Development of the outline design and specification is underway following agreement of the architectural concept. The adopted design allows for a separate waiting room to one side of the port-cochere with the main service hall on the other. The unique service hall design allows for small funerals (up to 30) and larger ones (between 200 and 300) to use the catafalque which is positioned along the same axis as the main entrance and the cremator equipment.

The main service hall has 150 seats with an open aspect to one side for views over the surrounding countryside through glazed panels which, for at least one of the facilities, can be opened to allow under-cover standing for mourners outside the hall. Office accommodation with public access is positioned at the other side of the crematory alongside the exit route from the service hall leading to the flower garden and car park.

The current design incorporates the vast majority of the aspirational list of features included in national guidelines together with those drawn up by existing staff with local funeral directors. The potential threefold increase in capacity of the new service halls together with the provision of separate rooms for viewing of the deceased and witness charging reflect major elements of local consultation outcomes with Hindu and Sikh representatives.

Subject to final technical design and specification, the current cost estimate of the building infrastructure for one new facility remains in the region of £5.1m (including the cost of 2 new cremators).

The complementary provision of on-site access roads, car parking, landscaping, gardens of remembrance and mains service provision/alteration together with off-site costs and land purchase currently suggests a total project cost of £9.1m for the Heaton crematorium.

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

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

The current overall cost estimate for the crematoria investment programme, including external specialist resources, Oakworth refurbishment, two new crematoria and an allowance for future inflation stands at £23m. The indicative capital requirement agreed by Executive in November 2016 and included within the capital programme is £16m.

Financial analysis has been undertaken for the required £23m investment to ensure the following:

- That where service prudential borrowing is required (where total costs exceed £16m) it is managed within the service, without creating pressure on existing revenue budgets.
- That the project in its entirety does not place additional strain on the Council finances (specifically capital financing costs) as a whole

The outcome of the financial analysis, based on the current information available, demonstrates that the service can fund the prudential borrowing repayments of the additional capital investment required.

The financial modelling base case underpinning this analysis makes the following assumptions:-

- That cremation prices will rise, at a rate of 3% above inflation, from 01/04/2020 for a period of 5 years.
- That there will be a moderate increase in service users based on approximately half of funerals returning within the district from residents currently choosing to use neighbouring council facilities.

Whilst not currently included within the financial models it should also be noted that:-

- The current facilities are at increasing risk of failure, should this happen there will be significant revenue pressure to the Council.
- The costs for the current facilities do not include backlog maintenance which is significant at all three existing sites.
- The capital costs do not include any decommissioning costs for Scholemoor and Nab Wood

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

- 5.1 Any significant and lengthy failure in the provision of a cremation service would cause both reputational and also financial damage to the Council.
- 5.2 Land acquisition had not yet been agreed for either new site. The instigation of powers for compulsory purchase within this report will, if required, assist in achieving the desired outcomes and will run in parallel with the negotiations.
- 5.3 In seeking planning permission for the site, which sit within the green belt, the Council will need to demonstrate that *'the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the proposal'*. The Council's Major Developments Senior Planning Officer sits on the Programme Delivery Board and remains comfortable with the proposals to date and the approach taken to achieve permission whilst an external specialist planning consultant has also been engaged to specifically advise on the planning application. Support will be required from Legal Services.
- 5.4 The investment programme has been referred to the Council's taxation advisor in order for the council's VAT partial exemption risks to be accounted for in the forward programme. The final timings for construction of the new crematoria will need to take due consideration of the outcomes of this analysis.
- 5.5 Before the Council legally commits to each build stage of the project, a further report, including a full review of the cost modelling together with all risks and the actions proposed to mitigate these risks, will be brought to the Council's Project Appraisal Group (PAG) for consideration.

## **6. LEGAL APPRAISAL**

- 6.1 The Cremation Act 1902 provides for a local authority to own and operate cemeteries and crematoria and charge such fees as they see fit. In addition to this, the legislation extends to statutory requirements for keeping registers for burial and cremation together with site plans.
- 6.2 The Cremation (England & Wales) Regulations 2008 also requires that a cremation authority must ensure that a crematorium is maintained in good working order.
- 6.3 Further, the cremation of human remains is also governed by the Environmental Protection legislation with regard to emissions from cremator operation. The level of emissions must be recorded to allow annual certification by the local Environmental Health office. Crematoria across England & Wales have been

required to abate emissions of Mercury by 50% (of 2003 levels) since 31 December 2012.

- 6.4 A full feasibility analysis including title and deed investigation, consultation with any interested parties and confirmation that planning and environmental health are satisfied in policy and regulatory terms is required before any new sites for the crematoria can be recommended for approval. .
- 6.6 All procurement activity must be undertaken in accordance with Council's Contract Standing Orders and in line with internal governance requirements.

## **6.7 Compulsory Purchase**

### 6.7.1 Powers

This Report considers the consequences and justification of proceeding to authorise the use of compulsory purchase powers to facilitate the proposed Crematoria development schemes. In deciding on the most appropriate power to use to enable a CPO to be made, regard must be had to the use of the specific power available for the purposes intended. As the proposed schemes involve the redevelopment of land, it is proposed to rely on the use of planning development powers under Section 226(1) (a) of the Town and Country Planning Act 1990 (as amended).

### 6.7.2 Guidance

In consideration of the potential use of compulsory purchase powers to support voluntary negotiations to acquire all the land needed for the schemes, reliance has been placed on Government guidance entitled "Guidance on Compulsory Purchase Process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of compulsion" published in 2015. Weight must be given to the Guidance to ensure that the proper compulsory procedures are followed, that the process is open and transparent and that nobody with a purported interest in the development land is prejudiced.

### 6.7.3 The rights of the individual

An important part of the compulsory purchase process is the need to ensure that the rights of the individual are recognised and taken into account by complying with the following list of human and equality rights (6.7.3.1 to 6.7.3.5).

The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the Council's compulsory purchase powers and duties as a local planning authority. Any interference with a Convention right must be necessary and proportionate.

If compulsory purchase powers are required, project officers are of the view that in pursuing a CPO, careful consideration has been given to the balance to be struck between individual rights and the wider public interest. Any interference with Convention rights is considered to be justified in order to secure the economic, social, physical and environmental regeneration that the development schemes will bring. Appropriate compensation will be available to those entitled to claim it under the relevant provisions of the compulsory

purchase national compensation code.

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

- 6.7.3.1 Entitlement to a fair and public hearing in the determination of a person's civil and political rights (Convention Article 6) - this includes property rights and can include opportunities to be heard in the consultation process.
- 6.7.3.2 Rights to respect for private and family life and home (Convention Article 8) - Such rights may be restricted if the infringement is legitimate and fair and proportionate in the public interest
- 6.7.3.3 Peaceful enjoyment of possessions (First Protocol Article 1) - This right includes the right to peaceful enjoyment of property and is subject to the Council's right to enforce such laws as it deems necessary to control the use of property in accordance with the general interest.
- 6.7.3.4 Right to life - in respect of which the likely health impacts of the proposals will need to be taken into account in evaluating the scheme (Conversion Article 2).
- 6.7.3.5 Public Sector Equality Statement - In addition to the human rights legislation and requirements, project officers in formulating and promoting a CPO have so far and at this stage, also had regard to the Council's statutory duties and obligations under the Equality Act 2010 and in particular, to the Council's obligations under Sections 149 and 150 of the said Act, by taking into account the differential impact a CPO might have on various groups of persons with protected characteristics. As a result, project officers are satisfied that no negative impact upon any protected social groups has been identified.
- 6.7.4 Justification - As this is the first time that the Executive has been invited to consider the making of a CPO for the development of the Crematoria the Executive must be satisfied, prior to authorising the making of a CPO, that there is sufficient justification to make the Compulsory Purchase Order and to demonstrate that the Council has exercised due diligence and probity and has been open and transparent in formulating its scheme proposals and in contacting and opening negotiations with interested parties to acquire the land needed.

Of paramount importance is for the Council to be satisfied that the following requirements have or are reasonably likely to be met, prior to a decision being taken to make a CPO -

- That it is apparent from negotiations already undertaken, that there is little or no prospect of the land needed being acquired by voluntary means;
- That sufficient funding is or is likely to be available;
- That there are no planning obstacles;
- That the schemes are economically viable (i:e funding of each scheme represents “value for money”);
- That there are sufficient resources available to implement and complete

- the scheme within a reasonable timeframe;
- That the scheme will contribute to achieve the object of either promoting or improving economic, social or environmental well-being in the locality of the individual schemes and the wider community;
- That the compulsory purchase process is open and transparent
- That due regard has and is being given during the compulsory purchase process to the rights of the individual under human rights and equality impact legislation; and
- That there is a compelling case for the scheme in the public interest

## **7. OTHER IMPLICATIONS**

### **7.1 EQUALITY & DIVERSITY**

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

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

Project officers in formulating and promoting a CPO have so far and at this stage, also had regard to the Council's statutory duties and obligations under the Equality Act 2010 and in particular, to the Council's obligations under Sections 149 and 150 of the said Act, by taking into account the differential impact a CPO might have on various groups of persons with protected characteristics. As a result, project officers are satisfied that no negative impact upon any protected social groups has been identified.

In addition, both schemes aim to maximise public access by being, fully DDA/Equality Act compliant and dementia friendly, with plans to consult and engage all relevant stakeholder groups throughout the design process

The updated Equality Impact Assessment is included at Appendix 1.

### **7.2 SUSTAINABILITY IMPLICATIONS**

The strategy seeks to deliver the most sustainable service achievable over a 30-40 year period and beyond through a programme of capital investment.

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

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

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

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

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

#### **7.5 HUMAN RIGHTS ACT**

There are no known Human Rights Implications arising from this report other than those detailed in section 6.7.3.

#### **7.6 TRADE UNION**

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

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

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

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

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

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

None

### **9. OPTIONS**

#### **9.1 CPO**

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

In essence –

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

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

## 10. RECOMMENDATIONS

That the Executive approves the following recommendations -

- 10.1 To delegate approval of spend to the Strategic Director, Place in consultation with the S151 officer for the construction of the first new crematorium within Heaton at a cost of £9.1m subject to land acquisition and planning permission.
- 10.2 That the Executive is satisfied that the proposed development schemes to construct the Crematorium is in the public interest and that any harm caused by the use of compulsory purchase powers to acquire and interfere with third party land and rights needed for the scheme is outweighed by the public benefits which the Crematorium development scheme is likely to generate,
- 10.3 To agree in principle to Compulsory Purchase Orders being made pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by Section 99 of the Planning and Compulsory Purchase Act 2004), Section 1 of the Localism Act 2011 and the Acquisition of Land Act 1981 and all other relevant and enabling powers, to secure the compulsory acquisition of the land shown edged red on the plan appended hereto in order to facilitate the construction of the proposed Crematoria subject to a final decision being taken jointly by the Strategic Director : Place and the Strategic Director: Corporate Resources , in consultation with appropriate Portfolio Holders as necessary, on whether to make and submit the Compulsory Purchase Order to the Secretary of State for Housing, Communities and Local Government for confirmation, if satisfied that the Council has properly taken into account the statutory requirements under human rights and public sector equality legislation
- 10.4 To further delegate to the Strategic Director: Place and Strategic Director: Corporate Resources, in consultation with as necessary appropriate Portfolio Holders authority to:-
  - 10.4.1 make any necessary, minor or technical amendments to the Compulsory Purchase Order;
  - 10.4.2 modify and settle the draft "Statements of Reasons" to justify the use of compulsory purchase powers, the Compulsory Purchase Order Maps and Schedules and all other legal documentation necessary to support and accompany the Compulsory Purchase Orders to the Secretary of State for Housing, Communities and Local Government for confirmation;
  - 10.4.3 promote any modifications to the Compulsory Purchase Order, if expedient to do so;
  - 10.4.4 approve agreements for withdrawal of any objections to the Compulsory Purchase Order, including where appropriate, seeking exclusion of land from the Compulsory Purchase Order;
  - 10.4.5 confirm the Compulsory Purchase Order, if satisfied that it is appropriate to do so, in the event that the Secretary of State for Housing, Communities and Local Government has empowered the Council to decide on whether or not to confirm the Compulsory Purchase Order;

- 10.4.6 take all necessary action to continue or open negotiations with persons for the acquisition of land included in the Compulsory Purchase Order and any other land needed for the Crematorium scheme and to authorise acquisitions by agreement where the use of compulsory purchase powers is in contemplation and to approve the purchase price, advance payments and all other compensation payments;
- 10.4.7 take all necessary steps in relation to any statutory blight proceedings instituted against the Council for the acquisition of land claimed to be blighted by the threat or presence of the Compulsory Purchase Order;
- 10.4.8 take all necessary action, should the quantum of compensation flowing from the threat or use of compulsory purchase powers be in dispute and be referred to the Upper Tribunal (Lands Chamber) or other form of arbitration;
- 10.4.9 to take and do all things necessary or incidental to the implementation of the above resolutions;
- 10.5 The implementation of Phase 3 and 4 works by Rex Procter & Partners to finalise the designs for the new crematoria and administer the subsequent building contracts

## **11. APPENDICES**

- 1 Equality Impact Assessment – Bereavement Services Strategy
- 2 CPO Red Line Plan – Heaton Crematorium

## **12. BACKGROUND DOCUMENTS**

Bereavement Services Strategy 2016-2031

## Appendix 1 – Bereavement Services Strategy EIA

Equality Impact Assessment Form

Reference –BerSerStrat

<b>Department</b>	Place	<b>Version no</b>	1.1
<b>Assessed by</b>	John Scholefield	<b>Date created</b>	May 2018
<b>Approved by</b>		<b>Date approved</b>	
<b>Updated by</b>		<b>Date updated</b>	October 2019
<b>Final approval</b>		<b>Date signed off</b>	

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

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

### Section 1: What is being assessed?

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

The Bereavement Services Strategy

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

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

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

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

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

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

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

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

Not applicable

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

No

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

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

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

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

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

**Section 3: Dependencies from other proposals**

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

None

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

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

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

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

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

## **Section 5: Consultation Feedback**

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

A number of stakeholder consultation events have been carried out specifically relating to the crematoria investment programme and the Oakworth refurbishment has been subject to an element of public consultation through the planning application.

The Bradford Council for Mosques remain a regular consultee particularly in terms of future Muslim burial ground provision.

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

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

Issues relating to appearance and size of service halls and viewing of bodies, raised by different religious/faith representatives, has been addressed within the designs for new crematoria.

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

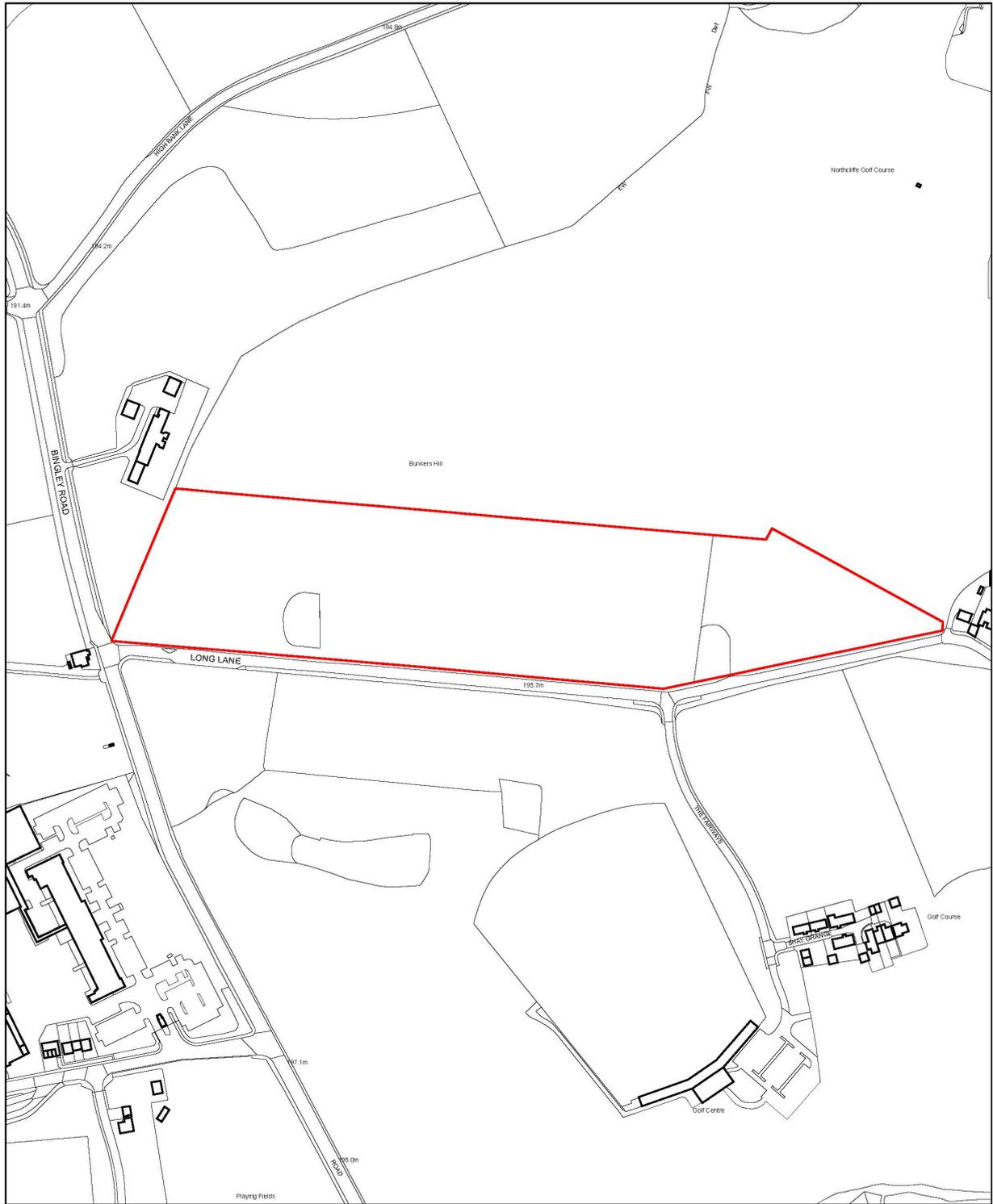
Awaited

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

N/A

**Appendix 2**

**CPO Red Line Plan – Heaton Crematorium**



City of Bradford Metropolitan District Council

**ESTATES and PROPERTY**

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 1/2500@A3

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Plan No.  
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CM

