

# Report of the Director of Finance to the meeting of Executive to be held on 31<sup>st</sup> January 2023

**AP**

---

**Subject: 2023-24 BUDGET UPDATE**

## **Summary statement:**

On 14th December 2022 the Executive approved budget proposals for consultation as required with the public, interested parties, staff and the Trade Unions. This report provides the Executive with an update on the 2023-24 budget position following national announcements outlined in the Provisional Local Government Settlement (20<sup>th</sup> December 2022), and the impact following the setting of the Council Tax and Business rates bases for 2023-24.

The report also provides a revised estimate of inflationary pressures in 2023-24, and an update on estimated savings associated with changing the Minimum Revenue Provision Policy following further review.

It also identifies issues and uncertainties which could still have a bearing on the final size of the budget for 2023-24 and future financial years. This includes for example the agreement of the contract price for the new Bradford Children's and Families Trust.

The report also outlines responses that have been received to the consultation so far. Executive will need to have regard to this report when considering the recommendations to make to Council at their meeting on 21st February 2023 in advance of Budget Council on the 23rd February 2023

## **EQUALITY & DIVERSITY:**

The report sets out clearly the need for equality to be considered as part of the Budget Strategy. As in previous years full Equality Impact Assessments have been produced for all budget proposals and full consultation with relevant groups has been undertaken. The outcome of consultation will be considered and reported upon before the 2023/24 budget is approved.

---

Christopher Kinsella  
Director of Finance IT & Procurement

Report Contact: Andrew Cross  
Phone: 07870386523  
Email: [andrew.cross@bradford.gov.uk](mailto:andrew.cross@bradford.gov.uk)

**Portfolio:**

**Leader of the Council**

**Overview & Scrutiny Area:**

**Corporate**

## 1. SUMMARY

- 1.1 This report provides an update to the 2023-24 Budget Proposals report approved by the Executive on the 14th December 2022, with additional information derived from;
  - The Governments Provisional Local Government Settlement (20<sup>th</sup> December 2022).
  - The Council Tax Base setting report (3<sup>rd</sup> January 2023 Executive),
  - The NNDR1 form to Government to set the Business Rates Base (31<sup>st</sup> January 2023).
- 1.2 Further, given the volatility of energy prices and other inflation, a review of inflation assumptions has also been undertaken, and expected 2023-24 capital financing savings have also been updated following the completion of a review into the Minimum Revenue Provision policy.
- 1.3 The overall impact of the above is to add c£4.2m to the budget gap for 2023-24 in comparison to that outlined in the 14<sup>th</sup> December Budget Proposals report.
- 1.4 Unless otherwise mitigated, this would increase the call on reserves to balance the budget in comparison to the 14th December Budget Proposals report from c£30.5m to c£34.6m in 2023-24.
- 1.5 In line with approvals from 2021-22, £4.25m of reserves are also required in 2023-24 to fund City of Culture preparation and a Regeneration opportunity, and £6m is recommended to be added to an Energy Price volatility reserve to earmark funds to pay for energy costs should they persist at current levels as outlined in Section 3.
- 1.6 It should also be noted that regarding Children's Social Care, there have been further increases in Children Looked After numbers and Agency staff use since a £45m pressure was included in the MTFs and reflected in the 14<sup>th</sup> December budget proposals. Updated values are not provided in this update, as negotiations are ongoing about the contract price for the Children's Trust. These are however likely to add additional pressures, and the outcome will be provided in future updates.
- 1.7 Section 7 outlines the revised funding gap amounts that would have to be covered by reserves unless otherwise mitigated, and section 8 outlines the remaining balance of reserves. Given forecast overspends in 2022-23, and the budget gap for 2023-24, reserve levels are reducing to critical levels based on current trajectories.
- 1.8 It should also be noted that the Provisional Local Government Settlement is itself subject to the outcome of a nationwide consultation which ends on 16th January 2023, and this will be followed by a Final Settlement shortly after that. This report is based upon officers' assessment of the Provisional Local Government Settlement, informed by financial analysts.
- 1.9 Section 9 of the report also recommends the addition of a new Children's Residential Care home capital scheme to the reserve list of the Capital Investment plan, pending the completion of the business case, and negotiations with the Bradford Children's and Families Trust.

1.10 Appendix B also provides an update on the outcome of the Budget consultation so far.

## Reconciliation of changes since the 14<sup>th</sup> December 2022 Budget Proposals report.

2.1 The table below outlines the key changes to the proposed 2023-24 budget following a number of events that have occurred since the 2023-24 Budget Proposals report was approved by the Executive on the 14<sup>th</sup> December 2022. The overall impact is to add £4.160m to the funding gap to 2023-24 as outlined.

	Expected Change in 2023-24 per 14th Dec Budget Proposals	Expected Change in 23-24 at 31 <sup>st</sup> Jan 2023 (This report)	Difference
<b>£000s</b>			
Inflation	58,605	58,450	-154
Reduction in New Homes bonus	1,476	1,424	-52
Reduction in Lower Tier Services Grant	104	984	880
Market Sustainability and Fair Cost of Care Fund	0	1,551	1,551
Cost of Reforms	0	-1,551	-1,551
ASC Market Sustainability and Improvement Fund	0	-5,379	-5,379
ASC Discharge Fund	0	-3,279	-3,279
Social Care Grant	-23,021	-15,494	7,527
Services Grant	0	4,191	4,191
Grants rolled into Core Spending Power	0	2,669	2,669
Business Rates Multiplier Cap Compensation	-15,422	-8,031	7,391
Funding Changes			13,948
MRP Change of Policy	-1,000	-5,000	-4,000
Capital Financing and central budget adjustments			-4,000
	Total Expected at 14 <sup>th</sup> Dec 22	Total Expected at 31 <sup>s</sup> Jan 23	
Resources			
Business Rates	-57,160	-58,249	-1,088
BR S31 Retail and Hospitality	-6,741	-7,944	-1,202
2022/23 BR Collection Fund Deficit	0	1,804	1,804
Business Rates Top up grant	-69,259	-74,971	-5,712
Revenue Support Grant	-36,792	-40,304	-3,512
Assumed increase in RSG from NHB legacy	-3,939	0	3,939
2022/23 Council Tax Collection Fund Deficit			138
Total Resources			-5,633
Total Change since 14 <sup>th</sup> December (- = Favourable, + = Adverse)			4,160

- 2.2 The Department for Levelling Up, Housing and Communities (DLUHC) published the Provisional Local Government Settlement on 20th December 2022, this resulted in a number of changes to funding expectations.
- 2.3 Although overall, the amounts expected for Adult Social Care/Social Care grants, and Business Rates multiplier compensation/Top up grant and Revenue Support Grant were largely as in line with those estimated in the 14<sup>th</sup> December report, the 2023-24 Budget Proposals report had not assumed that those increases would be partly paid for by a significant reduction in other existing grants.
- 2.4 For example, the Services Grant will be reduced by £4.2m; the Lower Tier Services grant will end (£0.9m), and some existing grants will get rolled into Core Spending Power. This means that the Council will stop receiving £2.7m of specific grants, and instead it will be received via the Core Spending Power calculation/ Revenue Support Grant instead totalling £2.7m. This includes Independent Living Fund grant of c£1.9m.
- 2.5 Our current best estimate is that the amount of funding will be c£6.7m lower in 2023-24 than previously assumed in the 14<sup>th</sup> December Budget Proposals report.
- 2.6 Further, since the 14<sup>th</sup> December Budget Proposals report, the Executive also approved the Council Tax base report on the 3<sup>rd</sup> January which identified a c£138k expected Council Tax collection fund deficit in 2022-23 that must be repaid in 2023-24.
- 2.7 As outlined in that report, the Business Rates base would be set for 2023-24 when the NNDR1 form is submitted by the Director of Finance to Government by the 31<sup>st</sup> January 2023 using the Business Rates data at the 31<sup>st</sup> December 2022.
- 2.8 At the time of writing, our current best estimate is that the net impact on top of the impacts that appeared in the Settlement is that the Councils funding would be a further c£1.5m worse off in 2023-24. This is due mainly to a forecast Business Rates Collection Fund deficit in 2022-23 that must be repaid in 2023-24.
- 2.9 When combined, the impact of the Provisional Settlement and the Council Tax and Business Rates base setting will be that the Council will receive c£8.3m less funding than assumed as part of the 14<sup>th</sup> December Budget Proposals report..

### **Comparison to 2022-23 budgets**

- 2.10 The table below outlines how much funding the Council now expects to receive in 2023-24 compared to the 2022-23 budget for those funding areas and grants that are included in the Provisional Settlement and the Council Tax and Business Rates base reports.
- 2.11 The table demonstrates that the amount of funding that the Council will receive as a result of the settlement and the setting of the Council Tax and Business rates base is significantly higher than in 2022-23, however it is less than previously anticipated in the 14<sup>th</sup> December Budget proposals report, and it falls a long way short of the pressures.

£000s (- = income)	2022-23 Budgeted Amount	Amount expected in 2023-24 following the Settlement	Difference
New Homes Bonus	-2,014	-590	1,424
Lower Tier Services Grant	-984	0	984
Market Sustainability and Fair Cost of Care Fund	-1,551	0	1,551
Cost of Reforms	1,551	0	-1,551
ASC Market Sustainability and Improvement Fund	0	-5,379	-5,379
ASC Discharge Fund	0	-3,279	-3,279
Social Care Grant	-24,311	-39,805	-15,494
Service Grant	-9,600	-5,409	4,191
Grants rolled into Core Spending Power	-2,669	0	2,669
Multiplier Cap Compensation	-12,973	-19,439	-6,466
Business Rates	-57,160	-58,249	-1,088
S31 Retail & Hospitality Reliefs	-7,431	-7,944	-531
Top up grant	-69,259	-74,971	-5,712
Revenue Support Grant	-35,875	-40,304	-4,429
Council Tax	-221,431	-233,291	-11,860
Total Funding Changes per Settlement incl Council Tax			-44,970

2.12 The c£45m of additional funding (inclusive of c£11m of Council Tax increases) also falls well short of the c£113m of pressures included in the Budget Proposals report to fund inflation (c£58.6m), demographic growth (£2.7m) and additional demands as outlined (£51.6m), meaning that the gap must be filled by cuts and one-off reserves.

## Inflation

3.1 Given the significant scale and volatility of inflationary pressures, a review of assumptions relating to inflation for 2023-24 has recently been completed. This has resulted in some changes to those assumed in the MTFs and 14<sup>th</sup> December Budget Proposals report as outlined below.

<b>Inflation Amounts included in MTFs and 14<sup>th</sup> Dec Budget proposals £m</b>	<b>58.6</b>
Adjust for the saving from the National Insurance increase reversal	-1.7
Take out the excess estimated for National Living Wage > inflation	-2.5
Reduction due to lower estimated impact of 2022-23 pay award (c£13m overbudget vs prior estimate of £14.6m)	-1.7
Review of Inflation on Contracts (Catch up CPI for 2022/23 + forecast CPI for 2023/24 (12.4% increase vs now 10.4% previously)	+5.8
<b>Inflation requirement following review (excl Energy Costs) £m</b>	<b>58.4</b>

3.2 The net impact of the above is for the inflation requirement (excluding energy costs) to be c£0.2m lower than the 14<sup>th</sup> December Budget Proposals report.

3.3 Further, a review of energy costs has also been undertaken. Energy prices are currently very volatile, and if energy spot market kWh prices before Christmas,

persisted throughout 2023-24, then energy costs would be c£6.0m higher than the amounts currently factored into the above table.

- 3.4 As energy prices continue to fluctuate and are falling currently, and the Government will be providing additional support via a discount scheme (which is not currently understood), it is not currently planned to provide for the potential excess cost through additional budget. Energy costs will however be a significant risk in 2023-24, and consequently it is recommended that £6m is earmarked to the Energy price volatility reserve.

### **Capital Finance - Minimum Revenue Provision policy review.**

- 4.1 Since the 14<sup>th</sup> December Budget Proposals report, a review of the Minimum Revenue Provision policy has also concluded which has assessed the extent to which near term financial savings could result from amending the policy from a straight line method to an annuity method.
- 4.2 Specialist advisors have undertaken this review, and the outcome is that changing the policy would result in savings in comparison to the current method for the next 10 years, after which the costs would increase above those using the current method.
- 4.4 The savings in 2023-24 of c£5m compare favourably to the £1m that is currently factored into the 14<sup>th</sup> Budget Proposals report. Consequently, should the policy change be adopted, this would result in an additional saving to 2023-24 of c£4m.
- 4.5 It is important to note however changing the policy does not result in a capital financing saving overall, it merely, alters the shape of repayments meaning that less is paid in the first 10 years, and more is paid in later years.

### **Children’s Social Care/ Bradford Children’s and Families Trust Costs.**

- 5.1 Contained within the 14<sup>th</sup> December Budget Proposals was c£45m for additional Children’s Social Care pressures; a share of budget to account for inflation, and funding for demographic growth. Additionally, the Children’s Services department proposed that c£6m of additional funding could be expected to be received from Health partners in 2023-24. This resulted in the following amounts that are included in the 14<sup>th</sup> December Budget Proposals report to pay for the contract price associated with the Bradford Children’s and Families Trust (BCFT) in 2023-24.

	£m
Current Budget inc 2022-23 Pay Award	110.0
MTFS Children’s Social Care Growth per 22-23 overspend	45.0
Inflation Social Care – Share of Council Wide £58m Inflation	8.0
Demographic Growth	0.6
Assumed additional CHC Money (part of the Central budget adjustments)	-6.0
<b>Current Amount in Budget Proposal to fund BCFT £m</b>	<b>157.8</b>

- 5.2 Since the £45m pressure was included in the MTFS, and subsequently the 14<sup>th</sup> December Budget Proposals report, there has been continued growth in Children

Looked After numbers. Work has been undertaken by Children’s Services to model Children Looked After placements, including the full year effect of significant growth in 2022-23, into 2023-24 and beyond, and this is likely to add additional financial pressures.

- 5.3 Further, many additional Agency staff have been taken on contrary to plans, and despite best endeavours, the numbers of permanent social workers have continued to reduce.
- 5.4 The financial impact of additional Children Looked After numbers and Agency staff will be to place further pressure on the 2023-24 budget. The extent of this however is currently subject to negotiation with the Bradford Children’s and Families Trust. Additionally, discussions are underway with DLUHC and DfE officials around the anticipated funding needs.

**Other Risks not factored in currently.**

- 6.1 In addition to the above, there are also a number of other risks that could add further cost that are not currently factored in.
- 6.2 The new Social Care grants that have been provided as part of the Autumn Statement could have some new burdens. Any costs associated with new burdens are not currently included.
- 6.3 Energy costs – although an Energy Price volatility reserve is proposed, energy prices could exceed this.
- 6.4 Other costs deriving from negotiations with the Bradford Children’s and Families Trust.

**Impact on Reserve use**

- 7.1 The net financial impact of the Provisional Settlement, Council Tax and Business Rates base setting, Inflation review; and MRP policy review is to add c£4.2m to the budget gap for 2023-24.
- 7.2 Further, £6.0m is recommended to be added to the Energy Price volatility reserve to address the risk of high energy prices persisting in 2023-24.
- 7.3 This would take the total call on reserves in 2023-24 from £34.5m to £44.9m.

	Reserve use per Budget Proposals report £m	Proposed Reserve use now £m	Difference £m
Reserves for City of Culture & Regen Opportunity	4.25	4.25	0

Dept of Place reserves	2	2	0
Reserves required to balance the budget	28.5	32.6	4.2
<b>Total Budgeted Reserve use</b>	<b>34.7</b>	<b>38.9</b>	<b>4.2</b>
Energy Price Volatility reserve		6.0	6.0
<b>Total including Earmarking</b>	<b>34.5</b>	<b>44.9</b>	<b>10.2</b>

7.4 The above is exclusive of any additional costs in excess of the amounts already included in the 14<sup>th</sup> December Budget Proposals associated with the Bradford Children's and Families Trust which remains subject to negotiation.

### Current Balance of Reserves

8.1 At 31<sup>st</sup> December 2022 reserves stand at £174.9m (Council £128.4m and Schools £46.5m).

	Closing Balance 2020-21 £m	Closing Balance 2021-22 £m	Opening Balance 2022-23 £m	Net Movement	Balance at 31st December 2022 £m
Council reserves	256.5	228.2	228.2	-99.8	128.4
Schools Delegated budget	42.9	46.6	46.6	-0.1	46.5
<b>Total</b>	<b>299.4</b>	<b>274.8</b>	<b>274.8</b>	<b>-99.9</b>	<b>174.9</b>

8.2 The Council has £19.5m of General Fund reserves.

8.3 Overall, reserve levels have reduced significantly in 2022-23. £99.9m of reserves have already been drawn down in 2022-23.

8.4 The table below outlines the current Council reserve balance and then adjusts that for the current 2022-23 forecast overspend that will have to be bridged using reserves unless otherwise mitigated. This is then adjusted further to account for Grant Reserves that have specific purposes, and the General Fund balance which is the minimum amount recommended to be held each year.

	£ms
Council Reserves at 31/12/2022	128.4
Less Forecast 2022-23 Overspend before mitigations	-37.0
Less General Fund Balance	-19.5
Less Grant Reserves	-14.5
<b>Amount Remaining</b>	<b>57.5</b>

8.5 The amount remaining after adjustments equates to c£57m, however it should be noted that some of this will already be allocated to committed spend.



## Capital Expenditure Budget Proposals

- 9.1 In addition to the proposed capital investments outlined in the 14<sup>th</sup> December Budget proposals report, there is also a proposal to invest in internally provided Children's Residential Care.
- 9.2 The investment would cover 'small group' homes, staying close provision for 17+ year olds, and emergency provision. The capital cost is expected to be c£5.2m and would be funded by savings that will result from the freeing up of capacity and reduced need for costly external residential provision. This is recommended to be added as a reserve scheme in the capital investment plan to be approved by Full Council on 23rd Feb 2023. In the meantime, the business case is in the process of being finalised and this will need to be approved by the Project Appraisal Group and the Bradford Children's & Families Trust prior to final approval by the Executive.

## Consultation

- 10.1 Appendix B provides the outcome of the budget consultation which includes feedback received from the public, interested parties and key stakeholders.
- 10.2 In proposing the final budget the Executive will need to have due regard to the information contained within this report, the consultation feedback received, and the public sector equality duty as set out in section 149 Equality Act 2010.

## 11. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 11.1 The uncertainties regarding the funding that will be available to the Council are considered within this report.

## 12. LEGAL APPRAISAL

- 12.1 It is necessary to ensure that the Executive have comprehensive information when considering the recommendations to make to Council on a budget for 2023/24 at their meeting on 21 February 2023. It is a legal requirement that Members have regard to all relevant information and the information in this report is considered relevant in this context.

S149 of the Equality Act 2010 (the Public Sector Equality Duty) provides as follows:

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

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010

b) advance equality of opportunity between persons who share a relevant protected

characteristic and persons who do not share it

c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

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

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

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

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

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

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

12.2 The Council must ensure that it has sufficient information to enable it to identify whether a proposal, if implemented, would disproportionately affect particular groups with relevant protected characteristics and if so whether any such adverse impact can be avoided or mitigated.

12.3 The courts have established a number of principles which the Council should take into account in making decisions:

- the duty means that the potential impact of a decision on people with different protected characteristics must always be taken into account as a mandatory relevant consideration
- where large numbers of vulnerable people, many of whom share a protected characteristic, are affected, consideration of the matters set out in the duty must be very high
- even if the number of people affected by a particular decision may be small, the seriousness or the extent of discrimination may be great. The weight given to the aims of the duty is not necessarily less when the number of people affected is small.

12.3 There is also a duty on all Best Value authorities to consult when making changes to services or ending service provision.

12.4 In addition to these specific legal duties, the Council has put out its proposals for public consultation and accordingly must have regard to the responses before making budget decisions.

12.5 In summary, it is necessary to ensure that Executive have comprehensive information when considering the recommendations to make to Council on a budget for 2023 -2024

Case law has confirmed that, in order to fulfil the duty under S149 Equality Act 2010, Elected Members need to read in full the EIA forms and consultation feedback as it is a legal requirement that Elected Members have regard to all the relevant information and accordingly Elected Members are referred to the

information at Appendix B and Annex 1 to Appendix B and to the equality assessments: <https://www.bradford.gov.uk/your-council/council-budgets-and-spending/budget-eias-2022-23/>

## **13. OTHER IMPLICATIONS**

### **13.1 EQUALITY & DIVERSITY**

The equality implications are considered in Appendix B of this report.

### **13.2 SUSTAINABILITY IMPLICATIONS**

There are no direct sustainability implications resulting from this report.

### **13.3 GREENHOUSE GAS EMISSIONS IMPACTS**

There are no direct greenhouse gas emissions implications resulting from this report.

### **13.4 COMMUNITY SAFETY IMPLICATIONS**

There are no direct community safety implications resulting from this report

### **13.5 HUMAN RIGHTS ACT**

There are no Human Rights implications resulting from this report

### **13.6 TRADE UNION**

Trade Union feedback is outlined in Appendix B.

### **13.7 WARD IMPLICATIONS**

There are no direct Ward or area implications resulting from this report.

### **13.8 IMPLICATIONS FOR CORPORATE PARENTING**

None identified.

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

None identified.

### **13.10. NOT FOR PUBLICATION DOCUMENTS**

None

## **14. RECOMMENDATIONS**

14.1 Executive are asked to:

14.1.1 note the contents of this report and to have regard to the information contained within this report when considering the recommendations to make to Council on a budget for 2023/24 at their meeting on 21 February 2023.

14.1.2 in accordance with Section 149 of the Equality Act 2010, to have regard to the information contained in Appendix B and the Annex to Appendix B together with the equality assessments when considering the recommendations to make to the Council on budget proposals for 2023-24.

## **15. BACKGROUND DOCUMENTS**

2022-23 Qtr 3 Financial Position Statement Executive report 31 January 2023

Calculation of Bradford's Council Tax Base and Business Rates Base for 2023/24  
Executive Report 1 January 2022

2023/24 Budget Proposals 14th December 2022 Executive

## **16. Appendices**

**Appendix A - SUMMARY OF FINANCIAL IMPLICATIONS**

**Appendix B - CONSULTATION FEEDBACK AND EQUALITY ASSESSMENT  
FOR THE 2023-24 COUNCIL BUDGET PROPOSALS**

## Appendix A- Summary of Financial Implications – Revenue Budget 2023-24

1.1 The table below shows the 2023-24 budget requirement based on the updated information outlined within this report, and compares it to 2023-24 Budget Proposals report approved by the Executive on the 14<sup>th</sup> December 2022.

**Table 1**

	<b>2023/24 Budget Proposals Dec 2022 £000s</b>	<b>Change since 14<sup>th</sup> December £000s</b>	<b>2023/24 Budget Proposals 31<sup>st</sup> Jan 2023 £000s</b>
<hr/>			
Cumulative gap £000s			
2022/23 Base Budget	388,456		388,456
Existing Pressures in Children's & Adults Care	50,000		50,000
Investments previously approved	500		500
New Investments for Consultation	1,098		1,098
Inflation	58,604	(154)	58,450
Demographic Growth	2,713		2,713
Funding Changes	(25,432)	13,948	(11,484)
Base Net Expenditure Requirement	475,938	13,948	489,732
Reversal of One-Off investments	(1,600)		(1,600)
Existing approved savings	(350)		(350)
New Savings for consultation	(13,692)		(13,692)
Capital financing & central budget adjustments	(18,390)	(4,000)	(22,390)
<b>Net Expenditure Requirement</b>	<b>441,906</b>	<b>9,793</b>	<b>451,700</b>
<hr/>			
<b>RESOURCES</b>			
Localised Business Rates (BR)	(57,160)	(1,089)	(58,249)
S31 Grant to compensate for BR Retail reliefs	(6,742)	(1,202)	(7,944)
BR Collection Fund deficit from 2022-23		1,804	1,804
Top Up Business Rates Grant	(69,259)	(5,712)	(74,971)
Revenue Support Grant	(36,792)	(3,512)	(40,304)
Assumed additional RSG replacing New Homes Bonus	(3,939)	3,939	0
Council Tax Income	(233,290)	0	(233,290)
CT Collection Fund deficit from 2022-23	0	138	138
Pre agreed Use of reserves	(4,250)	0	(4,250)
Dept of Place reserve use	(2,000)	0	(2,000)
Use of reserves to balance the budget	(28,473)	(4,160)	(32,633)
<b>Total resources</b>	<b>(441,906)</b>	<b>(9,793)</b>	<b>(451,700)</b>

## Appendix B

### CONSULTATION FEEDBACK AND EQUALITY ASSESSMENT FOR THE COUNCIL BUDGET PROPOSALS FOR 2023-24

#### 1. SUMMARY

On 14 December 2022 the Executive approved new budget proposals for consultation with the public, partners, local business, the voluntary and community sector, and other interested parties, staff and the Trade Unions. This appendix provides feedback from the public engagement and consultation programme. There is particular reference to the Council's responsibilities under equality legislation to enable the Executive to have due regard to the Public Sector Equality Duty when considering its recommendations to Council on proposals for the 2023-24 budget.

#### 2. BACKGROUND

##### Best Value and the Equality Act 2010

- 2.1 Statutory guidance on Best Value introduced in September 2011 and reaffirmed in March 2015 reminds local authorities that they are under a duty to consult service users and potential service users, local voluntary and community organisations, and small businesses.
- 2.2 There should also be opportunities for organisations, service users and the wider community to put forward options on how to reshape the service or project. Local authorities should assist this engagement by making available all appropriate information in line with the Government's transparency agenda.
- 2.3 The Equality Act 2010 protects people from unlawful discrimination on the basis of 'protected characteristics'. The Equality Act 2010 defines protected characteristics as age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. As outlined in the recently approved Equality, Diversity and Inclusion Plan, the Council's approach to equalities goes beyond this, by looking at equality more broadly and taking into account the impact of our decisions on people on low income or with a low wage.
- 2.4 The 2010 Act also introduced a specific Public Sector Equality Duty which requires local authorities, in the exercise of their functions, including when making decisions, to have due regard to the need to:
  - Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
  - Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
  - Foster good relations between people who share a protected characteristic and people who do not share it.
- 2.5 In discharging this duty, local authorities not only need to understand how different people will be affected by their activities, proposals and decisions, they also need to

demonstrate that they have given due regard by publishing information that shows they have consciously discharged their responsibilities as part of the decision-making process.

2.6 There is a range of guidance materials on the Public Sector Equality Duty from the Equality and Human Rights Commission (EHRC) to assist the bodies that are subject to the duty, to understand the duty and meet their responsibilities. This notes that a public body will only be able to comply with the general equality duty in relation to a decision, if the ultimate decision maker:

- Understands the body's obligations under the general equality duty.
- Has sufficient information.
- Demonstrably takes this information fully into account throughout the decision-making process.

2.7 The EHRC emphasises the importance of ensuring that the duty is complied with before a decision is taken, while options are being developed and appraised, as well as at the time of the actual decision. The duty cannot be used retrospectively to justify a decision.

### **3. OTHER CONSIDERATIONS**

3.1 The engagement and consultation programme in relation to the budget proposals for 2023-24 was agreed by the Executive at its meeting on 14 December 2022. At the meeting the Executive reaffirmed its commitment to a public engagement and consultation programme designed to meet the legislative duties and to fulfil the following objectives:

- Support the 2023-24 budget setting process in as fair and as transparent a way as possible.
- Ensure that the Council meets its specific duties under equality legislation, in particular that the potential impact of the proposals on groups or individuals who share protected characteristics are considered, assessed and consulted upon. This also includes the locally agreed characteristic of low income/low wage.
- Ensure that Trade Unions and staff are consulted appropriately and in a timely manner.
- Meet Best Value Statutory Guidance regarding the way local authorities should work with Voluntary and Community Sector (VCS) organisations and small businesses when facing difficult funding decisions.
- Consult and engage with the VCS.
- Ensure the Council complies with all other legal duties to consult.

3.2 While the Council is not required under statute to produce or publish Equality Impact Assessment (EIA) forms specifically, it must still show it is meeting its General Duty which includes showing due regard. To do this, a local decision has previously been taken to continue to use EIA forms. Equality impacts are considered by officers and elected members as part of the development of the budget proposals, with assessments recorded through an EIA form. The forms can then assist members of the public and other interested parties to view potential equality impacts. This will show where a disproportionate impact has been identified, or where an impact affects a number of people or particularly vulnerable

groups. Mitigations will have also been considered, and where these have been possible, they have also been captured on the EIA forms.

- 3.3 Case law has confirmed that in order to fulfil the duty under S149 of the Equality Act 2010, elected members need to have considered equality impacts and given due regard to the three aims of the Equality Duty as part of their decision making processes.
- 3.4 EIA forms outlining identified equality impacts on the new budget proposals agreed by the Executive at their meeting on 14 December 2022 are available on the Council's web site at: [Budget EIAs - 2023-24](#) . A summary of these is also provided in Annex 1 to this document. Feedback from the consultation where respondents have identified a possible negative equality impact related to a proposal is also provided in Annex 1.
- 3.5 Following a review and assessment of the consultation feedback, EIA forms will be updated then republished at the same time as the papers for the Executive meeting to be held on 21 February 2023.

#### **4 Cumulative Equality Impacts on the 2023-24 Budget Proposals**

The proposals focus on protecting key frontline services, investment in services to support our most vulnerable children and adults, and sustaining the capacity to deliver the Council's ambitions for growth. Previously agreed savings must continue to be delivered and new savings must be achieved.

The proposals contribute to fulfilling our equality duties to:

- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

The cumulative equality impact assessment is based on the draft budget proposals presented to Executive on 14 December 2022. All EIA forms will be updated where required and republished on the Council's website at the same time as the papers for the Executive meeting to be held on 21 February 2023. This will include an overall assessment of equality impact of the final Budget proposals.



**Table 1. Shows the total level of negative impacts across each protected characteristic group from proposals presented to Executive on 14 December 2022.**

Protected Characteristic	Negative impact Levels			
	High	Medium	Low	TOTAL
Age	0	0	5	5
Disability	1	0	5	6
Gender reassignment	0	0	4	4
Race	1	0	4	5
Religion/belief	1	0	4	5
Pregnancy/Maternity	1	0	3	4
Sexual Orientation	0	0	4	4
Sex	1	0	3	4
Marriage & Civil Partnership	0	0	3	3
Low Income/Low Wage	0	3	5	8

Where disproportionate negative impacts have been identified in the proposals, consideration has been given to measures that would mitigate against them. Please see Annex 1 for details of these measures.

There are no significant cumulative high negative impacts identified through these proposals, but the cost of living crisis continues to impact the district's people, with a disproportionate impact on those on low income, and may result in more people needing to seek support from the Council and other services.

## **5 Consultation Process**

- 5.1 The consultation provided the people, partners and businesses of the district along with Council staff and their Trades Unions, with opportunities to provide their views on the budget proposals, to help shape and inform final decisions. The budget consultation sought comments on proposals for the financial year 2023-24.
- 5.2 The consultation opened on the 14 December 2022 and ran to the 25 January 2023. The consultation comprised of a survey enabling individuals and organisations to comment on the proposals of their choosing. Online and face to face meetings to receive feedback were offered to partners and a number of face to face public consultation events were also offered. However, there was limited take-up of these events.
- 5.3 The public and others responding to the consultation could provide their responses online or by writing to the Council using a freepost address. The Council's website, press releases, social media (Twitter and Facebook), Stay Connected, direct email to partners and organisations and the Council's app were used to promote the consultation. The budget information was also provided in an easier read format and other accessible formats if requested.
- 5.4 The consultation has been promoted to:

- Strategic partnerships and partnerships
- Partner organisations from across the district
- Voluntary and Community Sector
- Faith Groups
- Business community – via the Chamber of Commerce and Industry
- Organisations that advocate or represent specific groups or communities

5.5 Annex 1 provides the consultation feedback on the budget proposals and feedback on their equality impacts for Executive to have regard to when considering their recommendations to Council on their budget proposals for 2023-24.

## 6 Consultation – Responses and feedback received

6.1 The number of comments received through responses to the survey, social media, and news releases for each of the proposals under consultation was as follows:

Ref	Proposal	No comments		Total
		Online Survey	Social media posts/ news releases	
4.8	Increase in Council Tax 2.99% and Social Care Precept of 2%	30	40	70
7.10	Replacement of Vehicles - £3m	0	0	0
7.10	Property Programme - £4m.	0	0	0
7.10	General contingency for unforeseen capital expenditure - £1m.	0	2	2
7.10	IT Device Refresh Programme - £2m.	0	0	0
7.11	PCS1 City Centre Regeneration.	0	1	1
7.11	PCS2 Inflation Contingency.	0	0	0
App A	Children's social care pressures	0	5	5
App A	Adults Social Care Pressures – part reversal of a prior Demand Management Saving	0	1	1
App C	SEND Improvement Plan - Additional investment in SEND in line with improvement plan	1	0	1
App C	Environmental Health – Support recruitment to enable the Council to meet its statutory requirements and meet demand generated through City of Culture	0	27	27
App C	Digital Autopsy Scanner - investment in the digital autopsy (non-invasive post mortem) service	0	0	0
App C	Share of Mortuary Staffing Costs - required to address a shortfall identified following inspection from HTA (Regulator).	0	0	0
CH6	Aspiration Bradford – Cease Service	0	0	0

Ref	Proposal	No comments		Total
		Online Survey	Social media posts/ news releases	
CH8	Child Friendly City – Reduce non-staffing Costs.	0	0	0
CR25	Digital Mailroom – Reduce outgoing mail and printing costs.	0	0	0
CR4	Vacancy Review & Abatement Factor – keep vacant posts unfilled for longer.	0	0	0
CR6	Estates – The temporary closure of two city centre office buildings to reduce costs.	5	1	6
CR8	IT Services – IT Strategy.	0	0	0
HW7	Changes to Adult Social Care Non-Residential Charges– This is being separately consulted on.	0	0	0
R40	Parking Permits and Charges Budget Proposal.	2	3	5
R41	Waste Review.	487	3	490
R52	PTH Improvement Plan implementation.	0	0	0
R53	Opening of a Housing Revenue Account (HRA) for the start of the financial year 2023-24	0	0	0
R54	CCTV commercialisation.	0	0	0
R71	Fleet Review.	0	0	0
<b>Total</b>		<b>525</b>	<b>83</b>	<b>608</b>

## 6.2 Consultation – Feedback on Proposals

To the 19 January 2023, The online survey has received feedback from 525 respondents against specific budget proposals and general feedback from 36 respondents against the budget proposals. The overwhelming majority of concerns raised are related to the proposal to review waste services, in particular the potential to close the Keighley Waste and Recycling Centre. This feedback is reflected in Annex 1.

Eighty-three comments have been made in response to Council social media posts and news releases about the proposals. This feedback is reflected in Annex 1.

A further six participants have provided feedback through the consultation events, all concerned about the potential closure of Keighley WRC along other concerns across a range of proposals. This feedback is reflected in Annex 1 and also provided more fully at the end of Annex 1.

Letters and emails have been received providing feedback on the proposals. Comments are reflected in the table in Annex 1, with the letter or email provided at the end of Annex 1.

Our voluntary and community partners have given feedback through both a virtual and a face to face consultation event hosted by CABAD. This feedback is reflected in Annex 1 and also provided more fully at the end of Annex 1.

Whilst there has been low interest shown in the consultation generally, this has not

been the case in regards to the proposal to potentially close the Keighley Waste and Recycling Centre.

Any further feedback received through the consultation up to the 25 January will be presented to Executive of the 31 January 2023 in an addendum report.

### 6.3 Trade Union feedback

The Trade Union budget consultation process commenced with the Chief Executive's and CMT's consultation meeting on 14 December 2022 with all the Trade Unions invited. Key budget proposals were presented by the Director of Finance. The Committee reports and summary consultation documents were circulated. The Budget was on the agenda of the Corporate OJC1 meeting held on 15 December and a Corporate Resources Level 2 meeting is scheduled for 24 January 2023.

Children's Services Level 2 consultation meeting took place on 15 December 2022 and 19 January 2023, Department of Place on 8 December 2022 with no further meeting scheduled as yet, Office of the Chief Executive's Level 2 meeting is scheduled for 15 February 2023 and Department of Health & Wellbeing's was held on 13 January 2023.

The Budget will also be on the agenda of the Corporate OJC1 on 26 January 2023 prior to the final submission of Trade Union feedback for the Executive meeting on 21 February 2023.

Initial feedback from the Trades Unions is as follows:

Unison and GMB's feedback: UNISON and GMB attended the initial consultation meeting alongside the other recognised TU's. At Corporate OJC1 GMB were thankful there are no compulsory redundancies, but were concerned that not filling vacancies adds pressure on staff left behind, and whether that drives more restructures. Unison raised a major concern about the proposed £10m saving deleting posts and the pressure it will put on community care and engaging agency staff, which would lead to a decrease in Council staff and increase in agency staff. They also raised concerns about the increased cost of absence rates on staff and the impact that not filling posts will have on employee wellbeing.

Any further feedback received from the Trades Unions will be presented to Executive at their meeting on the 21 February 2023.

### 6.4 Headlines from the feedback received

The following provides some headline feedback made on the specific budget proposals. These comments have been drawn from the online survey responses, social media, direct emails, and meetings.

<b>R41 - Waste Services review</b>
Drawing the most comments and feedback, both online and in meetings, not one respondent through whatever means was supportive of this proposal. Respondents and participants believed it contradicted the Council's policies for recycling and clean air, they

felt it was a proposal made in Bradford for Keighley. Many stated if implemented it would impact the environment through increased fly tipping and impact low income families, those with disabilities and older people through the need to drive further to dispose of waste. Many suggestions were made to negate the need to close the household waste and recycling site. Those in the meetings were passionate about Keighley and maintaining vital services there.

**Increase in Council Tax by 2.99% (and Social Care Precept 2%)**

Respondents did not feel the rise was justified given the current cost of living crisis, that the increase was unaffordable for many and others felt the reduction in services didn't warrant the increase. More help was called for in supporting those on low income. One respondent suggested increasing it further so that long term solutions could be implemented.

**AppC Environmental Health – Support recruitment to enable the Council to meet its statutory requirements and meet demand generated through City of Culture**

Only those responding to social media posts and news releases comment on this proposal, concerns were raised in relation to the:

- Clean Air Zone
- Land pressures, abandoned land and buildings
- District's environmental image is poor
- CO2 emissions.

A summary of all responses is contained in Annex 1 - Consultation feedback and suggestions against the budget proposals and equality impacts of those proposals to this appendix.

## 7 Background documents

Report to Executive on 14 December 2022: [Proposed Financial Plan and Budget Proposals 2023-24](#)

Equality Impacts for Budget Proposals 2023-24: [EIAs 2023-24](#)

## Annex 1 – Consultation feedback and suggestions against the budget proposals and equality impacts of those proposals

All proposals that were open to consultation are included in the tables below. Where feedback has not been received for a proposal, this has been stated.

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
4.8	Council Tax increase of 2.99%	Raising the amount of Council Tax payable on a property could have a disproportionate impact on people on low incomes.	<p><b>Council Tax Reduction Scheme</b> Those applying for Bradford's Council Tax Reduction (CTR) scheme and who meet the scheme's criteria can receive:</p> <p>4. 100% reduction in Council Tax for pensioners or a partner of a pensioner</p> <p>5. Up to a maximum 70% reduction on a Band A property charge for those of working age (and not a partner of a pensioner).</p> <p>One of the criteria for securing the CTR is being on a low income; the scheme is means tested.</p> <p><b>Single Person Discount</b> – is a 25% discount against the Council Tax payable on a property available to those who are the sole adult living in a property.</p> <p><b>Care Leavers</b> - Young people who were being looked after by Bradford Council at the point they turned 18, and have now left care, are exempt from paying Council Tax up to the age of 25. Care leavers are disregarded for the</p>	<p>Thirty respondents commented through the online survey. All but one was against the proposals</p> <p>Forty comments were received in response to social media posts or news releases. All were against the proposals</p> <p><b>A summary of the feedback is as follows:</b></p> <ul style="list-style-type: none"> <li>▪ 5% increase not affordable or justified during the cost of living crisis</li> <li>▪ May not raise expected amount due to the District's demographics</li> <li>▪ Tax goes up but services not improving/accountable (such as Children's)</li> </ul>	<p><b>Equality impact feedback:</b></p> <ul style="list-style-type: none"> <li>▪ Impact on low income households and those struggling due to the cost of living crisis</li> </ul> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>▪ Focus on basic services such as waste, safer streets etc.</li> <li>▪ Cancel new buildings</li> <li>▪ Reduce costs by: not engaging consultants/agency staff, reducing number of councillors and removing refreshments from their meetings, cutting staff pay, improving efficiency, not spending on IT and vehicles, not spending on Darley Street, not spending on city of culture and events,</li> <li>▪ Seek government help</li> <li>▪ People on benefits shouldn't have to pay</li> <li>▪ Reduce the proposed increase or freeze</li> </ul>
4.8	Social Care Precept.	<p>Raising the amount of Council Tax payable on a property could have a disproportionate impact on people on low incomes.</p> <p>The funding generated from the Social Care Precept will enable the Adult Social Care Department to continue to provide and commission support and services to the</p>	<p>One of the criteria for securing the CTR is being on a low income; the scheme is means tested.</p> <p><b>Single Person Discount</b> – is a 25% discount against the Council Tax payable on a property available to those who are the sole adult living in a property.</p> <p><b>Care Leavers</b> - Young people who were being looked after by Bradford Council at the point they turned 18, and have now left care, are exempt from paying Council Tax up to the age of 25. Care leavers are disregarded for the</p>	<p>Forty comments were received in response to social media posts or news releases. All were against the proposals</p> <p><b>A summary of the feedback is as follows:</b></p> <ul style="list-style-type: none"> <li>▪ 5% increase not affordable or justified during the cost of living crisis</li> <li>▪ May not raise expected amount due to the District's demographics</li> <li>▪ Tax goes up but services not improving/accountable (such as Children's)</li> </ul>	<p><b>Equality impact feedback:</b></p> <ul style="list-style-type: none"> <li>▪ Impact on low income households and those struggling due to the cost of living crisis</li> </ul> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>▪ Focus on basic services such as waste, safer streets etc.</li> <li>▪ Cancel new buildings</li> <li>▪ Reduce costs by: not engaging consultants/agency staff, reducing number of councillors and removing refreshments from their meetings, cutting staff pay, improving efficiency, not spending on IT and vehicles, not spending on Darley Street, not spending on city of culture and events,</li> <li>▪ Seek government help</li> <li>▪ People on benefits shouldn't have to pay</li> <li>▪ Reduce the proposed increase or freeze</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>most vulnerable groups across the district, while ensuring the provision of support meets the person care needs and outcomes in line with the duties set out within the Care Act. These groups include older adults and adults with physical and/or learning disabilities.</p> <p>The provision of needs-based more cost-effective and sustainable services will facilitate the integration of people into the community and will enable them to gain greater access to community services and resources. It will enable them to</p>	<p>purpose of assessing the number of adult residents in a property for the calculation of Council Tax, so if they live with another person, a discount will apply.</p> <p><b>Other discounts</b> are available based on a range of personal circumstances, such as reductions in the Council Tax payable on properties adapted to meet the needs of a disabled resident or for those who are severely mentally impaired. More information is available about this on the Council's website at: <a href="https://www.bradford.gov.uk/council-tax/apply-for-discounts-reductions-and-exemptions/other-council-tax-discounts/">https://www.bradford.gov.uk/council-tax/apply-for-discounts-reductions-and-exemptions/other-council-tax-discounts/</a></p> <p><b>Local Welfare Assistance</b> – the Council has a local welfare assistance scheme which helps low income households with food, fuel and essential household goods. Details of this support including Free School Meals, Discretionary Housing Payments and other support as set out here <a href="#">Benefits and welfare advice and help   Bradford Council</a></p> <p><b>Discretionary Housing Payments</b> are directed at low income households who need extra help with housing costs.</p> <p><b>Cost of living Bradford</b> website and booklets. This details a wide ranging</p>	<ul style="list-style-type: none"> <li>▪ Stop the spend on IT and new vehicles and save £5m</li> <li>▪ Raise by maximum allowed as need to support services</li> </ul>	<ul style="list-style-type: none"> <li>▪ Increase Council Tax further to enable proper improvement etc.</li> <li>▪ Stop being a City of Sanctuary and culture</li> <li>▪ Close offices, increase working from home</li> <li>▪ Sell assets</li> <li>▪ Charge businesses more</li> <li>▪ Better programme support to stop projects overspending</li> <li>▪ Invest in renewables</li> <li>▪ Incentivise prompt payment of council tax</li> <li>▪ Drop the 1% for local initiatives</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>participate in the broader social networks outside their homes and so improve their opportunities to access services (including services that may lead to employment) and foster good relations between different groups of people and communities by ensuring equality and transparency of service access and with the local community.</p> <p>discrimination and harassment may include unintended exclusion from opportunities or isolation from family, friends, and the community. The additional funding will enable the service to provide and secure</p>	<p>offer ranging from advice about wellbeing and debt and also details where support with food and fuel can be accessed including the Warm Homes, Healthy People team, foodbank support, and Warm Spaces are situated across the District. Much of this support is aimed at those on low incomes which includes those in receipt of CTR.</p> <p><b>Debt advice</b> Front line officers refer those struggling with debt to the Council's commissioned VCS Welfare and Debt advice providers and to national free, regulated and impartial support through the Money Advisor Network.</p> <p><b>The Household Support Grant.</b> A wide range of support to residents is offered via the Government's Household Support Grant (HSG) scheme as set out here <a href="#">Household costs   Bradford Council</a> For example in December 2022, a payment of £65 per CTR household plus £20 per eligible child was made funded through the HSG scheme at an estimated cost of £3.5m. This payment is offered in line with the requirements of the scheme and to support with the cost of food and fuel. The Government has announced in the Autumn Statement that the HSG scheme will continue in 2023/24 and it is likely that this</p>		



Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>ongoing equally accessed support for vulnerable people who share a protected characteristic to retain their independence within their own home (or supported living) while enabling them to continue to actively engage in their wider community. The approach we are taking should help reduce the potential for such exclusion and isolation.</p>	<p>targeted support for CTR claimants will continue.</p> <p><b>Benefits/Pensions increase 2023/24</b> The Chancellor announced in the Autumn Statement that benefits will be increased in line with inflation, measured by September CPI which is 10.1 per cent in 2022. Around 19 million families will see their benefit payments increase from April 2023. This includes increasing the State Pension by inflation, in line with the commitment to the Triple Lock. The standard minimum income guarantee in Pension Credit will also increase in line with inflation from April 2023 (rather than in line with average earnings growth).</p> <p><b>Breathing Space</b>, The Debt Respite Scheme (Breathing Space moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020 enables a standard breathing space to anyone with problem debt. It gives them legal protections from creditor action for up to 60 days. The protections include pausing most enforcement action and contact from creditors and freezing most interest and charges on their debts. A mental health crisis breathing space is only available to someone who is receiving mental health crisis treatment and it has some stronger protections. It lasts</p>		

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
			as long as the person's mental health crisis treatment, plus 30 days (no matter how long the crisis treatment lasts).		
7.10	Replacement of Vehicles - £3m.	No equalities impact(s) identified.	N/A	<p>Feedback was received via the online survey in relation to the proposal to increase Council Tax and the Social Care Precept 2% -</p> <ul style="list-style-type: none"> <li>▪ Don't spend on IT and vehicles</li> </ul>	
7.10	Property Programme - £4m.	No equalities impact(s) identified.	N/A	<p>No feedback was received via the online survey.</p> <p>Two comments were received in response to social media posts or news releases. Both were against the proposals.</p> <p><b>A summary of the feedback is as follows:</b></p> <ul style="list-style-type: none"> <li>▪ Considered it to be bad planning</li> <li>▪ poor road infrastructure</li> </ul>	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
7.10	General contingency for unforeseen capital expenditure - £1m.	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	
7.10	IT Device Refresh Programme - £2m.	No equalities impact(s) identified.	N/A	<p>Feedback was received via the online survey in relation to the proposal to increase Council Tax and the Social Care Precept 2% -</p> <ul style="list-style-type: none"> <li>▪ Don't spend on IT and vehicles</li> </ul>	
7.11	PCS1 City Centre Regeneration.	No equalities impact(s) identified.	N/A	<p>Feedback was received via the online survey in relation to the proposal to increase Council Tax and the Social Care Precept 2% and through the general comments.</p> <p>In addition, one comment was made in response to social media posts or news releases. The comment was against the proposals.</p> <p>The VCS made a comment about this proposal</p> <p><b>A summary of the feedback and comment:</b></p>	<p><b>Equality impact feedback:</b> None received</p> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>▪ Involve people in discussions about projects</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
				<ul style="list-style-type: none"> <li>▪ Cancel new buildings</li> <li>▪ Utilise existing premises rather than build new ones (1 City Park)</li> <li>▪ Concerned about improvements to pedestrianisation</li> <li>▪ Who decides which capital projects go forward?</li> </ul>	
7.11	PCS2 Inflation Contingency.	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	
Appendix A	Children's Social Care Pressures.	No equalities impact(s) identified.	N/A	<p>No feedback was received via the online survey.</p> <p>Five comments were received in response to social media posts or news releases. All were against the proposal.</p> <p><b>Summary of the comments:</b></p> <ul style="list-style-type: none"> <li>▪ Lack of support for: family and mental health</li> <li>▪ Vulnerable children in the District</li> </ul>	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
Appendix A	Adults Social Care Pressures – part reversal of a prior Demand Management Saving.	No equalities impact(s) identified.	N/A	<p>No feedback was received via the online survey.</p> <p>One comment was made in response to social media posts or news releases. The comment was against the proposals.</p> <p><b>A summary of the comment:</b></p> <ul style="list-style-type: none"> <li>▪ Concerned about the family and mental health support</li> </ul>	
Appendix C	SEND Improvement Plan – Additional investment in SEND in line with improvement plan.	No equalities impact(s) identified.	N/A	<p>One respondent commented through the online survey</p> <p>The VCS commented</p> <p><b>A summary of the feedback is as follows:</b></p> <ul style="list-style-type: none"> <li>▪ Much more needed for SEND to ensure children get what they need – this includes NHS services.</li> </ul>	<p><b>Equality impact feedback:</b></p> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>- Prioritise SEND over other spend – such as city of culture</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
				<ul style="list-style-type: none"> <li>▪ Assessments need to be completed in a timely way to support children</li> <li>▪ More special school places are needed for children who don't 'tick a box on the criteria'</li> </ul>	
Appendix C	Environmental Health – Support recruitment to enable the Council to meet its statutory requirements and meet demand generation through City of Culture.	No equalities impact(s) identified.	N/A	<p>No feedback was received via the online survey.</p> <p>Twenty-seven comments were received in response to social media posts or news releases. All were against the proposal.</p> <p><b>Summary of the comments:</b></p> <p>Concerns were raised about:</p> <ul style="list-style-type: none"> <li>- Clean Air Zone</li> <li>- Land pressures, abandoned land and buildings</li> <li>- District's environmental image is poor</li> <li>- CO2 emissions.</li> </ul>	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
Appendix C	Digital Autopsy Scanner – investment in the digital autopsy (non-invasive post-mortem) service.	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	
Appendix C	Share of Mortuary Staffing Costs – required to address a shortfall identified following inspection from HTA (Regulator).	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	
CH6	Aspiration Bradford – cease service.	The team consists of 3 female employees. The protected characteristics include Sex; Race; Religion; Disability and pregnancy.	Council managing workforce change procedure	<p>No feedback was received via the online survey</p> <p>The VCS made comments about this proposal</p> <p><b>Summary of feedback received:</b></p> <ul style="list-style-type: none"> <li>- EIA solely about loss of jobs</li> <li>- Don't have the information on which to engage in consultation</li> <li>- You should be providing activities for young people</li> </ul>	<p><b>Equality impact feedback:</b></p> <p>Unclear from the information provided</p> <p><b>Suggested changes from consultees to the proposals:</b></p>
CH8	Child Friendly City – Reduce non-staffing Costs.	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
CR25	Digital Mailroom – Reduce outgoing mail and printing costs.	No equalities impact(s) identified.	N/A	<p>Feedback was received via the online survey in general comments –</p> <p>- Not suitable for all residents due to disabilities, age, language and IT literacy</p>	<p><b>Equality impact feedback:</b></p> <p>Could impact people with disabilities, or who are older, or through language.</p> <p><b>Suggested changes from consultees to the proposals:</b></p> <p>None</p>
CR4	Vacancy Review & Abatement Factor – keep vacant posts unfilled for longer.	No equalities impact(s) identified.	N/A.	No feedback was received via the online survey	<p><b>Equality impact feedback:</b></p> <p><b>Suggested changes from consultees to the proposals:</b></p>
CR6	Estates – Closure of Argus and MMT 23-24. Closure of Britannia and additional sites 24-25.	No equalities impact(s) identified.	<p>It has been suggested that more staff may want to attend work in the winter because they will be unable to heat their homes. This may be the case for some staff, but it would have to be an extreme number to pressure the estate with 568 workstations free in Britannia House.</p> <p>Britannia House, City Hall, and Sir Henry Mitchell House are all accessible buildings, although wheelchair turning is limited near lifts and may be difficult for larger/extended wheelchairs due to restraints with the building space. Any specific needs in relation to access for those staff with a disability will be reviewed on an individual basis in by individual's line managers.</p>	<p>Five respondents commented through the online survey. None were wholly supportive nor against the proposal.</p> <p>One comment was received in response to social media posts or news releases. It was against the proposal.</p> <p>The VCS also made comments about this proposal</p>	<p><b>Equality impact feedback:</b></p> <p>None</p> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>- Consider supporting staff with additional costs incurred through home working</li> <li>- Rationalise the Council's depots such as Shearbridge, Harris Street etc.</li> <li>- Provide more information about the proposals such as the future of staff accommodation and provision of customer services</li> </ul>



Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
			<p>Existing PEEP'S (Personal Emergency Evacuation Plan) of staff being relocated will be reviewed by FM's. The managers of staff who currently have one in place will be contacted to advise they need to update this for the new location and liaise with the relevant FM of that building to ensure they meet the individual's needs.</p> <p>Buildings are not currently Braille signed; however, this has not been identified as a need by any individuals with visual impairments. Highlighted nosing that highlights the edge of stairs is installed in Hall lngs stairwells.</p> <p>Accessible toilets are available on all floors and lower-level worktops/sinks are installed in kitchens in Britannia House on the Hall lngs side of the building.</p> <p>Disabled parking is available close to Britannia House/City Hall at Norfolk Gardens and Bank Street.</p> <p>Rise and Fall desks will be available for those who need them in Britannia House, SHMH and City Hall.</p> <p>Multi Faith rooms are available for use by all staff in Britannia House/City Hall/Sir Henry Mitchell House.</p>	<p>Comments were made about this proposal at the Shipley drop-in session</p> <p><b>A summary of the feedback and comment is as follows:</b></p> <ul style="list-style-type: none"> <li>- Money spent in recent years improving the buildings to be closed, this needs to be justified</li> <li>- Hybrid working positive but incurs additional costs for staff</li> <li>- The building strategy is unclear from the information provided</li> <li>- Possible knock-on effect on city centre economy</li> <li>- Abandoned buildings</li> <li>- Is there a budget to access meeting rooms for face to face meetings with clients and is there access to large training rooms?</li> <li>- Staff can become isolated if not meeting,</li> </ul>	<ul style="list-style-type: none"> <li>- Revert MMT to a library when there is a break clause in the current library's lease (2026)</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
			Few members of the public access MMT and those that do come to pick up forms. The reception function will transfer to Sir Henry Mitchell House which is accessible. There is no public access to Argus Chambers. Meetings which would have been held in Argus Chambers or MMT will transfer to other buildings. These buildings are all accessible.	need to put measures in	
CR8	IT Programme – Implement IT strategy; initial savings identified.	No equalities impact(s) identified.	N/A	No feedback was received via the online survey	<p><b>Equality impact feedback:</b></p> <p><b>Suggested changes from consultees to the proposals:</b></p>
HW7	Charging Adult Social Care Self Funders full costs – This is being separately consulted on.	<p>Our initial assessment shows that the New Contributions policy is likely to have a disproportionate adverse impact on proposal HW7.</p> <p>We have assumed that there is a high probability that people receiving a social care service will have a disability under the Equality Act</p>	<p>The current charging policy ensures that individual service users, including those with limited income, are not required to contribute more than they can reasonably afford. That principle will not change under the new charging policy and all existing service users will have a new needs assessment / review, financial assessment with help to maximise benefits, review of DRE and affordability of any contribution. There is also appeals process if the service user cannot afford any newly assessed contribution.</p> <p>Where the assessment process under the new policy identifies a change in service provision, we will work with the service user and their family members, carers, and advocates to support the</p>	<p>Feedback was received via the online survey in relation to the proposal to review waste services.</p> <p>The VCS also made comments about this proposal</p> <p>Participants at Keighley and Shipley drop in sessions commented on this proposal</p> <p><b>A summary of the feedback and comment is as follows:</b></p>	<p><b>Equality impact feedback:</b></p> <p>Vulnerable, older and disabled people impacted</p> <p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>- Don't implement the proposal</li> <li>- Consult properly and withdraw the letter</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>2010, and that there is an unquantifiable negative correlation between possessing severe and life limiting disabilities and the ability to earn or acquire savings.</p> <p>Suggest we have a breakdown of the current users across the district and the impact e.g. There are currently over 504 social care service users across the district and the impact of the charging proposals is likely to have a greater impact on the savings and net disposable income of:</p> <ul style="list-style-type: none"> <li>• Older people</li> <li>• Working age adults that have more</li> </ul>	<p>implementation of the new charges. If we do agree to take a phased approach, then we will need to add this in here.</p>	<ul style="list-style-type: none"> <li>- 25% increase in fees is wrong</li> <li>- Letters sent to people were misleading and caused distress</li> <li>- Where is the EIA?</li> </ul>	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>income and</p> <ul style="list-style-type: none"> <li>• Young people under the age of 25.</li> </ul> <p>The provision of more cost effective and sustainable non-residential care services will facilitate the integration of persons with disabilities into the community and will enable older persons to gain greater access to community services and resources.</p> <p>It will enable them to participate in the broader social milieu outside their homes and so improve their opportunities to access services (including services that may lead to employment) and</p>			

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>foster good relations between different groups of service users by ensuring equality and transparency of service access and with the local community.</p> <p>See section above. Discrimination and harassment may include unintended exclusion from opportunities or isolation from family, friends and the community. By securing on-going equal access to non-residential services the policy will reduce the potential for such exclusion and isolation.</p>			
R40	Car Parking – Implement consistent parking regime.	No negative impact on protected characteristic groups as proposal does not	People could consider parking on street further out of towns and the city centre in areas where there are no restrictions and charging and adding a short walk to their journey rather than opting for convenience parking.	Two respondents commented through the online survey. Neither were supportive.	<b>Equality impact feedback:</b> Negative impact on older people as have more visitors and will incur more costs

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>adversely affect any group above another directly other than low wage/low income.</p> <p>No impact on protected characteristic groups as proposal does not adversely affect any group above another directly other than low wage/low income.</p> <p>No positive impact on protected characteristic groups as proposal does not adversely affect any group above another directly other than low wage/low income.</p>	<p>Use of public transport is encouraged, introduction of Clean Air Zone to discourage use of vehicles entering the City Centre on main gateways.</p> <p>Initiatives such as cycle to work schemes delivered by Council and local businesses.</p> <p>Plans to implement a park and ride scheme, therefore more parking may be available out of town.</p> <p>1<sup>st</sup> Visitor permit is free for residential permit schemes and people have never had the option to purchase a 2<sup>nd</sup> permit previously. Therefore, everyone should be already able to accommodate visitors without further costs to themselves.</p>	<p>Three comments were received in response to social media posts or news releases. All were against the proposal.</p> <p><b>A summary of the feedback and comments is as follows:</b></p> <ul style="list-style-type: none"> <li>- Town centre car parks should be free for one hour</li> <li>- Concern raised about charges at car parks</li> <li>- Issues with current permit scheme due to visitor limits and fines being imposed</li> <li>- Current scheme not suitable for Steeton</li> <li>- Limits people's social contact</li> <li>- Pressure on parking low in Steeton so unfair to impose this scheme</li> <li>- Concerned about bus lane fines, cycle lanes</li> <li>- There is potential for a park and ride scheme in the city centre</li> </ul>	<p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>- No charge for 2nd permit where low demand on parking</li> <li>- Change current policy to allow one hour free parking (in town centres)</li> </ul>
R52	PTH Improvement Plan implementation.	No equalities impact(s) identified.	N/A	Feedback was received via the online survey in general comments –	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
R54	CCTV commercialisation – Opportunities for CCTV commercialisation. Historic business case to be reassessed to determine viability and options.	The implementation of the Business Investment Plan proposals in the CCTV function will allow the CCTV service to reflect the expectations of local citizens more accurately, thereby fostering good relations between them. CCTV is often seen as the very visible presence of the Council in addressing resident's 'fear of crime' and where residents come to rely on the service (because they have been a victim of criminal activity or a civil wrong) they are often disappointed that their particular issue either is not	N/A	No feedback was received via the online survey	<p><b>Equality impact feedback:</b></p> <p><b>Suggested changes from consultees to the proposals:</b></p>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		detected through the CCTV network as it is happening, and help is arranged or that post-event evidence of the incident does not exist.			
R41	Waste Review – Reviewing waste services to reduce costs and maximise efficiencies including the potential closure of Keighley Household Waste and Recycling site, one of the least used sites and reducing hours at all HWRC's.	<p>Implementation of proposal would impact all residents who currently use the site, and in particular, the ones close to Keighley HWRC. Approx. 281 visitors per day to the site, however this includes repeat visitors.</p> <p>Only car users can access the HWRCs and there are alternate HWRCs a short distance away.</p> <p>There may be a low disproportionate negative impact</p>	Proximity of other alternative sites is expected to alleviate any potential low negative disproportionate impacts on those who are disabled or on low income. Data on site visits will continue to be used to inform service development.	<p>The majority of respondents to the online survey, 487, commented on this proposal. All the comments were in relation to the potential closure of the Keighley Waste and Recycling Centre. None of those responding via the online survey were in favour of the potential closure of the site.</p> <p>Three comments were received in response to social media posts or news releases. All were against the proposal.</p> <p>The VCS commented on this proposal.</p> <p>Keighley and Shipley drop-in session</p>	<p><b>Equality impact feedback:</b></p> <p>Large number of older people living in the area that the site serves</p> <p>Site provides easier access than alternative sites for people with mobility issues</p> <p>Impact on people who are incontinent as provides close and accessible site for disposal of personal soiled waste, such as adult diapers</p> <p>Impact those on low income as would need to pay more for fuel to travel to other sites</p> <p>Impact on carers who have limited time to spend away from those they care for</p>



Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>on those people who are disabled and those people who are on a low wage/income due to need to travel by car to other sites that may not be as close as this site to where they live.</p> <p>We have eight HWRCs across the district. This proposal will result in having one less HWRC with alternative sites being up to a 20-minute drive.</p>		<p>participants commented on the proposal</p> <p>Objection letters were submitted about the proposal from the Aire Valley River Trust and The River Worth Friends.</p> <p>Three people also lodged their objections via direct email or through our customer contact centre.</p> <p><b>A summary of the feedback is as follows:</b></p> <ul style="list-style-type: none"> <li>• The tip is well used by Keighley, Steeton &amp; Eastburn and Silsden residents and is always busy but queuing is on a quiet road – the data is incorrect</li> <li>• Lots of new house builds in the area – so need the facility</li> <li>• Implementation risks: increasing fly tipping and costs to deal with it (more than needed to upgrade the tip) –</li> </ul>	<p><b>Suggested changes from consultees to the proposals:</b></p> <ul style="list-style-type: none"> <li>• Don't close the site – make it more user friendly and promote</li> <li>• Close the council buildings sooner to save money</li> <li>• Relocate the site</li> <li>• Review planning restrictions with a view to increasing opening hours</li> <li>• If you must, shut somewhere else, such as somewhere in Bradford– keep this site open and promote it</li> <li>• Keep all HWRC sites open</li> <li>• Remove building at back of the site to make it bigger and capable of accommodating larger skips</li> <li>• Spend less on other things such as city of culture/city centre events – Keighley doesn't see this</li> <li>• Impose a small charge for use</li> <li>• Staff pay cut</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
				<p>blighting the landscape, increasing landfill and costs, traffic and safety issues at and around other sites especially Sugden End on Halifax Road (busy A629) – this site is also currently experiencing long queues, reduced rates of household recycling</p> <ul style="list-style-type: none"> <li>• Keighley has 50k residents – largest town in the district, should have its own HWRC</li> <li>• Site provides good access for people, is central and causes minimal disruption traffic and residents</li> <li>• Requirement to travel further would increase air pollution (against Council clean air policy), not environmentally or wildlife friendly</li> <li>• Bradford making decisions that affect Keighley</li> <li>• Valued by and essential to Keighley</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce/change hours, alter staffing at all sites rather than close</li> <li>• Alternative staffing arrangements</li> <li>• Reduce spend on city centre projects</li> <li>• Invest in the site</li> <li>• Reduce spend on bureaucracy</li> <li>• Invest in Keighley</li> <li>• Increase enforcement fines</li> <li>• Look long term at what support needed by all people</li> <li>• Buy Airedale Shopping centre, sell Kirkgate in Bradford to fund our services</li> <li>• Encourage more recycling</li> <li>• Provide a 'salvage' shop – selling on recycled goods</li> <li>• Save money, cut top management</li> <li>• Listen to people</li> <li>• Look for cuts elsewhere – management, funding for social and health organisations</li> <li>• Relook at criteria for determining which site to</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
				residents and businesses <ul style="list-style-type: none"> <li>• Closure would mean only one site in district for plaster board waste</li> <li>• Feel unheard, excluded</li> <li>• Added costs for residents to dispose of their waste</li> <li>• Listen to residents about this and other initiatives</li> <li>• losing the tip would make it harder for residents to dispose of green waste</li> <li>• Fuel drive to leave the LA</li> <li>• Could increase vermin due to people retaining waste</li> <li>• No car so won't be able to use alternative sites</li> <li>• Need to consider the wider impacts of closure i.e. Health, environmental</li> <li>• Keighley people don't want the incinerator but do want the tip</li> <li>• Is there a financial incentive to the</li> </ul>	close – road safety also important <ul style="list-style-type: none"> <li>• Get volunteers to help reclaim and sell reusable items – proceeds to charity</li> <li>• Forward plan and invest in services and facilities in Keighley – tip, police station etc.</li> <li>• Cut councillors wages, reduce spend on non-essentials such as Christmas lights</li> <li>• If closes collect green and grey bins every week</li> <li>• Stop funding ineffective schemes like the cycle lanes</li> <li>• Use brownfield sites for new industrial units rather than close the tip</li> <li>• Save money by planting perineal in flower beds</li> <li>• Don't spend on IT and new vehicles</li> <li>• Reduce jobs in the council</li> <li>• Manage performance of staff – social work, education</li> <li>• Take Keighley residents views into account</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
				<p>closure – it's on prime industrial land</p> <ul style="list-style-type: none"> <li>• Reducing opening hours at all tips will increase traffic queuing, congestion and air pollution</li> <li>• Keighley becoming rundown– this will add to the 'ghost town' feel.</li> <li>• What services are Keighley residents getting for the increase in Council Tax?</li> <li>• Proposal does not align with the 'sustainable district' or discharge the local development plan's Waste Management Development Plan</li> <li>• Feels like the Council don't want to have services in Keighley/Ilkley</li> </ul>	<ul style="list-style-type: none"> <li>• Let local town councils manage funding for services</li> <li>• Use enforcement on roads etc. to bring in funding</li> <li>• Change the skips to the larger, cheaper to run ones</li> <li>• Use incinerator site for new Keighley HWRC site</li> <li>• Look at provision in other LA areas</li> <li>• Not reasonable to remove service that Keighley people are paying for</li> <li>• More regular street clean-ups</li> <li>• Provide an alternative site if want to use for industrial units and jobs</li> <li>• Encourage people to use the tips with offers</li> <li>• Call on government for more funding – council tax higher in north east than elsewhere</li> <li>• Don't spend on Children's Trust – duplicating salaries</li> <li>• Treat Keighley fairly</li> <li>• Withdraw the proposal</li> <li>• Link up your policies</li> </ul>

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
					<ul style="list-style-type: none"> <li>• Take note of Keighley residents views</li> <li>• Close Sugden End instead</li> </ul>
R71	Fleet Review: Transformation programme Looking at Fleet efficiencies that includes reducing Grey Fleet, centralising budgets, reducing the use and costs of hire vehicles, value for money planned replacement plans.	Implementing the proposed changes is expected to save £0.5m per year, which may result in the Council being able to refocus its reduced resources on more public facing services.	N/A.	<p>No feedback was received via the online survey</p> <p>The VCS commented on this proposal.</p> <p><b>Summary of comments:</b></p> <ul style="list-style-type: none"> <li>• Issues with how the passenger transport service runs</li> <li>• Allow VCS to use vehicles out of hours</li> </ul>	<p><b>Equality impact feedback:</b></p> <p><b>Suggested changes from consultees to the proposals:</b></p>
R53	Opening of a Housing Revenue Account (HRA) for the start of the financial year 2023-24, (subject to viability and the rent standard being set at a minimum of 5% from 1st April 2023).	A key driver for many councils is about increasing the supply of social and low-cost housing for those in the greatest need. Opening a HRA is aligned to corporate priorities - the Council Plan identifies 'Decent	N/A	No feedback was received via the online survey	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>homes that people can afford to live in' and 'Ensuring the supply of homes is the right type and location to meet demand' as key priorities for the district as well as inclusive and sustainable growth ambitions.</p> <p>The provision of new and good quality affordable housing in the district has a positive impact on those groups and individuals who suffer multiple disadvantages associated with inadequate housing. The Council's 'Homes and Neighbourhoods - A Guide to Designing in Bradford' which provides for enhanced accessibility</p>			

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		standards ensuring homes are suitable for people with a disability and more flexible and adaptable to meet the needs of current and future generations. Living in good quality housing and a safe, well-designed neighbourhood improves life chances in terms of health, employment and educational outcomes.			
PTH5	Establish in-house delivery of private dropped crossing delivery.	The biggest impact of this proposal on protected characteristics will be financial in that the cost for the service being provided by the Council will increase to include construction costs of the crossing itself.	The disproportionate impacts can be mitigated somewhat by providing costs of the end-to-end process from the outset based on a 'standard' crossing specification with any variation to this being quoted separately (due to increased / decreased construction costs of larger/smaller crossings).	No feedback was received via the online survey	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>The proposed change itself will advise equality of opportunity and in terms of access to the service as the requirement for residents to be competent to appoint a reputable contractor to construct their dropped crossing will be transferred to the Council.</p> <p>As stated above, the removal of the need for residents to appoint their own reputable contractor for the construction of their dropped crossing will also eliminate discrimination and potential victimisation of residents who appoint disreputable contractors to provide this</p>			



Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		service.			
PTH6	Establish events / street works management operation to support delivery of licensed events and filming activities in the district.	<p>The biggest impact of this proposal on protected characteristics will be financial in that the cost for the service being provided by the Council will increase to include event management costs in addition to the current licencing arrangement.</p> <p>The proposal will support the advancement of equality of opportunity amongst the protected characteristics by providing an end-to-end service which can support the full range of events from large parades to small residential street</p>	<p>The disproportionate impacts identified above consider the range of events currently operated on the highway across the district which are organised by groups from these protected characteristics. Whilst removing the need to appoint an independent third-party Traffic Management company by event organisers would result from this proposal the increased costs of this service being provided as a 'turn-key' solution will invariably raise concerns from organisers of smaller events. The fees and charges approach will therefore need to be carefully designed in terms of recognising the scale of event being organised and the proportionality of the traffic management being provided. However, some of this mitigation will also be down to event organisers recognising that hosting events of major highways will significantly increase costs to ensure the safety of participants. This may mean that arrangements for events need to be negotiated with organisers to reduce the overall costs involved.</p>	No feedback was received via the online survey	

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		<p>events. It will remove the need to event organisers to identify reputable traffic management companies capable of supporting their events in a way which is acceptable to the Council, and it will help foster good relations amongst these groups as there will be a 'balanced' playing field where irrespective of the size of the event to be managed there is a consistent approach provided by the Council.</p> <p>The establishment of an internal events management operation will remove the need to event</p>			

Ref	Proposal for change	As published December 2022		Consultation feedback about the proposal	Consultation feedback about equality impacts / Suggested changes from consultees to the proposals
		Equalities Impact	Mitigation		
		organisers to identify reputable traffic management companies capable of supporting their events in a way which is acceptable to the Council, and it will help foster good relations amongst these groups as there will be a 'balanced' playing field where irrespective of the size of the event to be managed there is a consistent approach provided by the Council.			

## SUMMARY OF OTHER COMMENTS – NOT DIRECTLY RELATED TO SPECIFIC PROPOSALS

Theme	Comments
Cost of living crisis	<ul style="list-style-type: none"> <li>• Provide financial support VCS and local charities as energy bills and inflation increase</li> <li>• Everyone on benefits (means tested or contribution based) should receive cost of living support</li> <li>• Implement a four day working week to help staff with cost of living by reducing their childcare, travel costs etc.</li> <li>• Cancel the council tax rise</li> <li>• Provide help with school uniforms</li> <li>• People who are just above the threshold for benefits need help</li> </ul>
Parking issues/gritting/roads	<p>3 Enforce parking restrictions on Basil Street</p> <p>4 Free car park would stop dangerous parking on Silsden main street</p> <p>5 Plea for the Council to grit the bottom of Victoria Road at Saltaire</p> <p>6 Speed bumps shouldn't be a priority, such as at Bolling Road</p> <p>7 Improve road safety at Wagon Lane, Bingley</p> <p>8 Bus and cycle lanes – inconvenient for car drivers, often empty meaning the road is under utilised</p>
Housing	<p>9 Stop building in Silsden</p> <p>10 Quicker decisions and action on rehousing needed</p>
Crime	11 Charging for recycling bins leading to bins being stolen, people not recycling and litter issues
Impact of Council decisions on places	<p>ing as not getting the support it should from the Council, support going to Bradford city centre, council should lower business rents in encourage businesses to stay, need police station and Keighley people need to be listened to by Bradford Council</p> <p>te taken in Keighley to keep the green space</p>
Clean Air Zone	<p>ady pay road tax, may drive business out, the charge is causing hardship and should be scrapped, money making initiative disabled people</p>
Council move to online communications	<p>e for all residents due to disabilities, age, language and IT literacy</p>
Funding/investment	<p>8 Government should give the Council more funds to provide the necessary services</p> <p>9 Push government on the fair funding review and invest locally in people</p> <p>10 When will work start on Wyke's funded bandstand?</p> <p>11 Sell Council-owned artworks to release funds</p> <p>12 Save money by removing some leadership positions and stop internal promotions, reduce 90 councillors</p> <p>13 Save money by not investing in new vehicles</p> <p>14 Don't increase staff pay/pay frontline staff more</p> <p>15 Utilise existing premises rather than build new ones (1 City Park)</p> <p>16 Rebalance housing and land markets</p> <p>17 Provide performance indicators with the budget</p> <p>18 Why is council tax 20% higher than in London?</p> <p>19 Capital of culture should be stopped</p>

## SUMMARY OF OTHER COMMENTS – NOT DIRECTLY RELATED TO SPECIFIC PROPOSALS

Theme	Comments
	<p><b>20</b> Children’s Trust – board members’ salaries too much</p> <p><b>21</b> Keighley feels forgotten by Council Executive</p>
Education	<ul style="list-style-type: none"> <li>• Suggestions for improving education: Such as through better funding and use of libraries to support homework clubs</li> <li>• Put more money into children’s futures (schools)</li> </ul>

## PARTNERS AND PUBLIC CONSULTATION EVENTS FEEDBACK

### Voluntary and Community Sector hosted by Community Action Bradford and District – Virtual and Face to Face events

Zoom meeting on 11 January and Face to Face meeting at Perkin House on the 17 January 2023

#### PROPOSALS DISCUSSED:

##### Proposal - Council tax:

- With the increase in council tax, there needs to be something that will set out the whole picture e.g. income and expenditure (a way to see how income comes in and goes out). There is no equivalent of that to what has been proposed.

##### Proposal -Building closures: (Margaret McMillan Tower)

- Closing buildings is a big change. Keeping buildings open is better, as people working from home may become isolated. Health and wellbeing comes into question; i.e. what impact will buildings’ closures have on mental health two years down the line? Solely working from home only can be detrimental to mental health and social skills. Will the closure be over winter or permanently? - **Answer** – The closure is temporary at this stage
- Building closure has had an Impact on social work/Social workers. People aren’t able to use meeting spaces. Some people can’t use online platforms. Difficult to get face to face meetings. Need to have certain spaces to attend meetings.
- Moving services online can negatively impact people who have different language skills, are not IT literate or who don’t have digital access. Often find it hard to navigate services if not face to face. Could end up requiring higher more complex support if unable to access services earlier - thus cost more in the long run than keeping buildings open
- Margret McMillan Tower: is there other provision for training rooms? Training often can’t be done online. So need buildings and spaces to be available. Is there a budget to hire rooms needed for social workers to have face to face meetings with people? **Answer** – Sir Henry Mitchell House still open and also Customer Contact centre at Britannia House and Reception at City Hall. Will check and get back re if there’s a budget to rent venues/rooms
- **Need to consider:** Some staff may not have tech or have knowledge of tech. Disabilities also need to be taken into account as some people can’t work from home.

### **Proposal -Children and Adult social care: Self Funders – Paying full costs.**

- Letter: No mention of consultation only change. Lack of consultation. Letter should say we are consulting not we are doing this. Letters informed addresses they would be reassessed and may have to pay more from April 2023
- Also, need easy read letter. Delivery and process for letters needs to change, as vulnerable people may not speak up.
- Different processes around consultation. Need more flexibility. Not much about protecting people
- Those receiving the letters were confused and upset, many left feeling they would lose services or need to cancel their support
- On ringing the number on the letter, nothing was mentioned about the consultation.
- The saving from the proposal is expected to be £1.25m. Not a huge amount compared to the impact on the vulnerable people it impacts. We would like to see this proposal dropped
- Where is the EIA for this proposal? It's not on the website. One should have been available as it obviously impacts vulnerable and disabled people. How can we engage properly on this proposal when the information hasn't been provided?

### **Proposal – Aspiration Bradford**

- EIA solely about the loss of jobs and not about the loss of service and what this might mean
- Again, we don't have enough information in order to engage meaningfully.
- All local authorities have a legal responsibility to provide sufficient activities for recreation and wellbeing. Is this happening?

**Proposal -City regeneration:** Who decides which capital projects go ahead? Where is some money coming from? Feel like there has not been any consultation regarding this.

### **Proposal – SEND Improvement –**

- EHCP: is way too long. 2 years behind. Waste of time and money. Can be trimmed and time and money can be used elsewhere.

### **Proposal - Council vehicles/Fleet review:**

- Issues with how the fleet service runs, being on time, not turning up etc.
- Voluntary sector needs more minibuses and training facilities to lead groups. The Council's are unused in the evenings and at weekends. Could we look at how this resource might be made accessible to the VCS and community organisations?

**Proposal – Waste Review:** Concerned closure of Keighley WRC would result in more fly tipping. Could cost the Council more in the long run than expecting to save. Need to consider the impacts down the line. Council need to talk to communities before proposals are presented

## GENERAL

**Previous capital funding for disabled facilities:** All money went on venues and not activities or how to get to the venues. Not talked about afterwards.

**Impact of the cost of living (energy price increases and inflation) on contracted providers.** The consultation recognises the impact of rising costs and salary increases on Council services. However, there is no clear recognition of the impacted on services delivered by other providers via a contract or grant (whether to VCS, other statutory organisations or private sector). This could lead to inadvertent cuts where the organisations have to either reduce the service they offer or give up contracts entirely as they won't be able to afford to operate. At Place Lead Executive partners have committed to addressing these challenges, but it is not explored in the budget, nor the budgetary or service delivery implications of these commitments. There needs to be clear assessments of the financial viability of contracting and grant arrangements and a clear decision making process which explores options of increasing budget to preserve services or reducing service to enable delivery to be sustained. In the latter case mitigations would need to be carefully considered, to limit the effects on the most vulnerable.

### **Equality Impact Assessments and information provided**

The quality of most of the EIAs provided is dreadful and many we expected to see are missing – we would have expected a full EIA against the £45m going into Children's Services, on the SEND Improvements, on the closure of buildings that are used by people to access services and partners to run/access training. WE are unable to properly engage and contribute when the relevant information is not available.

### **Evidence of impact of input?**

How will we know what impact our input has had? **Answer** – Public report and published minutes in the Council's website. Executive will receive the consultation feedback report and a financial budget update report on the 31 January. They will consider these, then meet again on the 21 February to determine their budget recommendations to Full Council of the 23 February. The budget for 2023-24 will be set at by all Councillors at the meeting on the 23 February 2023.

## **Public face to face drop in events in each constituency**

### **Manningham Library, Bradford West – 16 January, 6-7pm**

No public participants

Helen Johnston, Senior Policy Officer and Amani Ali, Graduate Trainee

## Public face to face drop in events in each constituency

### **Central Hall, Keighley – 17 January, 6-7pm**

Seven members of the public participated

Council officers in attendance – Alan Lunt, Interim Strategic Director Place, Helen Johnston, Senior Policy Officer and Amani Ali, Graduate Trainee

### **Note of participants issues, questions, comments and feedback and any responses by Council officers**

All public participants were Keighley residents and all were mainly concerned about the potential closure of the Keighley Household waste recycling centre.

Alan explained the Council's situation in relation to reductions in funding since 2010 of over £300m, and that the continuing need to find savings year on year whilst delivering essential services.

The first question related to **the rational of making people redundant and then bringing in agency staff and consultants?**

**Alan responded** by stating there was a skills shortage for particular work. Out of 40 vacancies in his area, 5/6 needed filling urgently as are vital to continue services. Recruitment processes had failed to attract people with the skills to take the work on permanently, therefore he, like managers in similar positions, had no choice but to contract agency staff.

In relation to consultants, they are used when it would be difficult for incumbent staff to remain objective.

If the proposal in the budget to freeze vacancies is agreed, there will be less recruitment next year with some under understanding that existing staff will have to shoulder more work.

### **Question – Why has KHWRC been chosen to for closure?**

**Alan responded** – a study the Council commissioned stated we need six sites. Council needs to use circa £30m of reserves this year to balance books. Can only use once so really need to look at where we can reduce costs.

Criteria for selecting a site to potentially close was based on tonnage and the number of public visits to the sites, along with proximity to other sites. There are issues with Keighley HWRC as need to use smaller skips and compactors which cost more to maintain, with more often removal of waste from the site than others due to its size.

No decision has been taken yet. This is open to consultation and alternatives are being looked at.

Alan agreed to forward the study to the participants



## Public face to face drop in events in each constituency

### Question – How much does fly tipping cost?

**Alan responded** – haven't got the figures but there is no expectation that fly tipping will increase as this is mainly unlicensed businesses. Expectation was that responsible residents would take their waste to an alternate site

Participants disagreed, stating that more unlicensed businesses would likely get paid to take waste away and fly tip it as the other sites suggested to residents were further away. It was also raised that closure would impact air quality. One would like to know the cost to the Council of dealing with fly tipping.

### Question – how much will be saved by closing this site?

**Alan responded** there were three elements to the proposal: efficiencies, closure of a site and reductions in opening hours. But would get the figure for the potential closure and forward.

**Question – Have the police been informed because if closed, and people use other sites, this will cause road traffic issues?** There will be queuing on Halifax Road if Sugden End used.

A participant told the officers they felt the Council wants to take services from Keighley, and this is a vital service, that there is nothing left in Keighley, feel at the bottom of the pile, another 'nail in the coffin' as money spent on Bradford.

**Question/comment – Expect to go to Sugden End or Dowley Gap. Ice on the roads last night. If you close the site, gritters will have to come from Shipley and will be empty when they arrive. Where's the plan for the gritters?**

**Alan responded** - the site will have a salt dome on it and the gritters will remain. He mentioned that £30m of Town's funding was coming to Keighley.

Participant said Keighley people had not been involved in deciding to use and it would be wasted, the BID had seen businesses close down. Funding Council gets doesn't improve things here.

**Question** - Keighley needs Council and Government help. Saving the site would be a big victory for people – it's united people. Is the saving expected £150k?

**Alan responded** that he would forward the figure to participants, believes it is circa £260k

A participant disputed the figure but was informed this was due to use of compactors, their maintenance and extra movement of waste from the site due to its size.

Participants felt that the criteria used to put closure forward was flawed as it was also based on the site being open less than others. However, as plan was to reduce opening hours at all sites, this was negated (even now it's a three-hour difference only).

**Question** was asked as to why the plastic recycling facility had been removed, especially given the Council are trying to encourage more recycling? It looked to the participant as if things were being 'run down'.

## Public face to face drop in events in each constituency

**Officers agreed** we wanted more recycling as costly to send waste to landfill and not good for the environment.

A participant said they'd expected the run down site to be improved not closed, if it was closed, would that be permanent? And they would expect to see a report detailing costs and impacts. Who came up with Keighley? Haven't spoken to people here.

**Alan responded** that we have staff working and living in Keighley and their local knowledge is used.

One participant found it hard to understand how anyone with local knowledge would put the site forward.

**Alan responded** that we are in dire circumstances, have to balance the budget or government will send commissioners in who won't be concerned about what gets shut locally

The issue of Keighley being chosen as a site for an incinerator was raised – wasn't in the running then out of 99 possible, it's selected!

### Question – What's going on wages? Hard to see from the reports

**Alan responded** that wages are set nationally between the national employers and unions. We have to implement national wage agreements or qualified people would leave for more pay.

Most participants agreed or accepted this

### Question – How do you get on the Children's Trust Board to get paid £600 per hour?

**Alan responded** - The Council were unable to improve children's services at the pace needed so decided to hand responsibility to a Trust. Have to have a Director of Children's Services by law. There are costs associated with the Trust which the Council will need to meet.

A participant mentioned that Keighley is the largest town in the district it shouldn't be disregarded. People were still in opposition to the incinerator. Feels like decisions made for us, without us, and that aren't needed like the health and wellbeing hub. A need to breathe life back into the town. We need to be asked what we need and not have things done to us.

Another participant stated that more suitable services would take pressure off other services. The Towns fund needs to work for Keighley. Costs £250k to keep children in care, could use that money on prevention. We need activities for young people.

A further comment was made that services have gone through austerity, with some participants blaming the Council for this and poor management, and being countered by other participants that this was due to government cuts.

A further issue was raised re not repairing pot holes properly. The need for lorry wagons to get checked in Bradford six-weekly due to removal of staff who could do this in Keighley

**Alan stated** this was happening everywhere (in the UK)

## Public face to face drop in events in each constituency

A participant raised that the proposal to close the KWRC went against the Council's own Waste Management Development Plan 2017 that states the Council will safeguard waste recycling sites.

**Alan explained** that the document was about land use and not about waste management and how the Council delivered that.

The participant felt that the Council wasn't being transparent, the basis for selection of the Keighley site was flawed. It says it's based on site visits and not on a study that states six sites needed. Feels like it's being worked back from the conclusion. We need the information,

**Alan said** an officer would have the information forwarded,

Another participant said the library staff were unaware of the budget consultation and couldn't find it on the Council's website.

**Officers said they would follow** this up and make sure information was made available.

A final suggestion was made by a participant that the site for closure should be swapped to Sugden End.

Residents were thanked for their participation and comments.

### **Thornbury Centre, Leeds Old Road, Bradford East – 18 January, 6-7pm**

No public participants

Helen Johnston, Senior Policy Officer

### **Shipley Library, Shipley – 19 January, 6-7pm**

One member of the public participated

Council officers in attendance - Helen Johnston, Senior Policy Officer and Amani Ali, Graduate Trainee

The member of the public hadn't been able to attend the Keighley meeting but a resident there and wanted to be heard on a number of the proposals.

1. They'd like more information about the council/developer arrangements for 1 City Park
2. **Closure of the waste site at Keighley** will incur more travel for residents, likely increase fly tipping, need to keep it open as would put tourists/visitors off Bradford if there's more fly tipping, Clean Air Zone welcomed but policy not joined up across the District, should stay as is, bin lorries offload there, can dispose of rubble
3. **Building closures and working arrangements:** Need to look at officers working from home and make sure they're productive – what measure is used to ensure value for money? Good for work and mental health to get staff in once weekly at least. Since staff working from home hard to get through to services.

## Public face to face drop in events in each constituency

Return Central Library to Margaret McMillan Tower when there's a break clause in the lease at the current site (in 2026). We should have been able to show the King our culture and library when he came, not Morrisons.

Personal gratitude to have had such a wonderful library that sparked my interest in many areas. Would like children and young people to have the same opportunity to learn as I did. Online isn't always best and good to touch paper

4. Reduce costs by reducing number of councillors to 60.
5. Keighley people should decide what to do with the greenspace created by the demolition of the college

The participant was warmly thanked for sharing their comments and feedback on the proposals. (they had picked up information about the consultation from the library)

### **Salvation Army, Wibsey, Bradford South – 24 January, 6-7pm**

Not taken place yet

## LETTERS AND EMAIL

Aire Rivers Trust  
Albion Mills Business Centre,  
Albion Road,  
Greengates,  
Bradford BD10 9TQ

Dear Cllr Hinchcliffe,

I am writing to express our concern at the Council's proposal to close Keighley Household Waste Centre. We are a local charity who care for the River Worth (and River Aire) in Keighley alongside volunteers from the local community and the grassroots group Friends of the River Worth.

The River Worth and its tributaries are home to a huge range of wildlife from dippers to brown trout as it weaves its way through the centre of Keighley. It is an incredibly valuable green space within walking distance of some of the most deprived communities in Bradford.

However, it's hidden route through dense urban areas and small industry makes it vulnerable to fly tipping and the closure of Keighley's Household Waste Centre will only increase this. In 2020, the Aire Rivers Trust cleared one of the district's worst spots for fly tipping from an area of unadopted land along North Beck in Keighley<sup>1</sup>. Over five tons of refuse was cleared using funding raised by the Trust and a fence erected to protect the land. This site was an isolated section of stream banking that had been habitually used by fly tippers and illegal waste traders for many years. A mixture of residential and trade waste had accumulated that harmed water quality and deterred visitors. Projects like this do not mean that the problem has been solved. We have recently helped the Council clear van loads of waste from opposite Becks Mill on Becks Road, next to Postman's Walk, and can see it accumulating on inaccessible banking upstream on Mohair Street. In 2021, local volunteers from Friends of the River Worth removed more than 1000 bags of litter and debris from the River Worth, North Beck, Gingerbread Clough and Hogs Hole Beck with similar amounts predicted for 2022.

We are currently launching a River Worth Restoration project together with River Worth Friends with support from the Keighley Towns Fund and Keighley Big Local (and additional funds raised from Enforcement Undertakings against polluters of the river) that will see the river returned to the heart of the town with improved pedestrian access and habitat improvements. We are grateful for Bradford City Council recently confirmed financial support for our ongoing River Aire Care riverside conservation and clean-up programme across the whole district. All this is good work in line with the Councils "Respecting Our Rivers" motion. It would be a great shame to see the work of our charity and its volunteers undermined by an increase in fly tipping. This will surely be the result of the closure of

Keighley Household Waste Centre.

Our volunteers remove fly tipping because we know that it is a significant source of pollution into our rivers from micro plastics to waste cooking oils that harms our wildlife. Larger items , or accumulations, of fly tipping pose flood risks where they are washed downstream into culverts and archways.

We realise that the Council faces considerable financial challenges and is having to make tough decisions but feel this is a choice with wide reaching consequences. I would be grateful if you could confirm how the impacts of fly tipping in the Keighley area are being considered should the closure of the Keighley Household Waste Centre go ahead and whether additional resources will be put into enforcement and cleansing to mitigate this. Our objections are based on the firmly held belief that the proposed closure will have a detrimental effect on Keighley's river, environment, and communities.

Yours sincerely,

Operations Manager

**Sent:** 13 December 2022 12:15

**To:** Cllr Susan Hinchcliffe <[susan.hinchcliffe@bradford.gov.uk](mailto:susan.hinchcliffe@bradford.gov.uk)>

**Subject:** River Worth Friends - Objection to Closure of Keighley HWRC

Dear Ms Hinchcliffe

River Worth Friends understand that a proposal to close the Household Waste Facility in Keighley is to be discussed at a forthcoming council executive committee meeting. We strongly object to this proposal.

As an organisation working to improve the River Worth and its environs we constantly battle against litter and fly tipping, spending many hours removing debris from the river in and around Keighley. Earlier this year we worked with CBMBC community wardens and workers to remove a build up of fly tipped was on Becks Road near Becks Mill, many truck loads of debris were carted away. We are currently aware of a build up of fly tipped waste on steep banking further upstream on North Beck. The closure of the waste facility will inevitably lead to a massive increase in these issues.

We are currently working with the Aire Rivers Trust and Keighley Big Local, using funding from Keighley Towns Fund and the Environment Agency, to bring improvements to the river and the river corridor. These improvements will enhance the river for wildlife and also improve leisure access for the people of Keighley. At a time when this investment is being put into the river it seems perverse to take steps that will inevitably be detrimental to these aims.

Additionally if the facility is closed the council will have to considerably increase its provision for removal of fly tipped rubbish, I trust this has been factored into your considerations.

We realise that the current budget issues are a problem not of the councils making but would urge you to consider other ways to amend the budget rather than closing the Keighley HWRC.

Yours sincerely



**From:**

**Sent:** 13 December 2022 20:26

**To:** Cllr Susan Hinchcliffe <[susan.hinchcliffe@bradford.gov.uk](mailto:susan.hinchcliffe@bradford.gov.uk)>

**Subject:**

**CAUTION:** This email has originated from outside Bradford Council.  
Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good evening,

I am just writing to express my concerns regarding the proposed closure of Hard Ings Road tip in Keighley. As a gardener who uses the tip on a regular basis and relies on it to run my business, I think that it is an absurd idea, one which will affect many many businesses.

With the growing problem of fly tipping in our area I feel that Bradford council should be making it easier for businesses to dispose of their waste, not making it more difficult.

With the recent introduction of the clean air zone in Bradford would it not be irresponsible to bring more traffic, including many lorries into the city?

I hope that this is something which you will carefully consider before making a decision which could ultimately affect people's livelihoods.

Regards

**From:**  
**Sent:** 22 December 2022 11:38  
**To:**  
**Subject:** feedback re proposal 2023/24 Keighley tip closure

Cust doesn't have internet so cannot via log online form

Feed back re closure of kly tip  
Cust says what about this clean air act as well as the cost in time and fuel for crews going to have to go to bowling back lane which is often very busy with cars queuing which will slow the refuse rounds doing the rounds as well. Asks if we will be charging each wagon going £50 clean air levi ?

regards  
Customer Service Advisor  
Council Contact Centre

3<sup>rd</sup> Floor Britannia House  
Hall Ings  
BRADFORD  
BD1 1HX  
**City of Bradford Metropolitan District Council**  
**Department of Place**

From: WebSiteAutoResponder <[auto-responder@bradford.gov.uk](mailto:auto-responder@bradford.gov.uk)>  
To: Council Contact 2 <[CouncilContact2@bradford.gov.uk](mailto:CouncilContact2@bradford.gov.uk)>  
Date: 17/12/2022 13:49:17  
Subject: Online Form Submission - Complaint

What is your complaint about?: Keighley refuse tip

Please provide details of your complaint:



The proposal to close the tip in Keighley would create many problems for all the residents of Keighley in our case being into our eighties we would find it difficult to have to travel to other tips and get used to thier systems etc. Why don't you try using the larger skips before using it as an excuse I am sure your staff would be only to happy to help. The obvious problem that already exists with fly tipping would certainly increase. It will also give another huge argument to the lobby for leaving Bradford Met.

What would you like to see as an outcome to your complaint?:

The tip as is.