



Committee: CABINET

Date: TUESDAY, 8 DECEMBER 2020

Venue: THIS WILL BE A VIRTUAL MEETING
[CLICK HERE TO JOIN THE MEETING AS A NON-PARTICIPANT](#)

Time: 11.00 A.M.

A G E N D A

1. **Apologies**

2. **Minutes**

To receive as a correct record the minutes of Cabinet held on Tuesday, 24 November 2020 (previously circulated).

3. **Items of Urgent Business Authorised by the Leader**

To consider any such items authorised by the Leader and to consider where in the agenda the item(s) are to be considered.

4. **Declarations of Interest**

To receive declarations by Councillors of interests in respect of items on this Agenda.

Councillors are reminded that, in accordance with the Localism Act 2011, they are required to declare any disclosable pecuniary interests which have not already been declared in the Council's Register of Interests. (It is a criminal offence not to declare a disclosable pecuniary interest either in the Register or at the meeting).

Whilst not a legal requirement, in accordance with Council Procedure Rule 9 and in the interests of clarity and transparency, Councillors should declare any disclosable pecuniary interests which they have already declared in the Register, at this point in the meeting.

In accordance with Part B Section 2 of the Code Of Conduct, Councillors are required to declare the existence and nature of any other interests as defined in paragraphs 8(1) or 9(2) of the Code of Conduct.

5. **Public Speaking**

To consider any such requests received in accordance with the approved procedure.

Reports from Overview and Scrutiny

None

Reports

6. **Residential Conversions and Houses in Multiple Occupation** (Pages 3 - 53)

(Cabinet Member with Special Responsibility Councillor Hanson)

Report of Director for Economic Growth & Regeneration

7. **Local Government Reform proposal for the Bay area** (Pages 54 - 68)

(Cabinet Member with Special Responsibility Councillor Lewis)

Report of the Chief Executive (Appendices 1 & 2 were published on 4 December 2020)

ADMINISTRATIVE ARRANGEMENTS

(i) Membership

Councillors Erica Lewis (Chair), Dave Brookes, Tim Hamilton-Cox, Janice Hanson, Caroline Jackson, Jean Parr & Anne Whitehead

(ii) Queries regarding this Agenda

Please contact Liz Bateson, Democratic Services - email ebateson@lancaster.gov.uk.

(iii) Changes to Membership, substitutions or apologies

Please contact Democratic Support, telephone 582170, or alternatively email democraticsupport@lancaster.gov.uk.

KIERAN KEANE,
CHIEF EXECUTIVE,
TOWN HALL,
DALTON SQUARE,
LANCASTER, LA1 1PJ

Published on Monday 30 November 2020.

Lancaster City Council | Report Cover Sheet

Meeting	Cabinet	Date	8 December 2020
Title	Residential Conversions and Houses in Multiple Occupation		
Report of	Director for Economic Growth and Regeneration		
Purpose of Report			
To seek a Cabinet resolution to formally adopt the Residential Conversion and Houses in Multiple Occupation Supplementary Planning Document.			
Key Decision (Y/N)	N	Date of Notice	Exempt (Y/N) N

Report Summary

The concentration of Houses in Multiple Occupation (HMOs) in some parts of the District is at such an extent that the amenity available to residents is adversely affected due to; noise, increased demand for limited parking and a population density that fluctuates during the year. Policy DM13 of the adopted Development Management Development Plan Document (DMDPD) seeks to control the concentration of HMOs to protect the amenity of residents.

The Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document (SPD) provides guidance on how policy DM13 will be implemented and the standards that new HMOs are expected to meet.

The SPD has been through two stages of consultation and the views raised have been considered in the drafting of the final version. This report, outlines the content of the SPD, together with the attached Consultation Statement outlines the stages of consultation and how the responses were taken into account, and seeks a resolution to adopt the SPD as a material consideration for the determination of planning applications.

-

Recommendations of Councillors

- (1) That the Council resolves to adopt the Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document.
- (2) Should the Council adopt the SPD that the necessary measures are undertaken to publicise its adoption in accordance with national legislation.

Relationship to Policy Framework

The Corporate Plan includes ambitions to enhance community cohesion.

The SPD builds upon policies in the Local Plan, particularly policy DM13, which aims to ensure a balanced community. The SPD will support the implementation of this policy.

The SPD, in conjunction with policy DM13 and proposals to designate an Article 4 Direction seek to address the detrimental impacts of concentration of HMOs in accordance with the ambitions of the Corporate Plan and the Local Plan.

Conclusion of Impact Assessment(s) where applicable

Climate There are no climate change impacts arising from the adoption of the SPD.	Wellbeing & Social Value There are no wellbeing or social value impacts arising from the adoption of the SPD.
Digital There are no digital impacts arising from the adoption of the SPD.	Health & Safety There are no Health & Safety, Equality and Diversity, Human Rights, Community Safety, HR implications arising from the adoption of the SPD.
Equality There are no equality impacts arising from the adoption of the SPD.	Community Safety There are no community safety impacts arising from the adoption of the SPD.

The impacts of policy DM13 of the DMDPD have been assessed during the statutory Local Plan process. As the SPD provides guidance upon the implementation of this policy, it will not itself have an impact on these matters.

Details of Consultation

The SPD has been subject to two public consultations which have sought to gain the views of stakeholders on the content. Each consultation ran for six weeks between 21 February and 3 April, then between 14 August and 25 September 2020. The latter formed the statutory consultation.

Legal Implications

The statutory consultation has been carried out and the adoption process will be carried out in accordance with the process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Once adopted the SPD will form a material consideration in the determination of planning applications.

Financial Implications

The SPD provides guidance on the implementation of Local Plan Policy. There are no additional financial implications arising from its adoption.

Other Resource or Risk Implications

There are no resource implications arising from the adoption of the SPD.

Section 151 Officer's Comments

The s151 Officer has been consulted and has no comments to add.

Monitoring Officer's Comments

The Monitoring Officer has no further comments to add.

Contact Officer	Fiona Clark
------------------------	-------------

Tel	01524 582222
------------	--------------

Email	fjclark@lancaster.gov.uk
Links to Background Papers	
The following background papers are attached to this report: Residential Conversions and Houses in Multiple Occupation SPD Consultation Statement	

1.0 Introduction

- 1.1 Policy DM13: Residential Conversions, of the DMDPD seeks to control the distribution of Houses in Multiple Occupation (HMOs). It sets a threshold for the percentage of HMOs acceptable in an area. Where there is or will be a concentration HMOs above 10% of residential properties within a 100m radius of an application site, a new HMO will not usually be permitted. The aim of the SPD is to inform those who may wish to convert/use/build a property for multiple occupation about how the policy will be implemented, how the percentage will be calculated and the standards that the Council requires.
- 1.2 The SPD has been through two periods of public consultation. The responses have been considered and where necessary have informed changes made to the SPD. The final version of the SPD is attached, and Cabinet is requested to adopt the document.

2.0 The Content of the SPD

- 2.1 The SPD explains what a HMO is, the planning policy position with regard to HMOs and when planning permission is required for the conversion to a HMO. It explains how applications will be determined in accordance with policy DM13, how the radius will be calculated and provides standards that new HMOs will be expected to meet. The SPD also advises of the Council's intention to designate an Article 4 Direction over the Lancaster wards and the village of Galgate, of the submission to the Secretary of State for Housing, Communities and Local Government of an application for a Direction under Regulation 7 to control To Let Signs and the implications of these Directions.

3.0 Consultation

- 3.1 The SPD has been subject to two, six-week periods of public consultation. The first between 21 February and 3 April 2020 and the second, which formed the statutory consultation, between 14 August and 25 September 2020.
- 3.2 The first period of consultation also sought views on the Council's proposals for an Article 4 Direction to control small HMOs and a Direction under Regulation 7 to control To Let Signs. It provided early engagement with stakeholders to enable their views to be taken into account and amendments made the SPD prior to the statutory consultation. Ninety-nine separate responses were received.
- 3.3 The responses were predominantly positive and with very few relating to the content of the SPD. A number of concerns were raised with regard to the percentage and radius within policy DM13 and how this would be implemented.

Some respondents believed that the policy would not go far enough, and the radius and percentage should be changed to reduce concentrations further. As an SPD cannot change policy, the requests for alterations to the threshold within the policy could not be addressed in the SPD. There were conflicting views about the application of the policy, some expressed the view that the percentage should be applied flexibly and others that there should be no exceptions. Similarly, there were conflicting views with regard to the internal layout standards included in the SPD, some supported the standards and others believed them to be too onerous.

- 3.4 Concerns were raised that householders could be 'trapped' in properties where there are very high concentrations of HMOs or where their property is surrounded by HMOs and they are unable to sell them as a single dwelling. An amendment referring to a six-month marketing period for family homes, has been added into the explanation about when exceptional circumstances may apply to the 10% threshold. In response to the Environment Agency, a section was added discouraging bedrooms at ground floor in flood zones 2 and 3. The method of calculation was amended to reflect the way in which data is stored and retrieved. This change will not affect the outcome of the calculations.
- 3.5 The SPD includes a section about To Let Signs and encourages landlords and agents to reduce their use. Concerns were expressed that encouragement would not deter their display and that signs should be banned. As such signs do not currently require consent, additional controls cannot be included in the SPD. The Council has however taken further action by submitting a request to the Secretary of State for a Direction under Regulation 7. If granted, this would mean that all To Let Signs for residential properties in the designated wards will require advertisement consent.
- 3.6 The consultation in August and September formed the statutory consultation required by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.7 Eleven responses were received to the statutory consultation in August and September. The responses reflected responses previously raised and no further amendments were considered necessary.
- 3.8 Now the Article 4 Direction has been 'made' and the application for the Direction under Regulation 7 submitted, amendments have been made to reflect the change in status of these Directions. The section about the Nationally Described Space Standards has also been expanded to include reference to new build HMOs.
- 3.9 Further detail with regard to the comments received during both consultation periods and how they have been addressed, can be found in the attached Consultation Statement.

4.0 Adoption

- 4.1 Adopting the SPD will afford it weight in decision making. It will provide clear guidance with regard to the calculation of the percentage of HMOs within a 100m

radius of an application site and incorporates the standards for HMOs previously contained within the Appendix D of the 2014 DMDPD.

4.2 Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulation 2012 (as amended), requires that as soon as practicable after adoption the SPD and an adoption statement are published and formal notification sent to all who have been asked to be notified.

4.0 Options and Options Analysis (including risk assessment)

<p>Option 1: Adoption of the Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document</p>
<p>Advantages: The SPD will provide guidance for determining planning applications for HMOs, particularly in respect of the way in which the percentage of HMOs in an area will be calculated and the standards expected for HMOs. The SPD will be afforded weight in decision making.</p>
<p>Disadvantages: No disadvantages.</p>
<p>Risks: No risks.</p>
<p>Option 2: Do not adopt the Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document</p>
<p>Advantages: No advantages.</p>
<p>Disadvantages: There will be a lack of clarity with regard to the calculation of the percentage of HMOs in an area and the standards required. The SPD will not be afforded weight in decision making.</p>
<p>Risks: No risks.</p>

4. Officer Preferred Option (and comments)

4.1 The officer preferred option is Option 1 – Adoption of the Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document.

Adoption of the SPD will ensure the contents can be given weight in decision making.

A Local Plan for Lancaster District

2011-2031

Residential Conversions and Houses in Multiple Occupation
Supplementary Planning Document

December 2020



Contents

1. Introduction.....	3
2. What Is A House In Multiple Occupation	3
3. The Aim Of The SPD.....	4
4. Planning Policy	4
5. Article 4 Areas	5
6. When Is Planning Permission Required?.....	6
7. How Will Applications For HMO Use Be Determined	6
8. To Let Boards.....	8
9. Making A Planning Application	8
10. Licensing.....	8
Appendix A – Determining The Concentration Of HMOs	9
Appendix B – Standards For HMOs	11
Appendix C – Signage with Deemed Consent	14
Appendix D - Monitoring.....	15

1. Introduction

- 1.1 Concentrations of Houses in Multiple Occupation (HMOs) in have increased in recent years. Many HMOs are occupied as student houses and are concentrated in certain parts of the Lancaster City around the Universities. There are also concentrations of HMOs, some of which provide a poor level of accommodation, in the West End of Morecambe. These concentrations adversely affect the character of local communities and neighbourhoods. This arises from seasonal depopulation, divisions between social groups and lack of interaction, turnover of occupants, poor upkeep and an impact on the affordability of rented houses for families. To address these imbalances, Lancaster City Council has adopted policy DM13: Residential Conversion, in the Development Management Development Plan Document (DMDPD), which provides criteria for assessing applications for new HMO's. The Council is also designating an Article 4 in parts of Lancaster and the village of Galgate, to remove permitted development rights for conversion.
- 1.2 This Supplementary Planning Document (SPD) has been published to aid property owners, planning applicants and planning officers in preparing and determining planning applications in relation to Houses in Multiple Occupation (HMOs). It sets out how the Council will apply policy DM13 to planning applications for HMO's.
- 1.3 The SPD has been prepared, consulted upon and adopted in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012. The SPD will be accorded significant weight as a material planning consideration in the determination of such applications.

2. What Is A House In Multiple Occupation

- 2.1 HMO's are shared houses or flats occupied by a group of unrelated people who share some, but not necessarily all, basic facilities such as a toilet, bath/shower room and cooking facilities. In planning terms there are two types of HMO:
 - Small HMO - shared houses/flats of three to six people who do not form a single household. These HMO's fall within Use Class C4 of the Town and Country Planning (Use Classes Order). They have the same meaning as in section 254 of the Housing Act 2004, with the exception of section 257 which applies to converted blocks flats (and those buildings listed in schedule 14 of the Act).
 - Larger HMO - shared houses/flats with more than six occupants. These HMO's do not fall within any specific planning use class, therefore fall within the Sui Generis category.
- 2.2 To be classified as an HMO. The property does not need to have been modified in any way.
- 2.3 HMOs also apply to houses or flats where the landlord lives and takes in lodgers. A live in landlord can take in two 'non family' members before the property is classified as an HMO.
- 2.4 The definition includes bedsits.
- 2.5 The definition includes purpose built and houses/buildings converted into shared flats.
- 2.6 A household is either a single person or members of the same family who live together. A family includes people who are:
 - married or living together - including people in same-sex relationships;
 - relatives or half-relatives, for example grandparents, aunts, uncles, siblings;
 - step-parents and step-children.

- 2.7 The reference to small and large HMO's differs from the Licensing terms, where HMO's are referred to as large HMO if there are at least 5 occupants. For information with regard to Licensing please see section 8.

3. The Aim Of The SPD

- 3.1 The aims of the SPD are:
- a. To provide guidance in respect of policy DM13;
 - b. To inform those who intend to convert / use their existing property for multiple occupation about the Council's requirements and standards for houses in multiple occupation.
 - c. To manage the future development of HMOs to ensure such developments will not lead to, or increase existing over-concentrations of HMOs which are considered harmful to local communities and to meet housing need ensuring mixed and balanced communities.

4. Planning Policy

- 4.1 The Strategic Land Allocations Development Plan Document and the Development Management Development Plan Document were adopted by the Council on the 29th July 2020.
- 4.2 Policy DM1: New Residential Development and Meeting Housing Needs, seeks to promote balanced communities and meet evidenced housing need. The Strategic Housing Market Assessment (Part II) undertook a stakeholder survey. The responses are summarised at Appendix E of that document. Respondents noted, that student lettings have increased the typical rental charge in South Lancaster. As a result, South Lancaster is no longer affordable for renting on Housing Benefit (the Local Housing Allowance rates are the same across the whole area) (paragraph E.14). The poor quality of some private rented accommodation in Morecambe is also noted.
- 4.3 In order to control the proliferation of HMO's, the Council has 'made' an Article 4 Area in Lancaster and the village of Galgate to ensure that the conversion of small HMO's and an increase in the number of residents requires planning permission. Designation of an Article 4 Area in Morecambe will also be explored.
- 4.4 Policy DM13 forms the basis for this intervention and sets out thresholds for appropriate concentration of HMOs. Where there is a concentration of more than 10% of HMOs within a 100m radius, new HMOs will not be permitted.

Policy DM13: Residential Conversions

Proposals that involve residential conversions must meet the following criteria:

- I. Provide accommodation that will address local housing needs and imbalances in the local housing market;
- II. Contribute towards the provision of affordable housing in accordance with Policies DM3 and DM6 and the relevant policies of the Arnside & Silverdale AONB DPD;
- III. Not result in a significant detrimental impact on the amenity of nearby residents and the character and appearance of the street scene; and
- IV. Satisfy all other relevant planning policy including the requirements of Appendix H where appropriate.

The policy is continued on the next page

Houses of Multiple Occupation (HMOs)

The Council considers the importance of maintaining an appropriate housing mix and safeguarding the character of residential areas to be important priorities. In doing so, the Council have adopted an approach of a general presumption against new housing in multiple occupation within the district. Proposals which would lead to a concentration of more than 10% of houses being classed as HMOs of the total housing stock within a 100m radius will not be considered acceptable. This includes proposals for changes of use to HMOs, or extensions to existing HMOs.

The Council are considering the merits of bringing forward Article 4 directions to manage the amount of small HMOs being developed (i.e. those where 3 to 6 people live separately within the same dwelling house).

Proposals may on exception be considered acceptable where:

- V. Effective measures are proposed to minimise noise and other forms of disturbance to neighbouring residential properties;
- VI. Suitable means of storage including refuse, recycling and bicycle storage is provided;
- VII. The proposal would not harm the character of the building or surrounding area;
- VIII. The proposal would not result in unacceptable impact on parking including unacceptable levels of on-street parking;
- IX. The proposal would not result in the creation of sub-standard living conditions.

5. Article 4 Areas

- 5.1 The Council has ‘made’ an Article 4 in Lancaster (the wards of Bulk, Castle, John O’Gaunt, Scotforth East, Scotforth West, Skerton East, Skerton West and the village of Galgate) and is considering a further Article 4 in Morecambe to control the proliferation of HMOs. An Article 4 Direction is made by a planning authority under Article 4 of the Town and Country Planning (General Permitted Development) Order 2015. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in an authority’s area.
- 5.2 Article 4 directions are used to remove national permitted development rights where it is necessary to protect local amenity or the well-being of an area. An Article 4 does not prevent the development to which it applies, but it instead requires that planning permission is first obtained from the Council for that development.
- 5.3 Permitted development is contained in Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) (2015) as amended. This is arranged in Classes which set out development which does not require planning permission. The Classes of development restricted by the Article 4 Direction are set out below. The restrictions relate to the conversion of dwellings to HMOs.

Part 3 Changes of Use

Class L – small HMOs to dwelling houses and vice versa

L. Development consisting of a change of use of a building –

- (b) from a use falling within Class C3 (dwellinghouses) of Schedule to the Use Classes Order, to a use falling within Class C4 (houses in multiple occupation) of that Schedule.

- 5.4 Consultation took place in February and March 2020 and again in November and December 2020 after the Article 4 was ‘made’. Once the responses to the most recent consultation have been received, the Council will consider whether to bring the Article 4 into ‘force’. It is at this point that the restrictions will apply, and planning permission will be required for the conversion of a dwellinghouse to a small HMO. If the Council decides to proceed, the Article 4 is likely to come into force early November 2021.
- 5.5 Further information can be found on the Lancaster City Council website.

6. When Is Planning Permission Required?

- 6.1 Planning permission is required for the following:
- The conversion of a dwellinghouse or flat into a large HMO (shared house of more than 6 persons);
 - The conversion of a non-domestic building into a HMO, this includes small HMOs (of 3-6 persons who do not form a single household) and large HMOs.
 - If the Article 4 is brought into ‘force’, planning permission will be required for the conversion of a dwellinghouse or flat (Class C3) into a small HMO (Class C4) in the designated area.
- 6.2 For details with regard to the progress of the Article 4 please see the Lancaster City Council Website.

7. How Will Applications For HMO Use Be Determined

- 7.1 Paragraph 127 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should ensure that developments, ‘will function well and add to the overall quality of the area’ and ‘create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users’.
- 7.2 In order to do this, policies DM13, DM29 and DM30 provide a criteria which will be used when assessing HMO applications. The Local Plan includes a range of other policies which may be relevant to specific proposals and should be taken into account.

Balance of HMOs within a community

- 7.3 In accordance with policy DM13, the Council will seek to refuse planning applications for HMO uses where a community is already imbalanced by existing HMO uses or where granting planning permission would create an imbalance..
- 7.4 A community will be considered imbalanced where:
- More than 10% of residential properties within a 100m radius of the area surrounding the application property are already in HMO use.
- 7.5 A proposal will be considered to create an imbalance where:
- Granting planning permission would tip the ratio of HMOs to dwellinghouses (Class C3) within a 100m radius of the application property over the 10% threshold.
- 7.6 Where planning permission is sought to change the use of a small HMO (Class C4) to a large HMO (Sui Generis Use) or to extend a HMO, the Council will refuse planning permission, in areas where the concentration of HMOs already exceed the 10% threshold.
- 7.7 The methodology for determining the concentration of HMOs within the 100m radius of an application site is included in Appendix A of this SPD. The information will only be made public

by the council on request; in connection with the determination of a current application or appeal and in relation to the 100m radius from the application property. The means of identification of individual HMOs will not be made public.

- 7.8 Exceptional circumstances may include where the concentration of HMOs within the 100m radius is such that the retention of remaining buildings will have little effect on the balance and mix of households. In these circumstances it is recognised that some owner occupiers or long-term residents, being in the significant minority, and wanting to leave the street, may struggle to sell their property for continued C3 use. In these instances, the issues outlined at point V. to IX. of policy DM13 will be considered. Evidence of marketing for a period of at least 6 months at a reasonable C3 value, will be also be required to support such applications.

Living conditions

- 7.9 The Council will seek to ensure that new HMOs of all sizes provide a good standard of living and amenity for occupiers. Accommodation must be provided with an appropriate level of outlook and natural daylight.
- 7.10 Residential conversions to HMOs should be easily capable of conversion back into a single dwelling to provide accommodation for a single household.
- 7.11 The accommodation, internal layout, measurements of the HMO and associated access and storage should meet the standards within Appendix B of this SPD. The standards within Appendix B have been carried forward from Appendix D of the former Development Management DPD adopted in 2014 and have been in operation since that date.
- 7.12 Applications should include a full set of floor plans which identify whether rooms are single or double, and the layouts of furniture including sanitary ware.
- 7.13 Proposals should include measures to reduce energy consumption, carbon emissions and water consumption. Measures such as insulation, energy efficient and low carbon appliances and renewable energy technologies such as heat pumps and solar panels are encouraged.

Amenity of neighbours and local occupiers

- 7.14 In accordance with policy DM13, new HMOs must not have a significant detrimental impact on the amenity of nearby residents and the character and appearance of the street scene. Issues which will be taken into consideration include:
- Noise and disturbance;
 - The adequacy and location of refuge, recycling and bicycle storage;
 - The impact on the character of the building and the surrounding area;
 - The impact on car parking and congestion on the surrounding streets;
 - The intensity of the use of the property.
- 7.15 It should be noted that, new HMOs will not be automatically acceptable in locations where they form less than 10% of property types within a 100m radius. The above issues will be used to determine the impact of a new HMO in these locations. Where there is a high localised concentration or where a dwellinghouse would be sandwiched between HMOs, the impact on existing residents is likely adverse and the application refused.

Flood risk

- 7.16 A change of use to a HMO within Flood Zone 2 or 3 may increase the risk to occupants, particularly where the proposals would involve the creation of sleeping accommodation on the ground floor. The Council will seek to ensure that such circumstances do not occur and where necessary mitigation is included within a building to protect occupiers.

8. To Let Boards

- 8.1 Lancaster City has many areas that contain good historic architecture, including large areas of the highest quality which are designated as conservation areas and listed buildings. In some areas, the proliferation of To Let Boards causes significant adverse impacts to the historic character and appearance. The Council has submitted an application to the Secretary of State for Housing, Communities and Local Government for the introduction of a Regulation 7 Direction, under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, to control the proliferation of To Let boards. If approved, an application for advertisement consent will be required for all residential To Let Boards in the wards of Bulk, Castle, John O’Gaunt, Scotforth East and Scotforth West.
- 8.2 Agents are encouraged to minimize the number and timescale that To Let boards are displayed. An agent should not display signs on adjoining properties and they should be removed as soon as the property is let. Agents are encouraged not to display signs during June, July and August when the number of students fall. Agents should also look at ways to minimize the impact of To Let boards by displaying them flat against walls rather than as flag or ‘T’ mounted signs. Displays should be limited to one sign and only located on the front of a property.
- 8.3 Details of the signage currently permitted by the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and the penalties for display contrary to these regulations are included in Appendix C.

9. Making A Planning Application

- 9.1 Advice on how to make a planning application can be found on the Councils website or by seeking pre-application advice. Further information can be found using the following link:
<http://www.lancaster.gov.uk/planning>

10. Licensing

- 10.1 Licensing is a separate consenting regime. A licence is required for HMOs in Lancaster district for properties that meet all the following criteria:
- Has 5 or more unrelated people living in it
 - Has 2 or more separate households living there
- 10.2 Licensing also applies to blocks of purpose-built flats where there are up to two flats in the block and one or both are occupied as an HMO.
- 10.3 The Lancaster website includes details about the application process, standards and frequently asked questions:
<http://www.lancaster.gov.uk/housing/private-rented-accommodation/houses-in-multiple-occupation-hmo>

Appendix A – Determining The Concentration Of HMOs

The following outlines the methodology for determining the concentration of HMOs within an area.

An area with a radius of 100 metres, from the application site Unique Property Reference Number (UPRN) address point (Basic Land and Property Unit data in the Local Land and Property Gazetteer), will be identified.

Figure 1 - Houses – identifying the 100m radius around the application property

(Figure 1 is indicative and does not identify actual HMOs)



- Application property UPRN
- Identified Area - 100m radius around the property
- 100m radius
- HMO UPRNs

The number of dwellinghouses (Class C3) and HMOs will be determined by:

- Counting the total number of residential UPRNs, in C3, C4 and Large HMOs (Sui Generis) use, within the identified area;
- Determining the number of HMOs in the identified area by checking against the Councils HMO mapping;

HMOs will be mapped by the Council on a yearly basis or more frequently where information is available from Licensing and as a result of planning permissions being granted. This map will be used to determine the properties in HMO use.

The properties in HMO use will be identified by:

- All properties on the Councils HMO register;
- All properties exempt from Council Tax on the basis of student occupation;
- All properties which have extant planning permission for a small HMO (Class C4) or large HMO (Sui Generis HMO) regardless of whether they are in use at the time;
- All properties which have an extant planning permission for a mixed dwelling house (Class C3) and small HMO (Class C4) regardless of whether they are in use at the time.

Calculation

Figure 1 shows that the total number of residential properties in the Identified Area is 372

The HMO mapping shows that there are 45 HMOs within the Identified Area.

The number of HMOs will be calculated as a % of the total number of all properties in the Identified Area:

$$100(\%) / 372(\text{total number of residential properties}) \times 45 (\text{number of HMOs})$$

The % of HMOs in the Identified Area in this case will be **12%**

In the above scenario, the application will be refused in accordance with policy DM13.

The Council acknowledges that it may not have captured all of the HMOs in an area and will therefore continue to review the mapping and seek to capture further knowledge about the way in which properties are being occupied.

Those wishing to confirm the existing lawful use of a property should not rely on the mapping as evidence. The mapping has no legal weight and does not confer that that appropriate permissions and consents are in place. If you wish to establish whether planning permission is in place for the HMO you should submit an application for a Certificate of Lawful Use. Details are available on the Government website:

<https://www.gov.uk/guidance/lawful-development-certificates>

Appendix B – Standards For HMOs

These criteria have been prepared to ensure that appropriate standards are adopted for HMO accommodation. The standards have been carried forward from Appendix D of the former Development Management DPD adopted in 2014 and have been in operation since that date.

Residential conversions to HMOs should be easily capable of conversion back into a single dwelling to provide accommodation for a single household.

The minimum space standards set out below will be applied as appropriate, with some areas excluded from the calculations (e.g. areas with limited headroom under 1.5m from the finished floor level, alcoves etc).

Each unit of accommodation shall normally comprise no more than six bedrooms.

Bedrooms:

Bedrooms must be a minimum of 9sqm without an en-suite, or minimum of 11sqm with an en-suite.

All bedrooms must demonstrate on plan that the following can be accommodated:

- Bed (minimum size 2m by 0.9m);
- Desk and chair;
- Wardrobe;
- Chest of drawers (minimum 0.8m wide); and
- Adequate circulation space.

Bedrooms should accommodate no more than one resident. If the proposal is for accommodation to serve a couple (i.e. postgraduate couple) the minimum space standards for a single bedroom would not apply as additional space would be required.

Such bedrooms must demonstrate on plan that the following can be accommodated:

- Double bed (minimum size of 2m by 1.5m);
- En-suite (minimum 2sqm);
- 2 desks with a chair each;
- 2 Wardrobes;
- 2 Chests of drawers (each with a minimum width of 0.8m);
- Small sitting area for 2 people incorporating 2 'easy' chairs; and
- Adequate circulation space.

Kitchens:

Kitchens and kitchen / diners must not serve more than six residents. A kitchen and dining area must be provided in each unit of accommodation. If the kitchen and dining areas are to be provided in separate rooms, they should be situated on the same floor as each other (i.e. not separated by changes in levels).

All kitchens must demonstrate on plan that the following can be accommodated:

- Sink;
- Cooker with oven, grill, four hobs and extractor;
- Full height fridge/freezer – one for every three residents;
- Two cupboards per resident (minimum 0.6m wide);
- Adequate work surface for the number of residents; and
- Adequate circulation space.

All dining areas must demonstrate on plan that the following can be accommodated:

- Dining table of an adequate size to accommodate all residents at one sitting; and
- Chairs (one per resident).

If a separate living room is to be provided in addition to the kitchen and dining areas, or as part of these areas, then appropriate space standards should be applied (i.e. if separate, it should be demonstrated that appropriate levels of comfortable seating can be provided to accommodate all residents at one time, if combined then the minimum standards set out above should be increased accordingly). Living rooms should be designed to accommodate no more than 6 people to prevent their size becoming unmanageable in terms of attracting anti-social behaviour.

Bathrooms:

Bathrooms must be a minimum of 3.7sqm.

All bathrooms must demonstrate on plan that the following can be accommodated:

- Bath and/or shower;
- WC;
- Wash hand basin (should be of an adequate size for personal hygiene purposes including personal washing, cleaning of teeth and shaving);
- Circulation space to allow for changing; and
- Hanging / temporary storage facilities for towels, clothes and toiletries.

There must be at least one bathroom for every three bedrooms. Where possible, a bathroom should be provided on each floor where a bedroom is proposed /exists. Each bathroom must be accessible from a common area (i.e. corridor or hall) and if served by a window the glazing should be obscured.

Amenity:

All living spaces (kitchens, kitchen/diners, dining rooms, living rooms and bedrooms) must have an adequate level of natural light and adequate outlook (i.e. clear glazed windows with the lowest part of the glazing set at a height no greater than 1.5m from the finished floor level with a separation distance of at least 12m between the window and any wall or structure opposite (or at least 21m if facing windows serving a habitable room).

Therefore it is very unlikely that living spaces within basements or lower ground floors will be supported.

Other Issues:

Cycle Storage

Cycle storage should be easily accessible from the street (i.e. if steps/stairs form part of the access they should be easy to negotiate) and ideally should be an integral part of the building. If no rooms are available within the building that meets these requirements then a secured and fully covered storage facility must be provided within a secured external area within the curtilage of the building without having an adverse impact on the street scene). One cycle space should be provided per resident.

Refuse Storage

Provision must be made for refuse storage containers to be located on an area of external hard standing with suitable access from the internal space and to the street, without having an adverse impact on the street scene (i.e. discreetly screened). Where no external space is available within the building's curtilage the provision should be made within the building, subject to meeting fire and building regulations and again easy access can be provided to the street for refuse collections (i.e. if steps/stairs form part of the access they should be easy to negotiate).

Access and Security

Future residents should feel safe accessing the building and feel safe when residing within it. Therefore access to each self-contained unit should be via a single front door into a common area (i.e. a corridor or hall). All main access points from the street must be secured with appropriate levels of security including lighting, natural surveillance, locks and potentially CCTV.

Nationally Described Space Standards

The 'Standards for Houses In Multiple Occupation' provides guidance on the requirements for amenity, including heating, washing and toilet facilities, kitchens, standards for repair, management and equipment. The standards also include minimum floor spaces for specific rooms. Where a HMO results from the conversion of a building which is not currently a single dwelling or a new build, they will also need to accord with the gross internal floor areas defined in the Nationally Described Space Standards.

Appendix C – Signage with Deemed Consent

Signage with Deemed Consent

Class 3A of The Town and Country Planning (Control of Advertisements) (England) Regulations currently allow:

An advertisement relating to the sale or letting, for residential, agricultural, industrial or commercial use or for development for such use, of the land or premises on which it is displayed. Subject to the following limitations:

- (1) Not more than one advertisement, consisting of a single board or two joined boards, is permitted; and where more than one advertisement is displayed, the first to be displayed shall be taken to be the one permitted.
- (2) No advertisement may be displayed indicating that land or premises have been sold or let, other than by the addition to an existing advertisement of a statement that a sale or letting has been agreed, or that the land or premises have been sold or let, subject to contract.
- (3) The advertisement shall be removed within 14 days after the completion of a sale or the grant of a tenancy.
- (4) No advertisement may exceed in area— (a) where the advertisement relates to residential use or development, 0.5 square metre or, in the case of two joined boards, 0.6 square metre in aggregate; (b) where the advertisement relates to any other use or development, 2 square metres or, in the case of two joined boards, 2.3 square metres in aggregate.
- (5) Where the advertisement is displayed on a building, the maximum projection permitted from the face of the building is 1 metre.
- (6) Illumination is not permitted.
- (7) No character or symbol on the advertisement may be more than 0.75 metre in height, or 0.3 metre in an area of special control.
- (8) No part of the advertisement may be higher above ground level than 4.6 metres, or 3.6 metres in an area of special control or, in the case of a sale or letting of part only of a building, the lowest level of that part of the building on which display is reasonably practicable.

Penalties for the display of signs without the necessary consent

Anyone who displays an advertisement in contravention of the Regulations commits an offence. For example, by displaying an advert without the necessary consent or without complying with the conditions attached to that consent. It is then immediately open to the local planning authority to bring a prosecution in the Magistrates' Court for an offence under section 224 of the Town and Country Planning Act 1990. The penalty on conviction for the offence is at level 4 on the standard scale (current maximum £2,500) and in the case of a continuing offence a further daily fine of up to a maximum of one tenth of that amount (£250) until the contravention ends.

Where a local planning authority achieves a successful conviction for failure to comply with an enforcement notice, they can apply for a Confiscation Order, under the Proceeds of Crime Act 2002, to recover the financial benefit obtained through unauthorised development.

Local planning authorities also have powers to remove any advertisement (and any structure used for its display) which in their view is displayed in contravention of the Regulations.

Appendix D - Monitoring

The HMO data base and mapping will be updated yearly using Council Tax exemption data and more regularly when planning permission for new HMOs is granted.

**Residential Conversions and Houses in
Multiple Occupation Supplementary
Planning Document (SPD)**

Consultation Statement

October 2020



Contents

1. Introduction	3
2. Purpose of this document	3
3. Who we consulted	3
4. What we consulted on	5
5. How we have engaged	5
6. What issues were raised at Pre-Regulation 12: Public participation?	7
7. What issues were raised at Regulation 12: Public participation?	9
8. How these issues were addressed in the final SPD	9
Appendix A Summary of Consultee Responses at Pre-Regulation 12 Stage	12
Appendix B Summary of Consultee Responses at Regulation 12 Stage	26
Appendix C: Publicity Methods	28

1. Introduction

- 1.1 This Consultation Statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Statement sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Residential Conversions and Houses in Multiple Occupation Supplementary Planning Document) (SPD))
- 1.2 Supplementary Planning Documents (SPDs) relate to specific sites or specific planning issues. Unlike Development Plan Documents, they are not subject to Independent Examination and do not have Development Plan status. However, SPDs are given due consideration within the decision-making process and must relate to a specific Development Plan policy contained within a DPD. The Council will seek to prepare SPDs where it considers it to be necessary and appropriate and where it complements the overall Development Plan process.
- 1.3 The Residential Conversions and Houses in Multiple Occupation SPD provides guidance on the implementation of policy DM13: Residential Conversions, in the Development Management Development Plan Document.

2. Purpose of this document

- 2.1 This Consultation Statement provides a summary of the stages of engagement and consultation which the Council has undertaken in order to inform the preparation of the Residential Conversions and Houses in Multiple Occupation SPD and to address the requirements of national planning legislation.
- 2.2 For each stage of consultation, the Consultation Statement outlines:
 - Section 3: Who we consulted
 - Section 4: What we consulted on
 - Section 5: How we have engaged
 - Section 6: What issues were raised at the Pre-Regulation 12 public participation stage
 - Section 7: What issues were raised at the Regulation 12 public participation stage; and
 - Section 8: How the issues were addressed

3. Who we consulted

- 3.1 Through the process, the Council have sought to engage with the widest range of individuals, communities, organisations and stakeholders who may hold an interest in, or may be affected by, the content of the of the SPD and to make clear:
 - The purpose of the SPD, the process of preparing it and how and when they may be affected;
 - How and when they can comment on and get involved in preparing the SPD and what they can and can't influence;
 - How and when their comments will be taken into account by the Council and when they can expect feedback; and
 - The remaining stages in preparing the SPD and further opportunities to comment.

- 3.2 The Statement of Community Involvement (SCI) was reviewed and adopted in January 2019 and reflects the 2012 Regulations. Temporary COVID-19 and social distancing related updates were made in June 2020. The SCI sets out the Council's approach to engaging in preparing a SPD and in considering planning applications. It identifies who we engage with. The table below is not exhaustive and is amended or added to as required.
- 3.3 In addition to the organisations set out in the table below, the Council also consulted with the general public, all Council Members, agents, developers, education establishments, 3rd sector and local businesses who sign up to the Council's Planning Consultation Database.

Who we consulted	
Specific Bodies	
The Coal Authority	
The Environment Agency	
Historic England (Historic Buildings and Monuments Commission for England)	
Marine Management Organisation	
Natural England	
Office of Rail and Road (now called Office of Rail Regulation)	
Highways England	
Homes England	
Adjoining Local Planning Authorities	Barrow Council Craven District Council Lake District National Park Authority Ribble Valley Borough Council South Lakeland District Council Wyre Borough Council Yorkshire Dales National Park Authority
Area of Outstanding Beauty	Arnside and Silverdale AONB Forest of Bowland AONB
County Council	Cumbria County Council (+ libraries in the Lancaster District) Lancashire County Council
Parish Councils	
Lancaster City Councillors	
Local policing body	Lancashire Police and Crime Commissioner Lancashire Constabulary
Relevant telecommunications companies	PO Broadband, BT Openreach, Vodaphone, O2, EE
Primary Care Trust or successor body	Clinical Commissioning Group
Relevant electricity and gas companies	National Grid (Electricity) National Grid (Gas) Electricity North West E.on British Gas
Relevant water and sewerage companies	United Utilities
Others	Members of public Developer / Agents Landowners Businesses

Who we consulted	
	3 rd Sector Advocate groups Educational establishments Government organisations (NHS) Lancaster University Homes

4. What we consulted on

Pre-Regulation 12 Consultation (February 2020)

- 4.1 For a six-week period between 21 February and 3 April 2020 the Council carried out public consultation on:
- A Draft Residential Conversions and Houses in Multiple Occupation SPD;
 - The introduction of an Article 4 to manage the concentration of Houses in Multiple Occupation (HMO) in the wards within the city of Lancaster and the village of Galgate; and
 - The introduction of a Regulation 7 Direction to control the display of To Let Boards for residential properties.
- 4.2 The aim of the consultation was to carry out early engagement with stakeholders and provide an additional informal opportunity for comments on the draft SPD. The aim was also to gather feedback on the possible introduction of an Article 4 and Regulation 7 Direction to manage the concentration of small HMOs and To Let signs within the city of Lancaster.

Regulation 12 Consultation (August 2020)

- 4.3 For a six-week period between 14 August 2020 and 25 September 2020 the Council carried out public consultation on the Residential Conversions and Houses in Multiple Occupation SPD.
- 4.4 This formed the statutory consultation required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and sought to gain views on the content of the SPD.

5. How we have engaged

- 5.1 Table 5.1 outlines the consultation methods adopted for the Pre-Regulation 12 and the Regulation 12: Public participation stages, in order to satisfy the requirements of regulation consultation and to ensure that the requirements of the Council's Statement of Community Involvement have been met.

Requirements of Regulation	How the Council satisfied the requirement
Which bodies and persons the local planning authority invited to make representations	<p>At both stages the Consultation Database www.lancaster.gov.uk/ppcl) consultees, Parishes and Councillors were notified on the opportunities to participate in preparation of the SPD.</p> <p>The database consisted of residents and organisations who had been consulted on previous policy matters, those that had requested for inclusion and statutory bodies for which the Council must satisfy commitments to engage in ongoing duty to co-operate obligations.</p>
How those bodies and persons were invited to make representations.	<p>The Pre-Regulation 12 Consultation ran for 6 weeks, 21 February 2020 – 3 April 2020.</p> <p>The Regulation 12 Consultation ran for 6 weeks between 14 August and 25 September 2020.</p> <p><u>Consultation methods for both the Pre-Regulation 12 and Regulation 12 Consultation</u></p> <p>Emails sent to over 2,200 consultees on the planning policy consultation database, to Parish Councils and Councillors.</p> <p>Information on the consultation was published on the Council webpages, social media and copies of the consultation documents were made available at the 'Principal Offices'.</p> <p>A press notice was issued.</p> <p><u>Additional Consultation Methods for the Pre-Regulation 12 Consultation</u></p> <p>This included a period of publicity across the Lancaster District, with a Consultation Flyer and a public notice placed in the Lancaster Guardian (a local newspaper) following the start of the consultation.</p> <p>Posters were placed in 20 locations around Lancaster City and in Galgate, and over 80 posters were sent to venues in the area to ask them to display on notice boards. This method was carried out in respect of the proposed Article 4 Direction to control HMOs and Direction under Regulation 7 Direction in Lancaster City, however the SPD consultation was also referred to.</p> <p>An email (bcc) was sent to known letting agents advising of the consultation on 2 March. It is acknowledged that not all agents may have been captured and this was sent part way into the consultation. The notification was however, in addition to the Councils agreed publicity procedure.</p>

	<p><u>Additional Consultation Methods for the Regulation 12 Consultation</u> A presentation and Q&A via the Lancaster University Homes Webinar for landlords of student accommodation was held on 12 August 2020.</p> <p>Further details on the publicity methods are set out in more detail within Appendix A</p>
A summary of the main issues raised by the representations made	<p>The main issues raised in the representations are summarised in Sections 6 and 7 of this document and in Appendix A: Summary of Pre-Regulation 12 Consultation Responses and Appendix B: Summary of Regulation 12 Consultation Responses.</p> <p>The Officer response is set out in the Section 8 of this document.</p>
How any representations made have been taken into account.	<p>The Council has addressed the comments received and outlined how the comments have informed the final SPD.</p> <p>Sections 6 and 7 outline what issues were raised and Section 8 outlines how these issues have been addressed.</p>

6. What issues were raised at Pre-Regulation 12: Public participation?

- 6.1 Consultation on the Draft Residential Conversions and Houses in Multiple Occupation SPD provided the first opportunity for members of the public and interested parties to comment on the detail of the draft SPD. As the consultation related to the proposed SPD, Article 4 and Regulation 7 Direction, the range of responses received were varied and the level of detail provided extensive. There were 99 separate consultee responses to the three proposals. Several trends and patterns in respect of the draft SPD can be seen and are set out in more detail within this document.
- 6.2 The responses specifically in respect of the Draft Residential Conversions and Houses in Multiple Occupation SPD related to the following issues:

Support

- Significant support for limiting HMOs from permanent residents
- The policy to restrict HMOs is too late as concentrations are already high
- Shortage of family homes
- Landlords of HMO can get an overall combined greater rent than for family housing which pushes rents up at expense of the local community
- An over concentration of HMOs has harmed the local community spirit, there is no longer a balanced set of households
- Landlords live elsewhere and have no incentive to foster community spirit
- Properties stand empty over the summer
- HMOs have a significant impact upon the living conditions of residents
- Parking in the street is a problem, many HMOs have more than 1 car
- Large amount of waste, dumping of rubbish at the end of academic year by students and landlords

- Noise and antisocial behaviour
- Poor maintenance of some properties by landlords

Objection

- Disappointed at focus on students throughout the SPD
- The student population is not messy or noisy
- Students bring a large amount of expenditure and work to the local economy
- The student rented market under pins the Lancaster housing market, the coronavirus will create a recession on the housing market
- Student houses are maintained highly due to competition
- New purpose-built accommodation is expensive and does not replace the lower rent HMOs
- HMOs are an affordable source of accommodation for students – the increase in HMOs has improved the quality and supply
- Adverse impact on ability for residents to sell up, residents may be trapped, owner occupiers should be able to sell as a HMO
- The standards are too onerous and many properties both existing and new will not be able to meet these requirements

Comments on policy DM13 and implementation

- The HMO evidence base is inadequate and incomplete
- The 10% threshold should be applied flexibly to prevent an embargo on new HMOs and to prevent properties falling into disrepair or those which face demolition
- The 10% threshold will allow clusters – would it be better to calculate per street?
- The % cap should be on the number of residents within HMOs in an area
- The number of undergraduate students should be controlled rather than the type of housing to allow HMOs for post grads, young professions, those on short term contracts and families
- There should be no exception should be made if area already has over 10% HMOs
- How are exceptional circumstances assessed, a marketing exercise is suggested as long standing residents may wish to leave a street and struggle to sell
- Consider granting flexible uses class C3/C4 which would allow properties to change between each class
- The assessment should include ensuring increased occupancy does not increase flood risk to people, especially at ground floor

Standards for HMOs

- The HMO standards are backed by LU Homes (Lancaster and Cumbria Uni landlord accreditation scheme)
- The standards are much more onerous than current licencing standards
- Existing HMOs do not meet the standards
- Many properties cannot meet the standards, and they will prevent any conversions to HMOs
- Standards should be altered to allow 4 to share a bathroom, suggest cupboard, fridge/ freezer capacity per resident, desk space is not necessary for others than students

To Let Boards

- To many To let boards
- To Let boards not necessary with internet
- Unattractive and a blight the appearance of areas
- The paragraphs regarding signs are weak and should include the maximum sizes, and penalties for infringements

6.3 The responses specifically in respect of the proposed Article 4 Direction and the Regulation 7 Direction will be addressed separately when those proposals are progressed.

7. What issues were raised at Regulation 12: Public participation?

7.1. The consultation provided a second opportunity for interested parties to make comments on the content of the SPD. 11 separate responses were received. Many of the issues arising from concentrations of HMOs, outlined above, were reiterated.

7.2 The consultation responses highlighted the following issues in respect of the content of the SPD.

- The proposals do not control the quality of existing and new small HMOs, licencing should also be required for small HMOs
- Bedrooms at ground floor should also be prevented in flood zone 1
- The policy should only apply to HMOs with 5 or more bedrooms
- The 100m radius will not prevent over concentrations of HMOs
- The % should be altered to 5% in a 200m radius
- Criteria needs clarification to prevent subjectivity, reference to exceptional circumstances should be removed or made clear as landlords may interpret them differently to residents
- Encouragement to minimise signs is too weak, they should be banned

8. How these issues were addressed in the final SPD

1. Focus on students
2. Limiting HMO and the impact on market, quality, affordability
3. Evidence base
4. Flexibility and exceptions
5. Change how percentage is determined and type of control
6. Flood risk
7. Standards
8. Signs

7.1 As highlighted in Sections 6 and 7 of this statement, the Council received a range of responses to the content of the Residential Conversions and Houses in Multiple Occupation SPD. An explanation is provided below to outline how these issues have been dealt with in the preparation of the final version of the SPD.

1. Focus on Students
The references to student accommodation within the SPD have been reduced.

2. Limiting HMO and the impact on market, quality, affordability

The decision to limit the concentration of HMOs and 10% threshold within DM13 have been subject to consultation throughout the Local Plan process. Policy DM13 with the inclusion of the 10% threshold has been adopted by the Council. The Residential Conversions and Houses in Multiple Occupation SPD provides guidance on how the policy will be implemented, the aims of the policy and the 10% threshold have therefore not been amended within the SPD. The issues raised regarding limiting HMOs relate principally to the proposed introduction of an Article 4 area and will be addressed as part of the Article 4 process.

3. Evidence base

The evidence base intended to be used to determine the percentage of HMOs uses available data. This data consists of council tax exemptions, licensed HMOs (larger than 5 occupants) and a partial To Let sign survey. The comment regarding the data arises from an objection to the control of HMOs. It is acknowledged that this data is not complete but that it uses the most robust methods available. The data is, however, likely to underrepresent HMOs as not all HMOs are exempt from council tax, are licensed or will have had To Let signs in place at the time of the survey. Use of the data will therefore not prejudice the delivery of HMOs. If the Article 4 and Regulation 7 Direction are progressed it is intended to request that landlords notify the council of existing HMOs (currently not subject to licensing or planning permission) and carry out further To Let sign surveys.

4. Flexibility and exceptions

Policy DM13 refers to exceptions to the threshold and provides guidance on the issues to be considered. This allows flexibility where necessary. The SPD also refers to exceptions where existing residents may not be able to sell a property or where the living conditions of that property are significantly adversely affected by adjacent HMOs. Reference to a marketing period for a C3 use of 6 months has been added to address concerns raised.

The criteria for assessment and exceptions reflect the requirements of policy DM13. The impact upon amenity is a matter of judgement depending upon a range of issues such as the location and surroundings of the application site, the concentration of HMOs, availability of parking and waste storage. These assessments are made consistently by Officers of the Council not landlords, applicants or residents.

5. Change how the percentage is determined and type of control

The percentage and the way in which it is determined is included within policy DM13. It is therefore not within the remit of the SPD to change those details.

6. Flood risk

A section has been added to ensure additional sleeping accommodation within HMOs, at ground floor, does not increase risk to residents from flooding and that mitigation is put in place where necessary.

Where properties are in flood zone 1, they are at a low risk of flooding. Controls to prevent bedrooms at ground floor in these areas would be overly onerous and not supported by planning policy.

7. Standards and quality of HMOs

The standards within Appendix B have been transferred from Appendix D of the 2014 DMDDP. These standards have been in operation for a considerable period. They ensure that a suitable size of accommodation is provided where communal space may be limited and ensure that houses are not split into as many small bedrooms as possible. Where necessary they are applied flexibly.

Introducing licencing for small HMOs is beyond the remit of the SPD.

8. Signs

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 which allow/control To Let signs and the penalties for displaying signs contrary to the regulations have been added to the appendices of the SPD.

To Let Signs do not currently require consent. The SPD can therefore only encourage minimisation of their use. Separate action is being taken to control To Let signs further.

- 7.2 The means by which the number of HMOs is calculated has been altered from the Pre-Regulation 12 Draft SPD. The calculation now refers to an area with a radius of 100 metres, from the application site Unique Property Reference Number (UPRN) address point (Basic Land and Property Unit data in the Local Land and Property Gazetteer). This reflects how the data is stored and can be used. The separate methodology for flats has been removed.

Appendix A Summary of Consultee Responses at Pre-Regulation 12 Stage

Resident/Agent/Landlord	Support/Object/Comment	Summary of Comment
Resident	Support	Houses should be subject to planning consent processes to maintain character. Ideally residents would be long term. House purchasers should have to inform the council if planning to convert to HMOs, residents could then help to inform the planning process. Restrictions should be put in place to cap the number of HMOs vs long term residents. There is plenty of student accommodation so there should not be a need to use residential areas.
Resident	Support	Support the proposals in document 1, which is a positive response to problems that have impacted on many residents. Particularly support the provisions of cycle storage for HMO residents.
Resident	Support	Huge increase in HMO's in the area, therefore there is no longer a balanced mix of households and as a result community spirit has suffered. Landlords are often not from the area and HMOs provide high rent, which can exclude those on low incomes. HMOs also reduce the number of first-time buyer homes on the market. Residential areas were not designed for HMOs and consequently this causes problems e.g. waste issues. The number of HMOs should be reduced, and planning permission should be required for the conversion of properties to HMOs. There should be a requirement that a HMO can easily be reverted to its original state. Planning permission should also be required for letting boards. The conversion of properties also has an impact on the local environment e.g. materials being ripped out and replaced, gardens being paved over increasing the flood risk and impact on 'natural urban corridors'.
Resident	Support	HMOs should require planning permission as there should be adequate student accommodation. Housing should be affordable for families. Support limiting the number of 'to let' signs.
Resident	Objecting	Appendix B: standards for HMOs - the proposals are more onerous than the current standards and may mean that many properties could not be converted. It is unlikely that existing HMOs would comply with the proposed standards. The proposed rules are harsh and the existing ones should remain.

Resident	Support	Has been suggesting regulation for a long time. There is a particularly high percentage of HMOs on Golgotha Road. It is not possible to limit numbers on a street by street basis. The proposed standards are not enough, and a policy of reversal should be put in place. Planning permission should be required. Original property features have been removed/destroyed. HMOs create pressure on local services i.e. waste. Support need for planning permission for 'to let' signs. St Oswald Street is particularly unattractive because of this. Restrictions should also be placed on putting similar information in property windows. Signage is unnecessary in this digital age. Parking restrictions could help improve the issues caused by cars from HMOs, other residents, and the University.
Resident	Objecting	Student accommodation provides vital support to the local housing market. Competition helps to maintain high standards. Much of the new student accommodation is very expensive, therefore does not replace the cheaper HMOs. Cable Street, North Road, Kingsway, North Street, St Leonards Gate and Brock Street are full of student housing. However, many of these were previously commercial buildings which families were unlikely to want to live in.
Resident	Support	John O'Gaunt ward includes a mix of permanent and long-term residences and HMOs (primarily students). HMOs present many problems to the permanent and long-term residents e.g. waste, noise, parking, anti-social behaviour. The number of HMOs does not seem to be reducing, even though purpose-built student accommodation has been made available. 'To let' and 'now let' banners are an issue. Support proposals to limit the number of HMOs, require planning permission and related 'to let' signage.
	Support	The proposals will greatly improve community cohesion.
Resident	Support	Support all three proposals. Areas with high concentrations of HMOs have service and amenity issues. Purpose built student accommodation reduces the need for traditional housing to be converted to HMOs. The proposal to require planning permission would help to reduce the number of bedrooms being crammed into HMOs. Restricting the number of HMOs would help to retain family housing and permission for 'to let' signs would improve the look of areas with HMOs. It is important to hold landlords to account and keep the right balance of housing provision.

City Councillor	Support	Support all three proposals including restriction on numbers of HMOs, requiring planning permission for HMOs and regulation of 'to let' boards.
Resident	Support	Support all three proposals and they need to be introduced asap.
Resident	Support	Proposals are well thought through and suggest considered responses to some increasing problems. Parking is an issue that is not only caused students but other residents too. Anti-social behaviour issues need to be looked at. Community cohesion is also a concern. Covid 19 has brought the community together and would like this to continue e.g. shared street cleaning responsibilities, community led public events, community allotments. Environmental impacts of cars and use of bollards needs to be reviewed. Fines need to be put in place to support non-compliance. The proposals could contribute to positive social change.
Resident	Support	High numbers of HMOs have caused waste, noise and parking issues. HMOs also have an impact on the value of and selling homes.
Resident	Support	Support all three proposals. The issues of most immediate impact are the proposals on noise and car parking. Suggest that insulation is included in the permissions and a maximum number of cars per household. Refuse storage and intensity impact on character. HMOs often remove the gardens which help to provide character. Support the application of Article 4 in the areas designated in Appendix 2. The council could look at ways to attract the current HMO owners to invest in the student apartment blocks. Support proposal to require planning permission for HMO conversions, although would suggest a date to review this policy.
Resident	Support	Castle ward has a high number of HMOs which have increased over several years. HMOs do not meet student needs and change the character of an area, they also cause many issues e.g. waste, noise, no maintenance. The requirement of planning permission will help to provide an appropriate housing mix and protect the character of areas. Controlling the concentration of HMOs is vital and the proposed changes will support a more robust and sustainable approach locally.
Resident	Support	Support proposals to limit the proportion of HMOs and restrictions on 'to let' boards'. Regent Street is made up of 30% of HMOs. Have had no problems with students in the street but would like to ensure a mix of housing.

Resident	Support	Support Article 4 directive. Increase in HMOs has negatively impacted local area. Appreciate the value of students in Lancaster but it is unfair to take up streets. Create various issues e.g. waste, noise. Original features have often been replaced, sometimes in conservation areas which needs to be addressed. Majority of students are polite and friendly, but landlords do not maintain their properties.
City Councillor	Support	Support all three proposals. Scotforth west ward councillor so listened to lots of resident's views on the high density of HMOs and issues caused by these e.g. noise, waste, and parking. Restricting the use of 'to let' boards will also help to improve the character of areas.
Resident	Support	High density of HMOs without planning permission, stopping families buying properties and causing issues e.g. waste and parking. Letting boards devalue houses and discourage other families living in the areas.
Resident	Support	Support proposal to restrict density of HMOs.
Resident	Support	Support Regulation 7 Direction proposal, particularly the removal of 'to let' boards which are unnecessary as most students will look online. Also support the proposal to request planning permission, although this should be district wide and disagree with the 10% in 100m limit. Student accommodation blocks are not the best solution.
Resident	Support	Support the proposal to require planning permission. Live in John O'Gaunt ward and there seems to be an increasing high density of HMOs in Perth Street. Would want to move if there were more HMOs on street. Waste issues have increased. Support control of the character of the ward.
	Comment	Page 4 Policy D13 - No exceptions should be made to the 10% or more HMOs within a 100m radius.
Resident	Support	SPD 8.2 - Support the proposal to restrict 'to let' boards, in fact they should be banned for student housing.
Resident	Support	There is no need for 'to let' boards in the age of the internet. Support proposal to require planning permission, including 4 bed HMOs which has not been included in the proposed policy. Student renting is profitable and reduces the availability on non-student renting. Support the proposal to strengthen regulations on the conversion of houses to some sizes of HMOs, reduce 'to let' boards and would urge the council to go further in future.

Resident	Support	Support all three proposals. Section 8 - visual impact of 'to let' signs and refuse bins in Primrose area and along South Road is poor. The need to provide a license would help to control properties.
Resident	Support	Concerned about impact of HMOs in Allandale Gardens. Landlord for long term let in this area. Support the proposals but they don't go far enough. Suggest below is also required: DM13 should also apply to small HMOs and require a license, Article 4 should not be delayed to avoid a rush of conversions and this consultation provides notice of this, support Regulation 7 areas but should also include the Article 4 areas i.e. Marsh Ward, Scotforth East Ward, Skerton West Ward and Skerton East Ward.
Resident	Support	Support proposal to limit the density of HMOs and restriction of 'to let' signs. Live in Scotforth West which has a high number of HMOs. Support landlords having more responsibility for the external maintenance and cleanliness of their properties. Students do not pay tax for local services so landlords should be charged. Students do not get involved in local issues or the look of a street. Danger of creating 'student ghettos'.
Resident	Support	Support all three proposals. County Councillor for Lancaster East which includes most of the areas affected by the changes. Resident feedback suggests that the high density of HMOs changes the character of an area and impacts on community cohesion. HMOs also cause issues e.g. waste, noise and lack of maintenance. Supported purpose-built accommodation to help with these issues. HMOs also impact on resident's ability to rent and sell their properties. Hope proposals will help to meet the needs of families and young workers. 'To let' boards are a common complaint from residents. Pleased that the council is taking action in response to resident concerns.
Resident	Support	Support all three proposals. Hope that this will release affordable family homes and help with the sale of properties.
Resident	Support	Support all three proposals. Student accommodation in residential areas has reached a situation point and is negatively impacting local areas.
Resident	Support	Support all three proposals but would like to see retrospective enforcement against existing HMOs who do not meet the standards.
Resident	Support	Live in freehold district of Lancaster. Students have never caused any problems but the lack of maintenance and emptiness for part of the year is an issue.

Resident	Support	Welcome the proposal. Have no problem with students but the 'to let' signs, lack of maintenance, loss of original features and waste are an issue.
Resident	Support	Support proposals.
Resident	Support	Support proposals. Enjoy having student neighbours but HMOs cause various issues e.g. waste and parking. Also support restrictions on 'to let' boards, ideally use of them should be banned.
Resident	Objecting	Strongly disagree with proposals. This would mean that if someone is finding it hard to live in a student area and were struggling to sell, they would no longer have the option to convert their house into a HMO. It would be fairer if 'new owners' could not convert houses into HMOs, but owners for at least 5 years could have the option to do so if they chose or current owners should be given 2 years notice. Support restriction of 'to let' boards, in fact they should be banned.
Resident	Support	John O'Gaunt Councillor - These issues are regularly raised by residents. The high density and the use of 'to let' boards are an issue. Need to work towards a mix of housing within our communities.
Resident	Support	The proposals are well thought through to protect and enhance the range and level of accommodation for all those who live, work and study in Lancaster.
Member of Parliament, Lancaster and Fleetwood	Support	Support the proposals which positively respond to the issues being raised by residents.
Resident	Support	Support proposal on HMO restrictions. Purpose built student accommodation not resulting in HMOs returning to original state.
Resident	Support	The number of HMOs has increased in South Road. Noise issues tend to be at the start of the academic year and after exams finish. Support the proposed restrictions on 'to let' signs.
Resident	Support	Students help to support local businesses and the general economy, however, HMOs have led to artificially high house prices. Purpose built student accommodation should mean that houses can be made available for other residents to choose to live in the city.
Resident	Support	High density of HMOs has led to low availability of affordable homes for people on low incomes.
Resident	Support	Mixing students and residents has led to anti-social behaviour and parking issues.
Resident	Support	HMOs can cause waste, noise, parking, and no maintenance issues.

Resident	Support	Support all three proposals. More control and scrutiny will deter sub-standard landlords.
Resident	Support	No comment.
Resident	Support	HMOs can cause waste, noise, and parking issues. 'To let' boards can impact the character of roads. The purpose-built student accommodation should mean that affordable houses become more available for families.
Resident	Support	The purpose-built student accommodation should mean that affordable houses become more available for families. Support proposed restrictions on 'to let' signs.
Resident	Support	Support all three proposals. A reduction in HMOs would make more houses available for other residents.
Resident	Support	Support all three proposals. HMOs should require planning permission and 'to let' boards should be restricted. Boards should be located on actual properties of in the windows only.
Resident	Support	Support Regulation 7 proposal, as prospective tenants will most likely be looking for accommodation online. Regulations should be put in place on the external appearance of all properties e.g. Bath bylaw fines building owners who do not maintain their properties. Article 4 should be carefully considered. Fines should be put in place for maintaining properties and anti-social behaviour issues. From experience, students are not a problem, but sometimes other tenants can be.
Resident	Comment	The integration of students with local residential community is important, however, it should be managed by Universities not private landlords. Universities should encourage students not to use cars. Planning permission should only be given if there is co-operation between the University and Local Authority. Anti-social behaviour from students should be reported to the Universities, this should not be a problem for the Local Authorities to deal with alone. Other city universities seem to be more involved in supporting students to find suitable accommodation.
Resident	Support	Support all three proposals. Well done Lancaster City Council for finally addressing this problem. HMOs can impact on community cohesion and the high numbers of 'to let' boards look terrible. The council should make the universities know that they must take joint responsibility for the situation and be expected to help to fund the initiative.
Resident	Object	Object to the proposed restrictions on HMOs. Purpose built student accommodation is the problem, social housing should be being built instead.

Resident	Support	Concerned about HMOs, particularly when there is a shortage of housing for families. It is a good time to place restrictions on HMOs now purpose-built student accommodation is in place. Regulations would discourage HMO conversions which take up family homes.
Resident	Support	Support the requirement of planning permission but think this should apply to all house sizes. HMOs can cause waste and parking issues. Support the proposal to restrict the use if 'to let' boards but feel that it should go further e.g. each agent should have one board on a street which lists all the houses they have to let on that particular street.
Resident	Support	Long overdue.
Resident	Support	Long overdue. HMOs can cause waste, parking, noise, and no maintenance issues.
Resident		HMOs impact on community cohesion and can cause parking issues. The purpose-built student accommodation should mean that houses are freed up for families but allowing them to be turned into HMOs means that this is not happening. HMOs do not provide the level of community charge to provide services.
Freelance Planner	Support	Help to address socio-economic concerns and environment/amenity issues via more effective regulation and strong enforcement measures. Fully support designation of Article 4 areas and use of Regulation 7 Directions. Enforcement resources will be key to the success of DM13. Fully support Appendix A and B, although good practice examples would help. Could this approach be applied to HMOs elsewhere e.g. Morecambe?
Lancaster City Council Officer	Comment	Unsure how we can assess exceptional circumstances? Remaining residential properties may struggle to sell their properties for continued C3 use.
Resident	Object	1.1 - Opening statement and student numbers is incorrect (web link provided). Other areas have HMO issues i.e. West End of Morecambe, Central and Bare areas. Students should start to transfer from terrace housing stock to 'purpose built' accommodation. Section 4.4 - scope of coverage should be extended to adjacent areas to avoid poor quality housing attracting minimum rent. 10% could create further clusters, a blended calculation may be better. Fully support the proposal to minimise impact of 'to let' boards. Query on students paying council tax.

	Support	Support restriction of 'to let' boards, do not think there is a need for them at all as most people look for housing online. High number of HMOs/students has led to no sense of community. Set up Lancaster City Centre Residents Association as didn't know neighbours/long term residents. Assume nothing can be done about current HMOs. Would appreciate if the council could put something in place to encourage/enforce landlords to maintain their properties. Need to protect Lancaster's heritage.
Resident	Support	Fully support all three proposals. Huge growth in HMOs has had a profound and largely negative impact on demographics and community cohesion. Anti-social behaviour, waste, parking, lack of maintenance issues creates community tension. Also, that students don't pay council tax. HMO areas are driving down the availability and desirability of city centre family homes.
Coal Authority	No comment	No comment.
	Support	University success has led to more students than available campus accommodation, as a result there has been an increase in HMOs and rents have become unaffordable for many families in need. Purpose built student accommodation rents need to be lower to encourage HMO owners to reduce rents or return homes to original state. Councils will need to regularly inspect homes to maintain the proposed 10%. Existing landlords should also be required to meet the proposed standards. What action has been taken/will be taken to tackle the antisocial behaviour issues? Support the proposed restrictions on 'to let' signs.
	Comment	Suggested that the Norwich Stirling eco social homes approach should be considered (web link provided).
Environment Agency	Support	Support the content of draft DPD and have made some comments on flood risk. Section 7 Living Conditions - would like to see provision to ensure increase in occupancy does not result in flood risk. Do not support ground floor sleeping accommodation in Flood Zone 3 and would not support if no open internal access to first floor. Suggested text for inclusion. Support designation of Article 4 as an opportunity to ensure that flood risk is not increased.

Green Door Lets	Comment	HMO landlord - high concentration of undergraduates in the residential streets should be regulated, rather than the housing. HMOs offer housing for lots of other people e.g. some people want to downsize, and HMOs offer this, affordable rent and company. Should specify what cupboard/fridge/freezer space is required per person, rather than limiting to 3 people. Needs to be in line with NPPF Section 5:61. Sections 20:41 and 20:42 are also relevant in terms of vulnerable people. Preference would be to allow 'for sale' boards but ban 'to let' boards (allow in window).
	Support	Fully support all three proposals. High concentration of HMOs in Coulston Road. No problems with students themselves but high density has led to low sense of community, lack of maintenance, noise, waste, and parking issues. Other residents have difficulty in selling properties. Welcome proposed restrictions on 'to let' boards.
	Comment	Should clearly state the maximum size of signage allowed and penalties which will be imposed. Have suggested an interim approach to officers but unpopular. There should be a dedicated enforcement officer for this.
Resident	Support	Support proposal to restrict 'to let' boards, particularly in the Moorlands area. Positive about young people but need a balance to help to build a diverse and vibrant community. The Moorlands Community Group would like to revive community spirit, events have had to be postponed but a support leaflet has been distributed.
Lancaster City Centre Residents Association	Support	Lancaster City Centre Residents Association broadly support the proposal on restricting HMOs. Need to maintain a housing mix and ensure sufficient availability of affordable family homes. Minimum standards should be set for HMOs and regulated through council licensing. Question whether 'to let' boards are necessary when most look online. A detailed housing needs assessment on the type and sustainability of existing and future student accommodation needs and competency of providers is required. Support proposal to restrict 'to let' boards - should be required to remove after 2 weeks. Strongly recommend the examination of the use of council housing and other powers to tackle poor landlord management and the resulting environmental and antisocial behaviour problems.
Lancaster University Students Union	Object	Lancaster University Students Union objects to the proposed introduction of Article 4 - suggest evidence is inadequate or incomplete. Restrictions in the number of HMOs would lead to increased rents and reduced supply. Policy DM13 in the Local Plan already provides a way to control the number of HMOs. This policy should be

reviewed in 12 months before Article 4 is considered. Granting flexible Class C3/C4 planning permissions in should be considered as an alternative.

Lancaster University	Object	Lancaster University supports the proposal to improve HMO standards. 'Lancaster University Homes' ensures that existing HMOs meet current standards. The proposal was formally adopted in December 2019 and the standard will be updated following the outcome of this consultation and decision on proposed Article 4 and Regulation 7. Some students will always prefer to live in HMOs, therefore demand is likely to remain high, especially as this is affordable. However, a reduction in HMOs could cause rents to rise, which could impact on other rents. Concerned that proposals will put off landlords applying for the accreditation scheme. If restrictions are put in place, HMOs may be created in other neighbourhoods. Students support and boost the local economy. HMOs are also used by young professionals. If graduates cannot find accommodation, it is unlikely they will stay post-university. Suggest the 10% threshold is flexible. Support the proposal to restrict 'to let' boards. Would like to meet with officers to discuss these proposals.
	Comment	Several specific questions about HMOs and new/continuing licenses.
Resident	Comment	Oppose purpose-built student accommodation blocks. Students living in residential areas support the local economy.
Natural England	No comment	Natural England do not wish to comment because the supplementary planning document is not impact on the natural environment.
Lancaster Civic Society	Support	Lancaster Civic Society support the proposal to restrict the number of HMOs. Categories of tenants should be omitted, west end tenants cannot be compared with South Lancaster. The Council should monitor and register the HMOs to provide exact figures. Standards for fire safety and overcrowded need to be considered. A clearer definition of HMOs should be provided. Should be creating 'good healthy communities', including students and academics. Should consider need for including family accommodation, student accommodation, rehabilitation accommodation for the homeless, single, retirement and downsize accommodation. Commend the use of proposed local legislation to achieve these ends but expect such legislative policy to be informed by such statements of responsibility.

	Support	Support all three proposals, limiting the numbers will hopefully have some impact but fails to address issue of letting agencies buying up everything. Have experience of living next to and near student HMOs, as a result have moved out of the city centre. Lots of issues, original features list, parking, noise, litter, 'to let' signs.
	Support	Support all three proposals but not sure they go far enough. Concerned about HMOs in Allandale Gardens (landlord with long term tenants). DM13 should also apply to small HMOs and they should require a license. Article 4 should not be delayed, too much notice will mean C3 to C4 conversions will be created before planning permission is required. Hope something can be done about work in progress too. Regulation 7 should be applied to all Article 4 areas including Marsh Ward, Scotforth East Ward, Skerton West Ward and Skerton East Ward.
Lancaster Vision	Support	Lancaster Vision strongly supports all three proposals.
Lancaster Labour Party	Support	Covering email for Lancaster Labour Party paper responses.
Resident	Support	No comment.
Resident	Support	Too much saturation of housing and dodgy landlords/letting agencies.
Resident	Support	Too many HMOs in Bowerham/Scotforth, causing waste issues. Purpose built accommodation should release houses for first time buyers.
Resident	Support	Appreciate benefits that student bring but now purpose-built accommodation is available, houses should be released for others. Support restrictions on 'to let' boards that are an eye sore.
Resident	Support	Should keep houses for residents and young people starting out.
Resident	Support	Support all three proposals. No need for student HMOs now purpose-built accommodation is available.

<p>Welfare and Community - Lancaster University's Students Union</p>	<p>Object with the exception of 'to let' signs.</p>	<p>Overall, welcome the improvements for housing across the city. Responses are informed by various surveys. Para 1.1. Student HMOs do not contribute to 'seasonal depopulation'. Unsure that the proposals would help with 'poor condition accommodation' and current accreditation and licensing can help with this. Students add to and improve our vibrant community. Purpose built student accommodation had highlighted student accommodation to residents. The majority of students live in small HMOs and choose these for various reasons. HMOs provide an affordable option for students, many cannot afford the purpose-built accommodation. It is important that proposals do not increase rent or reduce choice for students as this can affect grades, wellbeing and experience. Need to be clear why 10% HMO is an imbalance in communities. Para 5.2. How will the impact on character of a building or area be measured? Para 7.14. Noise - the majority of students have not been involved in a complaint related to the council's environmental health team. Refuse, recycling and bicycle storage - the majority of students did not have issues accessing these. Individual bike stores seem excessive for new HMOs. Car parking - students did not have an opinion on this or said there was adequate parking available. Families can also have multiple cars, parking issues are also caused by hospital users. Behaviour change to reduce carbon footprints should be considered. Para 2.11. HMOs have different impacts on the community depending in their size and tenants. Section 4 - Poor upkeep - students expect a high standard of maintenance, although the turnover of occupants impacts on this. The condition of housing will be more influenced by the Homes Act 2018 and licensing or accreditation schemes than planning permission. Rents - Do not believe HMOs are the cause of rent increases. Do not support how 'students HMOs' are referred to in documents. Not confident that proposals will tackle issues raised. Would like to work in partnership on this. Students support the proposed restrictions on 'to let' boards. Suggest that this should be applied across the whole district.</p>
<p>Kendal Resident</p>	<p>Comment</p>	<p>Concerned that class C3 properties could be used for Airbnb type lettings.</p>
<p>Homes England</p>	<p>No comment</p>	<p>Homes England does not have any land holdings affected by the consultation and has therefore not commented.</p>
	<p>Support</p>	<p>Broadly support all three proposals. Essential to maintain a housing mix. HMOs are changing the character of the city and need to ensure affordable family homes are</p>

available. Support proposals on restricting the use of 'to let' signs. Council needs to explore powers to tackle poor landlord management and environmental problems.

City Councillor	Comment	Concern re saleability in Regent Street.
The Planning Station - a town and country planning and development consultancy	Object	Bedroom floor areas seem excessively large. May lead to configurations to get around this, which may lower standards incurring unnecessary costs and use of valuable resources.
Lancaster City Council Officer	Support	Request to consider changing boundary to include St Georges Quay, Willow Lane and Marsh Ward.

Appendix B Summary of Consultee Responses at Regulation 12 Stage

Organisation (if applicable)	Support/Object/Comment	Summary of Comment
City Councillor	Support	High concentrations of student housing, seriously affect quality of life in the following ways: parking issues – not enough space for all vehicles creates double parking etc., noise disturbance - especially from late night parties, lack of social cohesion - due to the yearly influx of new students with no opportunity to develop long-term community connections, lots of people coming and going, problems with refuse - bins overflowing etc., fear that their house value will be lowered. Whilst the introduction of Article 4 (Policy DM13) may not help these particular residents, as ward councillor I would like to see tighter controls, so this serious problem does not worsen.
	Support	Concentrations negatively affect the character of our local community. There is already no shortage of student accommodation and the increase in recent years have limited the options for locals to find appropriate homes, and rapid changes in existing neighbourhoods dramatically alter the overall feel. Extensive changes to the architecture to convert properties to HMOs, make them stand out from the ones of identical style and it is difficult to capture the original theme once significant structural changes have been made. There needs to be a better balance between the HMOs and all year residents.
	Supporting / Objecting / Comment	Broadly supporting of document but how do you control the quality of existing and new small HMOs over time? I would like to see in licensing being required for small HMOs (as in other planning authorities). A small HMO is no less deserving of this level of quality assurance than a large HMO. Bedrooms at ground floor should be prevented in flood zone 1 as well as zones 2 and 3.
	Support	It is important that the number of HMOs is limited as there has been a huge increase in recent years. This impacts the area negatively in multiple ways - changing the nature of the local community from a mix of families/ long term residents and students/temporary lets to dominance of temporary lets. This causes issues with traffic congestion and parking, refuse and tipping in alleys, backyards and front yards of properties which has led to recent issues with vermin. extensions of properties which impinge on neighbouring properties and difficulties selling properties which are surrounded by HMOs. This is not a way to create and support sustainable local communities
	Comment	Conversions to HMO will increase fire risk on neighbouring properties especially if carried out in terraced areas. The consultation pre-dates the COVID epidemics but with hindsight it is not hard to imagine how HMOs will negatively increase the risk of epidemics spreading onto neighbouring residential houses. HMOs are increasingly offered for let on daily basis. This is akin to offering totally unregulated and untaxed hotel services in residential area. Controls over these types of let's should be considered.

Green Door Lets	Comment	<p>There is an assumption that HMOs are generally less attractive a proposition, which is too simplistic. There are high quality HMOs, with en-suite bathrooms and a high standard of decor and comfort which enable professional people on starting salaries to live in high-quality accommodation without the high costs of a flat. Sharing facilities is sociable rather than onerous. Young professionals also often want a more flexible tenancy, as they may be on shorter contracts.</p> <p>The policy should only apply to HMOs with 5 or more bedrooms, and/or those with shared bathrooms.</p>
	Comment	<p>There are still a large number of houses in our city, which are being used as multiple occupancy. It would help young locals if these houses were returned to be used as family homes, allowing families to move on expand and freeing up smaller houses for first time buyers.</p>
	Comment	<p>I think multi occupancy is a good thing for many people at some stages of life. However, I like the idea of not too many of these households in one area. When too many multi occupancy houses, it is harder to build communities.</p>
Morecambe Town Council	Comment	<p>The 100m radius would not prevent imbalances growing, a developer could propose a development of the 100% radius and an area of imbalance would grow. In dense areas of HMOs, areas where new HMOs are prohibited should be designated with an exclusion zone around them.</p>
	Support	<p>Welcome the proposals. All new HMOs should require planning permission. The criteria should be clarified to prevent subjectivity, residents may consider there to be a significant adverse impact which a landlord may not. Exceptional circumstances should be removed or made exceptionally clear. A HMO should not adversely affect parking. Encouraging minimisation of To Let signs makes it sound optional, they should be banned. The SPD should encourage landlords to keep their properties in a good state of repair. Landlords could contribute to improving visual appearance within the city, similar to the BID.</p>
	Comment	<p>Proliferation of HMOs is having an impact parking and on long term family residents by removing family houses from the market and changing the character of the area. The % should be reduced to 5% in 200m circles.</p>

Appendix C: Publicity Methods

Methods	Main consideration
Documents made available for inspection	This is a minimum requirement as set out in the Regulations. Relevant documents will be made available for inspection during consultation period at the Council's offices in the Lancaster and Morecambe Town Hall and libraries in the Lancaster District. Public access to these documents is available via PCs in the reception areas
Website	Each consultation stage will feature prominently on the homepage of the council's consultation ¹ and planning policy webpages. This will link directly to information on document production, providing access to the consultation material and advice on how and when comments can be made. Articles providing updates on plan production, which may include consultation and engagement opportunities, may be published in the Council's online news section periodically but it will not be solely relied upon as a means of communication.
Adverts/public notices	Notices will be placed in a local newspaper advertising consultation and engagement opportunities, where appropriate. Statutory requirements to publish notices advertising certain planning applications
Mailing List – Email / Letter	The Council operates a database of individuals and organisations that have expressed an interest in the plan-making process, have previously been actively involved in policy development or are statutory consultees. Those who wish to be involved will be directly notified at each stage either through email or letter of opportunities to comment. Those who are interested in planning policy development and wish to be notified can be included on the Council's mailing list at any time ²

Methods	Main consideration
Press release	To be undertaken in accordance with the Council's media team, Media briefings/press releases will be issued to local media. Although items may only be reported if they are considered newsworthy by the newspaper editors, therefore publication is not guaranteed.
Parish and Town Council and Community Group publications	These types of publications are distributed to residents at least quarterly. The Council will work with relevant organisations to utilise these publications to notify residents of consultation and engagement opportunities, where possible. Consideration will need to be given to the timing of the consultation, and the timing and circulation of any publications outside the Council's control.
Posters	Posters may be sent to relevant Parish and Town Councils and libraries to be displayed on notice boards to raise awareness of any public consultation and engagement opportunities. Posters may also be displayed in other appropriate locations across the District.
Leaflets	Leaflets may be used to gain wider public awareness of a consultation or engagement opportunity, for example leaflets may be distributed at key attractors/destinations such as train stations and local schools.
Social Media	Media such as Twitter and Facebook will be used to highlight public consultations on planning policy documents with direct links to the Council's website and information on how to comment, and any engagement events. Such messages may be retweeted periodically throughout the consultation period ³ . However, comments will not be accepted via social media.
Events	Such events may include drop-in sessions, public exhibitions and/or targeted workshops. Parish and Town Council meetings will be utilised where possible. The type of event undertaken will be dependent on a number of factors, including the consultation stage, and time and resource constraints. Careful consideration will be given to the timing, venue and format of events to ensure accessibility and inclusivity.
Key stakeholder Groups	We will liaise with key stakeholder groups at key stages in the plan making process, to discuss issues and keep them informed of progress.

Methods	Main consideration
Questionnaires / surveys	Questionnaires / surveys may be used to focus comments and to help ensure that feedback relates to issues that are within the scope of the document being consulted upon.

Lancaster City Council | Report Cover Sheet

Meeting	Cabinet	Date	8 December 2020		
Title	Local Government Reform proposal for the Bay area				
Report of	Chief Executive				
Purpose of the Report					
To request Cabinet's endorsement of the full proposal for a unitary council for the Bay area.					
Key Decision (Y/N)	Y	Date of Notice	19/11/20	Exempt (Y/N)	N

Report Summary

At meetings on 5 November 2020, Cabinet endorsed, and full Council authorised the submission of an outline proposal for a unitary authority for the Bay to the Ministry of Housing, Communities and Local Government and the subsequent preparation of a full proposal. This report now presents that full proposal for approval.

If approved, the Barrow, South Lakeland and Lancaster councils will present the full proposal to Government, demonstrating how a unitary council will be an effective driver and enabler of economic, social and environmental benefits for the area's residents, businesses and visitors, realise the strategic potential of the area and enable transformation of public services.

Members should note the full report pack for detailed information, including the following appendices:

- Appendix 1 - The full unitary council proposal for the Bay
- Appendix 2 - A summary of engagement and consultation work
- Appendix 3 - The government's letter of invitation to the Cumbria authorities, which includes the core criteria
- Appendix 4 - The government letter regarding Type C proposals

Recommendations

It is recommended that Cabinet

- 1. Approves the full proposal for a unitary council for the Bay area (attached at Appendix 1) and recommends it to Council for their consideration and approval before submission by the Leader and Chief Executive to the Government by 9 December 2020; and**
- 2. Authorises the Chief Executive, in consultation with the Leader, to approve any minor amendments that may arise following consideration of the proposal by Barrow Borough and South Lakeland District Councils, prior to submission.**

Relationship to Policy Framework

Exploring the case for reform has taken account of the benefits a change to local government could deliver and relates to all services delivered by the council as well

as the outcomes for our communities. In addition, a new unitary council would have access to additional resources and a greater degree of influence over sub regional and national policy.

Conclusion of Impact Assessment(s), where applicable

Climate ✓

Wellbeing & Social Value ✓

Digital ✓

Health & Safety ✓

Equality ✓

Community Safety ✓

Developing the case for reorganisation and reform has required consideration of the benefits a change to local government could deliver for economic prosperity and resilience within Morecambe Bay and the opportunities to improve and maximise the wellbeing of residents and positively reduce inequalities. This accords with the Council's priorities of working across boundaries to deliver economic prosperity, strong and involved communities, community wealth, health and well-being, social value and tackling the climate emergency.

A key element of the proposal is that it demonstrates improvement to local government and service delivery and provide stronger strategic and local leadership across the area. The proposal clearly indicates the benefits and positive impacts it seeks to realise for the health, social, economic and environmental wellbeing of the area.

Details of Consultation

A comprehensive programme of communications and engagement has been undertaken over the last few weeks to inform residents, businesses, stakeholder organisations, councillors and employees about the development of the proposal and engage their views. Communications were coordinated across the three councils.

Stakeholder meetings have included Health, residents and businesses, other local authorities, parish and town councils, Police, Fire and Rescue, the third sector, Local Enterprise Partnerships

A resident and business survey has been made available online by each Council and an independent opinion poll carried out. Councillor briefings have taken place and online staff briefing provided with further briefings scheduled.

A summary of the engagement and findings is provided at Appendix 3.

The main outcomes are:

- The Opinion Poll demonstrates a broad level of support for the Bay proposals amongst residents across the area.
- Engagement with strategic bodies indicates that:
 - there are benefits to be derived through collaborative work to align and transform services to achieve better outcomes for residents and improve the sustainability of services
 - collaboration will improve the strategic voice and influence of the Bay area.
 - there are no fundamental or irresolvable issues which would stand in the way of a Bay proposal being implemented

- The survey demonstrates a very high degree of public support for organising local government on the scale and geography of the Bay

Some points arising from the engagement work will inform the design and development of the proposal, in the event Government approve its implementation.

Legal Implications

Proposals for a unitary authority are being submitted under Part 1 of the Local Government and Public Involvement in Health Act 2007 (“The 2007 Act”).

By letter of 9 October the Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007 invited the principal authorities in Cumbria to make a proposal in accordance with the attached letter at Appendix 3. In essence the Council had approximately 4 weeks to submit an Outline proposal and a further 4 weeks to submit a Full Proposal.

Section 3(5) of the 2007 Act requires authorities to have regard to guidance issued by the Secretary of State as to: “what a proposal should seek to achieve”; and “matters that should be taken into account in formulating a proposal”. Guidance for this invitation has been attached to the invitation to submit a proposal at Appendix 3.

Whilst there is no statutory consultation process the letter from the Secretary of State made it clear that any proposals should include a good deal of local support as assessed in the round overall across the whole area of the proposal. The Councils have carried engagement on the proposal and the results of this are attached at Appendix 2.

Once the Secretary of State has received a proposal in response to an invitation, he may seek advice from the Local Government Boundary Commission for England, which may recommend that:

he implements the proposal;

he does not implement it; or

he may make an alternative proposal.

Before making any Order the Secretary of State (s.7 of the 2007 Act) will consult every authority affected by the proposal (except the authority or authorities who made the proposal) and such other persons as he considers appropriate.

If the proposal is agreed by the Secretary of State, it is then implemented by a Structural Changes Order which is laid before Parliament. The Order is likely to create new shadow authorities, provide for elections, a shadow executive to take decisions, appoint staff, transfer assets and secure implementation and then dissolve the old authorities and effect the transfer of functions to the new authorities on 1st April probably 2 years hence in 2023.

The Secretary of State has invited proposals which include a Type C proposal. At present Cumbria Fire Authority is part of the County Council, whereas in Lancashire there is a Combined Fire Authority covering the area of the County Council along with the two unitary authorities of Blackpool and Blackburn with Darwen represented on a separate statutory corporation. Part 1 of the Policing and Crime Act 2017 places a duty on police, fire and ambulance services to work together and enables Police and

Crime Commissioners to take on responsibility for fire and rescue services where a local case is made under the 2017 Act

The legislation for the organisation and reorganisation of police areas and police and crime commissioner's does not constrain our ability to form a new unitary council which crosses existing county boundaries. If our Type C proposal is accepted the Secretary of State will consider what incidental or consequential provisions he may (should he wish to) make under Part I of the 2007 Act. There are also powers under s32 of the Police Act 1996 to bring the police areas and Police and Crime Commissioner boundaries in line with the new structure of the local authority. Similar transitional provisions with regard to Fire Authorities will apply.

Financial Implications

There are many potential financial implications of changing the structure of local government. These were last experienced in this area in 1974 when the current Lancaster district was created and some parts of north Lancashire became part of the South Lakeland and Barrow administrative areas.

It is expected that any reorganisation would result in additional one-off costs to implement the changes and then recurring variations in costs and income following the change. How these changes will balance out will depend on the individual circumstances of each local authority and the options adopted: without carrying out the analysis it is not accurate to assume the impacts modelled and delivered elsewhere would be replicated in Lancaster district as part of the Bay.

Particular issues to be considered include existing base budgets, the relative income base of each authority, existing levels of council tax and government grants, capital expenditure, assets owned, levels of borrowing, pensions, potential redundancy costs, relative salary and staffing levels, potential costs of aligning IT systems and the speed and ability to realign service delivery to realise efficiency savings while providing strong strategic and local leadership.

It will be necessary to set a single level of Council Tax for any new authority: the levels will be determined by existing Council Tax levels.

Each authority has been asked to submit details of expenditure, income, staffing, balance sheet assets and liabilities, key funding streams, five-year financial plans and expected demographic and non-demographic growth. This detail has been used to prepare information relating to the potential changes in funding and costs and are identified in the full proposal at Appendix 1.

It should be noted that, if the Bay unitary proposal is supported by government, further very detailed work will continue via a shadow authority and into the early years of the new unitary.

Transitional costs will be required to develop and implement all arrangements, and this will be a shared issue for all three councils. However, analysis suggests that over a ten-year period the cost of local government substantially reduces, becoming considerably more sustainable in the long term.

If the proposal is approved by government, developing arrangements will need to be supported by ongoing consideration of financial implications at every stage.

Other Resource or Risk Implications

Resource requirements moving forwards are fully considered and addressed as part of the full proposal and the costs associated with this carry a good business case. Clearly, there are significant benefits for the district and the wider Bay area that can be delivered by the council playing a full role in designing and implementing any new arrangements for a unitary council. There are no further immediate resource issues to raise in this report.

If supported by government, the implementation of the proposal would naturally lead to a TUPE transfer of employees from the various respective councils to the successor unitary authority. Transitional planning arrangements will develop the detail of the new authority's service delivery and workforce.

Identified risks if the proposal is approved and submitted to government are as follows:

Proposal does not meet the criteria set by Government for LGR proposals with the consequence that the proposal could be dismissed by government or be challenged by others.

This risk has been addressed by strong compliance with the criteria based on professional advice and confirmation from government, as required.

Proposal does not gain support of local bodies and other public sector organisations, which would create a risk that the proposal would not be supported by government.

This risk has been significantly addressed by strong stakeholder and public engagement and consultation, over the last few weeks evidencing that support for a unitary proposal for the Bay area is strong.

LGR will place pressures on existing resources.

Whilst development of the proposal has been necessary at a time when there are many other pressures on local government, this challenge was short term and has now been successfully met. Moving forwards, if the proposal is successful, significant further work would be required and the transformational shift towards a Bay unitary and the associated outcomes and benefits would need to be a priority for all three councils. Transition resources have been costed into the proposals to reflect this and will mean that there should be no reduction in quality of service to residents whilst unitary arrangements are developed and implemented.

Section 151 Officer's Comments

After a decade of having to make substantial savings Local Government continues to face significant financial challenges leading to suggestions that the current two tier model of local government is reaching the limits of what can be achieved and that the way in which services are administered and delivered needs to be rethought.

The proposal looks to establish a new Unitary for the Bay Area across two existing County Council boundaries. Increasing the scale at which Local Authorities operate can provide significant financial benefits through economies of scale. These benefits tend to be generated by reducing duplication across front and back office functions, senior management as well as reductions in areas such as property costs etc. However, it does require the disaggregation of services currently provided by both Lancashire and Cumbria County Council's such as Children's and Adult Social Care. This would result in additional costs being incurred, both because of the

disaggregation process, but also in terms of the lost opportunity costs associated with not maximising the potential benefits on offer.

In addition, any new Authority would inherit a share of assets such as school buildings etc to deliver its new services but also its share of liabilities associated with pensions, long-term borrowing, or other obligations such as PFI/ PPP which are currently with both County Council's.

The Council has contributed to the production of the indicative financial benefits within the proposal (Appendix 1 Section 4.4 - Finance and affordability). Members may wish to consider and challenge as appropriate. If the proposal is approved by Government, developing arrangements will need to be supported by ongoing consideration of financial implications at every stage.

Monitoring Officer's Comments

The Monitoring Officer has been involved in the drafting of this report and has no further comments.

Contact Officer:	Kieran Keane, Chief Executive
-------------------------	--------------------------------------

Tel	01524 582501
------------	--------------

Email	chiefexecutive@lancaster.gov.uk
--------------	---------------------------------

Links to Background Papers

1.0 Background

- 1.1 At meetings on 5 November 2020, Cabinet endorsed, and full Council authorised the submission of an outline proposal for a unitary authority for the Bay to the Ministry of Housing, Communities and Local Government. The outline proposal was also agreed by South Lakeland District and Barrow Borough Councils on the same day and was then submitted to the government by the required deadline of 9 November 2020.
- 1.1 Since that date, and with Council's authorisation, work has continued to develop the full proposal that is required to be submitted to government by 9 December.
- 1.2 The government's criteria and expectations for new unitary proposals are set out in Appendix 3 and include requirements around sustainable service delivery, value for money, population and local support.
- 1.3 The full proposal forms Appendix 1 to this report. The proposal presents the case for a new unitary council for the Bay, focussed on the cohesiveness of the area and its communities. It indicates the opportunities, strengths and strategic needs of the area's communities and economy and how they may best be addressed through the leadership and resources of local government based on the geography of the functioning economic area and health services footprint.

- 1.4 The proposal sets out the approach which has been followed to develop a clear and justified proposal which meets the criteria for local government reorganisation. It demonstrates that the Bay is a credible geography and population size, that the proposal has strong level of local support, that it will deliver affordable and efficient local government and that is deliverable.
- 1.5 The proposal is founded on the principle that 'form follows function'. The starting point is an understanding of what needs to be addressed in the Bay area, 'the drivers of change.' The proposal identifies the critical importance and opportunity for public services transformation so that whole system approaches are adopted to address needs. It sets out opportunity for a new relationship between communities, the third sector and public services, enabling co production of services and principles of subsidiarity. From this assessment of needs and opportunities for service reform come the objectives for the Bay Authority and the basis on which success can be measured.
- 1.6 The proposal provides comparison with alternative proposals against the criteria for reorganisation. It presents a financial assessment, identifying financial cost, benefits and sustainability of The Bay. It sets out the cost and approach to managing the transition from existing to new arrangements. It emphasises that by adopting the form follows function approach, the most significant benefits for the area and the affordability of public services are derived from service reform and transformation in addition to the savings from organisation structural changes.
- 1.7 The proposal provides commentary on an option for the organisation of local government in the remainder of Cumbria, should the proposal for the Bay be implemented, as well as useful commentary with regard to Lancashire. It presents the opportunity for future discussions to proceed on combined authorities and devolution of powers and resources from Government.
- 1.8 Outline proposals were submitted by Cumbria County Council for a single unitary council for Cumbria and by Carlisle City Council for two unitary councils within Cumbria and by Allerdale Borough Council for two unitary councils within Cumbria. These two outline proposals did not specify how the existing district areas would be grouped to create the two new unitary councils.
- 1.9 The Bay full proposal provides a comparison of these proposals and concludes the Bay proposal will deliver the strongest outcomes and benefits for the Bay area whilst enabling a sustainable unitary council to be established in Cumbria to the north and complementing potential unitary arrangements in Lancashire.
- 1.6 Members will be aware of recent local government reorganisation discussions in Lancashire and the early indications of a possible three unitary approach to

what is currently the Lancashire County Council administrative area plus that covered by the Blackpool and Blackburn with Darwen unitaries. In this context, Lancaster district could potentially become part of a North West Lancashire unitary that would also include Blackpool, Wyre, Fylde and Ribble Valley.

1.7 At this stage, no detailed analysis has been undertaken on this model by the potential constituent authorities to allow for a straight comparison. However, it is apparent that a new unitary proposal on this footprint would face some important challenges in terms of meeting the government's requirements:

- **Improved local service delivery, greater value for money, savings, stronger strategic and local leadership and more sustainable structures**

Improvements to meet these requirements are challenged by the lack of a functioning economic area, no identifiable Travel to Work Areas, Travel to Learn Areas and no aligned health service footprint. There are no existing local government shared strategies on this footprint.

- **Commands a good deal of local support**

There is no evidence of local support for a unitary on a North West Lancashire footprint and recent local engagement and consultation has evidenced that local public and stakeholder support is primarily for the Bay unitary.

- **A credible geography with an aggregate population within the range of 300,00 to 600,000**

A North West Lancashire model on this footprint would meet population requirements and does provide continuity. The challenge would be the need to make a case for a "credible geography", given the degree of geographical separation Lancaster district has from the wider area and the lack of any aligned services, strategies or priorities upon which to build a case.

1.8 For clarity, the analysis contained in the Bay proposal has been undertaken on the basis that unitary structures for local government are preferred by government and will provide critical structures as part of any devolution deals moving forwards. On that basis, no detailed analysis has been undertaken of the status quo arrangements, which in any event are well understood.

1.9 As members are aware, the Bay proposal covers an area that crosses the Lancashire and Cumbria county boundary as established in the 1974 local government re-organisation. At that time, Lancaster City Council was created and some parts of north Lancashire became part of the South Lakeland and Barrow administrative areas. Whilst it seems likely that these historic links are part of the reason for the feeling of connection between the communities around the Bay, it has still been important to fully confirm that the government's invitation to Cumbrian authorities allowed for cross county boundary proposals. This has been ascertained and a copy of the government's response, which

describes the Bay unitary proposal as a Type C proposal, is attached at Appendix 4.

2.0 Proposals

- 2.1 The full proposal is at Appendix 1 to this report (to be published by 4 December) and sets out the rationale and supporting case for developing a new unitary council for the Bay area. The proposal indicates the opportunities, strengths and strategic needs of the area's communities and economy and how they may best be addressed through the leadership and resources of local government based on the combined footprint of the three districts of Lancaster, South Lakeland and Barrow, which is also the geography of the functioning economic area and health services footprint.
- 2.2 In addition to structural change, the proposal indicates the benefits that can be realised through public service reform, within local government and collaboratively with other service providers. The area offers the population scale envisaged by the Government's invitation, with a population c320,000.
- 2.3 The proposal acknowledges the historic and current associations between places and communities across the Morecambe Bay area. This strengthens the rationale for the organisation of local government at a scale and footprint readily identified by residents and businesses. This enables locally based, accessible and engaged local government.
- 2.4 Cabinet is asked to consider and endorse the full proposal for approval by full Council and submission to government on the 9th December 2020.

3.0 Options and Options Analysis (including risk assessment)

Option 1: Submit the proposal to government by 9 December 2020
<p>Advantages:</p> <p>The Bay unitary option remains on the table to be considered by government.</p> <p>The preferences of our residents and stakeholders are supported.</p> <p>Builds on the strong relationship with the Bay authorities and partners.</p> <p>Potential for benefits and opportunities for our residents and businesses, opportunities for shared priorities and outcomes across the Bay area, more sustainable services working with connected communities, integrated health and social care reform.</p>

Provides a greater opportunity to deliver the economic prosperity and growth identified in The Bay Prosperity and Resilience Strategy, sooner and at scale

Potential for a louder voice with government with opportunities to influence policy developments, funding priorities and investment.

Potential for a coordinated Bay wide approach to climate change action.

Potential for more devolved funding and responsibilities as a unitary council within a Combined Authority area

Disadvantages:

Moving forwards, a great deal of work will be required but there will be the opportunity to plan and resource this well.

Risks:

There is a risk that the Bay proposal is not supported by government. All possible steps have been taken to ensure a strong proposal is made.

Option 2: Do not submit the proposal to government

Advantages:

None. No obvious advantages, particularly as the option to remain as a single district is unlikely to continue as local government reorganisation and devolution plans develop at the national government level.

Disadvantages:

The Bay unitary proposal will not be considered by government and the district will have significantly less influence on any future unitary developments.

Lost opportunity to deliver benefits and outcomes for our residents and businesses, develop for shared priorities and outcomes across the Bay area, more sustainable services working with connected communities, integrated health and social care reform.

The unitary proposal preferred by most residents cannot be progressed.

Reduced opportunity to achieve a louder voice with government to influence policy developments, funding priorities and investment

The Council's influence on local government reorganisation would be significantly reduced.

Lost opportunity to bring additional devolved funds and responsibilities into the district and the wider Bay area sooner than would otherwise be possible.

Lost opportunity for a coordinated Bay wide approach to climate change action.

Risks:

If the Bay proposal is not submitted, early discussions for reorganisation in Lancashire suggest the district could become part of a NW Lancashire potential unitary. Although not fully assessed this model does not present opportunities to build on shared economic functioning areas, Travel to Work/ Learn areas or a shared health footprint. The case therefore carries uncertainty and risk.

4. Officer Preferred Option (and comments)

4.1 The officer preferred option is Option 1, to submit the proposal for a Bay unitary council to the government by the deadline of the 9 December 2020.

THE BAY



**Full proposal for establishing a new
unitary authority for Barrow, Lancaster
and South Lakeland**

December 2020

Foreword

Dear Secretary of State,

Our proposals for unitary local government in the Bay would build on existing momentum and the excellent working relationships already in place across the three district Councils in the Bay area. Together, we can help you deliver a sustainable and resilient local government solution in this area that delivers priority services and empowers communities.

In line with your invitation, and statutory guidance, we are submitting a Type C proposal for the Bay area which comprises the geographies of Barrow, Lancaster and South Lakeland councils and the respective areas of the county councils of Cumbria and Lancashire. This is a credible geography, home to nearly 320,000 people, most of whom live and work in the area we represent.

Having taken into account the impact of our proposal on other local boundaries and geographies, we believe creating the Bay Council makes a unitary local settlement for the remainder of Cumbria more viable and supports consideration of future options in Lancashire.

Partners, particularly the health service would welcome alignment with their footprint and even stronger partnership working. The relevant Police and Crime Commissioners and Fire and Rescue Authorities across both counties do not see any unsurmountable barriers. Our public engagement shows stronger support for a unitary local authority representing the Bay area over any alternative.

Our vision for the Bay is real and already shaping the agenda that we are delivering. We have a joint committee and excellent working arrangements between relevant authorities to make it happen. We have the ideas and inspiration to align reform with reorganisation and make a real difference to people's lives.

As a leadership team, on behalf of everyone in the Bay area, we ask that if you agree to any reorganisation proposals for Cumbria that the Bay Council be the solution for this area.



Cllr Ann Thomson
Leader of the Council
Barrow Borough Council



Sam Plum
Chief Executive
Barrow Borough Council



Cllr Dr Erica Lewis
Leader of the Council
Lancaster City Council



Kieran Keane
Chief Executive
Lancaster City Council



Cllr Giles Archibald
Leader of the Council
South Lakeland Council



Lawrence Conway
Chief Executive
South Lakeland Council

Proposal on a page

Will it be better than today or potential alternatives?

YES

We will combine reform and reorganisation to drive recovery and build a better future.

Do we command local support?

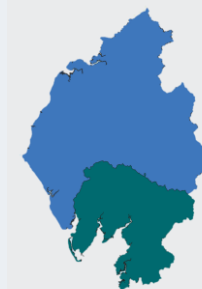
YES

Public surveys, opinion polls and partners say they support the Bay.

Is this a credible geography?

YES

for the 320,000 people in the Bay, and the 325,000 in north Cumbria



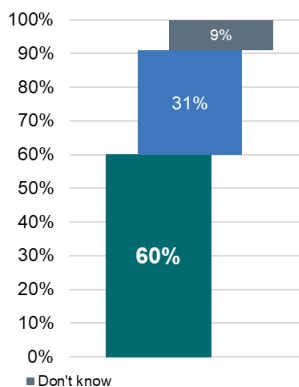
We meet the MHCLG tests because we will

- Improve local government and service delivery
- give greater value for money by investing in reform alongside reorganisation to change our long term costs and improve outcomes
- Generate savings of £50m over five years in the Bay with potential for £100m if North Cumbria also becomes a unitary
- Provide stronger strategic leadership by being aligned to how public services are actually delivered for communities in the Bay area
- be a more sustainable structure, not a race to the bottom claiming the biggest short term savings but a race to the future by building organisational and system resilience.

The increased scope and population across the Bay and North Cumbria makes unitaries viable

- The Bay and a North Cumbria unitary would both have total net service expenditure of £500m+ creating a balanced settlement.
- Future unitaries in Lancashire would be better placed
- Cumbria's fire and policing authorities would benefit from the scale of others and would also be more balanced

The Morecambe Bay area would be best served by...



■ A whole county unitary for Cumbria and separate arrangements for Lancashire
 ■ A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts

Independent telephone poll of 1012 adults living in the Bay area, conducted by Survation 13-19 November 2020

Local people should be represented by people that are close to the community and democratically accountable to local people...

Strongly agree	Agree	Neither	Disagree	Strongly disagree
78.0%	16.9%	2.6%	0.9%	1.7%

Local services should be decided and delivered close to where people live and work...

Strongly agree	Agree	Neither	Disagree	Strongly disagree
74.1%	18.7%	3.7%	1.5%	2.4%

Local survey with over 2700 responses open 10-30 November 2020 plus a series of ten community and stakeholder events

Key partner organisations support the Bay agenda and recognise any challenges can be overcome to create a resilient council for the future.

The Bay and North Cumbria are credible

This is a footprint where the natural geography influences how systems operate. The creation of Cumbria brought together areas around the mountains but operationally there remain distinct areas within the geography, and a particular distinction between north and south.

Public service responsibilities and accountabilities delivered by Cumbria wide organisations typically organise on a geographic rather than service basis.

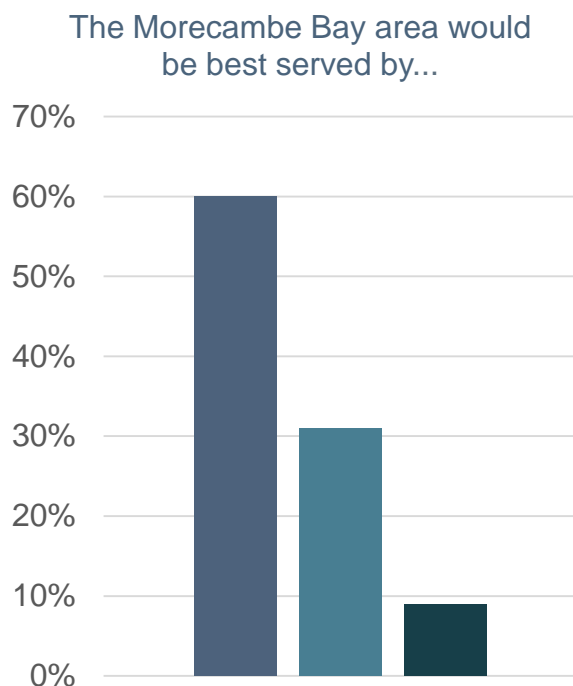
Those organisations see no barrier to the operational delivery of services on a North Cumbria and Bay Council footprint.

For the Bay there is a coherent functional economic area that we organise around and 96% of people live and work in the area.

The Bay and North Cumbria solution results in two unitary authorities that have the ability and resilience to be financially viable, represent a significant population and can provide a platform for wider regional co-operation and unitary solutions.

Top-line results from local consultation and engagement

Independent telephone poll of 1012 adults living in the Bay area, conducted by Survation 13-19 November 2020



■ A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts

■ A whole county unitary for Cumbria and separate arrangements for Lancashire

■ Don't know

Local survey with 2796 responses open 10-30 November 2020

Local people should be represented by people that are close to the community and democratically accountable to local people...

	All agree	All Disagree	Neither
Barrow	86%	10%	4%
Lancaster	93%	5%	2%
South Lakeland	76%	19%	4%

Community and stakeholder events involving employers, community groups, parish councils and young people

“The format of the Bay is very good...There is a massive opportunity to create prosperity for the north and set ambitious targets”

“From an NHS perspective it would make total sense to align the council with the NHS footprint which is pan Morecambe Bay”

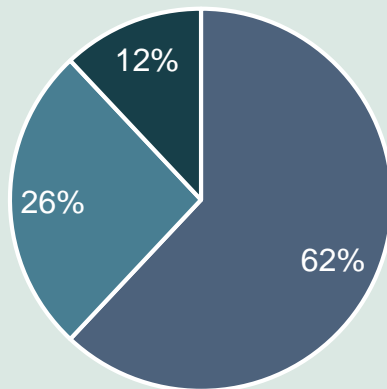
“I’m very happy to express the views of many parish councillors who have spoken to me and we are almost universally in favour of The Bay proposal”

“I believe that the merger with Barrow, Lancaster and South Lakes would be in all our best interests.”

Opinion Polling

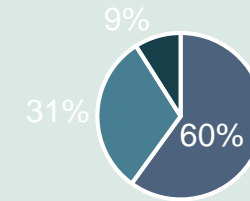
- Survation conducted a telephone survey of 1012 adults across the three districts of the Bay between 13 and 19 November 2020.
- The results show strong support for a Bay unitary, with a belief that this would deliver better services and concern that a county unitary would make it harder for local voices to be heard.
- These results are consistent across demographic groups and between all three districts
- Full data tables are available here: <https://cdn.survation.com/wp-content/uploads/2020/12/02090636/Morecambe-Bay-Tables.xlsx>

What option would be most likely to improve the quality of services provided by councils?



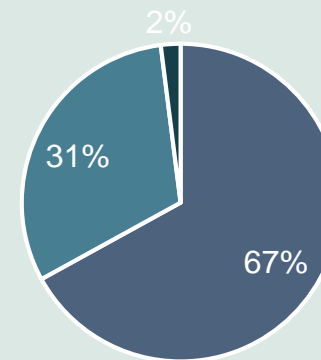
■ Morecambe Bay unitary ■ A county level unitary ■ Don't know

The Morecambe Bay Area would be best served by...



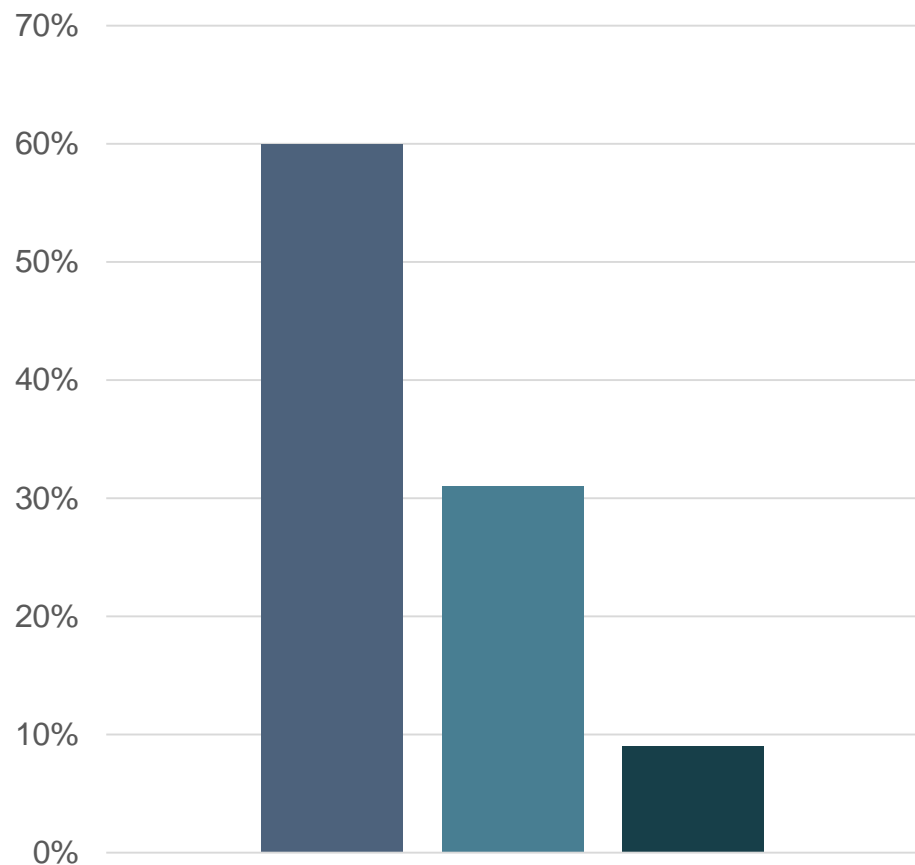
- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

Would you be concerned that if your local area was overseen by a single council at a county wide level, your voice may not be heard on local issues?

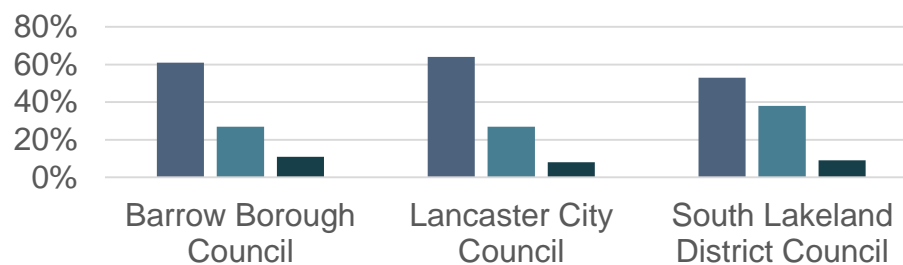
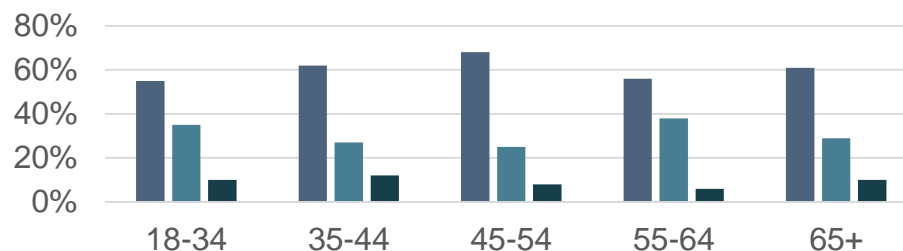
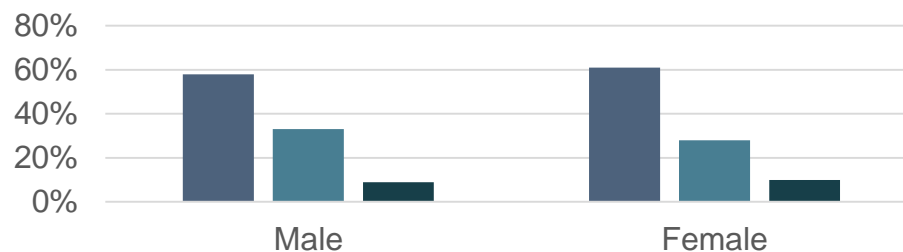


■ All concerned ■ All not concerned ■ Don't know

Q1. Which of the following statements best reflects your view? The Morecambe Bay area would be best served by...

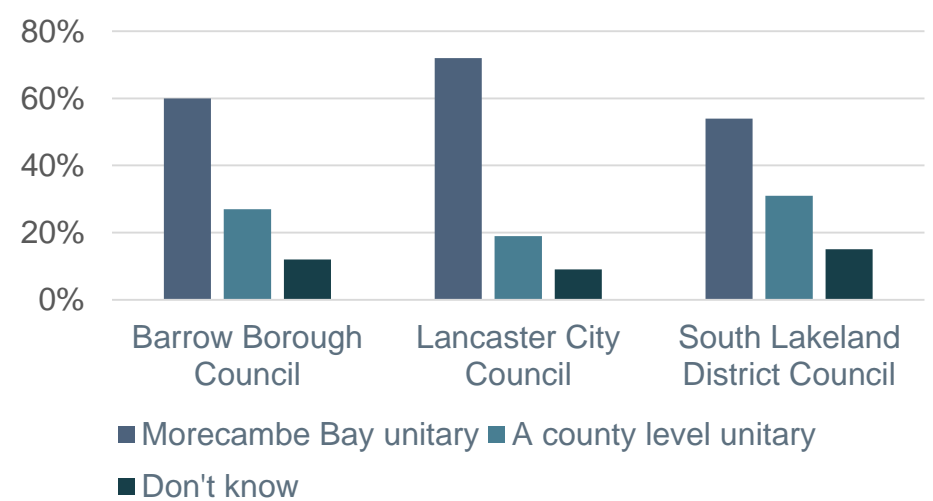
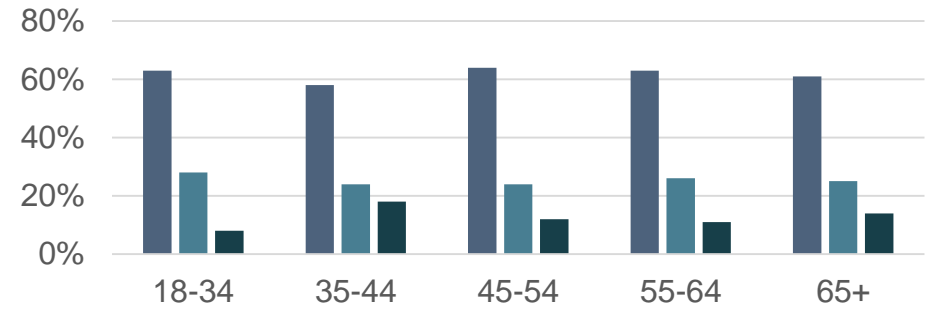
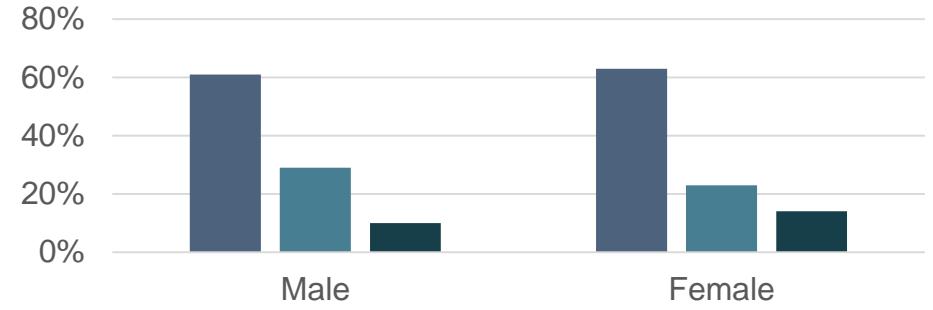
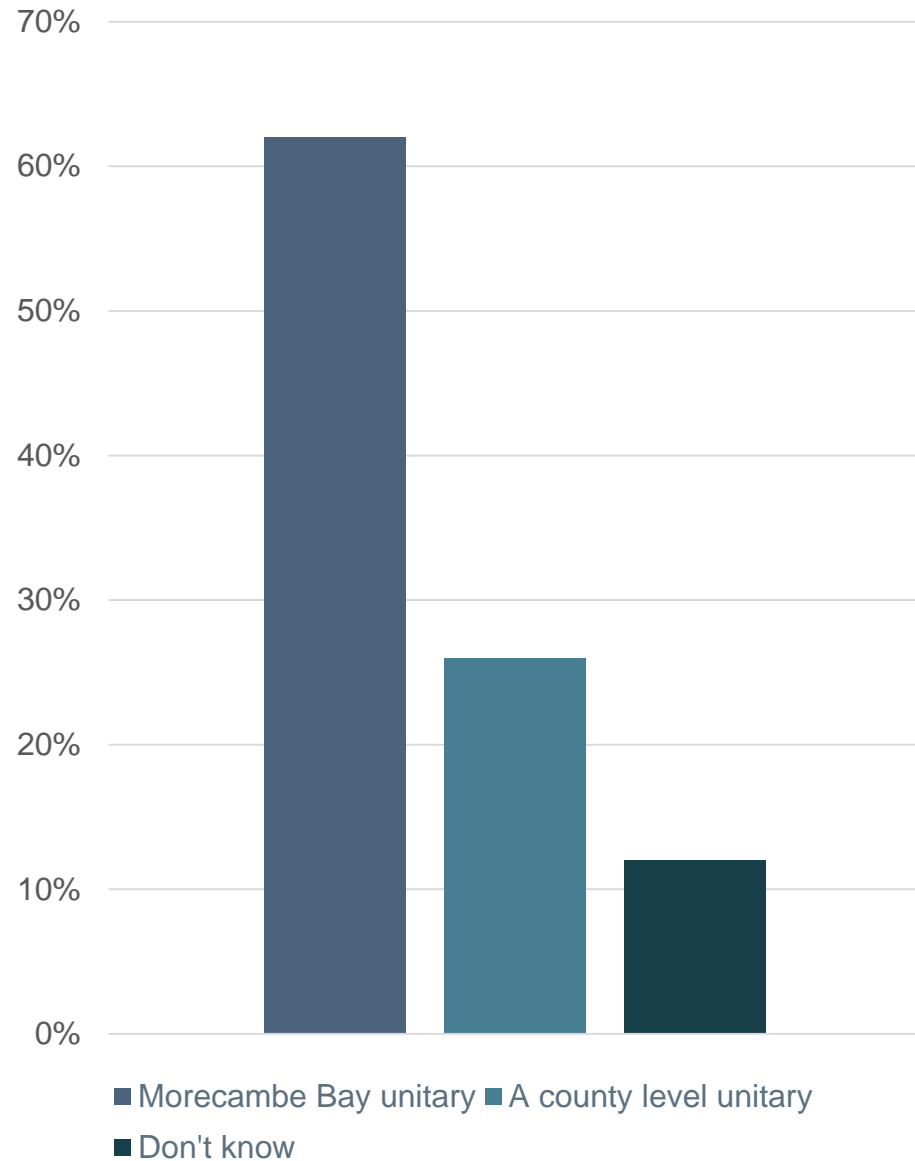


- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

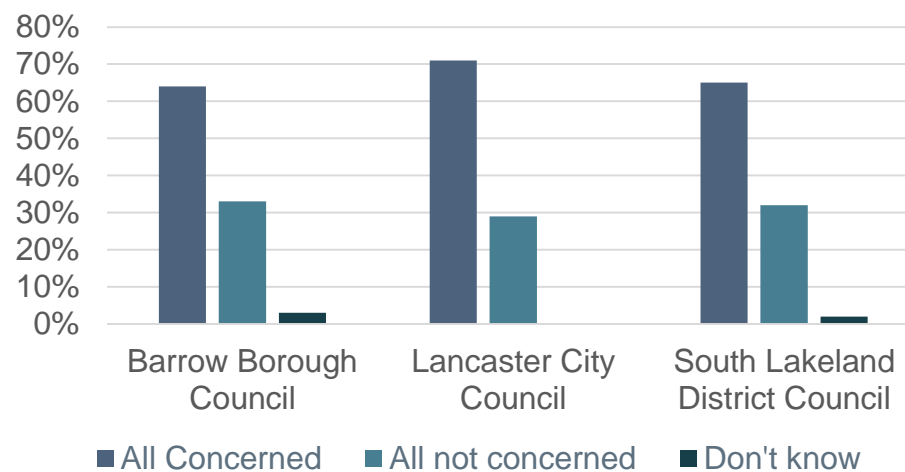
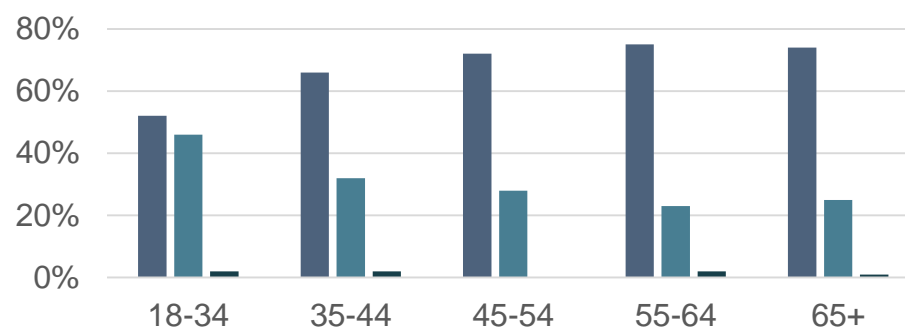
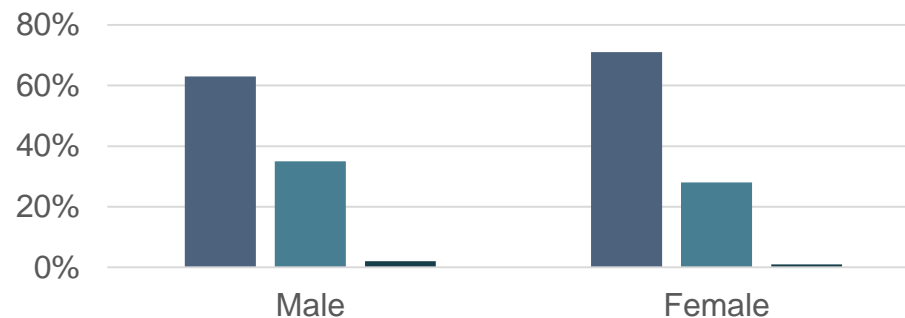
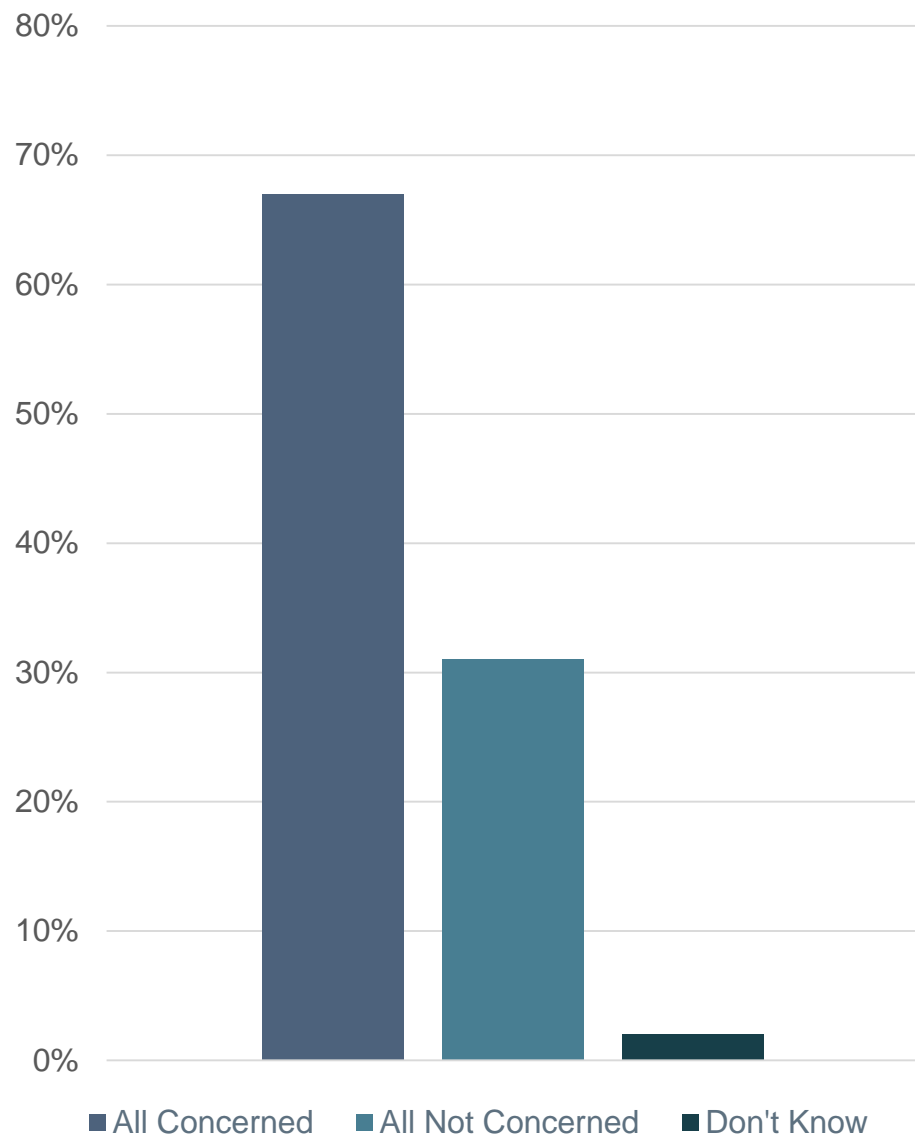


- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

Q2. In your view, what option would be most likely to improve the quality of services provided by councils?



Q3. To what extent, if at all, would you be concerned that if your local area was overseen by a single council at a county wide level, your voice may not be heard on local issues?



Contents

Executive summary		Page number
1	Introduction and approach	15
2	Case for change across Cumbria and the Bay area	17
3	Alternative options	39
4	Delivering for the Bay	55
5	Making it happen	82
	Annexes	92



Executive Summary

Our proposal for unitary local government builds on excellent working relationships across the Bay

Councils around the Bay already work well together. Becoming a unitary local authority for the Bay is an opportunity to go further.

This proposal responds to your invitation to submit unitary local government proposals for Cumbria. Despite being in the midst of unprecedented challenges we have responded to your invitation because we believe that becoming a Bay unitary is critical to our future and missing this opportunity would risk disrupting the shared work we are building to serve our residents and region.

We have set out why the Bay area needs to be considered as the preferred and only realistic option for our authorities and how it can be delivered. We have followed your criteria and developed, in the time available, a robust case that is based on the HM Treasury guidance for building better business cases.

Our proposal emerges not from the invitation call but from a long standing view of what is right for our local residents, communities and businesses. As councils, we have good working relationships, including the Lancaster and South Cumbria joint committee. A unitary council has the potential to build on existing momentum and complements potential reorganisation and reform in both the counties of Cumbria and Lancashire.

Our Bay Council can reinforce our integrated local economy, build on world class strengths in advanced manufacturing and higher education and be an engine room powering the green industrial revolution. We have already had investment to pilot innovative delivery models, such as being awarded the status of Arts Council Cultural Compact following a submission from us as the South Cumbria Economic Region Partnership. It is bringing together partner organisations to pilot a model which connects the three localities' distinct and different cultural assets to boost future creativity, investment, innovation, jobs and prosperity. The new scheme is designed to encourage a shared vision around the arts, bringing together a range of partners to embed culture at the heart of the community, as well as encouraging investment and untapping economic potential. This is an opportunity to effect change not just in the local Bay area but across the north west and further afield.

Our closely-linked community means 96% of the workforce live as well as work in the area. Our partners recognise our geography – the Bay area would share the same footprint as the local NHS making integration easier than it is today or would be through any alternative proposal. All authorities are in the same postal and broadcast area. Our relationship around the Bay are often stronger than the rest of the counties of which we are part.

Our Type C proposal for the Bay Council demonstrates how we have taken into account the Secretary of State's guidance.

We have undertaken analysis, engagement and development to clearly describe in section 4 how the Bay Council will achieve the outcomes detailed in the guidance including how the proposed unitary:

- Improves local government and service delivery across the area of the proposal for the Bay Council, giving greater value for money, generating savings, providing stronger strategic and local leadership and being a more sustainable structure.
- Commands a good deal of local support across the whole area of the proposal for the Bay
- Has a credible geography within the range of 300,000 to 600,000 having regard to our circumstances, including critically the local identity and geography
- Considers the impact on other local boundaries and geographies, including the views of the relevant Police and Crime Commissioners and Fire and Rescue Authorities.

As the principal authorities in the Bay area, we have retained the core focus of our proposal on the reorganisation and associated reform and recovery agenda of the Bay Council. This configuration has local support, delivering for the whole Cumbrian footprint, opening up opportunities for a viable option for the north of Cumbria, which would operate around a credible geography, with a local identity distinct from the Bay area, and population size within the range of 300,000 to 600,000. We have also set out the key features, opportunities and proposals for the North Cumbria Council, though recognise that this will need to be further explored alongside the Bay proposal following initial assessment by MHCLG.

An early decision will enable us to plan with greater certainty our opportunities for reform and recovery enhanced through re-organisation.

This proposal is the only option that can deliver effective, efficient and sustainable local government for the Cumbria area in line with the Secretary of State's guidance and to impact positive change for our local communities. Similarly, creating the Bay encourages viable options to be developed by the remaining area of Lancashire if invited at a later date.

Executive Summary

The Bay represents a credible geography within an aggregate population in the desired range and with local support

The Bay is a well-known and recognised geography that attracts millions of visitors each year and is home to 320,000 people, the vast majority of whom both live and work in the area.

The strong identity of the area is recognised across the public sector as a credible geography for service delivery. The Bay is the place-based building block for partnering and joining up services with the NHS and our Integrated Care System, which NHSE/I are seeking to place on a statutory footing.

Within the county of Cumbria, Barrow and South Lakeland are often considered as ‘South Cumbria’ for operational delivery in many County Council services.

Fire and rescue services operate across the county but aim to work more closely with communities, and can see no operational barrier to working in the Bay area. The Police authorities recognise that the geography could work operationally and it is aligned to the health and the ambulance service strategies.

The aggregate population of the Bay Council is nearly 320,000, which meets the Secretary of State’s guidance. The northern area of Cumbria would have an aggregate population of 328,000. A Lancashire-11 (without Lancaster) would have over 1 million residents, with a further c140,000 for Blackpool and 140,000 for Blackburn, to be considered for reorganisation at a later date.

Local authority	2019 population	Option	Population of proposed authorities
Cumbria County Council	500,012	North Cumbria	327,875
Allerdale	97,761		
Carlisle	108,679		
Copeland	68,183		
Eden	53,253		
Barrow	67,049		
Lancaster	146,038	The Bay	318,175
South Lakeland	105,088		
Lancashire*	1,219,799		

We have engaged with local stakeholders, taken opinion polls and consulted the public. We found strong support across the spectrum.

The Police and Crime Commissioner for Cumbria has said that he is confident the Police Service could be delivered in either option being proposed but that the preference would be for two unitaries. He would also be open to assuming Fire and Rescue Authority responsibilities in the future and would support the development of a Mayoral model. Lancashire counterparts have flagged the complexity but agree the proposal is deliverable with no issue considered insurmountable.

The Lead Member and Chief Officer for the Cumbria Fire and Rescue Authority, which is hosted by the County Council, expressed initial concern that reorganisation would require a separation into two fire authorities. However, they saw no reason why it would not be possible to continue to deliver good services across the current footprint, including the Bay. The deputy Chief Fire Officer in Lancashire, which is a stand alone authority, agreed it was deliverable although complicated.

The Bay Area Health Partnership would welcome a move to unitary local government on the Bay footprint as this would align with the health system and developing integrated care provision. This would simplify current efforts to better integrate health, care and well-being services and improve population health.

The Local Economic Partnership (LEP) in Cumbria have been positive about the Bay Council proposal and our prosperity and resilience plans. They would welcome the ability of unitary local government to support economic development. The Lancashire LEP would be happy to work with a new organisation and in new and better ways.

Town and Parish Councils, local associations and the voluntary and community sector all see potential for spreading and strengthening existing good practice engagement. They would welcome genuine engagement and participation in delivering together for the Bay which is embedded in our values and planned approach, including supporting communities to develop local representative bodies where they wish to. Public opinion, based on a representative sample of over 2700, overwhelmingly supported the Bay as the best solution in this area.

As we continue along the journey to develop the Bay Council we will continue to fully engage with, listen to and co-design the new ways of working together.

Executive Summary

Our offer is a sustainable and resilient local government solution that will deliver priority services and empower communities

We ask the Secretary of State that if they agree to any reorganisation proposals for Cumbria that the Bay Council be the solution for this area.

This would enable the remaining district councils and county to form a unitary in the north around the footprint of the four districts (Allerdale, Carlisle, Copeland and Eden) and makes future options in Lancashire more viable.

We can deliver a sustainable and resilient local government solution through a Bay Council. Renewing and re-balancing our relationships across the wider system, we believe a planned transition can link our reform priorities and recovery plans into reorganisation planning, to build forward better. This is about how we operate in the future as well as the what – refreshing our culture, values and behaviours around system leadership and community empowerment. We won't wait until we have changed the structures before we start changing the system. Reorganisation is one step in a longer journey to ensure a resilient and prosperous future of the Bay and our businesses and communities. It should support our reform plans, not disrupt them.

We offer a sustainable and resilient solution for the Bay. It builds on real relationships already shaping action and delivering together through a joint committee and excellent working arrangements between us.

As a unitary authority for the Bay area we can go further and faster than we can today. We are constrained by the current two tier system, and existing structures limit integration, local accountability and empowerment, key features needed to solve the productivity puzzle, and improve lives for those who live and work in the Bay area. We can deliver on existing priorities and create strong and strategic leadership that deliver other priority services efficiently and effectively.

This is not just about reorganisation, but is about a renewed focus on reform, recovery and rejuvenation. We will integrate reorganisation with a programme of reform and recovery planning that results in:

- sustainable internal efficiencies in the running of local government, increasing the resources spent on improving outcomes
- significant system efficiencies through integration and alignment to address long standing and increasing inequalities, level up the Bay, improve population health and well-being, and enhance community wealth and power
- accelerated effectiveness of targeted interventions, collaboration and co-design, driving towards our local outcomes and supporting the national priorities to build forward better

The Bay offer

A new unitary Bay Council would be better placed to **deliver on the existing priorities** in our joint committee terms of reference to:

- develop a sustainable local economy to meet the climate emergency
- build community wealth - sustainable local businesses & good local jobs
- reduce inequality & increase wellbeing
- build community power & engagement

It would also **create strong and strategic leadership**, with local involvement, representation and engagement to improve with local people outcomes that:

- enhance prosperity through green productivity
- support a community of talent to reduce skills shortages
- connect all communities to social, environmental and economic opportunity
- deliver person-centred and strengths-based care
- provide leadership on delivering net carbon zero
- maintain places where people choose to live

Becoming the Bay Council would enable us to deliver differently across the full scope of local government services and provide strong place based leadership.



Executive Summary

The Bay is affordable and creates an authorities that will deliver sustainable and recurring efficiencies reducing our funding gap

Our proposal for the Bay Council is an affordable and realistic plan that will deliver public value. We can make savings from the transition through internal efficiencies but also bring forward reform and recovery plans that have substantial wider benefits.

We used publicly available data, sector and local insight to develop our assessment of the strategic and economic case for the Bay and alternatives. Given the limitations in the MHCLG criteria ruling out two Type B unitaries within Cumbria the choice is between business as usual as the baseline, a county unitary or the Bay Council and either a North Cumbria unitary or retaining a two-tier arrangement in that part of Cumbria.








The baseline position uses a total net service expenditure of £797m for Cumbria options (the seven councils) and £1,040m across the Bay due to the inclusion of Lancaster and relevant Lancashire spend.

Transition to unitary local government in Cumbria and Lancaster is estimated to cost in the range of £12-19m for all options. This is consistent with recent experience, other proposals that we are aware of and the scale of challenge involved.

Although implementing the Bay and a North Cumbria unitary option is initially more expensive than a single unitary because it involves two new authorities, by doing so in parallel and across a larger baseline the costs are not double that of creating a county unitary.

The Cumbria County proposal, and intention to pursue Scenario C, suggests benefits that are double previous estimates produced at the end of 2018. It is questionable if these are deliverable, and if so, if they will create a resilient and sustainable solution authority.

The Bay is a more viable and more credible. We have made prudent evidence based assessments of what is achievable, linked to a clear reform programme. We are not seeking to compete in a race to the bottom. We are seeking agreement to organise in a way that supports communities and the potential of the Bay, and will deliver longer term financial returns for the Bay and UK plc.

	The Bay		Cumbria CC Scenario A	Cumbria CC Scenario C
	The Bay	North Cumbria		
				
				
Total implementation costs (£m)	(£ 12.7)	(£ 19.9)	(£ 16.0)	(£ 16.0)
Direct benefits (£m)	£ 43.7	£ 103.8	£ 94.4	£ 142.1
Direct costs (£m)	(£ 15.0)	(£ 27.2)	(£ 22.2)	(£ 22.2)
Indirect benefits (£m)	£ 43.7	£ 61.0	£ 19.4	£ 69.4
Indirect costs (£m)	(£ 9.0)	(£ 15.2)	£ -	(£ 21.0)
Net costs/benefits (£m)	£ 50.6	£ 102.5	£ 75.6	£ 152.3
NPV (£m)	£ 42.3	£ 86.4	£ 64.4	£ 129.7

Executive Summary

Our proposal is considered, ambitious, realistic, and the only option that will deliver our local and national priorities

A considered and deliverable approach to implementation

As the leadership across the Bay we are united in supporting the Bay Council as the right choice when you decide to move to unitary local government in Cumbria.

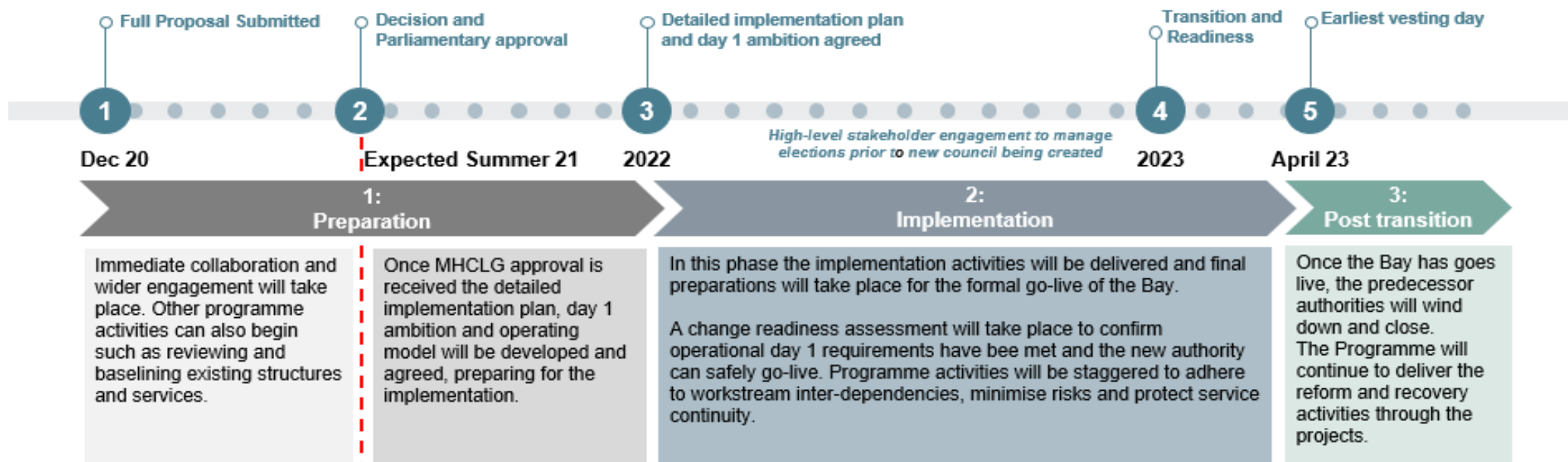
We will be able to make this happen and deliver a programme of engagement working with both of the County Councils, our public sector partners, our communities and the wider public, to create the council that we collectively want to see in the future.

We will establish a programme office to oversee and shape detailed planning, building on the engagement that we have undertaken to date and continuing to strengthen our existing arrangements.

This will build on our recovery planning so that reorganisation, reform and recovery work in harmony in enabling the Bay area, and our neighbours in a North Cumbria Council, to build forward better arrangements for delivering on our shared ambition.

Following this submission, we know that you will want to take the time to properly review and consult our partners, adjacent principal authorities and other government departments. We welcome this period of reflection although we would also welcome the agreement of the indicative timetable to ensure that we can embed the necessary planning and preparation into our forward programme.

Our assessment is that the transition period can not be done in nine months at this time of unprecedented pressure on local government so would welcome early clarification and agreement that vesting day should not be before April 2023.





Introduction and approach

This section explains the purpose of this proposal in seeking agreement from the government for the development of a unitary local authority to cover the Bay area, representing the geography of Barrow, Lancaster, South Lakeland Councils, and a second unitary to cover the geography of Allerdale, Carlisle, Copeland and Eden.



1. Introduction and approach

This proposal sets out a compelling case for unitary local government across the Bay and wider geography of Cumbria

Introduction

This full proposal is an ambitious and evolutionary response to an invitation for proposals on unitary local government that builds on long standing joint working across the Bay.

We set out a Type C proposal to create a unitary Bay Council, the Bay Council, focused on the current geography of Barrow, Lancaster and South Lakeland councils. The proposal for unitary local government is fully compliant with the MHCLG invitation and guidance of 9 October 2020 and builds on our outline proposal.

Our common interests and approaches, but also distinct differences from our respective county footprints and neighbouring districts, makes the Bay a logical choice. Our purpose is to serve our people and we are ambitious to improve outcomes across the Bay.

This is the only acceptable unitary local government choice available in this area that will be capable of delivering on our local priorities and the national agenda. Working together, we can build a great new unitary council that reflects our integrated economy and accelerates the momentum we have already built.

We set out how we will work with partners to reshape public services around the residents, communities and businesses that we serve and to meet the climate emergency.

Our proposal enables the remaining areas of Cumbria and Lancashire to form unitary solutions. To provide a potential full solution for the county of Cumbria we have also considered the northern districts in this proposal. As a Type B proposal, the northern unitary authority would comprise Allerdale, Carlisle, Copeland and Eden, which is a credible geography, with a population of c328,000 and a distinct local identity from the Bay Council.

But our proposal for the Bay is not dependent on change elsewhere, and could progress independently of wider reorganisation. It will be helpful to have a timely decision so that we can plan with certainty as we focus on the recovery during 2021.

Approach

To create a robust and credible proposal we have used the HM treasury ‘five case model’ for business cases to guide our approach.

We assessed all relevant alternatives against the MHCLG criteria, local objectives for reform and potential described in the outline proposal we submitted on 9 November, which had cross-party support.

Since submitting our outline proposal, we have undertaken additional engagement and consultation with partners, the public and with your officials to test our proposal against wider priorities across the Bay and government expectations. We have taken into consideration the ability to improve public service outcomes and had regard to the impact on others.

To impact real change, all proposals will come with challenges and complexities, and this proposal is no different. For this specific proposal we have explained how any complexity that comes from a Type C arrangement will be effectively managed, in particular for the move of Lancaster from Lancashire County Council, and the potential changes that may be required for police and fire boundaries if they are deemed to be coterminous with the new footprint across Cumbria and Lancaster.

We are not in a race to the bottom on who can claim the largest ‘efficiencies’. But we are in a race to net carbon zero and to a sustainable system. We show how we can deliver an affordable but credible programme that delivers internal efficiencies and unlocks larger public value benefits (both financial and non-financial) from reform priorities.

Our expanded reform vision describes creation of a new authority designed to support a better system: more local, more entrepreneurial and more trusting.

This proposal sets out the:

- **Case for change** – this sets out the strategic aim of the proposal
- **Options appraisal** – this economic case appraises potential options (including business as usual), to show our rationale for the preferred option
- **Delivering the Bay Council** – this section covers the main benefits of the proposal, financial case and outlines how the preferred option can be delivered, including next steps.

We ask the Secretary of State that if they agree to any reorganisation proposals for Cumbria that the Bay Council be the solution for this area.



Case for change across Cumbria and the Bay area

This section provides the local and national context, explores the key strengths and challenges facing the Bay and North Cumbria , and sets out the outcomes we will achieve from our exciting and ambitious reform agenda, creating unitary local government across the Bay area and across North Cumbria .



2. Case for change across Cumbria and the Bay area

Summary of our proposal for Cumbria and how a two unitary option of the Bay Council and North Cumbria Council is the right answer

This case for change sets out our proposed solutions for the whole of Cumbria as invited by the Secretary of State. We demonstrate why a unitary local authority across the Bay area is the only viable solution to deliver on the recovery and reform agenda for the region. The vision for the Bay Council of Barrow and South Lakeland in Cumbria comes alive because Lancaster is part of the solution. It makes perfect sense. Welcoming Lancaster into the solution for Cumbria allows the Bay Council (Type C) to be the key to unlocking the natural combination of Allerdale, Carlisle, Copeland and Eden in the north, as the North Cumbria Council (Type B).

Together, we will be even better placed to:

- strengthen local leadership, reflect and respond to our local identities and represent our communities on the strategic agenda
- capitalise on our natural assets, delivering sustainable economic prosperity and reform, reducing inequalities and investing for growth
- enhance and simplify our current partnership working, make it easier for our residents to interact with us, and improve outcomes for our communities, residents and businesses through integrated and whole systems working
- embrace new and modern ways of working, be agile, nimble, insight led and connected across our workforce and communities, releasing efficiencies and improving effectiveness to drive better outcomes

The Bay area links Cumbria and Lancashire but has its own distinctive identity and an ambitious vision. We care deeply about addressing inequality, handling the climate emergency, preventing bio-diversity loss and protecting/enhancing our natural assets, while delivering excellent services developed with and for our communities. We are and have been part of both counties but are different from the geographic expanse and sparsity of North Cumbria which looks to the Borderlands, and from the increasingly dense population of Lancashire which is drawn south to Greater Manchester and Merseyside.

Whilst respecting the history of both counties, their boundaries have evolved over relatively recent history with most of the Bay area being part of Lancashire until 1974. This proposal is not an argument for a return but an updating of arrangements to reflect today's priorities for managing the land, sand, sea and the prosperity of the Bay, and the different local priorities of North Cumbria .

The Bay area is different and distinct from both Cumbria and Lancashire

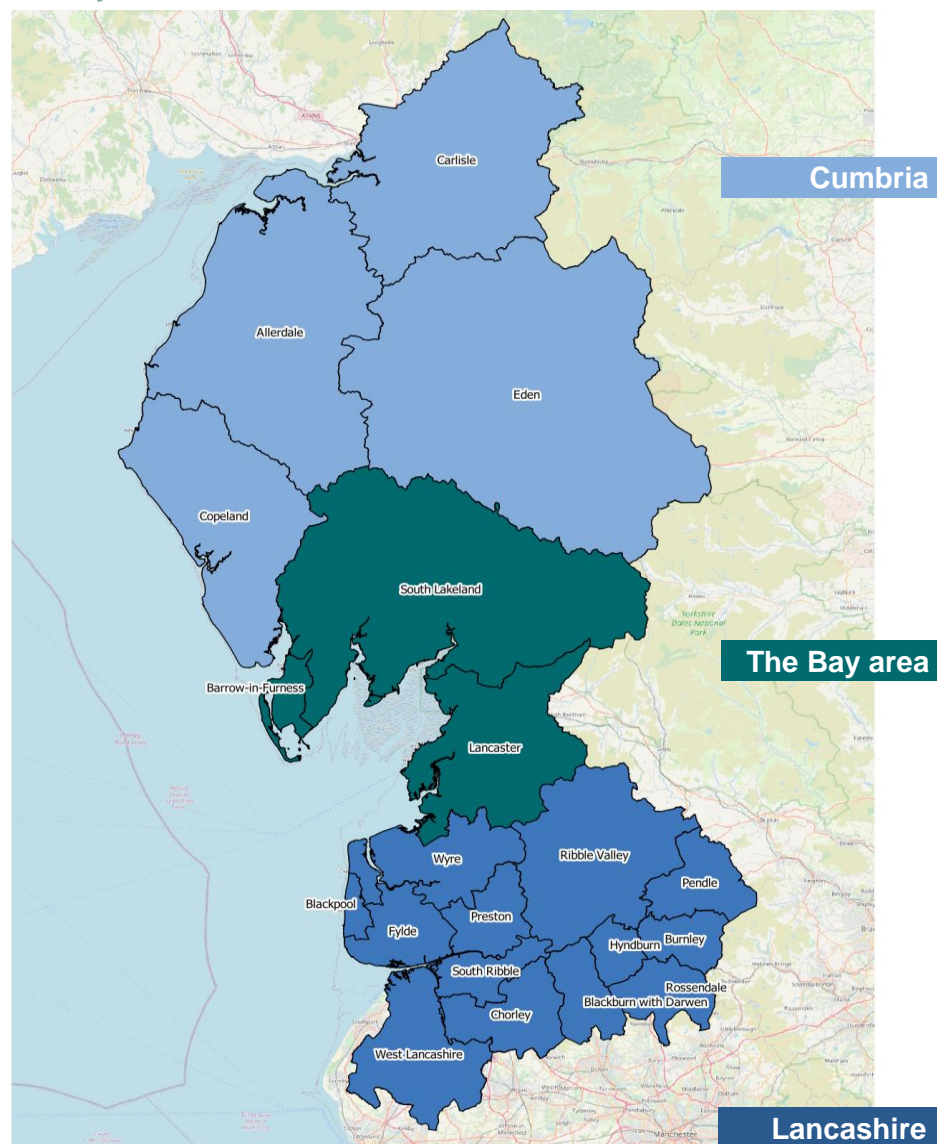


Figure 2.1.1 The Bay area bridges Cumbria and Lancashire

Our main assets



Ports

- 1 Barrow Port
- 2 Heysham Port
- 3 Glasson Port



Offshore energy assets



Natural assets

- 4 Lake District UNESCO World Heritage site
- 5 North Walney National Nature Reserve
- 6 Morecambe Bay SSSI
- 7 Arnsdale and Silverdale AONB
- 8 Yorkshire Dales National Park
- 9 South Walney Nature Reserve
- 10 Nationally-recognised coastline



Higher education

- 11 University of Cumbria
- 12 Lancaster University



Health facilities

- 13 Furness General Hospital
- 14 Royal Lancaster Infirmary
- 15 Ulverston Community Health Centre
- 16 Queen Victoria Hospital
- 17 Westmorland General Hospital



Advanced manufacturing/ key employers

- 18 Kimberley Clark
- 19 BAE Systems
- 20 Spirit Energy
- 21 GSK
- 22 GVS Fliters
- 23 EDF Energy
- 24 GAIST Solutions
- 25 Gilkes
- 26 James Cropper
- 27 Ørsted
- 28 Oxleys Developments
- 29 Forge Europa



Broadband/digital

- 30 B4RN Connectivity

THE BAY



Source: ONS 2018. © Crown copyright and database right (2018)

The facts

320 000

total population

13 000

businesses

18 000

jobs in advanced manufacturing and engineering (including half of the country's ship and submarine manufacturing jobs)

4 300

jobs in agriculture in our thriving rural communities

30 million

annual visitors to Lancaster and South Cumbria, contributing £2 billion to the economy

Three

international gateway ports

25 000

jobs in tourism

Five

major windfarms, oil and gas operations and two nuclear power stations

Two

universities, both already cooperating across The Bay

2.1 About the Bay

The Bay Council is a credible geography with the necessary aggregate population and unique attributes that justifies its own authority

The Bay has an appropriate scale of aggregate resident population

The Bay area is home to nearly 320,000 people so is well within the target range MHCLG have set out for future unitary authorities. It is an area of comparatively slow and steady population growth overall but with variation across ages. A further 325,000 people live in North Cumbria with its own distinct character.

Nearly 320,000 live the Bay area today, with 67,000 people living in Barrow, 105,000 in South Lakeland and 146,000 in Lancaster and will grow to around 330,000 by 2040. As with all of Cumbria, there is no large population centre¹, but the area includes a number of medium sized towns including Barrow, whose 57,000 population makes it the second largest town in Cumbria after Carlisle, Lancaster, which at 51,000 is the 6th largest town in Lancashire, Morecambe (35,000), and Kendal (29,000).

There are an additional 328,000 people across the remainder of Cumbria who could comprise a North Cumbria unitary, and 1m+ in the rest of Lancashire.

Cumbria is sparsely populated at 74 people per km². Lancashire, on the other hand is more densely populated with 233 people per km². The Bay Council would have a population density of 145 people per km², and North Cumbria not notably changed at 64 people per km² (the equivalent to Northumberland). The Bay is a tourism destination, with 30m annual visitors come to the Bay area, boosting the average population an equivalent of 80,000 plus over the year.

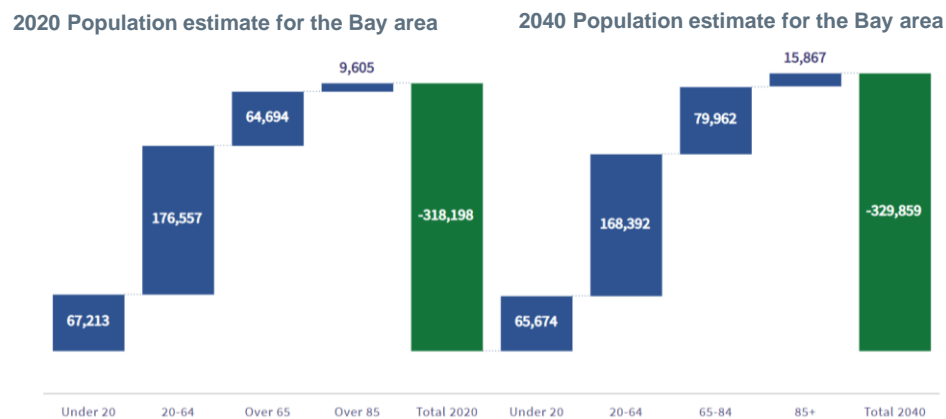


Figure 2.1.2 Population profile change in the Bay, ONS Population Projection

¹ Large towns are defined as above 75,000 population by ONS

The Bay can reinforce connections with Cumbria and Lancashire

The Bay spans the northern end of Lancashire and southern region of Cumbria. Designated a special area of conservation (SAC) it surrounds a large estuary providing a natural coherence and continues a rich and varied natural landscape, including the southern Lakes, western Yorkshire Dales and Arnside & Silverdale AONB.

Few areas can rival our array of clean energy assets, including the world's largest operational offshore windfarm and a key part of the nuclear supply, linked by a unique contribution of private sector expertise and academic excellence. We share a commitment to tackle the climate emergency, biodiversity loss, coastal erosion and prevent flooding.

Cumbria is a large and rural area covering 6,768 km² which is approximately half of the North West of England. The Bay Council, comprising Barrow, Lancaster and South Lakeland represents an area of 2,188 km². This is approximately the size of Herefordshire and would be the 33rd largest authority in England. North Cumbria, being nearly twice of the size of Northamptonshire, would be the 13th largest authority in England by area.

The Bay is an area rich in natural resources, including the Lake District National Park and North Yorkshire National Park. The Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) crosses the boundary of Cumbria and Lancashire and involves partnership working between our authorities, while the Morecambe Bay Site of Special Scientific Interest (SSSI) also relates to all three authorities. The north includes the Cumbria Coastline Conservation Area and more sparse areas of the West Lakes, Eden Valley and routes into Scotland and Newcastle.

The Bay is well placed to capitalise on the ambitions for a green industrial revolution as it already contains one of the biggest windfarms in the world and can be a centre for off-shore renewable energy.

The county councils Cumbria and Lancashire, are based in Carlisle and Preston respectively. Attending these councils Cumbria involves significant travel times and distances. Reaching Carlisle involves significant travel times and distances - more than 45 minutes and miles from Kendal, and around 90 minutes and 60-85 miles from Barrow. From Lancaster to Preston is a smaller distance, but still 20 minutes by a frequently not running train or 60 minutes by car on routes that are often block

The Bay area presents a unique opportunity to bring local government closer to the people and be designed at a scale best suited for local and regional focus

2.2 About the county of Cumbria

The Bay authorities are already working together and creating this unitary council will support viable change for North Cumbria

A resilient and sustainable Bay Council

The Bay area is currently represented by three district councils and two county councils. Within the two-tier system and across two counties the district councils have already developed strong and close working relationships, reflected in our shared economic prosperity and resilience strategy. Moving to a unitary is an opportunity to embed this co-operation in a single new council that integrates all functions across the authorities, to build on the momentum already in place.

We are managing the complications of a two-tier system as effectively as possible, supporting our communities and businesses despite, and not because of, existing structures.

As a unitary authority we would be able to combine our efforts and expenditure in support of the partnership goals, which include tackling the climate emergency and building a greener economy, building wealth across our communities and encouraging active and healthier residents.

Total net expenditure, including the relevant per capita share of the county councils, would have been over £511m in 2019/20¹. Reorganisation would add another pillar to the reforms we want to make to accelerate our recovery.

The Bay Council

Predecessor local authority	Population	Net service expenditure (£m)
Barrow	67,000	£9m
Lancaster	146,000	£20m
South Lakeland	105,000	£12m
Proportion of Cumbria	172,000	£246m
Proportion of Lancashire	146,000	£222m
Indicative total	318,000	£511m



Unlocking the credible solution across North Cumbria

Approval for the Bay Council maintains and strengthens opportunities for unitary working across the rest of Cumbria across the four northern districts, and it does not restrict future options in Lancashire. It is the only viable option for sustainable reform across and beyond Cumbria.

The baseline net service expenditure across the Cumbria system is £797m, and with the addition of Lancaster would total over £1bn. The net service expenditure in North Cumbria would have been £551m in 2019/20, of suitable and sufficient scale for reorganisation of the four remaining districts and associated county area into a parallel unitary, operating around a credible geography.

A comprehensive settlement across Cumbria, Lancashire and the Bay would support a unified reallocation of assets, reserves, debts and liabilities to new bodies. This will need careful consideration in the event of any reorganisation.

Council net service expenditure is only part of the total public service expenditure focused on delivering outcomes. By aligning the council footprints with the health system, which the Bay already operates within, there is potential for greater integrated planning and programming on actions to improve population health, a key driver of local outcomes.

North Cumbria Council

Predecessor local authority	Population	Net service expenditure (£m)
Allerdale	97,527	£11m
Carlisle	108,387	£50m
Copeland	68,424	£11m
Eden	52,000	£10
Proportion of Cumbria	328,000	£469m
Indicative total	328,000	£551m

¹ Based on all councils Revenue Account 2019/20 data to all for comparison.

2.3 Wider considerations that inform our proposal

The national context will impact on our plans for the Bay irrespective of any reorganisation and provides a platform for growth

Amplification of pressures from the recent pandemic

Local authorities across the country were already facing a challenging agenda which has only been amplified by the impact of the pandemic. The way that local government is organised needs to support our efforts to drive reform and recovery.

Local authorities have been at the forefront of responding to the coronavirus crisis and the different impacts on health, on families and on jobs and incomes. Naturally, uncertainty about the impact and length of the crisis not only has public health impacts but will have social and economic shocks that are only just starting to manifest, as recognised by the OBR and outlined in the recent Spending Review.

Whilst over £3bn of funding has been made available to local authorities nationally to help us cope with the impact it is evident that there will be an on-going impact on our spending, with increased pressure, and on our income, with reduced ability to generate revenue. The IFS analysis of Covid-19 impacts shows how Bay area councils have varied impacts from the pandemic, with factors such as the visitor economy and underlying pressures on left-behind areas affecting the impact. The 30m visitors to the area are fundamental to its economy with associated know on impact on council revenues from fees and charges.

This crisis comes on top of existing pressures for local government which has followed a near decade of contraction in real terms spending, which only recently was starting to ease with per-person spending down 23% since 2009-10. Planned above-inflation increases in spending are now uncertain and there is a need to complete the Fair Funding Review and multi-year settlements.

“The Lancaster BID Management Board are keen to support the proposed ‘Morecambe Bay Unitary Authority’. Even before the Covid Pandemic broke in March this move would be something we would have supported, but it makes even more sense now. The BID Board feel this is the most logical way forward and feel it will give Lancaster a stronger voice in the years to come”

Lancaster Business Improvement District

The road to recovery and sustainable growth

To build forwards better, any reorganisation of local government should reinforce and support reforms that drive the recovery over the medium to long term.

As the Prime Minister has said, the public response to Coronavirus shows that we can, in future, have a better system for supporting our communities: more local, more entrepreneurial and more trusting¹. The Spending Review sets clear priorities for MHCLG to deliver public value through action to raise productivity and empower places so that everyone across the country can benefit from levelling up and for a sustainable and resilient local government sector that delivers priority services and empowers communities.

Reorganisation is just one part of a wider agenda we need to plan for. Our overriding priority will be to connect it to reform and recovery actions needed to support the Bay. There are short term gains that we must capture, but our focus is on creating a sustainable system for future generations that is efficient, effective and enables sustainable economic prosperity.

Any reorganisation will have to be planned and managed in the context of:

- **Overall government decisions on council funding** will make a significant impact on foundations and starting position from which any reform agenda and re-organisation proposal is considered.
- **A devolution white paper** which the government has announced will be published in spring and will have in place implications for how we use reorganisation to connect local recovery with levelling up. The white paper could helpfully provide for place based strategies to boost regional economic performance, building on initiatives such as our Bay Area Resilience and Prosperity Strategy. There is also an opportunity to make additional provisions for town, parish and community councils to enhance their powers and potential duties to support communities.
- There are also **key policy agendas and decisions** from adult social care, social housing, planning, the environment and health integration that will impact on the role and function of the future authority.

Prime Ministerial commission of 23 June 2020 for Danny Kruger MP to report on 'Levelling up our communities: proposals for a new social covenant'

2.4 Evidence based decisions

Available evidence on reorganisation is limited and benefits depend on the purpose of change

Evidence based and shaped around our communities

There is comparatively limited robust evidence on the merits of reorganisation across the country with no clear consensus except that unitaries are generally preferred.

The debate can become polarised between arguments for scale against local representation. Much of the evidence is based on averages rather than reflecting on the unique local context.

Arguments for scale include:

- reducing administrative overheads and operating costs...but this is being rapidly overtaken by technology solutions.
- economies of scale...but without recognising the diseconomies and negative correlation in some services
- avoiding risk by disaggregating services...although many such services are already organised operationally at a smaller scale.

Arguments for unitary solutions are stronger in:

- reducing the need to co-ordinate between councils
- simpler arrangements for the public and partners

Our overall reflection is that the case for reform can not be simplified to an argument about size and scale – bigger is not better / lower cost for everything but neither are the current structures perfect.

We have taken three key messages into our proposal that recognise:

1. how places and councils operate is more important than administrative history or scale
2. the transition process is an opportunity to renew strategic leadership and embed a new culture, supporting reform by working with communities and partners
3. reorganisation is not the destination but a step in the journey - it can be a catalyst for opening up opportunities for bringing responsibilities and resources closer to the people they affect.



2.5 Benefits of our proposal for recovery, reform and reorganisation

Why this is better than the current structures and ways of working and any other proposals that could be considered

Benefits of unitary local government

The current two tier arrangements are not working for all communities across Cumbria and the Bay area. A new model of unitary government in the form of a Bay Council and North Cumbria Council would bring a large number of benefits:

- Integration of complementary and connected services to focus around the resident and their needs to improve outcomes and reduce inequality
- Simplification of access for our residents, businesses and partners with improved local accountability
- Reduction of organisational complexity, simplified and automated processes and a focus on insight led decision making underpinned by clear accountabilities to realise increased efficiencies
- Deep local connections bringing power to our voice at a strategic level, with potential for greater devolution through a combined Authority to accelerate economic growth and prosperity across the region

Organising around the geography of the Bay and North Cumbria

Organising the unitary across the geographies of the Bay area and North Cumbria also makes sense:

- **Credible geography** – both are functional economic areas - 96% of people live and work within the Bay, with distinctive natural, economic and cultural assets, and strong relationships with key local partners
- **Local identity** – the Bay is proud of its unique assets and identity centred around the Bay, distinct from the rurality and sparsity of North Cumbria which looks north to the Borderlands
- **Principles of subsidiarity** – the sparsity of Cumbria necessitates local decision making on a smaller more local footprint, decisions being made close to their communities
- **Sufficient scale** – both have a population over 300,000, able to drive efficiencies whilst retaining the local connectivity to make a difference to their communities
- **Integrated services** – many services, including adults and children's, are already delivered on a district and locality footprint due to the un-manageable scale of the county, minimising disruption to frontline services and maximising opportunities to work more closely with partners such as health who are already organised on the Bay footprint

The Bay unlocks the natural combinations across Cumbria

A Type C proposal was invited by MHCLG, which recognises existing county footprints should not be a constraining factor for logical decision making for future economic, social and environmental sustainability. Bringing Lancaster into the solution for the Cumbria footprint allows the Bay Council to unlock the natural combination of Allerdale, Carlisle, Copeland and Eden as North Cumbria Council. It is the optimal configuration for Cumbria to pass the government's tests, to work hand in hand with partners and communities and to understand and meet the distinct needs of our places and our people. Both Councils would be coterminous with their ICP, with North Cumbria ICS looking to the north east with patient flow to Newcastle. This provides opportunity for system wide change across the whole footprint aligned to health partners including the North West Ambulance Service operational delivery.

Lancashire has a range of viable options available should Lancaster be part of the Bay Council both now and in response to any central government request.

At the heart of the ecosystem to drive change

The Bay Council will be at the heart of a wider ecosystem for driving public sector reform across the Bay and beyond. Our solution goes beyond reorganisation, with multiple benefits arising from an outward-looking system-wide solution.

Current structures and configurations add complexity to the system, holding us back from realising the full potential of our businesses, communities and natural assets. As a unitary authority we have an important part to play in setting the local agenda, working closely with our partners in health, fire and rescue, policing, town and parish councils, businesses and residents. It is only by stepping up and playing our part in the system that we will deliver and facilitate the change that is needed to release our communities to fulfil their potential.

There are no doubt strengths in our ways of working, exemplary practice and a sense of pride in our communities. But this is in spite of, and not because of existing structures and approaches. We can and must do better. Covid is exacerbating inequalities and financial pressures and change is needed.

It is time for a fresh start to take a once in a generation opportunity to make the right decision for a step change in tackling local priorities and accelerating delivery on the national agenda.

2.6 The local challenges we face

Reorganisation must work in combination with reform and recovery to support our local priorities

Aligned around our reform agenda

The Bay authorities have a long history of collaboration. The Lancaster and South Cumbria joint committee is the next stage of their joint work on the economic regional partnership. The Committee promotes the economic, social and environmental wellbeing of the Bay, driving growth in the shared agenda around the visitor economy, culture, energy, advanced manufacturing, digital technologies, life sciences, health innovation and higher education. There are four reform priorities that are formed around the local assets and challenges of the Bay:

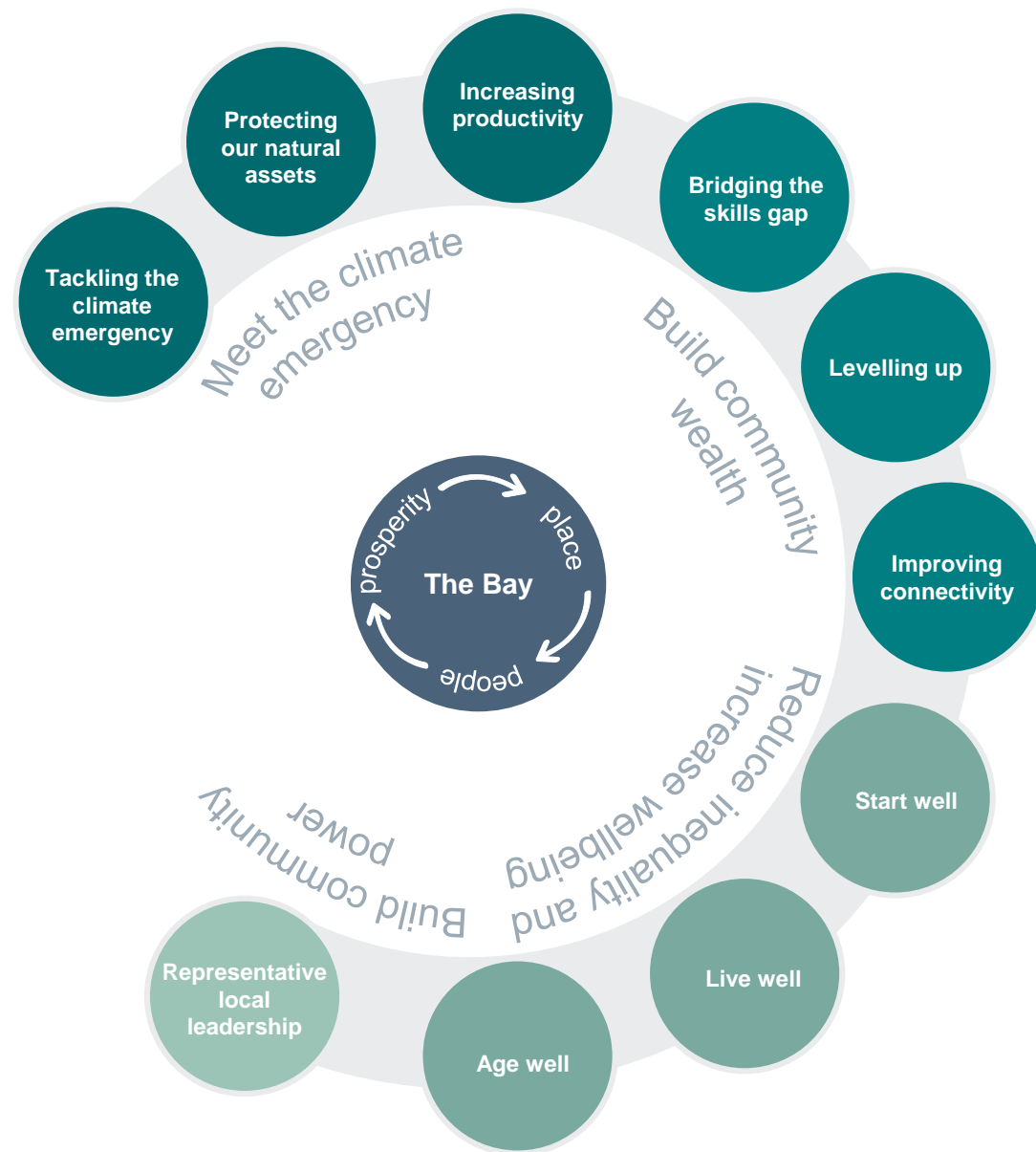
- **Reform priority 1:** community power and engagement
- **Reform priority 2:** community wealth building
- **Reform priority 3:** well-being
- **Reform priority 4:** climate emergency

Having built a consensus around these shared priorities we want to drive change and seize the opportunity, in the right way, to use reorganisation as a catalyst for supporting reform and recovery in the Bay area. Continuing with existing arrangements or entering into different arrangements where the area covered by the three districts is not formally brought together as one, and indeed could be separated three ways, risks disrupting and slowing down progress. We have the opportunity to deliver for the businesses and communities across the Bay area, and any other reorganisation limits our ability to unleash the full potential of our region for growth.

The Bay area is a great place to live with advantages for many. But for some there are challenges. We want to create council structures that work with our partners and with all of our communities to enhance prosperity, raise aspirations and improve life chances, whilst protecting and enhancing the environment.

Our local challenges to address through reform and reorganisation

Building from this consensus there is real opportunity for reorganisation, reform and recovery to work in tandem in driving change. We have identified themes and issues which should be the focus of change here in the Bay. There are interconnected issues we want to tackle to strengthen the Bay. This is in addition to our joint work in promoting and supporting the whole of the North to prosper.





2.7 Responding to the drivers for change

The drivers for change align to our reform priorities, and levelling up, which are committed to in our existing joint working arrangements

1 Building community power and engagement

Representative local leadership

- Stronger leadership with local coherent and early involvement to ensure that our residents, local organisations and business are being listen to and for the council to bring in their expertise and insight in developing strategic plans and initiatives
- Improved local representation and engagement to improve outcomes for local people by working with communities to achieve local priorities
- Ensuring that all our Town and Parish Councils, and other forms of community governance, can contribute and support in a meaningful way, built on a common understanding of subsidiarity, flexibility and agility to influence and own local decisions
- Prioritise the strategic and equitable distribution of resources across the Bay area.

Empowering communities

- Creating the conditions and environment through asset based community development and community organising, building on our track record of nurturing social action
- Investing in local place based solutions and building capacity of residents to do more together, creating conditions for neighbourliness and social innovation. Building on lessons from Covid response and capitalising on local and national expertise available within the Bay area
- Recognising the talents and potential of our communities to create solutions with our support through co-production, design and development

2 Building community wealth

Build Community Wealth

- Greater procurement spend retained within The Bay, our neighbouring counties and within the wider Northern Powerhouse
- Improved labour market indicators such as the a lower unemployment rate and claimant count
- Improvements in social mobility indicators such as the Social Mobility Commission index.
- Encourage and support community and social enterprise and micro business

Prosperity through Productivity

- Improve the quality of life of our residents by helping them to work smarter rather than harder
- Improve health and wellbeing for our residents by having a better working life balance. A healthier workforce as a positive economic driver to generate further improvements in productivity.

Community of Talent

- Being a catalyst driving a whole system long-term strategy and approach to skills and learning
- Offer an exciting and innovative range of education and training opportunities to residents
- See improved educational attainment across agreed groups for all form of education



2.7 Responding to the drivers for change

The drivers for change align to our reform priorities, and levelling up, which are committed to in our existing joint working arrangements

3 Reducing inequality and improving well-being

Start Well

- Increasing continuity of care for children and families
- Closing of the gap in outcomes for vulnerable children
- Financial sustainability for council services and investment in new approaches
- Anticipating, planning for and managing demand reducing inequalities based on protected characteristics and where people live.

Live Well

- Give every child the best start in life
- Enable all children, young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Health happy homes, vibrant thriving safe neighbourhoods, places to live and breathe

Age Well

- Increasing continuity of care for adults
- Greater independence and wellbeing for older adults (living where they choose)
- Financial sustainability for council services and investment in new approaches
- Anticipating, planning for and managing demand reducing inequalities based on protected characteristics and where people live.

4 Tackling the climate emergency

Tackling the climate emergency

- The Bay will have the economic assets and appetite to capitalise in developing natural environmental and biodiverse resource. We will build a world class knowledge and expertise working with our universities and key industries to support the green industrial revolution
- A joined-up approach will put the Bay on the map in tackling the climate emergency with more critical mass and strategic investments
- Economic models that value the circular economy and sustainability to meet the needs of all within the limits of the planet
- The Bay will create a commercial model that will allow us to increase financial sustainability and support quality services, such as green transport.

Investing in a Greener & Sustainable Tourism

- The Bay to further develop its reputation as a sustainable visitor destination, extending the benefits of the Lake District brand the potential of the Eden North Project

2.7.1 Responding to the drivers for change

Climate emergency - meeting the challenge needs to be a core function of a future authority



Climate emergency

The Bay area authorities are united in their commitment to meet the climate emergency. We have been taking action in this area and want to see significant improvement in the translation of declarations of a climate emergency into delivery of local and national action plans.

Lancaster have supported Climate Emergency UK and are playing a key role in bringing together identified best practice and resources to help councils deliver on their commitments. South Lakeland was the first local authority in Cumbria to declare a climate emergency.

We want to be leading the move to net carbon zero helping develop the confidence, skills and understanding on how it can be achieved in the complex economic, social and political dynamic in which we operate.

Business as usual and action to tackle climate change is not enough. There is a growing urgency to meet the climate emergency which reorganisation could help accelerate by embedding the shared commitment of our councils in a new unitary authority.

The Bay area is well placed to extend its leadership in the sustainable and clean industries of the future, such as tidal and battery power, amplifying its existing strengths in one of the largest offshore wind farms in the world, with a council that creates the conditions for action.

The climate emergency has accelerated interest in how organisations can respond. A new unitary council created in this environment would give us the opportunity to maintain our leadership on the climate emergency do more good, not only less harm.

Cumbria Action for Sustainability (CAfS) is Cumbria's climate change organisation. Its vision is a zero carbon Cumbria, bringing about a better way of life in balance with the environment. Its mission is to empower and enable people, communities and businesses to live and work more sustainably by sharing its knowledge, practice, skills, networks and practical experience. It promotes low-carbon living, energy saving and reduced use of fossil fuels across Cumbria through its inspiring events, training courses and practical projects.



2.7.2 Responding to the drivers for change

Environment – protecting, managing and enhancing our natural assets which are fundamental to our identity

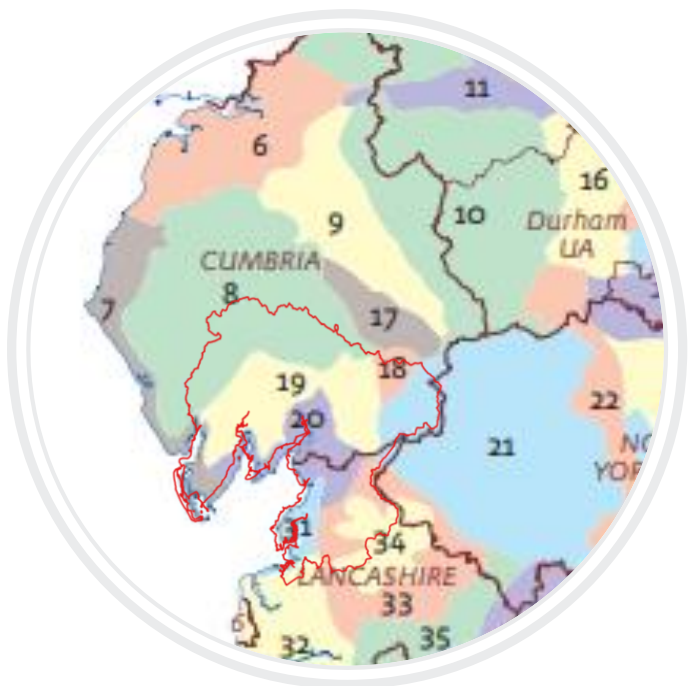


Figure 2.7.1 Natural England's National Character Areas in the Bay area

Environment

The Bay area has a number of outstanding natural environments of national and global significance, including the Lake District National Park, Yorkshire Dales National Park, Arnside and Silverdale AONB and Forest of Bowland ANOB, plus Morecambe Bay and estuary.

The unique landscapes that make up the Bay and their characteristics across city, coast and countryside are vital components of the value of the Bay.

We welcome the Prime Ministers Ten Point Plan to drive the UK's green ambitions including action to address bio-diversity loss and build on the 25 Year Environment Plan.

As local councils we are committed to taking actions that support and protect priority habitats and help people connect with nature. We are already actively involved in the management of these landscapes and recognise our natural capital needs to be nurtured and enhanced.

As a unitary authority we would have additional focus on supporting natural capital projects to become investment ready and to partner with government on public funding for nature protection, management and enhancement.

Lake District National Park

The Lake District National Park will be 70 next year and was designed a UNESCO World Heritage Site in 2017. South Lakeland Council work closely with the Lake District National Park Authority, and nominate two of the ten local authority members of the 20-member authority, although representatives represent the authority not the council they come from.

Arnside and Silverdale AONB

The Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) covers parts of South Lakeland and Lancaster districts. It is a nationally protected landscape afforded statutory protection and its primary purpose is to conserve and enhance the natural beauty of the area. Lancaster City and South Lakeland District councils work together on the development planning for the AONB to reflect the designation

Yorkshire Dales National Park

The Yorkshire Dales National Park was established in 1954. Both Lancaster City and South Lakeland Councils work closely with the Yorkshire Dales National Park Authority, and nominate one member each of the 15 local authority members of the 20-member authority.

Morecambe Bay Partnership

The Morecambe Bay Partnership registered charity, governed by a board of trustees and as an independent partnership seeking heritage, environmental and economic benefits across the Bay.

2.7.3 Responding to the drivers for change

Economy – the Bay is a special economic area with a coherent and credible plan to unlock potential



Figure 2.7.2 The Bay Prosperity and Resilience Strategy

Economy

Our recent prosperity and resilience strategy highlighted how our area has a unique economic geography with a clear focus of activity around the coastal area running from Heysham in the south to Barrow-in-Furness in the west and Kendal in the north. We have industrial and commercial strengths, a platform for innovation, nationally significant infrastructure assets and a unique cultural and lifestyle offering.

Business and employment activities around the Bay, Kendal and the Lake District drive the economic activity of our wider functional economic area.

The Bay area is home to 13,000 businesses, with 18,000 jobs in advanced manufacturing and engineering, 25,000 in tourism and 4000+ in agriculture.

Our specialised sectors have ambitions to grow and we want to support them to expand locally and to attract talent to the area. The Bay is well placed to benefit from predicted 23% increase in international visitors by 2025 and 3% annual increase, but we want to be a sustainable and accessible tourism zone with the associated infrastructure and experiences.

However, we need to close the productivity gap with the rest of the UK, where productivity per average hours worked in a week is less than 30 hours a week in Cumbria and Lancashire against an UK average of 35 hours.

Supporting prosperity and resilience

Our joint partnership wants to build momentum. We have scope to quicken the pace of our collaborative work and deliver economic benefits and to secure substantial public and private and sector investment.

As part of a large geography the Bay area can lose out if focus and priority is north and east. As Rob Johnston the Chief Executive of Cumbria Chamber Commerce has said about the Borderlands Growth Deal, *'Half the population of the Borderlands region live in Cumbria yet we're not getting anywhere near half the money. The Carlisle Station Gateway is the only major infrastructure project in the county to receive funding.'*

The Bay Prosperity and Resilience Strategy sets out our partnership commitment to work collaboratively, share assets and share opportunities to strengthen the economy in Cumbria and into Lancashire. The evidence based approach identifies eight themes for delivering better solutions that would be integral to the new authority including becoming a UK leader in renewables and clean growth.

2.7.4 Responding to the drivers for change

Skills – we need to skill up the current and future workforce to support prosperity and resilience



Figure 2.7.3 Eden Project North

Skills

In the Bay area the most important sectors face a number of barriers in relation to expanding and attracting talent, with specific requirements for high level and technical skills.

The Bay area, much like the rest of Cumbria faces a serious skills shortage. Cumbria LEP (Local Enterprise Partnership) estimates that the county will need to fill over 80,000 jobs between 2016 and 2021. The bulk of these jobs will be as a result of replacement demand (for those retiring, leaving the county etc.) but significant demand will also result from major planned investments.

Over 40% of the jobs relating to replacement demand will be for people educated to Level 4 (equivalent to degree level) or above.

Employers regularly express concern that they struggle to recruit locally and point to low response rates to job vacancies. The business community is already worried about the county's ability to respond to the employment opportunities and the serious risk of skills shortages hampering growth. Cumbrian employers are also more likely than their national equivalents to highlight additional issues such as the difficulty of potential employees getting to work on public transport and a perceived lack of required attitudes, motivation and personality.

There are concerns about a declining workforce, low attainment and aspiration, skills shortages and the health and well-being of the workforce that we will address.

Talent

The Bay is home to world-class universities and strong further education, but needs to develop and support the skills needed in future growth sectors across a more diverse range of industries.

As a Bay Council we can be more focused on the skills and talent requirements needed in the future and work closely with the Local Economic Partnerships to build on our strong foundations.

Barrow has 22.3% of those aged 16-64 with NVQ4 of equivalent qualification or higher (Jan to Dec 2019), Lancaster 35.6% and South Lakeland 42.3% compared to 32.5% in Cumbria, 36.1% in the North West and 40.3% in Great Britain.

We want to work with our further and higher education establishments, with business and with schools to create a community of talent who are well placed to drive the development of a green industrial revolution and to protect our natural environment.

The Eden Project has agreed a 25 year memorandum of understanding and partnership with Lancaster and Morecambe College and Lancaster University and launched the Eden Project Study Programme. This has evolved into the Morecambe Bay Curriculum formulated in collaboration with education partners around the whole of the Bay area to focus on the unique natural environment of Morecambe Bay. This will create research opportunities, new skills relevant to the area and be a key activity in supporting current and future workforce development to support the local industrial strategy.

2.7.5 Responding to the drivers for change

Levelling up – Deprivation and affluence are polarised, exacerbated by recent events, with an urgent need to level up within the Bay



Figure 2.7.4 Index of Multiple Deprivation, MHCLG

Deprivation

The Bay area is a place of diversity with areas in both the most deprived and least deprived deciles across the range of domains.

Cumbria ranks 83rd out of 151 upper tier authorities and has become more deprived since 2015, with Barrow being the most deprived district (and in the top 10% nationally). Lancashire-12's index of multiple deprivation (IMD) ranking is 78/151 upper-tier local authorities but the most deprived of 26 two-tier county council areas.

Generally there are pockets of deprivation within the Bay area in close proximity to the least deprived areas. The pattern of deprivation is similar across all domains except for the living environment where access and affordability of housing means most of the Bay area is more deprived than average.

An example of the diversity is reflected in the 42% of residents in South Lakeland that live within postcodes classified as ACORN Category 1 (Affluent Achievers); this is 1.9 times higher than the national (Great Britain) proportion (22.7%). In contrast, just 13.1% of residents in Barrow-in-Furness live in postcodes classified as ACORN Category 1. Barrow has the lowest median income whilst South Lakeland has the highest in Cumbria.

Coastal towns, like Barrow and Morecambe, have had slower population and employment growth than the England and Wales average. Larger coastal towns tend to have higher deprivation levels in all domains except for barriers to housing and services and living environment, which is the base in the Bay area.

“Cumbria is a place of contrasts, with some very wealthy areas sitting alongside places where levels of deprivation are comparable to some inner-city areas. This wealth gap is a significant factor in contributing to the large inequalities in health and wellbeing that we see across the county. We have a huge amount to do to tackle some of these deeply entrenched challenges, and all parts of our community have to work together if we’re going to have any chance of doing so.”

Colin Cox, Director of Public Health, Cumbria County Council

"Rural areas in Lancashire have poorer access to many health services, and those services which are seen as damaging to health are often concentrated in poorer areas.

Professor Alex Singleton, Deputy Director of the Consumer Data Research Centre

The Brilliant Barrow Town Deal (£29.9m bid for seven key projects) recently received £750k in accelerated funding as one of the first towns to benefit from the Towns Fund, established to share prosperity across the country and level up. Testament to the ambition and vision of the local community and partners, this additional funding provides a significant opportunity within the Bay to address some of the challenges of those currently living in deprivation.

2.7.6 Responding to the drivers for change

Connectivity – improving on and off line access to services and opportunity

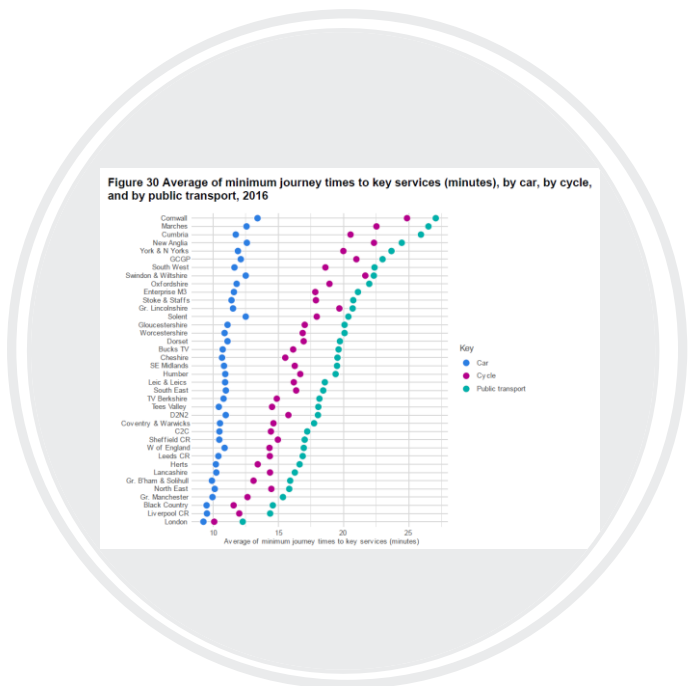


Figure 2.7.5 Average journey times to key services are high in Cumbria but less so in Lancashire

Digital Connectivity

We know that strong digital connectivity will underpin our economy in the future, and is already so important for supporting the activities of our businesses and residents across the Bay. However, our area faces connectivity challenges due to the very rural location of some our communities.

Whilst we boast brilliant local assets such as the community-run Broadband for Rural North (B4RN), a proportion of our residents still don't use the internet (16% in Lancaster, 12% in Barrow and 8% in South Lakeland).

Our ambition is to unlock the considerable socioeconomic opportunities that are currently constrained by poor access through the delivery of new and enhanced digital infrastructure. Creating a fully connected Bay area will be a key enabler for inclusive economic growth and improved productivity across the region, connecting businesses to growth opportunities and enhancing quality of life.

Inconsistent quality of digital connectivity across the region can reinforce social and economic isolation for our rural communities.

The 'Connecting Cumbria' initiative, funded by central Government, has achieved superfast connections but (secure) high-speed broadband and mobile phone coverage across Cumbria is still perceived as a risk to economic progress. Cumbria is in the bottom 5 counties for the level of internet usage amongst people aged 65 and over with almost 70% being offline at home.

Physical connectivity

Cumbria is the second most sparsely populated county in England - 70% of all the county's settlements have less than 200 residents - and getting access to even some very basic essential services can be extremely difficult. For many parts of Cumbria, the travel times to reach essential services are significantly greater than the average.

The issue of transport infrastructure as a key theme for a future Morecambe Bay geography, particularly focused on the need to improve the A590 link from Barrow to other parts of the region as well as down into Lancaster. The need to improve this road is a widespread concern amongst local businesses and residents.

It is estimated that in 2017 the UK ports industry directly contributed approximately £9.7 billion in GVA and 115,000 jobs. Within the Bay area we host two significant ports at Barrow and Heysham. The Port of Barrow plays a key role in serving the offshore energy industry in the north and is the site of BAE Systems' submarine design and manufacturing facility. 110,000 tonnes of cargo are handled by the Port of Barrow each year.

The Port of Heysham also has a wealth of experience working with offshore wind, gas and nuclear energy industries. Heysham Port is at the heart of the Irish Sea RoRo hub and caters for numerous daily sailings from providers like Seatruck, Stena Line and Isle of Man Steampacket. Both Port facilities, and the wider portfolio of industrial land that sits around them, have considerable growth potential. We have creative and imaginative plans improving connectivity on land, sea and on-line, creating the local infrastructure for future prosperity.

2.7.7 Responding to the drivers for change

Start well – every child should have a good start in life and we can use reorganisation for a fresh start

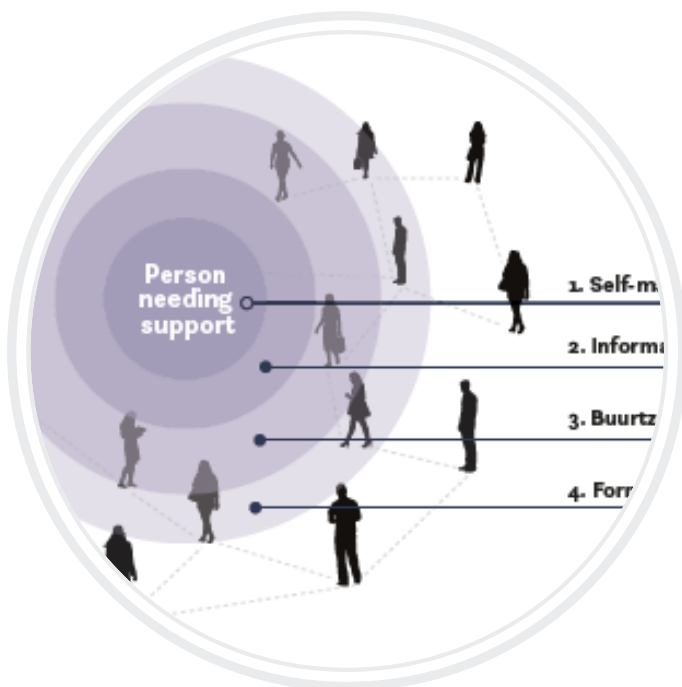


Figure 2.7.6 Buurtzorg Onion Model

Start well

We want to ensure that children and young people have a good start in life. Too many children in the Bay area lack a safe or stable home but levels of child poverty are generally below the national average, although this totalled 18% in Barrow and there are high pockets elsewhere. All local authority services for children have significantly improved and overall effectiveness now requires improvement to be good. This is an achievement, as it follows three inspection ratings of inadequate. Services for children were inadequate for overall effectiveness in 2012 and 2013 because of weaknesses in safeguarding. In 2015, help and protection services had improved, but services for children looked after had declined and were inadequate. The local authority has now achieved a period of continuous development in all services.

There continues to be challenges in the capacity and stability of the workforce, exploration of children's identity needs, child homelessness and implementing actions from audit in a timely way. The latest SEND inspections by Ofsted and the Care Quality Commission resulted in determining a Written Statement of Action was needed in both Cumbria and Lancashire. For Cumbria this included an overall assessment of a lack of joint working between health, care and education and limited coproduction or joint commissioning. It also highlighted the inequities that exist in access to, and performance of, services between different geographical areas of Cumbria. Lancashire has made progress on significant weaknesses identified in their review two years ago including stronger partnership working but still needs to do more to understand the local area's needs.

However the number of Children Looked After in both Cumbria and Lancashire continues to increase from 632 to 683 for Cumbria over the period 2017 to 2019 and 1,842 to 2,116 for Lancashire for the same period.

The Cumbria Children's Trust operates District Delivery Groups (DDG's) to ensure key partners cooperate effectively on the ground to improve the well-being of children and young people and promote effective integrated working across agencies in Cumbria. This is coterminous with Barrow and South Lakeland. Whilst recognising the improvements that have been made in local services, creating a new unitary authority would be an opportunity to redesign a better future around children and families. Integrating responsibilities offers an opportunity to work more closely with children, families and practitioners to redesign the system, going broader than statutory social care services. There is a perceived risk of disaggregation which is in fact an opportunity for reform and improved integration with health and community partners. Getting this right will help to address the existing workforce, demand and financial pressures which potentially jeopardise the journey to Outstanding for these fundamental services to our local communities.

2.7.8 Responding to the drivers for change

Live well – creating homes and places that are affordable, attractive, inclusive and sustainable



Figure 2.7.7 Chatsworth Gardens, West End, Lancaster

Ability to live well

The Bay area should be a quality place to live and work but we need to be able to build and provide the right types of homes and create places that attract and maintain a balanced community. Housing has a critical role in helping achieve our vision and priorities. A safe, secure and decent home has a significant positive impact on quality of life. It is anticipated that the area will need more housing in the future to accommodate even the relatively static population anticipated. This is mainly a reflection of the forecast growth in one person households.

Virtually all our employed residents work within the Bay area which has reasonably high levels of self-containment in housing markets. There are connections between us e.g. between Lancaster and South Lakeland. Barrow and South Lakeland for a Furness peninsula travel to work area.

Across city, coast and countryside there are distinct challenges and an under supply of social and affordable housing means we need to bring forward more homes in the right towns and places.

We can reinforce our Local Plan commitments to ensure a sufficient supply of good quality housing, increase the supply of affordable housing and require new homes are built to better space standards and can be adapted more easily to meet the changing needs of our diverse communities.

Addressing the shortage of affordable, decent and good quality homes is an opportunity to support:

- sustainability and targets for net zero
- inclusive growth to develop the local economy
- health and well-being in our communities
- community power and influence over priorities

Places where people can choose to live

As a stock holding authority, Lancaster's recently updated homes strategy for 2020-2025 sets out plans to utilise additional freedoms to enhance housing building and support an increase in nearly 3,000 homes delivered over the last five years.

Barrow also has its own housing stock, though there is a lack of choice in the current housing market to meet the needs of industry to attract the highly skilled workers it requires and meet the housing aspirations of many existing residents. The vision of the recently adopted local plan is to promote the Borough's greatest assets to attract and retain people and businesses in the area, such as its natural environment, its highly skilled workforce and its strong communities.

South Lakeland's most recent Strategic Housing Market Assessment indicated a slightly lower local housing need that previously but it remains an expensive place to live.

Becoming a unitary will strengthen the alignment of action across all three authorities to manage their housing market areas, prepare and attract funding and bring forward strategic developments together.

We have a clear opportunity to work together on accelerating housing delivery where it is needed and of the right type, advancing retro-fit to reduce emissions and strengthening the quality of place across our communities.

2.7.9 Responding to the drivers for change

Age well - Health & Adult Social Care are increasingly integrated with an opportunity to reform both systems



Figure 2.7.8 Morecambe Bay is one of the five areas of the South Cumbria and Lancashire Integrated Care System

Ability to age well

We want to ensure that people stay healthier for longer and are able to remain in their home. 21% of Cumbria’s population is over 65, which is higher than the national average and it will continue to increase. The proportion of older people is higher in the south of the county than elsewhere.

The growing population will add to the pressure for good quality social care and suitable housing solutions to meet the growing elderly population needs of the Bay communities.

The demographic situation is one of the most important challenges facing the area. With relatively little in-bound migration, a tendency for younger people to leave the area after education and a general drift of residents away from Barrow-in-Furness, the entire area is not forecast to grow significantly in population terms in the period 2014-2039 and almost all the growth will be in the age categories of 70+.

There are two Integrated Care System (ICS) footprints in Cumbria, with the integrated care community here mirroring the footprint of Barrow, Lancaster and South Lakelands. Although common overarching principles are being implemented, they are operationalised differently across the two ICS.

NHSE/I are now seeking to put ICSs on a statutory footing and increase the expectations of place based leadership, including local authority representation.

The Bay area would be coterminous with the NHS Morecambe Bay CCG as part of the Lancashire and South Cumbria ICS. This was created after NHS Cumbria CCG was rated requires improvement in 2016/17.

A recent review by CQC of the local system in Cumbria, recognised that although there is a single Health and Wellbeing strategy for Cumbria review acknowledges that the two systems are progressing at different paces and have different contexts and issues. There are separate management structures and operations, such as two A&E delivery boards with no links between them. Co-production in the south was more prevalent than in the north of the county, and the Bay would continue to adopt co-design as a core feature of their work across the system.

Integration or disaggregation?

Disaggregation of adult social care services from the counties is an opportunity to integrate better with health. There are increasingly different systems developing within Cumbria which reflect the local context and operating models in those areas so this is an opportunity to plan for the future.

Disaggregation along the lines of the existing ICS footprints could accelerate the focus on integration in both areas. Any alternative approach would embed a need for one council to operate two systems, unless the progress in the development of the respective ICS areas was to be unwound.

Integration takes time because it involves the bringing together of issues like communications, technologies and data sharing to enable interoperability between organisations. Person centred integrated care also requires organisational relationships and trust and moves to pooling budgets and investment.

2.7.10 Responding to the drivers for change

Strengthening local leadership through unitary local government at the scale that works



Figure 2.7.9 Travel to work areas in the Bay area

Ability to align strategic leadership

Local authority boundaries are subject to regular change. The Redcliffe-Maude Commission originally proposed a Furness & North Lancashire authority on the approximate boundaries of the Bay Council now proposed.

For the Bay area reorganisation is an opportunity to enhance alignment of key public sector partners around a common geography and population. This would be particularly valuable in relation to alignment of local authority and local health services where integration and population health management is a policy priority and we already work together.

Police, Fire and Rescue and the LEPs are all based on county boundaries but we see no reason why arrangements could not be resolved to cover a new footprint. Enlargement of each would also enhance their viability.

The Morecambe Bay Partnership is another example of our established co-operation on environmental and heritage issues.

Aligning administrative boundaries can be convenient but there are also strengths in considering functional economic market areas, travel to work areas and broad rental market areas.

Many current 'county services' in Cumbria are in practice organised around operational areas within the county, where services to Barrow and South Lakeland are combined. A unitary solution offers the potential to align strategy with operational reality.

Ability to retain strong representation

There are 338 councillors in Cumbria and a further 60 in Lancaster (plus c10 covering the Lancashire county services in this area). With 408 councillors across a 500,000 electorate the area is well represented at present.

A single county unitary for Cumbria at around 85 councillors in line with the Local Government Boundary Commission would represent approximately 4600 electors per councillor and a reduction of nearly 75% on current numbers. This would be the fifth highest ratio in the country, and unlike areas such as Birmingham, would be an area of dispersed rural populations.

The last national Census of Local Authority Councillors in England in 2018 suggested that councillors already spend 22 hours a week on council business, of which 8 hours was in meetings and 6 engaging with constituents, surgeries and enquiries and 4 hours working with community groups.

Retaining local leadership, with councillors knowing and being known in their area is at the very heart of the Bay's proposal. A move to unitary local government at the proposed scale will not address all of these issues but it will provide for greater clarity on accountability, enhance the ability to provide strategic local leadership and be better than if it was being created on a single county footprint.

Devolution is a further opportunity to address the ability of local government to make more decisions about the issues affecting their local area to strengthen local leadership around place shaping.

2.8 The outcomes we will achieve

Our future priority is to address these challenges as one

Our excellent close working relationship means we have clear reform priorities and a vision and plan to deliver the interventions needed to address the drivers for change. The ability to deliver on the outcomes our communities deserve would be enhanced by becoming a single unitary authority in the Bay. As learning organisations, North Cumbria and the Bay will share best practice and foster a supportive culture whereby success can be shared, including initial leadership shown from the Bay in forging those tight collaborative system-wide relationships to enable recovery, reform and devolution.

The impact will be:

- **improved life chances** – enabling people here to have the best chance in life and increasing aspirations and skills to drive better social, health and economic outcomes and reduced inequality.
- **connected communities** - improved service quality and access, supported by physical and digital infrastructure, that attract people to make the Bay their home.
- **thriving places to live** - welcoming, safe, healthy, happy neighbourhoods where people get to know each other, look out for each other and come together as strong communities.
- **sustainable and inclusive economic prosperity** – preservation of our natural assets and proactive action on meeting the climate emergency, making the Bay area a leader at the forefront of a green industrial revolution.
- **effective, diverse and inclusive** – working with all our wide range of communities (city, countryside and coastal) through creating structures and ways of working to better understand local needs and effect meaningful change on issues from service delivery to meeting the climate emergency.
- **improved quality and effectiveness of services** – through a shared vision and purpose, joined up strategic and delivery decision making, and through system wide collaboration instead of tackling challenges in silos, reducing failure demand, and designing with residents at the heart of all that we do.
- **realised efficiencies** - tackling demand through upstream preventative action reducing long term cost across the system, enabling more efficient local delivery.
- **active, engaged and connected** – reinvigorated local democratic and participative structures that inspire people to have a voice, allow communities to better influence and participate in local decision making, and revived role of our anchor institutions

This proposal will use reorganisation to create a resilient and prosperous Bay Council and North Cumbria Council.

Our future priorities

As The Bay unitary authority, there is an opportunity to address these challenges together, aligning our priorities. Any unitary arrangement not based on The Bay will be a retrograde step in delivering local government.

Unitary council arrangements are a step forwards to strengthening local government in The Bay. It will prepare us for next step - devolving resources and responsibilities to enable growth.



Environment

- Climate emergency
- Transition to a green economy
- Conserving natural assets



Skills

- Declining workforce
- Low attainment and aspiration
- Skills shortages



Productivity

- Income inequality
- Retaining resources locally
- Sustaining future jobs



Connectivity

- Poor digital connectivity
- Physical connectivity east to west
- Local transport systems



Places and houses

- Housing affordability and suitability
- Housing viability
- Left behind towns



Health and wellbeing

- Growing dependency and long term conditions
- Health inequalities
- Inactive lifestyles



Recovery

- Maintaining and improving quality of life through recovery



Source: ONS 2018. © Crown copyright and database right (2018)



Alternative approaches

This section explains the choices for developing a unitary local authority to cover the Bay area and the opportunity this offers for a North Cumbria unitary.



3.1 Identifying alternatives

A limited range of options are available for Cumbria unitary local government but the Bay Council is a credible choice

Within Cumbria we can either maintain the business as usual position or, assuming the aggregate population criteria is a hard rule, recognise that a unitary county solution is the only option within the boundaries of Cumbria that meets the tests. But Type C proposals have been invited, including from the Bay, which allows for relevant adjoining areas to be part of the proposal. The proposed Bay Council meets all the tests and makes a ‘North Cumbria ’ solution to a county unitary possible.

LONG LIST	Potential to improve local government	Potential for good deal of local support	Credible geography	SHORT LIST
Business as Usual	No change	No need to test	Existing arrangements	Alternative 1: Business as usual
County unitary	One new large unitary with associated benefits (as set out by Cumbria County Council)	Not supported in our assessment or stakeholder engagement	Aligned to recommended aggregate populations of between 300,000 – 600,000, but little evidence that it can meet needs of diverse local communities as Cumbria is large and sparsely populated	Alternative 2: Cumbria County Unitary
South Cumbria (Copeland, South Lakeland, Barrow) and North Cumbria	Two unitaries within Cumbria with associated benefits	Not supported by local representatives	Falls outside of the aggregate population requirement of 300,000-600,000, with unitaries of 240,000-260,000	DISCOUNTED due to not meeting the criteria
East Cumbria (Eden, South Lakeland, Barrow) and West Cumbria	Two unitaries within Cumbria with associated benefits	Not supported by local representatives	Falls outside of the aggregate population requirement of 300,000-600,000, with unitaries of 225,000-275,000	DISCOUNTED due to not meeting the criteria
The Bay Council and North Cumbria	Two unitaries - one in the Cumbria footprint and one including Lancaster, with associated benefits	83% support for the Bay Council over a county unitary through our survey	Aligned to recommended aggregate populations of between 300,000 – 600,000, with 320,000 (the Bay) and 328,000 (North Cumbria)	Proposed approach: Bay Council and North Cumbria

3.2 Summary of shortlisted alternatives

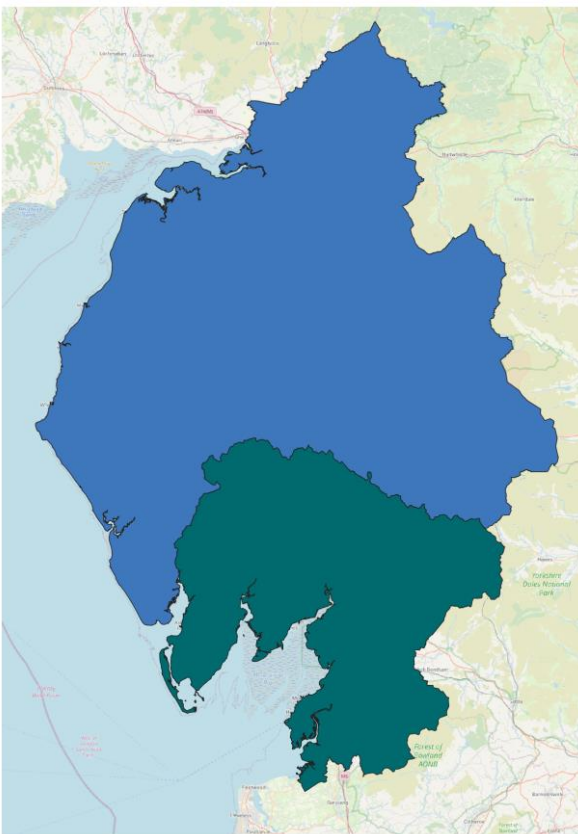
Three potential alternatives are viable in response to the terms set out in the Secretary of State's guidance

To best address our local challenges and strengthen local government in Cumbria, we have considered the three potential alternatives for reorganisation. We have only selected those that could be considered viable in response to the terms set out in the Secretary of State's guidance, including the status quo as required good practice set out in HMT guidance and the 'Five Case Model'.

The Bay Council and North Cumbria

This would replace all seven councils with a Bay Council (Type C) and a North Cumbria Council (Type B), providing unitary local government for the area of Cumbria and Lancaster.

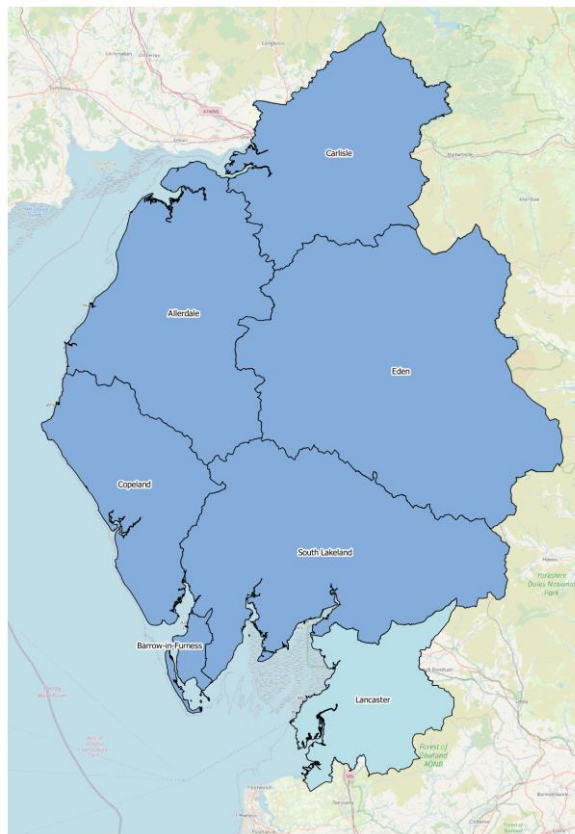
Co-operation in the Bay area would be embedded in the structure and purpose of local government.



Alternative 1: Business as usual

This would maintain two-tier arrangements in Cumbria and the current seven councils. There would be no benefits or costs from unitary local government in the area.

The Bay authorities could continue developing their joint committee as the basis for co-operation.



Alternative 2: Cumbria County Unitary

This would replace all seven councils with a single unitary local authority for the area of Cumbria.

There would be benefits and costs from unitary local government in the area. The future of the co-operation in the Bay area would be a decision for the new council.



3.3 Qualitative assessment of the alternatives

Our proposal and potential alternatives were tested against critical success factors to see if they meet our ambition

CSF	Purpose
<p>1</p> <p>Strategic case - Enables the Bay Council to deliver public service reform, improving the quality of public services</p> <p><i>(HMT: Strategic fit and business needs)</i></p>	<ul style="list-style-type: none"> a. Will strengthen local leadership: enable collective and co-ordinated leadership, providing a platform for a modern culture and service excellence rooted in preventative and whole systems working removing silo cultures and working, that can get in the way of better community and economic outcomes b. Will enable future devolution: provide an effective platform for a strong regional agenda to harness local assets and drive productivity, generating economic and social opportunities from devolution which enable the Bay Council and North Cumbria to level up c. Will promote effective service transformation: effectively involve communities in designing and delivering services that are tailored to local needs, harnessing local strengths and assets d. Will result in unitary local government: deliver a less complex, more transparent, agile and accessible structure of local government, able to respond more quickly and take advantage of opportunities e. Will improve democratic representation: strengthen quality democratic representation to effect the change needed in the places they represent and build on meaningful local identities f. Will improve accountability: offer clear accountability (locally) for the delivery of outcomes required by the place
<p>2</p> <p>Economic case</p> <p><i>(HMT: Value for money)</i></p>	<ul style="list-style-type: none"> a. Will improve value for the public sector: tackle the causes of demand through a whole systems approach b. Will be more efficient: reduce the delivery cost of public services balancing flexibility and scalability for long term sustainability c. Will be sustainable: deliver long-term financial sustainability for local government in the Bay area and North Cumbria
<p>3</p> <p>Investment attractiveness</p>	<ul style="list-style-type: none"> • Will leverage investment: leverage additional investment in reform to deliver improved infrastructure, housing and economic prosperity, balancing scale with local knowledge that builds credibility
<p>4</p> <p>Achievability / deliverability</p>	<ul style="list-style-type: none"> • Will be delivered: implement transformation successfully, mitigating key strategic risks through effective and collaborative leadership

The two remaining criteria to be assessed in line with Treasury guidance have been assessed as part of the financial case – assessing if the programme can be delivered within the identified budgets and repayable through savings, and that it deliver long-term financial sustainability for local government in the Bay and North Cumbria .

3.4 Qualitative assessment – strategic case

The strategic case considers the ability to deliver improved local government and services

Strategic case - Enables the Councils to deliver public service reform, improving the quality of public services	Business as usual	County unitary	Bay Council	North Cumbria
1.a Will strengthen local leadership	N			
1.b Will enable future devolution	N	N		
1.c Will promote effective service transformation	N			

Summary Rationale	
Business as usual	<ul style="list-style-type: none"> a. There would be no change to current arrangements which are working although achievements in collaboration, such as our joint committee in the Bay area, are despite the current arrangements. b. There would be no change to current arrangements. It is unlikely there would be any devolution potential under the current policy framework with continued two tier arrangements. c. There would be no change under this approach other than is already planned by each council.
County Unitary	<ul style="list-style-type: none"> a. A single unitary would be a backwards step on local leadership going further in implementing an artificial arrangement that does not reflect local identity. It does simplify the ability to strengthen local leadership within the single organisation and with some county-wide services. But equally, it complicates existing arrangements that are developing around functional areas such as the Bay which may no longer be a priority. It also risks becoming inwardly focused on leadership of council services, especially in high spend, high risk areas such as adult social care with less focus on community power and involvement. b. There would be limited benefit over current arrangements for devolution and would be unable to create a combined authority under proposed arrangements. It would not be in line with current policy indications and partners to the north and east, such as Borderlands, could draw focus away from the Bay area which has it's own distinct strengths and challenges. c. There would be potential for service transformation within council services but a risk of a top down standardised approach across Cumbria, focused on delivery of statutory services, and complexity in working with key partners such as health, and that is inflexible to local context and developed without user involvement.
Bay Council	<ul style="list-style-type: none"> a. A new council leadership focused on the Bay area would accelerate and enhance the excellent relationships already in place and simplify arrangements for co-operation by bringing all areas of the Bay under a unified leadership. It enables collective leadership at a scale that works with existing markets, identities and partners and supports the development of strong relationships across the system. b. The Bay Council would be well placed to work with arrangements in both Cumbria and Lancashire to make a coherent case for devolved responsibilities and resources and could enable a future Combined Authority and Mayoral model. It would also be committed to taking forward the existing Prosperity and Resilience Strategy ambitions. c. There is strong commitment and evidence between the Bay authorities to transform services in partnership with other organisations and co-producing solutions with communities. d. The Bay Council is the preferred solution that improves on business as usual which will improve connectivity, communication and synergies in both Cumbria and Lancashire.
North Cumbria	<ul style="list-style-type: none"> a. As above for the Bay area but at a much earlier stage of maturity, a unitary in the north could enable stronger leadership focused on their local priorities. b. As above for the Bay but with a targeted approach to specific requirements, building on the Borderlands foundations. c. Potential to develop new service approaches but not as developed as the Bay's existing joint work d. This alternative could limit connectivity with residents, businesses and organisations in targeting local needs to ensure local residents, business and organisations are being listened to.

Assessment Scale	
	Fully meets
	Partially meets
N	Neutral
	Does not meet

Distinct in nature so have assessed each on own merit

3.4 Qualitative assessment – strategic case (continued)

The strategic case also considers the impact on representation

Strategic case - Enables the Bay Council to deliver public service reform, improving the quality of public services	Business as usual	County unitary	Bay Council	North Cumbria
1.d Will result in unitary local government	N/A			
1.e Will improve democratic representation	N		N	N
1.f Will improve accountability	N			

Summary Rationale	
Business as usual	<ul style="list-style-type: none"> d. No change to current arrangements as it would retain two-tier working e. No change to current representative arrangements across the 398 councillors in Cumbria's councils f. No change to existing arrangements or accountabilities
County Unitary	<ul style="list-style-type: none"> d. Delivers unitary local government and associated benefits, with a simple narrative at the point of transition. However, it complicates delivery and accessibility for future service users and partners and may need revisiting or realignment in the future. This is in part because sparsity and scale work against the unitary benefits and hamper agility and accessibility opportunities for Cumbria based on its particular geography. e. A significant reduction in the number of representatives, where the Boundary Commission technical guidance on council size suggests between 30-85 councillors without additional evidence and concentration. Results in unacceptable increases in case load and travel times. Some counterweight by removing confusion over representative roles and responsibilities. f. Strengthens accountabilities for council services as part of a unitary but weakens the relationship to place based action and partnership working, both of which are increasingly important in a diverse area such as Cumbria with large variations between the north and south and key partners, such as health, who would not operate on the same footprint.
Bay Council	<ul style="list-style-type: none"> d. Delivers unitary local government and associated benefits, reflecting local identity and ways of working that reinforce the value and sustainability of the approach. e. A reduction in the number of representatives but double that of a county unitary balanced by removing confusion over representative roles and responsibilities. More contained geography and population reduces the impact of additional case load and travel times, and improves local democratic representation. Alignment with representatives roles in health bring greater coherence. f. Strengthens accountabilities for council services as part of a unitary and enhances relationships around place based and partnership working in the Bay. Allows for clear accountabilities and tailored solutions to the unique interwoven issues in the Bay.
North Cumbria	<ul style="list-style-type: none"> d. Potential to delivers unitary local government and associated benefits if wanted by the current authorities, with a simple narrative at the point of transition. Limited preparation and joint working on this footprint may make arrangements unstable if there is limited buy in to the approach. e. As for the Bay area but limited existing joint working may take a little longer to realise the desired outcomes, albeit there is strong representation across the local communities. f. Potential to be as for the Bay and provide a stimulus to place based relationship working.

Distinct in nature so have assessed each on own merit

Assessment Scale	
	Fully meets
	Partially meets
N	Neutral
	Does not meet

3.4 Qualitative assessment – economic case

The economic case considers the alternatives ability to deliver public value

Economic case	Business as usual	County unitary	Bay Council	North Cumbria
2.a Will improve value for the public sector	N			
2.b Will be more efficient	N			
2.c Will be sustainable	N	N		

Distinct in nature so have assessed each on own merit

Summary Rationale	
Business as usual	<ul style="list-style-type: none"> a. There is no change to current arrangements b. There are no additional efficiencies over and above those already planned c. Increasing challenges on viability due to demand increases and funding pressures particularly in county-led services and foregone potential benefits
County Unitary	<ul style="list-style-type: none"> a. Increased potential for improving value for the public sector from service redesign, but potential delay as phased after transition to a unitary b. Short term high potential for transitional efficiencies from standardising and simplifying processes and pathways across council services. But increased risk that complexity of scale and alignment to two different integrated care systems for example erodes benefits. Potential trade off from efficient 'standard' services requiring more expensive solutions later when compared to agile responsive approached tailored to community requirements. c. Increased risk of unsustainable benefits if locality work needs to be reintroduced and replicated within the diverse communities of Cumbria
Bay Council	<ul style="list-style-type: none"> a. High potential for bringing forward benefits and value for the public sector by aligning and supporting leadership across organisations with shared values and ambitions for the Bay b. Similar short term benefit realisation potential from unification over a planned transition and enhanced long term value through on bringing forward reform across services, including a focus on a single integrated care system c. Working within a coherent locality developing shared agendas and plans, pooling resources and budgets to deliver on places based shared priorities. Provides a platform at an appropriate scale for Cumbria and Lancaster for working upstream and focusing on preventative actions with long term significant value for the public sector.
North Cumbria	<ul style="list-style-type: none"> a. Potential for improving value as the new authority develops but currently less mature than the Bay b. As above c. As above

Assessment Scale

	Fully meets
	Partially meets
N	Neutral
	Does not meet

3.4 Qualitative assessment – investment attractiveness

The investment attractiveness considers the impact on supporting reform

Investment attractiveness	Business as usual	County unitary	Bay Council	North Cumbria
3. Leverage additional investment in reform to deliver improved infrastructure, housing and economic prosperity, balancing scale with local knowledge that builds credibility	N	Yellow	Green	Yellow

Distinct in nature so have assessed each on own merit

Summary Rationale	
Business as usual	a. No change to current arrangements with continuation of our work through the joint committee across the Bay
County Unitary	a. Enhances current arrangements and supports integrated teams and specialist expertise but limited potential through emerging structures such as Combined Authorities and devolution arrangements in the current policy context.
Bay Council	a. Significantly enhances the current capability and capacity in the Bay area to deliver on the prosperity and resilience strategy, while also enhancing the wider regional potential to come together in the future on devolution discussions post publication of the White Paper.
North Cumbria	a. Enhanced opportunity as part of the wider arrangements across the region.

Assessment Scale

Green	Fully meets
Yellow	Partially meets
N	Neutral
Red	Does not meet

3.4 Qualitative assessment – achievability

The achievability considers potential to release benefits

Achievability	Business as usual	County unitary	Bay Council	North Cumbria
5. Capability to implement transformation successfully, mitigating key strategic risks through effective and collaborative leadership	N	N		
<i>Confidence in strategic risk mitigations being successful:</i>				
i. Reorganisation does not divert the focus from reform and recovery				
ii. Partner organisations are engaged in maximising benefits				
iii. Organisations have the capacity and capability to deliver				

Distinct in nature so have assessed each on own merit

Assessment Scale	
	Fully meets
	Partially meets
N	Neutral
	Does not meet

Summary Rationale	
Business as usual	i. Not applicable ii. No change to current arrangements iii. Not applicable
County Unitary	i. Focus on transition and transformation before reform delays the benefits for residents and communities ii. Partner organisations not on a county footprint are marginalised and joint working arrangements are weakened if the focus is on the county iii. Sufficient capacity within the large organisation but which may become inward looking as it becomes one of the largest unitaries in the country across the second largest county geography with a sparse population
Bay Council	i. Reorganisation integrated with recovery and reform planning from day one ii. Partner organisations already in support and engaging in joint working around the Bay area iii. Capacity, capability as well as ambition and aptitude to apply the reorganisation opportunity to wider ambitions for the Bay
North Cumbria	i. Less mature but to adopt an integrated approach as per the Bay ii. Less mature pan-public sector partnership working iii. Less mature but as above, ambitious to use this opportunity to drive the local agenda forwards

3.4 Qualitative assessment conclusion

The qualitative assessment of alternatives demonstrates that the Bay Council is the preferred and only choice for this area and would unlock the potential for North Cumbria.

Our proposal for the Bay Council and North Cumbria Council:

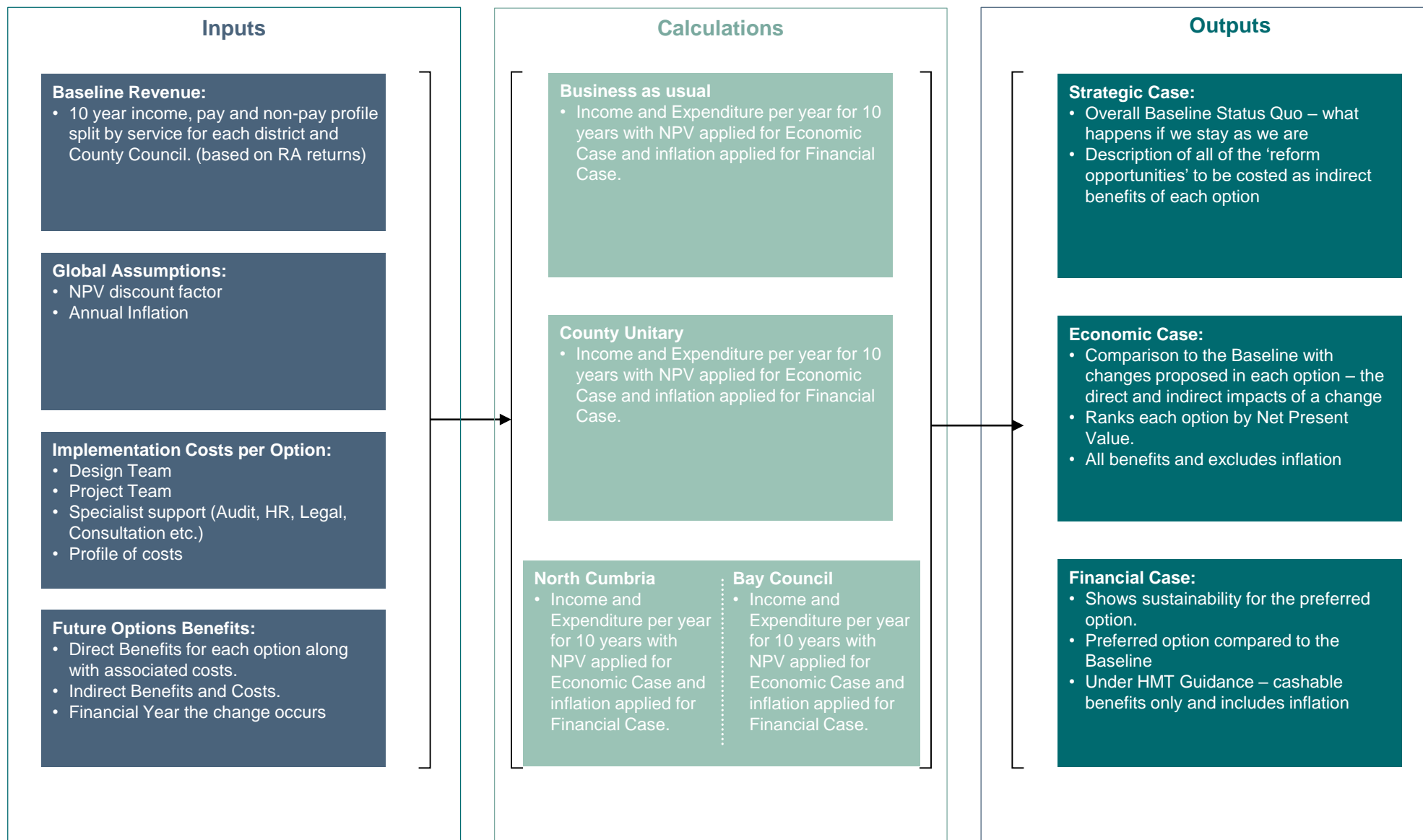
- respects the local geography, meets the population criteria and is sympathetic to the diverse and sparsely populated communities that make up the Bay area and the north of Cumbria
- strengthens local leadership, reflecting and responding to our local identities to represent our communities on the strategic agenda
- unlocks future devolution opportunities, capitalises on our natural assets, delivering sustainable recovery and reform, reducing inequalities and investing for growth
- enhances and simplifies our current partnership working, make it easier for our residents to interact with us, and improve outcomes for our communities, residents and businesses through integrated and whole systems working
- embraces new and modern ways of working, be agile, nimble, insight led and connected across our workforce and communities, releasing efficiencies and improving effectiveness to drive better outcomes

Our proposal builds on existing strengths and commitments and will accelerate the realisation of benefits in a way that is not replicable in a county unitary or could be delivered within the existing two tier arrangements. A Cumbria wide unitary would be unacceptable and a step backwards in our ability to deliver for our communities and businesses.

Critical success factor	Business as usual	Cumbria unitary	The Bay Council	North Cumbria
Improving public services				
1.a Will strengthen local leadership	N			
1.b Will enable future devolution	N	N		
1.c Will promote effective service transformation	N			
1.d Will result in unitary local government	N/A			
1.e Will improve democratic representation	N		N	N
1.f Will improve accountability	N			
Value for money				
2.a Will improve value for the public sector	N			
2.b Will be more efficient	N			
2.c Will be sustainable	N	N		
Investment attractiveness				
3. Leverage additional investment in reform to deliver improved infrastructure, housing and economic prosperity, balancing scale with local knowledge that builds credibility	N			
Deliverability				
4. Capability to implement transformation successfully, mitigating key strategic risks through effective and collaborative leadership	N	N		
FULLY MEETS				
PARTIALLY MEETS				
NEUTRAL		N		
DOES NOT MEET				
CONCLUSION: The Bay Council is the preferred solution alongside North Cumbria – and the only unitary solution that improves on business as usual.				

3.5 Quantitative assessment of the alternatives

A quantitative assessment considered the economic case for change



3.5 Quantitative appraisal

The quantitative assessment has been developed on the basis of available information to provide an initial assessment of potential returns, demonstrating that change is affordable and can work with recovery and reform to deliver value

Local government faces significant financial challenges, amplified by the pandemic but inherent in the system before the crisis hit. The financial forecasts for local government show a growing funding gap and there will be an on-going need to continue to find more efficient and effective ways of delivering public service outcomes.

The assessment of options needs to consider the ability to support local government in Cumbria to get onto a financially sustainable path; one that provides an effective platform for improving services and driving economic prosperity. Achieving sustainability requires finding more efficient ways to operate – reducing replication in, and modernising enabling services for example. But just as importantly, it requires service reform that can start to reduce failure demand for complex services over the longer term. Without this second strand of work, any savings will only postpone a financial crisis.

While the structure and culture of local government can't deliver service reform on it's own – it is a critical enabler to the success of those efforts. As a result, in evaluating the economic impact of each of the shortlisted options, we have considered three categories of costs and benefits:

1. **One-off implementation costs** associated with the transition to a new structure. this excludes one-off implementation costs associated with each direct / indirect opportunity area.
2. **Direct costs and benefits** which flow directly from structural change presented in each option. These are recurrent, based on changes to leadership and management, operational efficiencies from enabling services, increased buying power and governance and democratic services
3. **Indirect costs and benefits** that arise from key areas of service reform – in this case we have explored the potential in Adults and Children's social care due to the reform agenda and proposed interventions we will make in the Bay with our health partners and communities.

In line with HMT guidance, a net present value (NPV) has been used for each option. We have calculated this for five years, and for 10 years.

Only financial benefits and costs that impact the councils in scope have been included in the NPV calculation – we have not attempted to model the significant wider economic value of interventions at this stage. The NPV must therefore be viewed alongside the non-financial benefits of a change in governance.

In terms of reform around localism and levelling up, reforms have incorporated minimal costs at this stage, and benefits are included qualitatively/ quantitatively in the wider Economic Case. We have modelled costs and benefits of reform in social care – thorough analysing the key planks of a reform agenda for these services. It should be noted that all individual opportunity areas are subject to more detailed analysis in individual business cases.

This quantitative analysis draws on PA Consulting analysis, publicly available data for local councils, financial data and assumptions, previous publicly available work and analysis by Pixel for the CCN, as well as a wide range of published evidence on funding and financing public services.

Our analysis has been predominantly focused on the combined revenue general fund budgets using available Revenue Account information for 2019/20 to assess costs and benefits that could be achieved by re-organisation and reform.

Consideration will need to be given to the overall balance sheet including factors such as reserves, business rates retention, council tax harmonisation, pay harmonisation, pensions, redundancies and potential receipts from property portfolio rationalisation, which benefits are cashable and non-cashable, as well as the impact on individual councils. These will be explored in the next detailed phase as we prepare for implementation and are able to work alongside our local authority partners with up to date financial and performance information.

At this stage of the process, a number of assumptions are necessary and there is significant uncertainty due to the impact of Covid-19 and the future funding settlement for local government.

3.5 Quantitative appraisal – cost and benefit per capita

The Bay is comparable to a county reorganisation and more achievable than Scenario C proposed by Cumbria County Council which has a high risk of non-delivery

Costs and benefits in this table are shown on a per head of population basis to aid comparison across different scales	The Bay	The Bay and north Cumbria	Cumbria CC Scenario A	Cumbria CC Scenario C	The Bay	The Bay and north Cumbria	Cumbria CC Scenario A	Cumbria CC Scenario C
Investment period	5 year (£m)				10 year (£m)			
Cost to implement								
These are costs such as the programme team, support and advice, recruitment and redundancy, contingency and investment in better capabilities in areas like analytics								
Implementation costs per capita	(£39.70)	(£30.70)	(£32.04)	(£32.04)	(£39.70)	(£30.70)	(£32.04)	(£32.04)
Direct benefits								
These are the costs and benefits from organisational changes to the structure resulting from integration and alignment such as leadership, management, support services and assets								
Direct benefit per capita	£149.04	£154.68	£152.99	£198.39	£406.92	£424.78	£419.14	£545.60
Direct cost per capita	(£46.83)	(£41.99)	(£44.31)	(£44.31)	(£69.98)	(£61.95)	(£64.30)	(£64.30)
Indirect benefits								
These are the indirect costs and benefits to the cost of service provision as a result of doing things differently in the new option, such as adopting leading practices in social care and in working with communities								
Indirect benefits per capita	£62.23	£64.35	£54.57	£186.11	£173.40	£179.98	£138.57	£472.54
Indirect cost per capita	(£28.29)	(£23.42)	-	(£41.99)	(£38.09)	(£33.32)	-	(£41.99)
Net costs/benefits per capita	£96.44	£122.92	£131.21	£266.16	£432.55	£478.80	£461.37	£879.82
Net Present Value NPV	£79.57	£103.32	£111.65	£226.51	£340.00	£376.17	£362.71	£693.29

3.5 Quantitative appraisal – overall cost and benefit

This view illustrates how the Bay Council and North Cumbria would deliver better benefits than a reorganisation resulting in a county unitary and is more achievable than the other scenarios proposed that risk unsustainable solutions being considered.

	The Bay	The Bay and north Cumbria	Cumbria CC Scenario A	Cumbria CC Scenario C	The Bay	The Bay and north Cumbria	Cumbria CC Scenario A	Cumbria CC Scenario C
Investment period	5 year (£m)				10 year (£m)			
Cost to implement	These are costs such as the programme team, support and advice, recruitment and redundancy, contingency and investment in better capabilities in areas like analytics							
Total implementation costs	(12.7)	(19.9)	(16.0)	(16.0)	(12.7)	(19.9)	(16.0)	(16.0)
Direct benefits	These are the costs and benefits from organisational changes to the structure resulting from integration and alignment such as leadership, management, support services and assets							
Total direct benefits	47.9	100.5	76.6	99.3	131.6	276.6	209.8	273.0
Total direct costs	(15.0)	(27.2)	(22.2)	(22.2)	(22.5)	(40.3)	(32.2)	(32.2)
Indirect benefits	These are the indirect costs and benefits to the cost of service provision as a result of doing things differently in the new option, such as adopting leading practices in social care and in working with communities							
Total indirect benefits	20.0	41.8	27.3	93.2	56.1	117.2	69.3	236.5
Total indirect costs	(9.0)	(15.2)	-	(21.0)	(12.2)	(21.6)	-	(21.0)
Net costs / benefits (£m)	31.2	80.0	65.7	133.3	140.3	312.1	230.9	440.3
Net Present Value NPV (£m)	25.3	66.7	55.8	113.2	108.2	243.0	181.3	346.5

3.5 Quantitative appraisal

Of the comparable alternatives, the Bay & North Cumbria outperforms Scenario A in the County proposal over the longer term, with all alternatives delivery a net benefit after year three, and is resilient to different sensitivity tests

Alternatives

The four alternatives considered were:

1. The Bay Council only
2. The Bay Council and North Cumbria as another unitary with a similar approach
3. The Cumbria CC Scenario A model focused on reorganisation
4. The Cumbria CC Scenario C model which claims to be able to double any benefit of reorganisation.

Option	5 Year NPV (£m)	Difference (£m)	10 year NPV (£m)	Year 1	Year 2	Year 3	Year 4	Year 5
				21/22 (£m)	22/23 (£m)	23/24 (£m)	24/25 (£m)	25/26 (£m)
The Bay	25.3		108.2	(11.3)	(9.0)	14.2	14.1	17.3
The Bay and North Cumbria	66.7		243.0	(17.7)	(14.7)	31.3	31.0	36.8
Cumbria CC Scenario A	55.8		181.3	(8.3)	(7.0)	22.4	22.0	26.7
Cumbria CC Scenario C	113.2		346.5	(23.5)	(6.9)	47.3	46.2	50.2

Sensitivities of the Bay Council

The Bay Council remains viable when tested for sensitivities against four scenarios are:

1. The Base Case
2. Reduced benefits – where only 50% of the benefits are achieved and all costs are incurred
3. Direct benefits only – where no indirect benefits are achieved and all costs are incurred
4. Expensive implementation – where implementation costs are 50% higher
5. Disaggregation impact – where staff costs increase by 4.2%

Scenario	5 Year Benefit Value (NPV £m)	Year 1 21/22 (£m)	Year 2 22/23 (£m)	Year 3 23/24 (£m)	Year 4 24/25 (£m)	Year 5 25/26 (£m)
1. Base case	25.32	(11.34)	(8.96)	14.23	14.11	17.27
2. Reduced benefit	4.31	(11.34)	(9.52)	4.39	4.42	7.74
3. Only direct benefit	14.31	(11.34)	(8.96)	10.51	10.44	13.66
4. Expensive implementation	19.29	(14.60)	(11.73)	14.23	14.11	17.27
5. Disaggregation impact	3.36	(11.34)	(8.96)	6.66	6.80	10.21

3.6 Summary of appraisal of alternatives

Both the quantitative and qualitative assessment of alternatives reinforce the case for the Bay Council for this area

The qualitative assessment of alternatives demonstrates that the Bay Council is the preferred and only choice for this area.

It builds on existing strengths and commitments and will accelerate the realisation of benefits in a way that is not replicable in a county unitary. A Cumbria wide unitary would be unacceptable and a step backwards in our ability to deliver for the Bay Area.

The quantitative assessment of alternatives demonstrates that the Bay Council is also a sensible choice for this area delivering sustainable recurring benefits.

It creates an affordable option for the Bay and enables alternative solutions across the remainder of Cumbria and, should the Secretary of State invite them, enables viable alternatives in Lancashire.

The Bay Council:

- respects the local geography, meets the population criteria and is sympathetic to the diverse and sparsely populated communities that make up the Bay area and the north of Cumbria
- strengthens local leadership, reflecting and responding to our local identities to represent our communities on the strategic agenda
- unlocks future devolution opportunities, capitalises on our natural assets, delivering sustainable recovery and reform, reducing inequalities and investing for growth
- enhances and simplifies our current partnership working, make it easier for our residents to interact with us, and improve outcomes for our communities, residents and businesses through integrated and whole systems working
- embraces new and modern ways of working, be agile, nimble, insight led and connected across our workforce and communities, releasing efficiencies and improving effectiveness to drive better outcomes
- enables a more effective way of delivering public service outcomes in partnership with key stakeholders for a significant population of local communities and local people
- achieves a financially sustainable pathway for local government services by creating an effective platform for improving services and driving economic prosperity for the Bay area
- enhances the opportunity to reform public services to tackle and reduce demand for complex services over the medium to longer term through a whole system shift to prevention and a deeper and more constructive forged relationship between local service providers and their local communities
- delivers a greater level of annual benefits form year three than the Cumbria CC Scenario A option and therefore provides a sustainable financial opportunity than any other option.



Delivering for the Bay

This section explains how our preferred choice for a unitary local authority to cover the Bay area would deliver for our communities, and how the north of Cumbria will operate as a close neighbour, connected but distinct to the Bay.



4.1 Delivering on the aspirations of our communities

Councils around the Bay already work well together across organisational boundaries to deliver effective services. Becoming a unitary Bay Council is an opportunity to become even better placed as one authority. Thus pursuing shared opportunities and address common challenges together.

This is a once in a generation opportunity to fundamentally and sustainably transform lives of our communities and businesses in the Bay. We are fully committed to transitioning from our current two-tier arrangements to a locally driven unitary authority that operates on the functional economic Bay area.

With significant and critical local support, we passionately believe a Bay unitary is crucial to our future and missing this opportunity would risk disrupting the shared work we are building to serve our residents and region.

The Bay area is the preferred and only realistic unitary option for Barrow, Lancaster and South Lakeland authorities, and is the only option that opens credible and sustainable opportunities for reform and reorganisation across the remaining geographies in the counties of Cumbria and Lancashire.

Our proposal emerges not from the invitation but a long-standing view of what is right for our local residents, communities and businesses. Becoming a unitary council will simplify and accelerate the momentum we already have in successfully working together across organisational boundaries, and complement both Cumbria and Lancashire. The Bay can broker wider sub-regional opportunities.

With a dedicated focus on the Bay area, we can unleash the power of our human and natural capital, reinforcing our integrated local economy and build on world class strengths in advanced manufacturing and our universities. We have real potential to become an engine room powering the Government's green industrial revolution.

Our closely-linked community means 96% of the workforce live as well as work in the area. As councils, we have excellent close working relationships, including through the Lancaster and South Cumbria joint committee. Our public sector partners recognise our geography – the Bay area would share the same footprint as the NHS who align under the Bay Health and Care Partnership. All authorities are in the same postal and broadcast area. Our relationships as councils and communities with a Bay identity are often stronger with each other than they are with the counties of which we are part.

An early decision will enable us to plan with greater certainty our opportunities for reform and recovery enhanced through re-organisation.

The Bay offer

A new unitary Bay Council would be best placed to **deliver on the existing priorities** in our joint committee terms of reference to:

- meet the climate emergency and a need to develop a sustainable local economy
- build community wealth - sustainable local businesses & good local jobs
- reduce inequality & increase wellbeing
- build community power & engagement

It would also provide a **stronger foundation for delivering against additional national government and local priorities:**

- enhances prosperity through green productivity
- supports a community of talent to reduce skills shortages
- connects all communities to social, environmental and economic opportunity
- delivers person-centred and strengths-based care
- provides leadership on delivering net zero
- creates and maintains happy, healthy, safe places where people choose to live and to fulfil their potential
- High quality affordable homes for local people and where the housing market is invigorating to attract new talents in the area

The Bay Council would be at the heart of an ecosystem for driving public service reform and productivity across the region. It is more than reorganisation. Crucially, it is not just about the unitary council itself, but about the connections to the wider ecosystem of local public services and improving how we all work together to achieve better outcomes. There are multiple benefits from the outward-looking system-wide solution we propose.

North Cumbria shares similar ambitions, a drive to succeed and to reform through reorganisation. Less established in working together to date, there will be an opportunity to share learnings from the Bay and to shape each unitary through design and transition into modern, inspiring and connected organisations.

4.1 A fresh start and a renewed imperative for reform and recovery

A credible geography and established local identity

Morecambe Bay is a well-known and recognised geography that attracts millions of visitors each year and is home to 320,000 people, the vast majority of whom live and work in the area.

The strong identity of the area is recognised across the public sector as a credible geography for service delivery. Notably, with it being the basis for planning the development of the future NHS and Barrow and South Lakeland being considered as ‘South Cumbria’ for operational delivery in many County Council services. Fire and rescue services no longer use operational commands but aim to work more closely with communities. Policing see no insurmountable reasons why the geography would not work.

The aggregate population of the Bay Council is nearly 320,000, which both meets the Secretary of State’s guidance and results in the remaining area of Cumbria having an aggregate population of 328,000. A Lancashire-11 would remain with over 1 million residents if Lancaster was become part of the Bay Council.

Local authority	2019 population	Proposed future footprints	Future population above the threshold
Cumbria County Council	500,012	North Cumbria	327,875
Allerdale	97,761		
Carlisle	108,679		
Copeland	68,183		
Eden	53,253		
Barrow	67,049	Bay Council	318,175
Lancaster	146,038		
South Lakeland	105,088		
Lancashire*	1,219,799	Lancashire-11	1,073,761

*Future population for Lancashire-11 is without the population for Lancaster

A renewed imperative for change is supported locally

We have engaged with local stakeholders, taken opinion polls and consulted the public. We found strong support across the spectrum.

The Police and Crime Commissioner for Cumbria has said that he is confident Policing Service could be delivered in either option being proposed but that the preference would be for two unitaries. He would also be open to assuming Fire and Rescue Authority responsibilities in the future and would support the development of a Mayoral model. Lancashire counterparts have flagged the complexity but agree the proposal is deliverable with no issue considered insurmountable.

The Lead Member and Chief Officer for the Cumbria Fire and Rescue Authority, which is hosted by the County Council, expressed initial concern that reorganisation would require a separation into two fire authorities. They saw no reason why it would not be possible to continue to deliver good services across the current footprint, including the Bay. The deputy Chief Fire Officer in Lancashire, which is a stand alone authority, agreed it was deliverable if complicated.

The Bay Area Health Partnership would welcome a move to unitary local government on the Bay footprint as this would align with the health system and developing integrated care provision. This would simplify current efforts to better integrate health, care and well-being services and improve population health.

The Local Economic Partnership in Cumbria have been positive about the Bay Council proposal and our prosperity and resilience plans. They would welcome the ability of unitary local government to support economic development. Early conversations with the Lancashire LEP have been positive.

Town and Parish Councils, local associations and the voluntary and community sector all see potential for spreading and strengthening existing good practice engagement. They would welcome genuine engagement and participation in delivering together for the Bay which is embedded in our values and planned approach, including supporting communities to develop local representative bodies where they wish to. Public opinion, based on a representative sample of over 2700, overwhelmingly supported the Bay as the best solution in this area.

As we continue along the journey to develop the Bay Council we will continue to fully engage with, listen to and co-design the new ways

4.1 Adopting a progressive approach to sustain local government

These principles will guide the decisions we make within the Bay Council and with the wider system to accelerate our reform agenda. We will design innovative, modern, accessible and outcomes focused organisations that will drive efficient and effective solutions designed with and for our residents and communities, and provide great learning opportunities and experiences for our workforce. Reorganisation is a catalyst for a renewed ambition for the Bay.

Our approach will provide comparable direct financial benefits to a single unitary across Cumbria, as set out in section 5. But it's about much more than that. This is about a race to the future, not a race to the bottom. Our agenda is one of reform, supported by reorganisation. We passionately believe that how we deliver this once in a generation change is as important if not more so than what changes. Local government has been in the spotlight over the past year in a way that it never has before. This has shown others what we already knew about the commitment, inspiration and agility of our staff and our communities to come together around a shared purpose. We have a huge responsibility and welcome the opportunity to own it, to take accountability and to begin to work in a way that future proofs us and the Bay.

The Bay will be at the heart of an ecosystem for driving public service reform and productivity across the Bay and beyond Cumbria. There are multiple benefits from the outward-looking system-wide solution we propose. We will design for simplicity and easy access for residents, we will be insight led and resident centred, we will foster a culture of innovation to benefit from new technologies and new models for delivery, and we will co-design solutions around outcomes not services.

We want to lead the way not just in Cumbria, but for the rest of the UK to see what can be achieved when we adopt new ways of working with our local communities. We will build on core values of care and kindness, a commitment to good governance and democracy, and put a strengths based approach at the heart of our system.

traditional world

future world

Driven by process and formality	← relationships →	With people, communities, businesses and places
Reactive response – picking up the pieces	← demand →	Proactive and preventative, focus is on an effective response, we come to you and work together
Siloed and specialised	← service design →	Co-design and co-production, purposeful and based on the needs of individuals
Programme and fixing problems within	← method →	Strengths based building integrated solutions around people
Top down and disconnected from reality	← decision making →	Connected to individuals and communities informed by bottom up approaches
Do to people	← citizen and state →	Do with, supporting communities
Achieving organisational outcomes	← focus →	What matters to people –their strengths and hopes
Manage spend, reduce demand, reduce organisational risk	← purpose →	Empowered to change lives – proactively investing in the right things, outcome and not input driven
Short term budgets and monitoring lagging statistics	← measurement →	Measure what matters to people, long-term incentives to invest in prevention and improve through innovation

Source: Greater Manchester Public Service Reform White Paper



4.1 How the Bay Council will address our four priorities

This section we present how we will address our four reform priorities. To explain this in more detail we have identified 10 interventions them stem from our drivers of change and create the change we need for the Bay.

1 Building community power and engagement

Representative local leadership

- Stronger leadership with local coherent and early involvement to ensure that our residents, local organisations and business are being listen to and for the council to bring in their expertise and insight in developing strategic plans and initiatives
- Improved local representation and engagement to improve outcomes for local people by working with communities to achieve local priorities
- Ensuring that all our Town and Parish Councils, and other forms of community governance, can contribute and support in a meaningful way, built on a common understanding of subsidiarity, flexibility and agility to influence and own local decisions
- Prioritise the strategic and equitable distribution of resources across the Bay area.

Empowering communities

- Creating the conditions and environment through asset based community development and community organising, building on our track record of nurturing social action
- Investing in local place based solutions and building capacity of residents to do more together, creating conditions for neighbourliness and social innovation. Building on lessons from Covid response and capitalising on local and national expertise available within the Bay area
- Recognising the talents and potential of our communities to create solutions with our support through co-production, design and development

2 Building community wealth

Build Community Wealth

- Greater procurement spend retained within The Bay, our neighbouring counties and within the wider Northern Powerhouse
- Improved labour market indicators such as the a lower unemployment rate and claimant count
- Improvements in social mobility indicators such as the Social Mobility Commission index.
- Encourage and support community and social enterprise ad micro business

Prosperity through Productivity

- Improve the quality of life of our residents by helping them to work smarter rather than harder
- Improve health and wellbeing for our residents by having a better working life balance. A healthier workforce as a positive economic driver to generate further improvements in productivity.

Community of Talent

- Being a catalyst driving a whole system long-term strategy and approach to skills and learning
- Offer an exciting and innovation range of education and training opportunities to residents
- See improved educational attainment across agree groups for all form of education



4.1 How the Bay Council will address our four priorities (continued)

This section we present how we will address our four reform priorities. To explain this in more detail we have identified 10 interventions them stem from our drivers of change and create the change we need for the Bay.

3 Reducing inequalities and improving well-being

Start Well

- Increasing continuity of care for children and families
- Closing of the gap in outcomes for vulnerable children
- Financial sustainability for council services and investment in new approaches
- Anticipating, planning for and managing demand reducing inequalities based on protected characteristics and where people live.

Live Well

- Give every child the best start in life
- Enable all children, young people and adults to maximise their capabilities and have control over their lives
- Create fair employment and good work for all
- Health happy homes, vibrant thriving safe neighbourhoods, places to live and breathe

Age Well

- Increasing continuity of care for adults
- Greater independence and wellbeing for older adults (living where they choose)
- Financial sustainability for council services and investment in new approaches
- Anticipating, planning for and managing demand reducing inequalities based on protected characteristics and where people live.

4 Tackling the climate emergency

Tackling the climate emergency

- The Bay will have the economic assets and appetite to capitalise in developing natural environmental and biodiverse resource. We will build a world class knowledge and expertise with our universities and key industries
- A joined approach will put the Bay on the map in tackling the climate emergency with more critical mass
- Economic model that meets the needs of all within the limits of the planet.
- The Bay will create a commercial model that will allow us to increase financial sustainability and support quality services, such as green transport.

Investing in a Greener & Sustainable Tourism

- The Bay to further develop its reputation as a sustainable visitor destination, extending the benefits of the Lake District brand the potential of the Eden North Project

Community power – creating the conditions for a new social covenant

Why it matters

Our public services today need reform, not just transformation, to reflect the complexity of society today and to become more preventative and more upstream in their focus. We continue to refine and improve services that were conceived in a different era, where the state provided services to those in need, and have looked to market forces to drive competition and efficiency.

Services have improved but to become more effective requires us to be more ingenious and continually adapting to change and opportunity. Transition to a unitary authority is an opportunity for the Bay to build on our strong foundations in asset based community development and organisation, and create new solutions to challenges we face today.

What will be different

In doing so we can build on the green shoots of a new era of public services that is emerging, adding our own experience from working with social innovators like Hilary Cottam, and community anchor institutions, to:

- Empower communities – recognising we don't need to hold on to power and can shift decisions into communities and support growing confidence. There are numerous examples of this approach across the country and in particular in this region – home to the pioneers of co-operatives and mutual and with social enterprises and community businesses
- Resourcing communities – we are not talking about shifting responsibility without resources. We will invest in asset based community development and we will place control of resources with communities where appropriate. We can build on a long tradition of participatory budgeting and enhance take up of the powers under the Localism Act. We will work with health partners on this approach which aligns with their ambitions on social prescribing and development of community action and population health:
- Coproduction, design and delivery will be in our culture – We have developed a range of projects already where we work with communities to identify the issues, opportunities and solutions. We will continue to do so as a unitary and embed this approach in our operating practices and procedures. Not just in a few discreet pilots but as the way we work across the organisation.

We have a far greater opportunity to see a step change through this approach than if we remain as a two tier area or become more remote through a single county unitary. Embedding this way of working into our culture will begin to shift the dial and is a core feature of our reform agenda for the Bay Council.

Local case study: People's Jury on climate change

In response to the climate emergency declared by Lancaster City Council in 2019, a People's Jury was formed to examine the response to the climate emergency so far and produce recommendations to guide the future work of the council and a range of other organisations across the district.

Exemplifying the power that can come from collective community voice, the 28 members, who were chosen to reflect the make-up of the district in relation to gender, age, ethnicity, disability, geography, attitude to climate change and deprivation, then developed their recommendations, which were formally launched at the end of November 2020. Crucially, they recognise that while local authorities need to accept and financially support the recommendations, real change will only come about by involving communities.



What will be different

The agenda we are keen to pursue is already emerging and we have been involved in shaping future practices. As a unitary we will be able to do more and further enhance this agenda, becoming a pioneer for the new social covenant where the social responsibility we saw at the height of the pandemic becomes embedded in our way of live.

Community power – strengthening relationships with all localities, nurturing the varied ambitions of town and parish councils and social action

Why it matters

A focus on current local government tiers creates a perceived lack of accountability, transparency and a clear relationship from communities to local leadership which creates a barrier to making things happen and a loss of local identity. We care deeply about the lives of all our residents, and already have some great examples of empowering local communities. But it's not enough, it's not yet scaled and consistent, and we are held back by our existing structures.

Town and Parish Councils - we understand the importance of all elements of the local government system in shaping, contributing and influencing through a genuine engaging dialogue that makes a meaningful difference to the communities they serve. We have strong and active Town and Parish Councils, though in some localities such as Barrow, we don't currently have representation. We commit to working in non-parished areas to create, where there is support, new councils and/or organisations to ensure local voices and representation are valued in an impactful way. We will ensure that all our Town and Parish Councils can contribute, support and are supported, built on a common understanding of subsidiarity, flexibility and agility. Whether it is Town and Parish Councils or other community governance arrangements, it is about empowering our communities from the bottom up and recognising we have a duty to make this work effectively.

We are inspired by places across the county where parish councils have stepped beyond their traditional role. The National Association of Local Councils 'Points of Light' publication shows the contribution they are making in areas as diverse as arts and culture, canals and rivers, community safety, economic development, flood management, health and wellbeing, sports and leisure, and transport on demand. Many of these schemes harness the contribution of local people to make their places better, and in some areas this activity is even having an impact on services that are usually provided by the County and the NHS.

Adopting a locality approach - we want to enable more of this activity. We will operate as a unitary around localities, with integrated services and locally based teams, as well as locally based decision making. Many of the key services provided to our communities are already delivered on a locality based model, such as adult social care and children's services. We now have an opportunity to join up these core statutory services with the other services, solutions and partners who together can make a sustainable impact on outcomes for our children, families and adults.

We have a far greater opportunity to see a step change through this approach than if we remain as a two tier area or become more remote through a single county unitary. Embedding this way of working into our culture will begin to shift the dial and is a core feature of our reform agenda for the Bay Council.

Local case study: Locality working in South Lakeland

We have moved decision making closer to the customer, resolving customer requests as soon and as straightforwardly as possible. We work through 'Case Management' in which a member of staff takes responsibility for managing a service request from beginning to end, drawing in the necessary information, knowledge and expertise to provide a resolution for the customer. We achieve the same outcomes by working 'on the patch' with communities, with Ward Councillors, resolving local neighbourhood issues, doing what needs to be done face to face and enabling local communities to address their aspirations for improving their locality.

This locality based working has led to a new approach from our staff, being more flexible, with a confidence to address a wider range of issues, supported by their training, by access to information and advice within the organisation, by working in an agile way. It also supports our Ward Councillors with better access to the knowledge and resources of the Council, through our locality staff and through their access to information about localities.

Locality workers are one of our new roles, alongside our other roles of Customer Services, Case Management, and Specialists. Together – one team – Empowering and inspiring our communities to thrive.

What will be different

As a reaction to austerity, we have seen the drawbridge pulled up and administration become separated from the people it serves, undermining the work that prevents demand for services. We want to create a localism approach that provides people with flexibility to participate at the level and in the way they choose, to create a framework of support that inspires participation but doesn't require it. We want to make it easier for a positive choice to be made, and want the approach to work with the grain of existing neighbourhoods and identities, rather than impose a new area structure that no one locally will recognise.

Empowering our localities and role modelling the right behaviours to see our communities thrive and prosper

Community action - we will adopt a flexible delivery model framed by some common principles that align to the CALC objectives and both encourage and support community participation, in whatever shape or form is right for that locality and the problem / opportunity being addressed. We will build on the objectives of community representatives to enable our parish councils and other community organisations across the Bay area:

- To protect, represent and promote the interests of local communities
- To promote good community governance in the performance of their duties
- To promote interest and wider participation
- To promote the economic, social and environment well-being of all communities through the activities in our localities.

As Barrow already commits to now, we will work with non-parished areas to create new town or parish councils, or other local community representations.

Adopting a locality approach - there is growing evidence of the effectiveness of Community Networks and Co-ordinators and Locality Agreements along with Area Boards to improve local democratic accountability, and the social, economic and environmental returns that can be made through double devolution. Using these tools and encouraging the associated ethos can realise solutions in a more agile and impactful way.

Engagement with stakeholders showed overwhelming support for more local accountability and frustration with the complexity of the current system and limited funding or powers devolved from the two tiers of local government. From our experience over the past few months, along with many others, we believe that many people who would be willing to play a far more active part do not do so because resources are centralised, access is complex, and decision-making feels so remote.

How we will deliver by adopting a locality approach

We plan to invest in Community Networks with Locality Coordinators that operate around a sensible size and shape of locality. We will create a Locality Agreements framework that provides a consistent process for facilitating tailored, place-led solutions that bring together local partners to address local priorities within each area, built on the following principles:-

- A Locality Agreement would be an arrangement between the unitary and the locality as equal partners confirming their vision and ambition and what each party agrees to do to achieve this. It would specify powers and responsibilities to be devolved in return for agreements about outcomes to be achieved

- It is the intention that the town and parish councils will be at the heart of coordinating local partners to developing these agreements, though that may vary for each locality dependent on the strength of the different groups in that area. Each Community Network (led by the town and parish council or another community based group) would be invited, in an open-ended call, to work with the unitary in developing their proposals
- Depending on the agreement's focus, the Community Network would need to demonstrate the involvement and engagement of other local partners and institutions, such as schools, businesses and voluntary and community sector organisations, in shaping the proposals to achieve a whole systems view
- Where the agreement involves the devolution of assets and budgets and the achievement of service standards or outcomes, we will work with the Community Network to help them demonstrate their ability to be able to take on and sustain the additional powers and responsibilities, such as attaining independent accreditation or similar.

We recognise we have a crucial role to play in engendering the right behaviours, and playing to our strengths to equip each council to achieve their vision. We will support this devolution using our own strengths and assets – this could take the form of provision of buildings, coaching and development on core competencies, budget management and making connections through our network.

Local case study: Love Barrow together and engagement framework

Love Barrow Together is a group of statutory and community sector organisations who have come together to develop partnership working into full system change by guiding, informing, owning policy change by using residents' needs to help direct collective resource through a common vision, common values, calling on collective data and intelligence.

In doing so the group are developing and implementing an Engagement Framework so all partners can own and utilise engagement outcomes across the whole community realm and ensure that ground-breaking work, such as Barrow's New Constellation, is shared from both methodology and outcome perspective. It can also utilise and direct collective resource such as co-located hubs and joint engagement projects utilising multi agency teams.

Realising improved outcomes through locality working at the appropriate scale to be effective and efficient

South Lakeland provide a strong example of innovative use of their assets having been recognised for their innovative approach to bulky waste collection and recycling by The Local Government Chronicle who short-listed the service in the Best Service Delivery Model of their 2019 awards.

Local case study: Good Things Collective community initiative

The Good Things Collective community initiative is regenerating the old Coop building in the heart of Lancaster district's most deprived area to create business, learning community and creative spaces, generating jobs and improving local skills.

The council owns a former Co-Op department store in the West End. Known as Centenary House, the building has three floors over a basement and a small central dormer providing approximately 3,000m² of internal space. With the exception of the Co-Op Late Shop who occupy just under half the ground-floor the majority of the building is vacant and in need of comprehensive refurbishment.

The intention is for the Good Things Collective to refurbish the vacant ground floor and basement space to operate a community enterprise hub focused on supporting the incubation and growth of emerging local enterprise. Bridging the gap between our community and the enterprise sector by providing a welcoming inviting ground floor space for community learning, events and activities, alongside our cafe and gift shop, offering single focussed point of sale for tenants to sell from. The basement will contain shared and private business space that offers efficiencies through shared tools and equipment. There are no current proposals for the upper floors and their future use is intended for expansion of business space.

The council has committed funding towards the refurbishment of the building's superstructure, but this is conditional on the Good Things Collective securing their own funding to refurbish their space. The Good Things Collective have secured financial support towards the project from the Coastal Revival Fund, National Lottery Big Local initiative the West End Million, Architectural Heritage Fund and The Creative Civic Change. The council will offer the Good Things Collective a long-lease on terms that satisfies a Community Asset Transfer and this will assist with funding bids as it provides the security and long-term benefit they require to invest.

Through more effective collaboration and data sharing with our partners, we will also provide analysis and insight from investing in our data capabilities, supporting effective and insight led decision making at a locality level, and supporting localities measure the impact of their decisions.

It is important these agreements are not just made available to the most affluent places, potentially increasing inequality. We will work with communities to design any future arrangements to properly recognise the complexity and assets of their place.

We will use the experience of Locality Agreements to invest, develop and learn from new ways of working that will have benefits locally and be of interest nationally. There will also be a commitment to create a continuous, learning system through which lessons are shared across towns, parishes and neighbourhoods to create an on-going approach to supporting and developing capacity, capability and appetite.

It is envisaged that a programme of training and development will be designed to build trust between partners, to support a quality of standard across the town and parish council network and Community Networks and strengthen relationships.

The importance of working in neighbourhoods

"A health system based on prevention and health equity would involve a focus on place – on small areas and on influencing the environment and social and economic conditions of places in order to improve the health of residents." The Marmot Review, 10 Years

Evidence shows the most successful models are built on population or place-based neighbourhood hubs. The focus of these hubs will be on providing the right services, capacity and local care offers to meet local needs. The model of support will be tailored to local context, but draws on a variety of national and local evidence. This also creates opportunities for a one public sector response, particularly when also combined with operational policing teams and with the community work of the Fire & Rescue Service.

Local case study: Ulverston BID

Ulverston BID is one example in South Lakeland replicated in the other two districts, which is an investment scheme where local businesses collectively agree on the priorities and how to invest their money to benefit themselves, their staff, their customers and, as a consequence, the town as a whole.

Recognising and promoting health in all policies to tackle at a whole system level the inequality and inequity in our communities

Why it matters

Deprivation and inequality is polarised across the Bay area with some communities experiencing the best quality of life in the most affluent wards whilst others face significantly challenging life chances and a poor quality of life in some of the most deprived wards in the country. The 2019 Indices of Deprivation (IMD) reveal significant challenges in particular in the Living Environment domain, with increasing evidence and acknowledgement that quality of housing has a major impact on health outcomes.

The multitude of root causes are not being addressed in the current disconnected system and therefore is collectively failing our communities.

Local case study: Poverty Truth Commission

A Poverty Truth Council (PTC) was set up in Lancaster in July 2018 involving a range of statutory and voluntary sector partners and numerous individuals with lived experience of poverty. The premise is based on 'nothing about us is for us without us'. Round 1 has been completed and has been so successful, a Round 2 is about to be commissioned. Decision makers listen to the stories of those with lived experience and what tangible interventions could make a real difference to reducing inequalities and improving their lives. Changes to service delivery have been implemented as a direct result of this commission. Round 2 aims to link with similar recently agreed PTCs in both Barrow and South Lakeland.

A report by Professor Michael Marmot, Fair Society, Healthy Lives, commissioned and published in 2010 draws attention to the accumulating evidence that the conditions in which people are born, grow, live, work and age and the inequities in power, money and resources that influence these conditions have a huge impact on their health and have led to increasing health inequalities.

The recent pandemic is set to have significant long lasting implications on our health and wellbeing, both physical and mental health, and inequalities have been exacerbated. However, now more than ever the accumulating evidence base and the narrative that has risen to the surface over the past year is the understanding that we need to work as a system around the needs of our communities, at a local level and with, not to, our communities.

The creation of the Bay Council enables a new local authority to more effectively connect the local authority influence to health in our local communities.

The King's Fund reviewed a lot of the evidence to help local authorities prioritise evidence-based actions that improve public health outcomes across their functions. This covered nine themes which form the basis of our approach to reducing inequality:

- The best start in life
- Healthy schools and pupils
- Helping people find good jobs and stay in work
- Active and safe travel
- Warmer and safer homes
- Access to green and open spaces and the role of leisure services
- Strong communities, wellbeing and resilience
- Public protection and regulatory services
- Health and spatial planning.

Action to improve health and reduce health inequalities requires action across all the social determinants of health – health in all policies (HiAP).

What will be different

HiAP is not a new concept but one which we don't see in action in many regions, including across Cumbria. It is a collaborative approach to improving the health of all people by incorporating health considerations into decision-making across sectors and policy areas. HiAP is based on the recognition that our greatest health challenges – for example, non-communicable diseases, health inequities and inequalities, climate emergency and spiralling health care costs – are highly complex and often linked through the social determinants of health. Just one government sector will not have all the tools knowledge capacity, let alone the budget to address this complexity.

The goal of HiAP is to ensure that all decision-makers are informed about the health, equity, and sustainability consequences of various policy options during the policy development process.

A HiAP approach identifies the ways in which decisions in many sectors affect health, and how better health can support the achievement of goals in many sectors. It engages a range of partners from government and local government and stakeholders to work together to improve health and health equity and, at the same time, advance other goals, such as educational attainment, improved housing and green spaces, environmental sustainability, promoting job creation and economic stability.

Embedding whole systems working at the core of our ways of working we will address the social determinants of health to reduce inequality

How it will work

At its core, HiAP represents an approach to addressing the social determinant of health which are the key drivers of health outcomes and health inequities. The Marmot review said that addressing this will require action on six policy objectives. These objectives have been adopted widely across government, local government and public health:

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Create fair employment and good work for all
4. Ensure healthy standard of living for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill-health prevention.

It is important to note that no one agency could implement any of these objectives on its own. They require collaboration, partnership and collective action in many different spheres of activity.

Our approach will identify the ways in which decisions across our sectors affect health, and how better health can support the achievement of goals in many sectors. We will engage a range of partners from government and local government and stakeholders to work together to improve health and health

equity and, at the same time, advance other goals, such as educational attainment, improved housing and green spaces, environmental sustainability, promoting job creation and economic stability.

Through integrating local government services and responsibilities into a unitary authority, the Bay Council, we will be able to accelerate our joint working with health across the Bay, building on the relationships forged on our coterminous boundary, and exploring the opportunity that HiAP offers.

This will also be a core part of our culture and way of working – listening and co-designing solutions with our communities and partners, addressing the root causes that are leading to poor outcomes, not just providing statutory services, but tackling failure demand and improving the quality of life for all of our residents.

Local case study: Winter Wellness Hub in partnership

The intention is for the approach with the support of PCNs, district council and community groups to be led locally by ICCs who have well established relationships and routes into a variety of CVFSE organisations/groups and health and social care services to enable holistic packages of support.

The Amber approach is part of a red-amber-green proposed strategy to minimise winter deaths (from all causes but compounded by Covid). The amber approach is proactive targeting of individuals with known risk factors that could put them at risk of harm over winter e.g. Diabetes, Hypertension, Mental health issues and a combination of multiple conditions. Following identification of cohorts contact is made with a view to supporting; behaviours change, mental wellbeing, necessary medical intervention and other interventions to enable people to stay well, safe and comfortable at home over winter.

The work will not duplicate that which has already been undertaken to support individuals who are shielding or extremely clinically vulnerable, but to proactively target those who may be at increased risk of harm over winter due to social vulnerability, identified underlying conditions and the pre Covid management thereof / or changes in management thereof that may have been impacted by the pandemic.

Given the various factors that influence health and wellbeing, this approach will be multidisciplinary, drawing on locality expertise and services to provide wrap around support as appropriate.

Local case study: Community led housing schemes

In South Lakeland, community-led housing (CLH) is a way for local people to be involved in meeting their own housing needs. This could include new build, re-use of existing buildings and bringing empty homes back into use. Housing schemes that are genuinely community-led all share common principles:-

- The community is involved throughout the process in key decisions like what is provided, where, and for who. They do not necessarily have to initiate the conversation, or build homes themselves
- There is a presumption that the community group will take a long-term formal role in the ownership, stewardship or management of the homes
- The benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity

A fresh leadership agenda with a renewed focus on prevention and quality to improve outcomes for children, families and adults

Fresh and focused leadership through a dedicated DCS and DASS

Our ambitious agenda for our local communities presents an exciting opportunity for the leadership of adults and children's services across in the Bay area. Our population size aligned with our challenges and agenda for substantial change and improvement, warrant focused leadership in the roles of the DCS and the DASS for the Bay Council working across well developed local partnerships with a focus on developing a deep trusting and caring relationship with our local communities.

We do not propose, at least not at the outset, to seek to formally share any key strategic leadership roles with the North Cumbria unitary for these community and people based services. There is a significant shift needed to improve outcomes and to progress the practice within county led services. Current issues include capacity and stability of the workforce, increasing the likelihood of inconsistent quality of practice, permanence planning and assessments of children's identity needs, along with the needs of young people who present as homeless require further improvement. We will empower our DCS to take hold of the agenda, build out excellent practice and be part of the whole systems leadership, improving lives of our children and families. The DCS will lead our strategic agenda working alongside and in the community to build relationships with schools, health, blue light services and other key stakeholder relationships.

Our DASS will also focus on the communities in the Bay, and have the opportunity to work as a strategic partner in the developing ICS at this pivotal time for the Bay, providing a powerful injection of ambition into the whole system for health outcomes and seeking to forge new working relationships and practice in the integration of health and social care across the Bay area.

Local case study: Reshaping the local children's trust board partnerships

Barrow Borough Council have reset and are chairing the Barrow Children's and Families partnership. Moving children's services further upstream and ensuring that need, rather than systems, are the key drivers for policy and operation are key to giving children and young people the very best start possible. Tapping into work being delivered locally by Cormack Russell the partnership is looking at creative and ground breaking ways of reshaping the provision of children's services in the Borough. Community groups and families will be at the heart of future decision making.

Finding opportunity in the disaggregation of services

We would anticipate minimal disruption to frontline services through a well planned and executed transition phase and set up of the new Bay Council and North Cumbria Council. The county services for children's are already delivered on a locality footprint, with adult's services reflecting the practice of a pathways service design. We would not expect that initially to feel any different to the children and families and critically social workers in the front-line of the professional practice who already care and support our local communities.

This is an opportunity to rebalance skills and knowledge, deepen the connections between management and social workers and the children and families they support each and everyday. As a unitary council we have the opportunity to integrate all relevant services such as public health, leisure, wellbeing, housing and care. With a population of 320,000 in the Bay Council, whilst still relatively sizeable, a locality approach will work effectively, and a single DCS and a single DASS would be commensurate with many other local authorities across the country. Any bigger and with such a variation of need and support across the county leaves the decision making and strategy development much harder than if embedded into and working with our local communities, as is borne out through the improvement challenges being managed in the existing county set-up. We will focus on those on the edge of care, wrapping support and empowered communities around them.

What will be different

The Bay Council will have responsibility for Children and Adult Social Services as statutory authorities for these services. We recognise the importance of these services to our local communities and the opportunities this represents as a new unitary authority to integrate these services within the newly formed organisation and as part of a whole system integration with our key partners across the Bay area. We have set out the principles for developing these services when they become the responsibility of the newly created unitary authority.

Local case study: Love Barrow Families

Community organisation delivering wrap around care for families and working up ways that social care can be delivered through identifying real need. Illustrates that social care can be transformed, more effective at early intervention and cheaper on the holistic public purse.

As corporate parents we care for all children as if they were our own

Why it matters

'It takes a village to raise a child' - this beautifully captures how an entire community of people must interact with children for them to experience and grow up in a safe and healthy environment. It encapsulates the interconnectedness of our society, across the generations and across all aspects of our lives and encapsulates our vision for children's services.

Extensive research from Ofsted, the DfE and others has shown that the determinants for success for children are economic, housing, health and education. Therefore the Bay model for our social care system will enable a multi-agency and multi-disciplinary approach, in order to keep all our children safe in our communities.

The most recent Ofsted inspections across Cumbria and Lancashire assessed county services as 'Requires Improvement'. Progress has been acknowledged, the relationships with other partners and the health system, along with 2018 and 2019 Ofsted reports were called out as areas where performance could be better. The recommendations have since been developed into an Improvement Plan, which is now included in the Children Looked After Strategy.

The Bay Council provides the opportunity to create a children's service which can support the challenges faced by our children and families in our local communities. Our proposed model has at its heart the idea that meaningful relationships with families are key enablers of good social work practice and that social workers should be given the responsibility and decision-making power they need to support families.

The Bay Council provides the opportunity to effectively create a whole system which is significant in size to impact change and locally connected to be meaningful to our children, communities and their needs.

What will be different

Based on research from NLGN and our desire to work with our local communities we would build a children's service based on a shift of practice to prevention. Our focus for children's services (*Ref: A Blueprint for Children's Social Care Unlocking the potential of social work*) for the communities within the Bay would prioritise relationships over bureaucracy. This new opportunity paves the way for change for the children's social care system, acknowledging the importance, complexity and inherently risky nature of the work:-

- Increase in the face-to-face time social workers spend with children and families due to reductions in travel time and administrative burdens;

- Reduce the average caseloads due to increased numbers of practising social workers in the Bay Council through a fresh approach to attract social workers;
- Better continuity of the child and social worker relationship, enabling more timely support and improved interventions;
- More empowered social workers who can provide the right support to families when they need it; and
- Improved quality assurance driven by an increase in the time allocated to team meetings and group supervision of decision making.

How we will deliver

In the longer term, our proposed model can help to address low morale and staff retention in the profession, particularly as we currently have shortages across Cumbria. This will in turn create positively reinforcing effects for individual social workers and the profession in general.

Towards a culture of partnership working - as councils and the community increasingly collaborate to improve their children's services, the dynamic of their relationship, which is often characterised by a lack of trust, will need to be altered, with more decision making power transferred, and a culture of participation becoming a natural part of the community's everyday life.

One significant step to develop a culture of partnership working is to encourage community commissioning. Insights from the Big Local show that the community often already have a fine-grained understanding of local needs and they are keen to build their capability through their commissioned services.

Community-led commissioning has been shown to increase community cohesion and wellbeing, which contributes to prevention and reduce demand on other services. Our work on Love Barrow Families is a good current example of this.

Encouraging community ownership and resourcefulness - giving the community a greater sense of ownership of local assets such as children's centres or community hubs encourages the community to be inventive and resourceful, turning the culture of scarcity into one of abundance.

Supporting early intervention and prevention through meaningful engagement - early intervention is contingent on the early identification of need, which is facilitated through establishing trusting relationships. Yet the importance of relationships is often side-lined for the sake of efficiency. To build trust, relationships need to be nurtured through a long-term approach to family support that focuses on prevention.

Targeted reform of Adults' services so our residents can live longer and healthier lives in their homes and within their communities

Why it matters

The Bay area has a population with an increase in the % of older people (the proportion of people aged 65+ may increase by 2043) and a declining working age population as younger people leave, which adds to the pressure for good quality social care and suitable housing solutions to meet the growing elderly population needs of the Bay communities.

Our communities have a right to expect that their local public services work effectively together. Unfortunately, in recent years, it has been evident that some people experience services which are fragmented, where communication is poor and where they are left feeling that their needs and wishes are not heard or understood. To tackle these challenges, NHS, council and community organisations have begun to improve their partnership working in local areas – with some good early results. The Bay Health and Care Partnership (BHCP) is the local ICP. There is also a strong network of integrated care communities (ICCs) operating at PCN level developed through a vanguard programme.

This form of partnership will create a feeling of belonging to a place, where all partners are valued and respected, and mutual support is offered to all partners. This will be particularly significant in challenging times. It is important to acknowledge that residents are co-partners in the continued evolution of ICPs, and that social movements in communities can increase people's ownership of their own health and wellbeing and mobilise communities to support each other.

Our proposed model will facilitate change to focus on prevention, health, wellbeing and independence at all stages of life, through:

- Ensuring that wellbeing, social value and strengths-based approaches are part of all practice, policy and decision-making
- Ensuring that prevention and early intervention are prioritised
- Targeting resources based on need and place, maximising impact, and vfm
- Challenging and developing our culture and practice
- Working in partnership with a focus on system integration at all levels.

The aim of our approach will be to consolidate and extend strengths-based practice across social care and public health in the Bay. This is supported by skilled community workers and navigators who listen as well as support people with actional steps they can take to support their life and wellbeing.

Strengths-based practice can enhance health, wellbeing and resilience and reduce long term pressures on the health and care system, especially when the practice is co-produced with people who use Adults' services such as carers, providers and the community and voluntary sector.

What will be different

We will adopt similar principles and practice as described for our children's services, for example to increase face to face time, and increase numbers of empowered practising social workers. We will also take activity further upstream allowing early intervention and prevention that maintain independence for longer.

The Bay Council will be a key partner and provide energy, passion and leadership to aims and ambitions of our Integrated Care Partnership (ICP) for all of our local communities. We need to deliver a consistently high level of quality and access across the Bay, while ensuring that we provide care and support which recognises the diverse geography of the area and responds to different local needs.

We will create momentum for improved population health and care management by creating a strengths-based, integrated and local authority-led care model that can work effectively with our primary care network. This will help us deliver local services that meet local need in our communities in the most joined up, efficient and cost-effective way.

How we will deliver

We will bring about a step-change in outcomes and experiences in the Bay by delivering operational change priorities that focus on:

- Increasing continuity of care for adults
- Greater independence and wellbeing for older adults (living where they choose)
- Financial sustainability for council services and investing in new approaches
- Anticipating, planning for and managing demand reducing inequalities based on protected characteristics and where people live.
- Reducing demand on health services and investing in public health

Local case study: Egerton Court Hub

Originally set up as a response to drugs deaths in a group of flats in Barrow Island, the multi-agency outreach work developed into the provision of flats and is a key outreach in a deprived area. Working with police, local authorities and residents upstream to prevent longer term health conditions and reduced independence, this will provide the area with a community group and has tangibly improved the area in question.

Addressing the climate emergency through strategic investment in a new economy

Why it matters

The Bay area is becoming more vulnerable to the wider dangers of the climate emergency in the loss of our communities through flooding and sea ingress. With long stretches of coastline and high risk flood areas inland, this is a significant issue for our residents and businesses and already causes some disruption, which will only get worse if not addressed. The economic impact as well as environmental will be huge. The aspiration is to achieve a low/net zero carbon economy by 2030 to become carbon neutral, which is a concern that our communities wholeheartedly support.

All three councils have declared a climate emergency and developed policies and action plans to address this. This was evidence by the Lancaster district Climate Change People's Jury agreeing *'We are facing a climate emergency which makes us concerned and worried about the future.'*

We must accept that progressive change to fight the climate emergency will have financial implications. Our new business model will have a joined up approach to combat climate emergency through the empowerment of the critical mass and green productivity in the Bay area.

The Bay area has the opportunity to create an authority that is geographically more focused on tackling the climate emergency and leading on environmental challenges for generations to come. We have an opportunity to promote a sustainable and greener tourism industry whilst expanding on the growing demand for eco and sustainable tourism to deliver our commitments to the climate emergency agenda and create jobs. The Towns Fund will help support future projects involving improvements to parks and local transport from new cycle lanes and better pedestrian access and repurposing community spaces.

What will be different

A collaborative and integrated approach to the climate emergency in the Bay area is essential. We will help to deliver key services to the communities most disadvantaged and vulnerable to changes in our climate.

Strategic planning will identify positive impacts we can take against the priorities:

- Local Flood Risk Management
- Coastal Erosion
- Damage to vital infrastructure
- Renewable Energy
- Home Energy
- Sustainable Travel and Tourism

How it will work

To become "carbon neutral" and mitigate likely impact of the climate emergency:

- The Bay will have the economic assets and appetite to capitalise in developing natural environmental and biodiverse resource. We will build world class knowledge and expertise with our universities and key industries
- We will tap into collective community power, we will plan and build housing that is empathetic to the local environment
- A joined up approach will put the Bay on the map in tackling the climate emergency with more critical mass and therefore a greater impact in developing local solutions
- The Bay will create a commercial model that will allow us to increase financial sustainability and support quality services, such as green transport.
- In addition, this will open opportunities to invest strategically in green solutions relating to land, property, energy and local live/work solutions and to make the Gov One Public Estate programme to rationalise estate and assets and free up land for housing, community and other use
- Boost workforce through training and development in areas such as cycling and walking in alignment with work-life balance and agile working to promote co-location, employing locally, employment care leavers in vital roles as part of corporate parent role.

Local case study: Coastal defence

Funded by £10.8m central government grant-in-aid funding, the wave reflection wall defence will reduce flood risk to 11,400 homes and has a design life of 100 years, taking into consideration climate change and sea level rise. Led by Lancaster City Council in partnership with the Environment Agency, the wall consists of 4km of reinforced concrete defences to protect against a major flood event. Sympathetically designed to fit in with the local environment, the wall also includes a nod to late local legend Eric Morecambe - with the shape of his glasses engraved in an end section. In addition to protecting 11,400 residential properties, it will also:

- reduce flooding risk to 2,246 commercial properties;
- reduce flooding risk to major highway and promenade infrastructure;
- safeguard the local economy.

Playing to our strengths and aligning to the ten point plan for a Green Industrial Revolution

Government's Ten Point Plan for a Green Industrial Revolution	Opportunities and strengths that currently exist across the Bay area
Homes and public buildings	Identifying or adopting new innovations creating a step change towards a low-carbon economy: <ul style="list-style-type: none"> • Replacing existing lamps with LEDs to make significant savings on a buildings' electricity usage • Building fabric with low insulation values that produces more heat to meet building comfort levels
Offshore wind	There are over 100 offshore wind turbines visible from the AONB, seen to the far west of Morecambe Bay. This will open new opportunities to improve wind and offshore further in areas such as the Lake District National Park, Yorkshire Dales National Park, Arnside and Silverdale, North Pennines and Solway Coast, with the government's process for designating new national parks and AONB schemes, early next year.
Electric vehicles	The Bay area have been actively involved in reducing carbon emission through the Cumbria Climate Change Working Group (CCWG). The council has invested in a fleet of electric pool cars and charging points to reduce the CO2 emissions in the area. There are opportunities to expand existing initiatives such as the Charge My Street scheme, whilst continuing the behaviour changes outlined in the Cumbria Transport Plan Strategy 2011-2026, encourages the use of electric vehicles.
Nuclear	The Local Enterprise Partnership (LEP) in the Bay area has identified six priorities, reflecting the LIS and Green Grand Energy Challenge, with potential of Green growth, nuclear development. Barrow port acts as the UK's west coast hub for oil and gas and the offshore It is also a gateway to Sellafield Location of Furness College and its Advanced Manufacturing Facility has the potential to support future R&D initiatives and to improve economic growth in the Bay area.
Carbon capture	Investing in the local economy provides business to local companies and creates new jobs, resulting in new and existing local infrastructure and better supply chain management.
Hydrogen	The Lakes Line in Cumbria will be the first in the country to benefit from new research development in partnership with North West Hydrogen Alliance.
Jet Zero and greener maritime	There is an opportunity for the Bay to develop a Sustainable Aviation Strategy unique to the Bay area, using past knowledge and experience in delivering low carbon emissions in the area and to invest in future airports and seaports in changing behaviours in future proofing the aerospace industry.
Public transport, cycling and walking	Technology designed to decarbonise the UK's railways using hydrogen and oxygen to produce steam, combined with a compelling case for future inward investment and enhancement along the A590 to improve development opportunities around the Bay area for housing and business employment using greener transport.
Nature	There are opportunities to develop existing AONB plans team to improve the desired outcomes for the Bay area, which offers a wealth of visitor attractions and wildlife sites. The level of investment and uptake of Agri-environment schemes will help to improve the natural landscape and biodiversity value in generating new jobs in nature and land management.
Innovation and finance	The CLEP's strategy will need to consider the short, medium and long term finance and budgets to invest in green technologies and net zero initiatives for the Bay area. For example encouraging testbeds and innovative programmes and identifying opportunities for innovation in 'clean growth' that meets the local needs for the Bay area.

The Bay is best placed to invest in its greener and sustainable tourism industry

Why it matters

Tourism plays a key role in the economy of the Bay area, employing around 25,000, with most of those based in South Lakeland. A significant part of South Lakeland is covered by the Lake District National Park and Yorkshire Dales National Park. COVID has elevated the UK staycation and the Lake District has seen one of the busiest summers in recent history. The growing demand for eco and sustainable tourism and outdoor leisure activities e.g. camping, walking, hiking, cycling, boat trips etc has increased the use for facilities around the Bay..

The Bay's branding is already well recognised by the public. With demands for parks and open space likely to continue to stay due to COVID and also climate emergency, we must act now to make sure this industry aligns to our priorities.

A lack of investment in social and leisure infrastructure means the Bay area needs a stronger offer for attracting and retaining tourists.

There is relatively little out-commuting from the Bay area - 96.1% of the working population remain in the area for their employment. The area is also a net in-commuting location with the area drawing in almost 1,500 additional people per day to work in the area. There is an opportunity is to unlock the considerable constrained access through the delivery of new and enhanced transport and infrastructure in the Bay area to make it the Bay Eden-ready. This will ensure the Bay area benefits from better connectivity with extended cycle way to promote new attractions and walking routes to test new visitor experiences.

The local funding, led by Lancashire LEP will have the opportunity with a large scale footprint to attract future workforce in green initiatives across the Bay area.

What will be different

The Bay area has the opportunity to design and invest in our towns and infrastructure in a way that encourages tourists to make better health and wellbeing choices. There are likely to be a number of social, health and environmental benefits as a result of tourism. To attract inward investment and innovation towards a more cleaner and greener Bay area we will focus on:

- Developing Morecambe Bay's potential as a visitor destination for its natural environment and heritage, with a focus on encouraging opportunities for visitors to stay all year round, not just in the summer
- Protecting and enhancing the Bay's green and blue spaces, ensuring that everyone in the county has good access to a high quality natural environment
- Improving air quality in the Bay through action on transport, industrial, agricultural and domestic emissions such as the Bay wide cycleway

- Working closely with the National Park Authorities to support carbon reduction, better environmental management and greener transport choices
- Reducing the amount of waste produced in the Bay through reduced material use, promoting greater product re-use, and improving recycling rates
- Embedding the Transport Authority into the Bay operating model will bring in fresh thinking in the Bay area and be an enabler for new circular opportunities
- Strengthening local supply chain relating to tourism to encourage economic growth that specialises in consumer services, reflecting the entrepreneurial spirit and independence of the local community.

How it will work

We believe the Bay is both unique, in terms of the existing industries, renewable technologies and educational institutions and a natural partner, in terms of our landscape, for the Government to pilot national options and opportunities to inform, test and lead the Green Industrial Revolution on behalf of the UK.

We will progress the Eden Project North and similar schemes. Investment and co-creation of job opportunities with our anchor institutions will help to conserve natural landscape and promote biodiversity whilst also promote tourism. This will include applying for funding from the £40m Green Recovery Challenge Fund recently announced in Government's 10-point green recovery plan.

Local case study: Eden Project

The Eden Project has submitted a business case for £70m Government funding to help make Eden Project North in Morecambe a reality. This will be a major new exemplar attraction in the Bay that seeks to reimagine the British seaside resort for the 21st century. Planned as a year-round destination to combine indoor and outdoor experiences, connecting people with the internationally-significant natural environment of Morecambe Bay while enhancing wellbeing.

Eden Project North is a key driver of the UK's post-Covid green recovery and shows it is a "shovel-ready" project which would deliver significant economic, environmental and social benefits for the Bay and wider North West region, as well as contributing to the wider levelling-up agenda and the Government's 25-year Environment Plan. Eden Project North is projected to attract around 1m visitors a year and directly employ 400+ people. The business case estimates a visitor spend of more than £200m pa in the region (not including money spent at Eden Project North) which would support an additional 1,500 jobs.

Building community wealth is central to our ambitions and our culture

Why it matters

We will prioritise Community Wealth Building as a fundamental way of serving and improving our communities. It's people-centred approach to local economic development will drive our values, behaviours and principles to support the community wealth agenda across the Bay area.

The Bay is best placed to be the anchor and agent of change to realise the potential of community wealth. We are already collaborating to exercise strong, confident interventions, as shown by our recent ability to secure funds in our request to Government in our Resilience and Prosperity Strategy.

In the aftermath of the effects of COVID-19 community wealth building will play a pivotal role in generating sustainable local businesses and good local jobs. We want to capitalise on the positive emergence of a strong social capital and community capacity, as well as help to build much needed economic resilience.

We are already using the principles but in small pockets, by working together we can continue to build on our potential to create wealth. There is also disparity in local wealth in certain parts of the Bay, resulting in income deprivation and where a large proportion of the local economy is driven by low wage and tourism.

We will draw on best practice and lessons from around the UK and abroad. In particular we will use the five the pillars of the community wealth building approach, as set out in the recent paper 'Own the Future,' from the Centre for Local Economic Strategies (CLES) (see diagram).

What will be different

Putting community wealth building at the heart of our culture, we will agree a 'Bay Model' using the best practice of CLES's five pillars.

Anchor organisations: We will utilise our strong relationships with our anchor institutions, such as higher education institutions, other public sector organisations and tier 1 manufacturers, to maximise their spend in the Bay area. This will involve:

1. Co-designing a statement of intent for institutions to sign up to, committing them to following the building community wealth approach
2. Co-developing activities bespoke to each anchor institution to unlock economic and social value.

Putting community wealth building at the heart of our culture, we will agree a 'Bay Model' using the best practice of CLES's five pillars.

We will lead the way as one of the largest public sector employers in the area. For example commissioning public contracts using social licensing so that local and environmental priorities are met.

Another key anchor organisation will be the NHS. BHCP have signed up to an Anchor Charter. We will work with their Head of Economic Partnerships to review opportunities to unlock wealth in their suppliers and establish other partnership working opportunities.

Strengthening our local supply chains: Working closely with industry we will:

- Conduct market intelligence to understand how much suppliers spend on local firms and where there are opportunities for our local suppliers to grow
- Tailor industry specific support schemes to foster the growth of local suppliers and generate healthy market competition.



Figure 4.x Five pillars of community wealth building

Building community wealth is central to our ambitions and our culture (continued)

How we will deliver

We will deliver this exciting, future focused and socially responsible culture and approach, building on our successes to date, being insight led, and ensuring our staff and wider workforce understand, buy in and advocate this approach in all that they do. As a unitary we can effectively unlock wealth to grow of our local economy and create sustainable jobs. Measures of these outcomes will include:

- Greater procurement spend retained within The Bay, our neighbouring counties and within the wider Northern Powerhouse
- Improved labour market indicators such as the a lower unemployment rate and claimant count
- Improvements in social mobility indicators such as the Social Mobility Commission index.

Local case study: My MainwayHub

My MainwayHub set up on a Housing estate providing access to housing teams in a non -traditional public building setting, in their community. Working with Beyond Imagination around community engagement with residents of a whole housing estate (Mainway) the MyMainway project has been about gathering views about the future of the estate and been undertaken in the challenging Covid environment.

Beyond Imagination working with Lancaster University on creative engagement, participative and collaborative design and multi-disciplinary action research. Projects include creative engagement with our residents around the Mainway housing development; developing a 3D 'digital twin' for our whole district using geospatial, public realm and planning data; exploring resident and landlord behaviour to enable energy efficiency improvement across our district.

Local case study: New Constellation

Barrow's New Constellation is an experiential journey to explore what the Barrow area could become if it fully reflected the potential of its incredible residents. A search has been launched to find a group of up to 15 people, representing all walks of life across Barrow and its communities, to be part of this exciting adventure. Participants will be given the space and tools to co-create a new vision for Barrow's future, inspired by cutting-edge community projects and innovation already happening in the area, as well as elsewhere. The powerful project will create a place that offers the group safety and courage to dream and to give expression to the deeper voice within us all that too rarely influences the plans that shape our lives. The aim is to hear the experiences and hopes from the group members, then collectively they will map a new story for the Barrow borough. The outcomes will be shared so that they can help inform the strategy processes for the area. The journey will be led by creative incubator The New Constellation, working in close collaboration with Barrow Borough Council and local community groups, as well as acclaimed innovators Hilary Cottam, author of 'Radical Help', and Rob Hopkins, author of 'From What Is to What If'. The vision will be articulated through the creative content made alongside local artists and shared with the community. It is intended that this collaborative community project will evolve to provide a context and guiding principles that can assist Barrow borough for the future and the important decisions ahead.

The process, designed to work around Covid-19 restrictions and provide a hopeful, future-focused moment in what is expected to be a challenging winter, is supported by The National Lottery's Emerging Futures Fund. Hosted remotely, it will combine group and one-to-one conversations, audio recordings, individual work and reflective exercises, creative workshops and tasks, and a few surprises.

Prosperity through productivity – a growing and productive Bay economy

Why it matters

Together with our shared understanding of our priorities and challenges we will better support the Bay area to close the productivity gap. Growing the productivity of the Bay economy can make a huge impact on the prosperity of its residents and support the wider performance of the Northern Powerhouse.

We are a key driving force in the national economy due to our industrial and commercial strengths, our platform for innovation, nationally significant infrastructure assets and our unique cultural and lifestyle offering.

Currently we work longer hours for less reward which makes it harder for our residents to have a work life balance. The productivity puzzle has become even more acute as a result of COVID through business uncertainty, falling investment and social distancing restrictions. We want to unlock our productivity potential to stimulate our economic recovery and improve the quality of life of our residents. The 2019 LEP Outlook Report measures productivity using GVA per hour worked. Against the national average of £35 in 2018 Cumbria earned £30.2 and Lancashire £31.3, or 14% and 11% less than the average respectively.

Local case study: The Bay Prosperity & Resilience Strategy

The Bay Prosperity and Resilience Strategy has been jointly developed by an economic partnership between Barrow Borough Council, Lancaster City Council and South Lakeland District Council. The partnership is seeking government funding over the next 2 years to jointly develop plans and projects to further unlock the Bay's economic potential. These plans would provide the evidence for a significant bid to Government, which could provide millions of pounds of investment in crucial schemes that deliver economic growth.

The strategy describes the council's eight economic collaboration themes:

- Renewables and clean growth
- Building on the area's arts and cultural offer
- Delivering new roles for ports at Barrow and Heysham
- Retaining and attracting the best talent and diversity
- Supporting high-efficiency 'food-agri' innovation
- Enhancing digital connectivity
- Growing healthy communities
- Building resilient town centres

What will be different

In the Bay Prosperity and Resilience Strategy submitted to Government in September, we laid out our strategy for our economic partnership including our response to helping business with the immediate and longer-term impact of COVID-19. This included our eight themes of economic collaboration which all represent areas where collaboration will deliver bigger, better and more effective solutions and boost productivity.

With the greater scale and voice as a single Bay Council to work with industry we have the potential to release productivity through:

- Working with the LEP to foster the growth of high-technology industries, through start-up businesses and through university-business interaction
- Providing a forum for businesses to have a voice, seek support and collaborate on issues of mutual interest
- Supporting our world class leading sectors to invest in learning and development spend and invest in their people
- Promoting fairer employment practices and quality of life such as the national living wage.

We would lead the way by delivering activities to close our own productivity gap, including supporting front line workers. A priority area would be seeking to offer the living wage for all our staff and asking our partner organisations to follow.

How we will deliver

As a unitary we will:

- Improve the quality of life of our residents by helping them to work smarter rather than harder.
- Close the £5m productivity gap to become 10% more productive leading to an increased economic output of £868m*. This unlocked economic potential would multiply outwards to benefit our neighbouring councils and the Northern Powerhouse. If fully utilised our productivity potential could turn our authority into a net contributor to Exchequer.
- Improve health and wellbeing for our residents by having a better work life balance. A healthier workforce as a positive economic driver will also generate further improvements in productivity.

This ambition provides a platform for further devolution, with an opportunity for the Bay and wider North West footprint to accelerate recovery and growth, including consideration of this being through a Mayoral Combined Authority.

* 10% of £8676m GDP for the 3 Bay authorities at current market prices, ONS

Raising life-long aspirations by developing education & qualifications and a community of talent

Why it matters

The task of implementing initiatives to improve life-long learning and enhance individual development and employability represents an essential opportunity.

We want the Bay to be a successful lifestyle location of choice for large volumes of talented individuals and their families. But currently the Bay faces a number of challenges including:

- A declining workforce
- Low attainment and aspiration
- Key skills shortages including digital skills and key job shortages such as creative industries

The current structure doesn't enable conversations between different organisations and the private sector, including our anchor institutions. This has led to an unequal approach and cut off the routes for some of our residents.

There are joint project opportunities that will contribute to the prosperity through productivity, such as the Morecambe Bay curriculum work being pioneered by Eden Project North in partnership with Lancaster University, University of Cumbria, and the FE colleges around the Bay, agreed with Ofsted. This is a step change in a rounded curriculum offer that is centred on Place and reconnecting our children and young people with their natural surrounding, history and community, creating diverse education and career opportunities.

Local case study: South Lakeland Masterplan for Industrial Site

A local working group aligned with the LIS to drive economic regeneration represented by GSK Ulverston, South Lakeland District Council (SLDC), Cumbria LEP, Cumbria County Council and Ulverston Town Council, under the chairmanship of MP Simon Fell is developing the vision for an area of land in Ulverston donated by GSK in 2018 to support the creation of jobs and growth in the local economy. Local MP for Barrow and Furness Simon Fell said: "This is a hugely important step to seizing the opportunity that this site offers. We have the chance to build a lasting legacy for Ulverston and the surrounding area with a focus on life-science and renewable energy jobs." The Task Force's vision for the land is for it to be a nationally significant advanced manufacturing-based business location, which draws on Ulverston and Morecambe Bay's established strengths in world-class life sciences.

However, to date the response across Cumbria to promoting education pathways has been largely reactive. Individually we lack the scale to create and deliver a cross sectoral vision. We need a strategy to support local people and retain the talent that currently leaves the Bay.

What will be different

Together we can lead on the reform agenda for education by creating a forum for collaboration on a new long-term strategy. This community of talent made up of educational institutions, local authorities, Cumbria and Lancashire LEPs will drive the strategy forward, as well as creating opportunities for new forms of collaboration and identification of synergies.

Activities within our strategy would include:

- Greater coordination in driving skills development that fits and supports the potential of high-value growth industries
- Greater collaboration with our HEIs, such as Lancaster University, a top ten UK institution, benefiting from their strong international links.
- Working with education institutions to address specific skills shortages in advance, such as engineering (electrical, nuclear, civil, marine etc)
- Supporting our institutions to prepare our people for the jobs and opportunities in tomorrow's industries, with a focus on digital skills
- Link our long-term strategy with our Prosperity and Resilience Strategy so that our attractive economic area retains our best talent.

How we will deliver

- Be the catalyst to drive a whole system long-term strategy and approach to skills and learning
- Offer an exciting and innovation range of education and training opportunities to our residents
- See improved educational attainment across agreed groups for all forms of education
- Support the growth of new sectors as a result of a more diverse range of skills and wider talent pool, furthering our innovation and productivity potential
- Empowering communities and delivering broader outcomes, not just focus on formal qualifications
- See skills shortages, vacancy rates and unemployment fall, leading to a fall in the area's benefits bill.

Improved digital and physical connectivity will enable long term economic growth and resilience and improve social wellbeing

Why it matters

There is a need to improve both digital and physical connectivity for people, communities and businesses alike as important enablers to economic prosperity and thriving communities. Good digital connectivity is now a pre-requisite for long-term economic growth and resilience. It is also an increasingly important contributor to social wellbeing, allowing people access to services, resources and social connection. Poor digital connectivity is a major concern, particularly in Cumbria. The rural and remote nature of many of our communities means people and businesses are operating in the context of a digital deficit when compared to other parts of the UK.

Only 93.8% of Cumbria has Superfast broadband (≥ 30 Mbps) compared to 97% on average for the rest of England. In addition Cumbria's mean download and upload speed is currently 33Mbps and 8.7Mbps respectively. This is again below average as the national mean is 46.8Mbps and 9.6Mbps respectively.

The UK Broadband impact study projected a £20 net economic impact for every £1 of public investment. The Centre for Economics highlighted that disconnected individuals are likely to experience between a 3%-10% decrease in earnings benefits. Moreover, those who are digitally connected are able to communicate with family and the community 14% more frequently.

Similarly, physical connectivity is varied and in places poor – it's needed to allow people to reach economic areas in reasonable time and to connect socially.

Like many rural places, parts of our communities face limitations on physical connectivity due to the condition of local roads; reliance on A-roads and minor roads in some areas; limited access to public transport in some villages and towns (especially on weekends) and a lack of integration between different modes of transport.

These physical and digital issues create challenges for providing financially sustainable and effective public services and is a barrier to attracting people to live and businesses to locate here. We need to create greater digital inclusion through both skills and access for all our residents so they can better access services and participate in their communities. It also exacerbates social isolation and associated problems for those in more remote areas, reducing quality of life.

What will be different

Our ambition is to bridge the current digital divide with other areas of the country, delivering enhanced digital infrastructure, as well as supporting the development of digital skills for all of our population. This will involve:

- The further roll out of Superfast/Ultrafast broadband, meeting and then exceeding Government targets (e.g. of Gigabit broadband by 2025)
- Bringing forward a strategy to join up the public estate to enable a Full Fibre grid and greater public Wi-Fi capability;
- To develop a strategy to improve mobile coverage extending 4G coverage (working with the shared rural network initiative) and open a dialogue with government to develop 5G pilots/testbeds as these start to become more mainstream, building on rural pilot programmes in areas like Dorset.
- Looking at how we support alternative models of increasing connectivity in rural areas, for example Broadband for the Rural North (B4RN), enabling greater levels of inclusive online service provision
- Building on exemplars from the Digital Skills Partnership for our region and maximising the impact of the National Retraining Programme.

In terms of physical connectivity, we will be delivering a strong transport strategy and investment plan to support existing and future development, linking this with The Bay's green and visitor economies, supporting active lifestyles and improve public health outcomes. Examples would include increasing the quality of cycle paths and facilities in towns and our key transport transition points (e.g. road to rail). We also plan to look at innovative ways of revitalising public transport availability in those areas that are currently less well-served (e.g. transport as a service Apps), which will empower the Bay to focus on our priorities together.

How we will deliver

Working closely with our neighbouring authorities we can take advantage of the opportunity that devolution could offer in terms of new powers and funding, for example around strategic transport planning. Creating a Combined Authority that could operate across the two new unitaries and with key public and private sector providers, we will explore a coordinated transport strategy, amongst other opportunities, to maximise the impact of infrastructure investment in our region, ensuring it is better aligned between public and private sectors.

Local case study: B4RN

Launched in 2011 by a local volunteer group, B4RN's affordable community-focused model is regularly used as a leading national exemplar of what is possible in terms of gigabit fibre and an empowered rural community. 7,000+ homes have been connected with £7m+ invested by local communities.

4.4 Finance and affordability

This proposal present realistic and deliverable savings that will create a resilient and sustainable council.

Financial summary

Previous sections have outlined how the Bay Council will deliver a resilient and sustainable system of unitary local government for the Bay. This financial impact of changes have been developed based on indicative modelling as part of this proposal. This indicates that the Bay is expected to deliver a net benefit of £35m over the next 5 years.

The figures quoted in the Financial Case differ from those in the Economic Case because they include inflation. Figures in the Economic Case are presented at current prices (excluding inflation). Those including inflation should be used for the purposes of informing affordability and funding.

Note that VAT is also typically included in the Financial Case, but is not included here as it is assumed that Councils can recover VAT.

In line with HM Treasury guidance, only cashable benefits should be shown in the Financial Case. Indirect benefits, in this case, can be considered cashable, however, they are not achieved as a direct impact of the structural change being proposed in this case. For completeness, total overall direct and indirect benefits are shown in this section, with a sensitivity showing the overall financial position if indirect benefits are not achieved.

It should be noted that all individual opportunity areas are subject to more detailed analysis in individual business cases to inform decisions by the implementation executive. This should include consideration of any pension issues, impact on budgets of each organisation and any changes to shared staff roles.

Summary table

5 Year Benefit Value (£m)	FY21/22	FY22/23	FY23/24	FY24/25	FY25/26
	Year 1	Year 2	Year 3	Year 4	Year 5
	(£m)	(£m)	(£m)	(£m)	(£m)
£35m	(12.0)	(10.0)	16.7	17.5	22.7

Notes: Difference in total due to rounding

Refining and updating our business case

Additional analysis around the financial case will be conducted when the Secretary of State has agrees to our proposal.

This would include:

1. Updates in light of government announcements on future funding for local government
2. Updates in light of expected policy announcements, particularly in relation to devolution and recovery
3. Incorporation of additional detail and analysis of reform options based on feedback
4. Attribution of project costs to participating authorities (capital and revenue)
5. Analysis of further likely sources of funding
6. Analysis of the impact on participating authorities' income and expenditure accounts and balance sheet, duly confirmed by an external auditor
7. Overall affordability and funding arrangements, including (written) confirmation from the organisation's Members and other key stakeholders and any contingency arrangements for overspends
8. Assessment of council tax harmonisation
9. Assessment of policing and fire and rescue service costs once arrangements are agreed.

4.4 Finance and affordability

The Bay Council represents an affordable transition with costs of transition modelled on recent experience and a conservative approach

Affordability summary

This table sets out the estimation of implementation costs for developing and managing a two-year transition programme.

The assessment of costs has been built bottom up from an assessment of similar experience, recent reorganisation business cases and actuals and scaled to the Bay context.

The assessment includes additional areas reflecting the Bay area commitment to engagement and partnership working. An allowance has been made for co-production and development to built in community and partner involved in the design and development of the council.

Given the uncertainties at this stage of the proposal, and in line with general conservative approach taken in this submission, a significant contingency has been built into the assessment.

Sub-Category	5 Year Costs (£m)	Year 1 (£m)	Year 2 (£m)	Year 3 (£m)	Year 4 (£m)	Year 5 (£m)
Programme Team, Org Design and Change Programme	5.48	2.74	2.74	-	-	-
Accommodation	-	-	-	-	-	-
Audit / Finance one-off support	0.41	0.41	-	-	-	-
HR one-off support	0.41	0.10	0.31	-	-	-
Skills / learning costs	0.82	0.41	0.41	-	-	-
Legal one-off support	0.77	0.57	0.19	-	-	-
Other specialist advice	0.20	0.15	0.05	-	-	-
Consultation, communications and rebranding	0.38	0.19	0.19	-	-	-
Co-production	0.20	0.20	-	-	-	-
Contingency	2.47	1.20	1.27	-	-	-
Redundancy Costs	1.80	0.90	0.90	-	-	-
Total:	12.93	6.88	6.06	-	-	-

Notes: Difference in total due to rounding

4.4 Finance and affordability

The direct benefits and costs of reorganisation represent a deliverable and cautious approach we are confident can be realised

Direct costs and benefits

This table shows the costs and benefits from reorganisation that will come from the efficiencies of bringing together the existing three districts and respective parts of the two counties.

These benefit areas represent recognised areas of benefit targets from bringing organisations together and removing duplication or reducing operational demand.

There will be a reduction in leadership and management roles as a result of the consolidation, resulting in a recurring benefit.

There will be investment in transforming enabling support across the council, taking the opportunity of reorganisation to modernise support functions and systems. The initial costs of transformation are repaid over the period and reducing the running cost of the council.

There is a planned investment in new capabilities that will enhance the future council's ability to make evidence based decisions through use of advanced analytics and data.

There will be a significant opportunity for consolidating procurement of common and shared categories of spend between the predecessor councils.

There will also be savings in the operational asset requirements of the future council from consolidation of accommodation and ways of working to make optimum use of the portfolio.

There will be savings from reduced costs of elections and due to fewer members.

Type	Opportunity	5 Year Value (£m)	Year 1 (£m)	Year 2 (£m)	Year 3 (£m)	Year 4 (£m)	Year 5 (£m)
Direct Benefit	Leadership integration	4.9	0.0	1.2	1.2	1.2	1.2
Direct Cost	Leadership integration	(0.1)	(0.1)	(0.0)	(0.0)	(0.0)	(0.0)
Direct Benefit	Transformed enabling support	11.9	0.0	0.0	3.9	4.0	4.0
Direct Cost	Transformed enabling support	(14.6)	0.0	(2.7)	(5.3)	(5.3)	(1.3)
Direct Cost	Investment in enabling support	0.6	0.0	0.0	0.2	0.2	0.2
Direct Benefit	Joined up commissioning & procurement	18.3	0.0	0.0	6.0	6.1	6.2
Direct Benefit	Governance change	0.3	0.0	0.0	0.1	0.1	0.1
Direct Benefit	Asset strategy & portfolio management	13.5	0.0	0.0	4.4	4.5	4.6
Direct Benefits & Costs Total		33.5	(0.1)	(1.4)	10.1	10.4	14.6

Notes: Difference in total due to rounding

4.4 Finance and affordability

Combining reform and reorganisation we will make interventions that create recurring and sustainable system benefits

Indirect costs and benefits

This section outlines the in-direct benefits that are possible through linking our reorganisation to a reform and recovery approach that delivers on our priorities.

There are significant opportunities for the creation of a new unitary authority in the Bay area to provide strategic leadership in driving system wide benefits.

For each of these areas we have included a high-level assessment of the net benefit potential as a result of interventions we could make.

We have included assessment of the costs of those interventions and based the potential returns on available evidence and examples to validate the assessment. These thematic intervention areas will be further developed and refined as part of the implementation process, combining our reorganisation and reform planning in an integrated programme of change.

In making our assessment we have been conservative in the potential returns. We have included a further sensitivity test to consider the potential stretch benefits and additional return that might be possible.

These benefit areas result in significant, sustainable and recurring benefits that will be enhanced by a Bay Council providing the leadership and stimulus.

Type	Reform priority theme	5 Year Value (£m)	Year 1 (£m)	Year 2 (£m)	Year 3 (£m)	Year 4 (£m)	Year 5 (£m)
Indirect Benefit	Adult Social Care	3.5	0.0	0.0	-1.1	-1.2	-1.2
	Children's services	-1.9	0.0	0.0	-0.6	-0.6	-0.6
Indirect benefit	Community Power	-3.8	0.0	0.0	-1.2	-1.3	-1.3
Indirect benefit	Community Wealth	-3.8	0.0	0.0	-1.2	-1.3	-1.3
Indirect benefit	Climate Emergency Commercial Strategy	-7.5	0.0	0.0	-2.5	-2.5	-2.6
Indirect cost	Community development	(2.6)	0.0	(0.6)	(0.6)	(0.6)	(0.6)
Indirect cost	Reform investment	(6.6)	(5.0)	(1.7)	0.0	0.0	0.0
Indirect Benefits & Costs Total		11.2	(5.0)	(2.3)	6.0	6.2	6.3

Notes: Difference in total due to rounding

Council tax harmonisation

Council tax rates will need to be harmonised and a subject of further analysis and agreement pending a decision

In order to model council tax harmonisation for the unitary authorities we assume that the lowest district rate will be increased at the maximum allowed (1.99% or £5 which ever is greater) with highest rates held constant and then reduced to harmonise within five years.

Band D equivalents can be taken from the MHCLG Calculation of Council Tax Base data (October 2020). Council tax rates will be taken from the MHCLG data. 2021/22 would be the base year.

The aim will be to minimise 'foregone council tax' and create an equitable rate for all reflecting the new unitary.

This will also need to consider the precepts relating to the counties precept including the adult social care precept (Lancashire at £1,400 and Cumbria at £1,441 in 2020/21), police authorities (Lancashire at £211 and Cumbria at £266) and fire and rescue authorities (Lancashire at £71 and Cumbria included in the county precept). Average band D parish totals in Lancaster are £0, £8 in Barrow and £39 in South Lakeland.

This will form part of the financial workstream to be explored in more detail as we progress to implementation.



Making it happen

This section explains how we will deliver the change.



5.1 Making it happen

How we will ensure that the benefits and opportunities for a new sustainable model for local government are achieved

In previous sections of this proposal we set out why the Bay is the best solution for a move to unitary local government. In this section we set out our considered and deliverable implementation approach to deliver reorganisation, reform and recovery within the Bay, building on the lessons learned from the South Lakeland District Council transformation programme, Customer Connect. The outcomes of the programme will help to further improve systems for residents, business and visitors to drive property for all.

Such large scale change requires a detailed implementation plan and approach, alongside an established change management approach. More details of how we will make this happen are describe in 3 steps below:

1 Immediately begin detailed planning and collaboration

We will immediately begin detailed preparation and collaboration activities to deliver the new Bay Council.

- Our joint work will continue to evolve after submission of this proposal and focus on the important prosperity and resilience agenda we are pursuing
- We will lay the foundations for mobilising an enhanced programme once the MHCLG decision is made.
- We will begin to establish our implementation programme and team to develop and deliver on reorganisation, reform and recovery
- We will add greater granularity and agree our detailed implementation plan.

2 Drive the change

We will establish best practice programme management tools and techniques to deliver change at scale and at pace.

- We will establish a Programme Management Office to oversee and co-ordinate the programme, adopting leading practices to realise the benefits that we have set out
- Our programme governance model will guide and steer our agenda, led by a Programme Board who will provide strategic direction against our reform priorities
- We will set up a rigorous approach to risk and issue management approach to ensure the right people are involved in managing issues early.

3 Release the change

We will deliver a programme of engagement working with both of the County Councils, our public sector partners, our communities and the wider public.

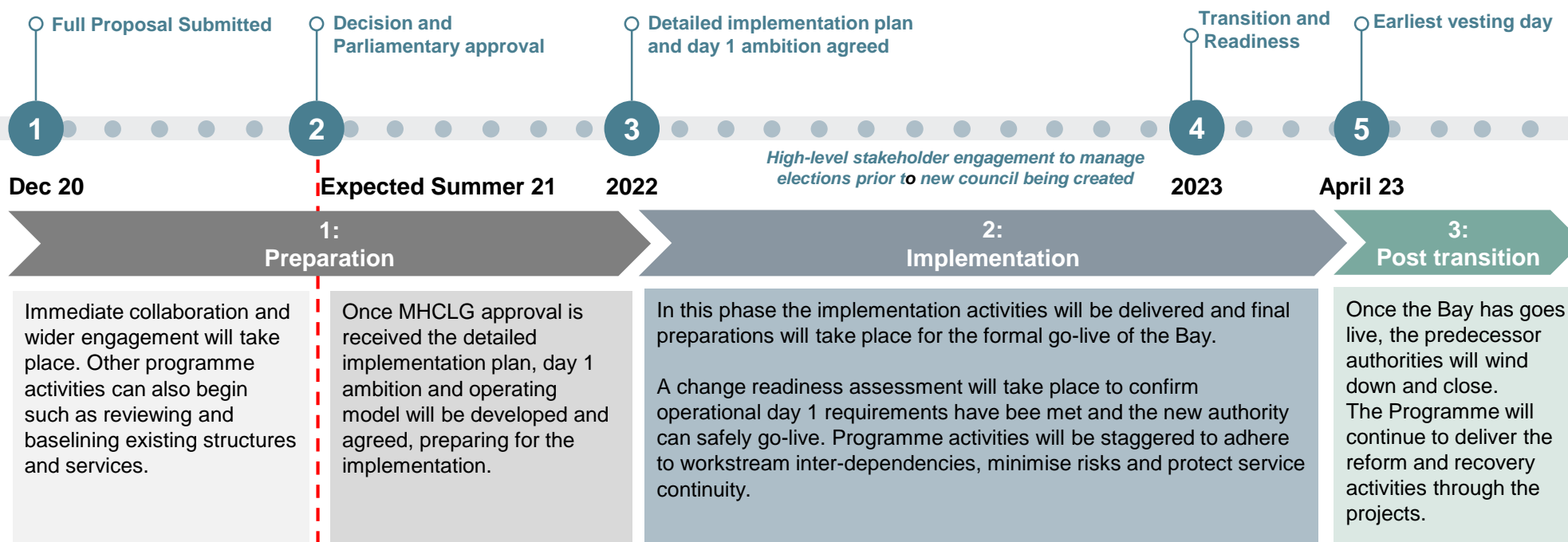
- Our leadership team will communicate our ambition to our people, partners and residents to create a feeling of shared ownership
- We will combine our stakeholders, both internal to the councils and involved in the wider system, to understand their needs and motivations and take them with us on this journey
- We will redefine the desired beliefs, behaviours and ways of working in the new council and represent a fresh start
- Shared priorities to achieve real change

5.2 Programme approach

How we will ensure that the benefits and opportunities for a new sustainable model for local government are achieved

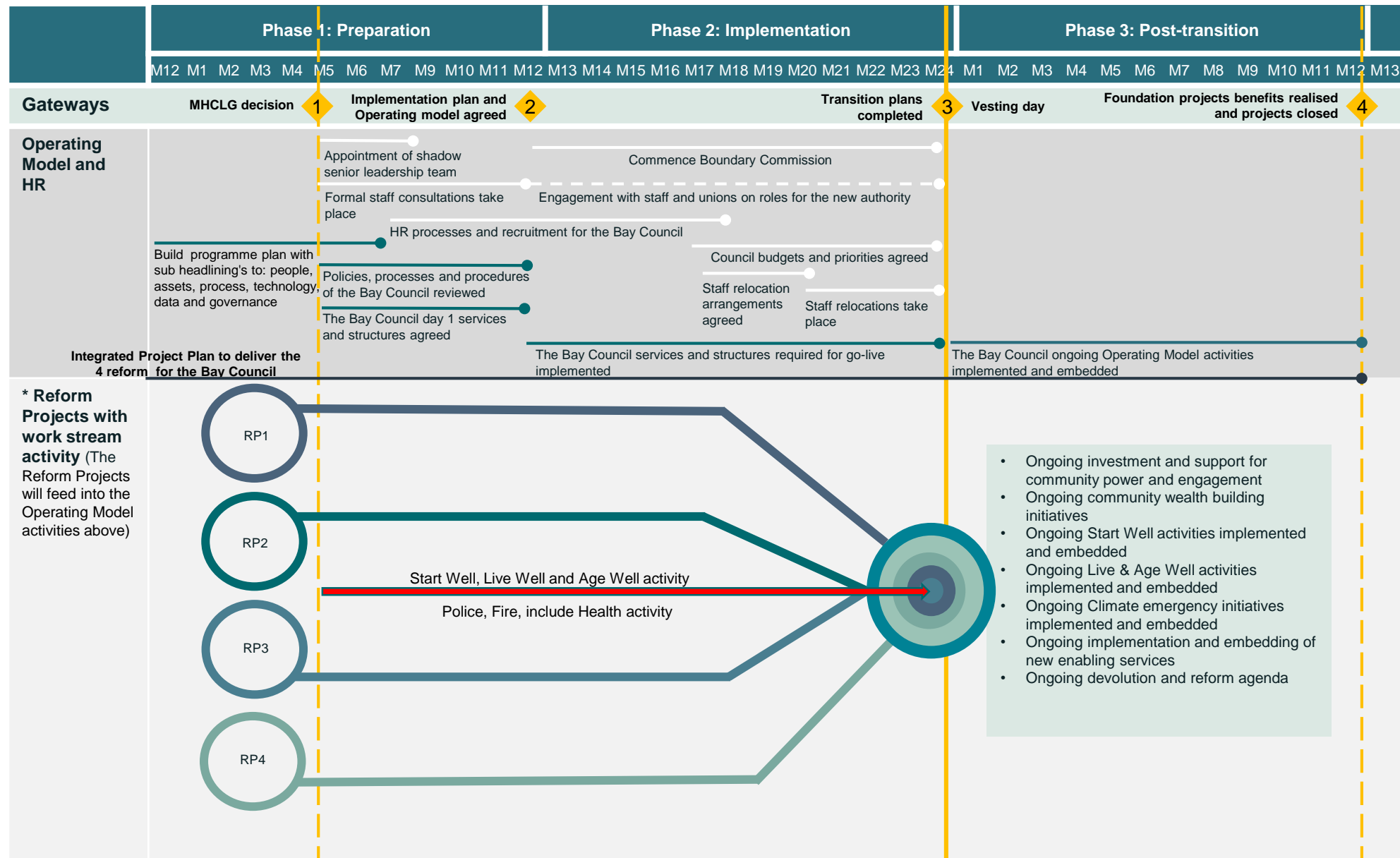
Below is a high level summary of our programme phases to launch the new Bay Council. We expect that any decision will take some time to allow for full consideration of our proposal and consultation with local partners and within government. We have assumed that the decision and subsequent transition period will be targeted at vesting day no earlier than April 2023.

The length of each programme phase is dependant on the completion of programme activities within it, which are described in more detail in our high level programme implementation plan.



5.3 High level Programme implementation plan

This section has been developed based on experience and recent unitary authorities as good practice as well as our own learning.



Indicative Reform Projects:
 Key: RP1 = Community Power and Engagement, RP2 = Community Wealth Building, RP3 = Well-being, RP4 = Climate Emergency with the following workstreams: Start Well / Children Services, Live & Age Well Adults Services & Health, Investments and Devolution

*The implementation plan will be developed further based on good practice from previous programmes such as Customer Connect, in managing change

5.4 Driving Change - Programme management approach

We will establish best practice programme management tools and techniques to deliver change at scale and at pace.

Programme Governance

The Programme governance model will guide and steer a combined reorganisation and reform agenda across the Bay area and all impacted councils, including continuing authorities

- We will convene and align partner organisations and other stakeholders through our system leadership to better integrate efforts on creating the conditions in the system that enable more effective working. Reorganisation will become a catalyst for reforming that services are delivered, enabling a rethink that removes departmental and organisational siloes and introduces more holistic solutions.
- The Bay Programme Board will drive the Programme forward by providing strategic direction and sign-off. Its members will include Leaders from each district council, chief executives, lead officers and programme and project managers
- The role and terms of reference of the joint committee going forward will be reviewed and updated.

Benefits management

A structured approach to benefits management will ensure that the Programme successfully achieves positive outcomes for the people, places and performance of the Bay area

- The benefits in this proposal will be regularly updated and review to ensure that as a programme we realise our ambition for the Bay. Greater details on the approach to benefit realisation management will be developed during the preparation phase.
- Direct financial benefits of reorganisation
- Indirect financial benefits that are possible through linking our reorganisation to a reform and recovery approach that delivers on our priorities
- More details on the types of benefits were provided in section 4.3 Finance and Affordability.

Risk management

Effective risk management is essential in any major transformation programme. We will establish a robust risk management regime to ensure successful delivery of re-organisation and reform.

- The Bay Programme approach to Programme Risk Management will be consistent with best practice guidance for managing successful programmes. The PMO will own the process for the creation, tracking and management of risks with the RAID (risk, assumption, issue and dependency) Log.
- Each risk, assumption, issue and dependency will have a designated owner who will be responsible for ensuring that mitigating actions as required are put in place, tracked and reported on, with the support of the PMO.
- The RAID log will be reviewed on a regular basis by the PMO and escalated up through the programme governance model as needed.

Assurance and review

Programme assurance activities will be established to assess the performance of the Programme and provide reassurance on a regular basis.

- This will include a detailed formal review as the programme moves between the preparation, implementation and post-transition phases. At these points the Programme Board will give their approval once they are satisfied that the Programme can safely and successfully proceed.
- Alongside the formal reviews the PMO will monitor and evaluate programme performance throughout to resolve issues and learnt lessons quickly.
- Once all programme benefits have been achieved a detailed post programme evaluation will take place.

5.5 Releasing change

We will deliver a programme of engagement working with both of the County Councils, our public sector partners, our communities and the wider public.



Enable reform leadership

We already have a sense of shared purpose and commitment amongst our leaders. Our leadership team will communicate our ambition to our people, partners and residents to create a feeling of shared ownership

- In the initial phases our reform leadership team will build on existing good relations developed between council leaders and officers during the previous work by all councils and this case.
- Once our proposal is agreed Shadow Authority and Executive arrangements, subject to any legislation requirements, will be put into place.
- This will involve officers and members from the preceding councils co-operating as reform leaders and being supported to think, engage and role model:
 - Breaking with the past and present – abandoning mindsets grounded in the past and anchoring all activity to the desired future
 - Focusing on genuine commitment – investing emotional and intellectual energy and committing whole-heartedly to making the future a reality
 - Incorporating people in the change – leaders investing sufficient time and energy to build collective enthusiasm for the future and creating the employee participation and involvement essential to success.



Engage and enable people

We will combine our stakeholders, both internal to the councils and involved in the wider system, to understand their needs and motivations and take them with us on this shared journey.

- This will involve overcoming resistance to change, and creating an environment that encourages the willing participation of people in the change process by helping people understand why they should change, and maintaining the focus on this rationale so there is a compelling and sustained reason to become involved and be part of the solution
- We will equip people both inside and outside of the councils with the skills, behaviours and mindsets for reform
- We will also create emotional connections with reform supporting people's need to respond positively with both heart and mind to the future vision and the benefits of the change
- As we would expect all existing councils to cease to exist to be replaced by the Bay staff transfer and engagement will be a key factor – both on a technical level (i.e. TUPE regulations / continuity and equality of employment opportunity for most, with open competition for key leadership roles) but also emotionally to the new councils and way of working.



Embedding new behaviours

We will redefine the desired beliefs, behaviours and ways of working in the new council and represent a fresh start.

- This case presents a much stronger opportunity to avoid a single 'preparing' council culture to dominate the new arrangement. The new arrangements are an opportunity to shape councils in the spirit of a modern and progressive council. To embed new behaviours we will:
 - Clarify and define the desired future culture and ways of working
 - Assess the current cultural alignment and responsiveness to reform
 - Work with staff, partners and residents on ways of working to the desired future.

5.6 Managing the risks and realising benefits from reform and reorganisation

Adopting a risk conscious approach

Throughout this process we have approached potential risks and issues in an open, honest and collaborative way. We recognise the risks associated with any form of local government reorganisation and reform, in fact we are effectively managing many similar risks in our current operating environments within and between organisations.

As set out in section 4, our proposal is about adopting a risk conscious mindset, exploring, assessing and consciously taking appropriate risks where the returns, be they financial, social or environmental, outweigh the risks.

Our continued approach to risk management will be consistent with best practice for large, complex change programmes with multiples stakeholders and multiple workstreams as we move from design, into transition and implementation.

We have identified the top three strategic programme risks we are tracking as part of our risk management approach, and will continue to build on and develop out the risks, along with assumptions, issues and dependencies over the coming months, with the appropriate governance arrangements in place.

Realising the benefits for our organisations, communities and wider public service agenda

The ability to realise both short term and longer term sustainable benefits is at the very heart of this agenda. Identifying, measuring and reporting on the benefits realised through reorganisation and reform are critical to provide direction, purpose and focus for us and to demonstrate achievement to our communities and partners.

As set out in this proposal, our vision is bold and far reaching, and to that end we will go further than just demonstrating realisation of benefits from direct savings. Embedded into our culture we will take a whole systems approach, collaborating with partners, businesses and communities to identify total benefits from our proposed interventions, and seeking to address financial, social and environmental benefits in our approach. Through adopting this mindset we will continue to strengthen the public service agenda across the Bay and deliver better outcomes for all of our communities.

Risk description	Proposed mitigation
The proposal is not treated as a platform for system wide reform as well as reorganisation, leading to underachievement of benefits and reduced improvements in outcomes for our communities	Reform based projects form the foundation of the implementation approach, and the future culture and behaviours both in transition and into delivery. There will be clear identification and assessment of benefits associated with reform as well as reorganisation, and effective distributed leadership to drive system wide change.
Service delivery is impacted due to integration of some services and disaggregation of others	Priority is given to minimising disruption and maximising the opportunities that change offers to our communities and organisations. Implementation workstreams will focus on stability and improvement to key services such as adults services and children’s service, police, fire and place based services in close collaboration with those currently responsible for the services.
Staff and the wider workforce are negatively impacted from further change whilst potentially still in response or moving into recovery	Staff engagement has already been taking place to articulate the vision and ambition, the opportunities for staff and the local communities. Continued focus on clarity and transparency of the process, along with ongoing support for their health and wellbeing.
Limited stakeholder support increases complexity of the change	Consultation has already taken place with broad support from across our key partners. Continued focus on strengthening relationships, listening and collaborating to find mutual benefits of the future arrangements. Ongoing design and planning to make this change happen in practice as well as on paper.

5.7 Equalities and diversity impact assessment

Under section 149 of the Equality Act 2010 the General Equality Duty asks public authorities and any organisation providing a public function to take proactive steps for equality and diversity.

This due regard is evidenced through an Equality Impact Assessment. Section 149 states:

A public authority must, in the exercise of its functions, have due regard to the need to:

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

We anticipate our proposed option will have some positive and no negative impacts on persons with protected characteristics. Our drivers for change and proposed future vision, values and operating model will be driven by an overriding determination to make a significant positive impact on all three priorities of the Act, and explicitly to improve equality of opportunity and tackle the deep-seated inequalities that currently plague many of our communities, and in turn exacerbate community tensions and discrimination. We will complete a full Equality Impact Assessment during the preparation phase of the programme and will continue to review and test as the proposal firms up.

5.8 System impact - Police services

We are not proposing immediate changes to the geographic boundaries for policing in Cumbria or Lancashire, and neither do we believe that these boundaries are limitations on the options for the Bay Council. There are short and longer term solutions which could be considered by the Secretary of State

Short term

A **collaboration agreement** between the two Police forces to exercise police powers that will support efficient and effective delivery of police services across the area is possible. Provisions for collaboration are set out in the s22A to s24 of the Police Act 1996, as amended by the Policing and Crime Act 2009 and Police Reform and Social Responsibility Act 2011.

Statutory Guidance for Police Collaboration sets out the provisions under which collaboration agreements may be made by police forces and policing bodies.

The Policing and Crime Act 2017 created a statutory duty on fire and rescue authorities, police forces, and ambulance trusts to:

- keep collaboration opportunities under review;
- notify other emergency services of proposed collaborations that could be in the interests of their mutual efficiency or effectiveness; and
- give effect to a proposed collaboration where the proposed parties agree that it would be in the interests of their efficiency or effectiveness and that it does not have an adverse effect on public safety.

The duty is deliberately broad to allow for local discretion in how it is implemented. It recognises local emergency services are best placed to determine how to collaborate for the benefit of their communities. However, the duty sets a clear expectation that collaboration opportunities should be considered.

The duty does not preclude wider collaboration with other local partners, such as local authorities and health bodies. To reflect their wider role, ambulance trusts are required to consider the impact of the proposed collaboration on their wider non-emergency functions and the NHS when determining if it would be in the interests of efficiency or effectiveness.

The view of the Chief Constable in Cumbria was that they would make the proposal work from an operational policing perspective. Their equivalent representative in Lancashire has said although crossing county boundaries increases the transition complexity, none of this is considered insurmountable.

Longer Term

In the event that the Secretary of State was minded to make an Order for reorganisation, then a longer term solution would require the respective Chief Officers and Police & Crime Commissioners to consider any relevant proposals in the Local Recovery and Devolution White Paper and intention to build on the government ambition for a radical transformation of how the police and fire and rescue services work together.

Police Authority	RA 20/21 £m
Cumbria	£114.6
Lancashire	£309.9



5.9 System impact - Fire & Rescue Authority

The current Fire & Rescue Services do not align to the proposed geography of the Bay Council, therefore our assessment seeks to address this in both the short and longer term.

Short term

In the short term we propose no changes to the existing geographic boundaries for Fire & Rescue Services in Cumbria or Lancashire, but agreement on operational collaboration.

Under the Fire and Rescue National Framework for England, fire and rescue authorities must collaborate with other fire and rescue authorities to deliver interoperability (between fire and rescue authorities). Fire and Rescue Services Act 2004, Section 16 covers arrangements for discharge of functions by others and to address some of the short term barriers which may exist.

We propose in the short term the use of a **collaboration agreement** between the two Fire & Rescue Services as set out in the Fire and Rescue Services Act 2004. As for the police, the Policing and Crime Act 2017 created a statutory duty on fire and rescue authorities, police forces, and ambulance trusts to:

- keep collaboration opportunities under review;
- notify other emergency services of proposed collaborations that could be in the interests of their mutual efficiency or effectiveness; and
- give effect to a proposed collaboration where the proposed parties agree that it would be in the interests of their efficiency or effectiveness and that it does not have an adverse effect on public safety.

The creation of a Bay Council would be an opportunity for collaboration.

The Lead Member for the Fire and Rescue Authority, which is hosted by Cumbria County Council, would want assurance that reorganisation would not result in a separation into two fire authorities. This would be unviable given the small size of the current authority. However, neither the Lead Member nor the Chief Fire Officer saw any reason why it would not be possible to continue to deliver good services across the current footprint, including the Bay, and for joint work with the Fire & Rescue Service in Lancashire.

Their equivalent in Lancashire, which is a stand alone authority, identified the opportunities through collaboration to support the Bay Council

Longer Term

In the event that the Secretary of State was minded to make an Order for reorganisation, then a longer term solution would require the respective Chief Officers and Police & Crime Commissioners to consider any relevant proposals in the Local Recovery and Devolution White Paper and intention to build on the government ambition for a radical transformation of how the police and fire and rescue services work together.

FRS Authority	RA 20/21 £m
Cumbria	£21.4
Lancashire	£59.0





ANNEX

This section explains the outputs from the strategic stakeholder engagement and expression of support



Stakeholder Engagement and Expression of Support

We have included two of the letters of support that we have received and will share further information and feedback as our proposal progresses.

Dr Hilary Cottam OBE
Unit 412 / Level 4/
Peckham Levels
95A Rye Lane SE15 4ST

30th November 2020

To Whom it May Concern

I would like to express my support for the plans submitted by Barrow Borough Council, South Lakeland District Council and Lancaster City Council for their proposal for a unitary authority covering their areas – to be known as The Bay.

This proposal re-draws the boundaries of the authorities in keeping with historical ties and strong local identities. It presents a unique opportunity for Barrow, Lancaster and South Lakeland to build on over a decade of deep community work which has created strong horizontal relationships within this geography between citizens and local leaders, and which in turn, if respected, and nurtured, will enable local leaders to grow strong local economies and thriving communities.

My work on *Radical Help* and more recent research into work and the local economy has enabled me to develop strong ties in this region across local government, business, academic institutions and the eco-system of local community organisations. I believe the richness of the connections within this geography – and across these sectors – provides a particular opportunity to create a dynamic local economy - ensuring the success of local grants already secured - and a step change in statutory provision (in health care, social care and learning environments) – ensuring the development of new models of public service provision for others to emulate.

Working with governments around the world, I am closely familiar with the challenges involved with external assessment of proposals for institutional re-organisation. I write to you therefore in an independent capacity, based on my experience in designing effective system change and with close knowledge of the localities involved. I believe that a re-organisation that draws the boundary around Barrow, Lancaster and South Lakeland Councils would create the conditions to reduce inequalities, underpin a thriving regional economy and ensure social flourishing for decades to come, exactly as the Government seeks to achieve.

Yours faithfully

Dr Hilary Cottam



Westmorland General Hospital
Burton Road
Kendal
LA9 7RG

1 December 2020

Sam Plum
Chief Executive
Barrow Borough Council
Duke Street
Barrow-In-Furness
LA14 2LD
(by email)

Moor Lane Mills
Moor Lane
Lancaster
LA1 1QD

Dear Sam

Thank you for sharing your recent submissions regarding Local Government reform and we appreciate that much thinking and planning has already gone into your initial proposals. We recognise this is an exciting opportunity for you and for future partnership working with health colleagues for the betterment of our local populations.

The Morecambe Bay Health and Care Partnership has inspired new thinking amongst partners and brought many benefits to our local population. Yet we equally recognise that it is an area that inequalities remain high and population outcomes low. There is much more we can and should do together, and we believe better integrated working across health, local authorities and district councils is a key enabler in help make this happen.

As healthcare partners we thought it would be helpful to set-out a consistent view on Local Authority reform to share with all Council partners. We have done this through a set of simple principles and ambitions (attached) that we hope councils will consider and reflect on in their future submissions. At this stage we are keeping an open mind with regard to all proposals and continue to welcome the opportunity for further dialogue.

Yours sincerely

Aaron Cummins
Joint System CEO

Jerry Hawker
Joint System CEO

Enc.

cc Mike Thomas, Chair, University Hospitals of Morecambe Bay NHS Foundation Trust
Dr Geoff Jolliffe, Clinical Chair, Morecambe Bay Clinical Commissioning Group

Stakeholder Engagement and Expression of Support

"That South Lakeland District Council be advised that, if the Government insists on pressing ahead with local government reorganisation in Cumbria, Natland Parish Council supports the creation of a new Bay Authority, combining the administrative areas of South Lakeland District Council, Barrow Borough Council and Lancaster City Council, and that the Parish Council's expression of support be included in the submission being made to central government".

*Kevin M Price. Parish Clerk.
Natland Parish Council*

Appendix

Community and Stakeholder Engagement

THE BAY



Methodology

Barrow, Lancaster and South Lakeland have jointly conducted a comprehensive programme of community and stakeholder engagement. This has shaped our proposal and validates our belief that this proposal commands widespread public support.

External **independent polling** conducted by Suration shows **overwhelming support for a new Bay Authority** and indicates serious concerns that a single county unitary would not reflect the needs and opinions of local people. Suration, a respected member of the British Polling Council, conducted a telephone survey of 1012 adults across the three districts of the Bay between 13 and 19 November 2012.

- 60% believe that the area would be best served by a unitary council for Morecambe Bay
- 67% are concerned that under a single county unitary their voice would not be heard on local issues

Full results are available here <https://cdn.suration.com/wp-content/uploads/2020/12/02090636/Morecambe-Bay-Tables.xlsx>

The three authorities have conducted a **local survey** consisting of both closed questions and spontaneous free text responses. This was promoted by the three councils and in the local media, was open from 10-30 November and has attracted 2796 responses. The results show overwhelming support for these proposals. Crucially, this **support extends across all three authorities, with no geographic area or section within the community opposed.**

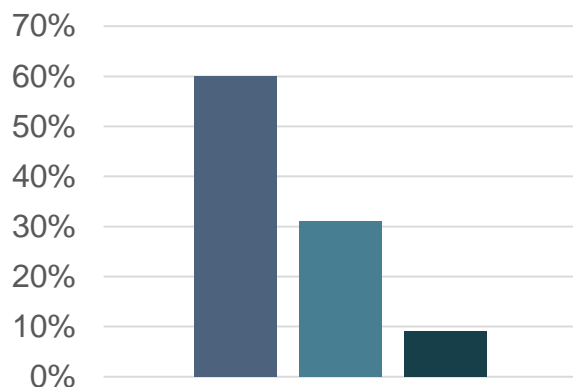
There have been two strands of **community and stakeholder engagement**: District-led local engagement, and co-ordinated events across the Bay. In the Bay wide strand, 10 focus group events have taken place involving business, community groups, parish councils and young people. Stakeholders have engaged very seriously with the Bay proposals and the response has been generally positive. There is a broad recognition of the importance of this process and there was particular support for:

- Bringing decision making closer to the Bay
- Aligning our economic area with a single authority
- An ambitious shared vision for the future of the Bay

Topline Results

An independent telephone poll of 1012 adults living in the Bay area, conducted by Survation 13-19 November 2020

The Morecambe Bay area would be best served by...



- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements for Lancashire
- Don't know

A local survey with 2796 responses open 10-30 November 2020

“A new local authority that covers Barrow, Lancaster and South Lakeland would be preferable to one based further afield e.g. in Carlisle (Cumbria County Council) or covering a bigger geography (Lancashire County Council)”.

	All agree	All Disagree	Neither
Barrow	86%	10%	4%
Lancaster	93%	5%	2%
South Lakeland	76%	19%	4%

Community and stakeholder events involving employers, community groups, parish councils and young people

“The format of the Bay is very good...There is a massive opportunity to create prosperity for the north and set ambitious targets”

“It would make total sense to align the council with the NHS footprint which is pan Morecambe Bay”

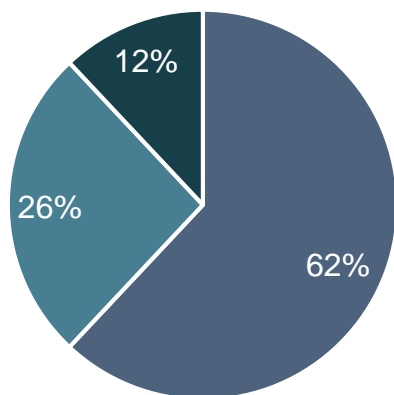
“I’m very happy to express the views of many parish councillors who have spoken to me and we are almost universally in favour of The Bay proposal”

“I believe that the merger with Barrow, Lancaster and South Lakes would be in all our best interests.”

Opinion Polling

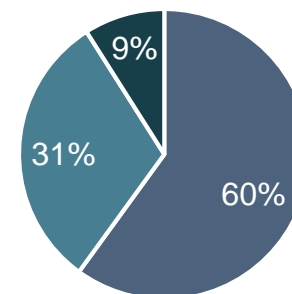
- Survation conducted a telephone survey of 1012 adults across the three districts of the Bay between 13 and 19 November 2020.
- The results show strong support for a Bay unitary, with a belief that this would deliver better services and concern that a county unitary would make it harder for local voices to be heard.
- These results are consistent across demographic groups and between all three districts.
- Full data tables are available here: <https://cdn.surveon.com/wp-content/uploads/2020/12/02090636/Morecambe-Bay-Tables.xlsx>

What option would be most likely to improve the quality of services provided by councils?



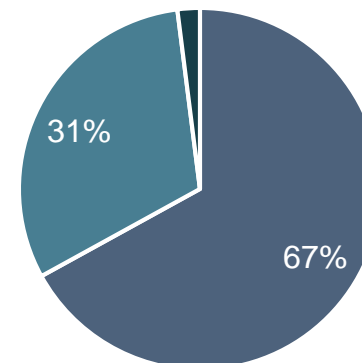
- Morecambe Bay unitary
- A county level unitary
- Don't know

The Morecambe Bay Area would be best served by...



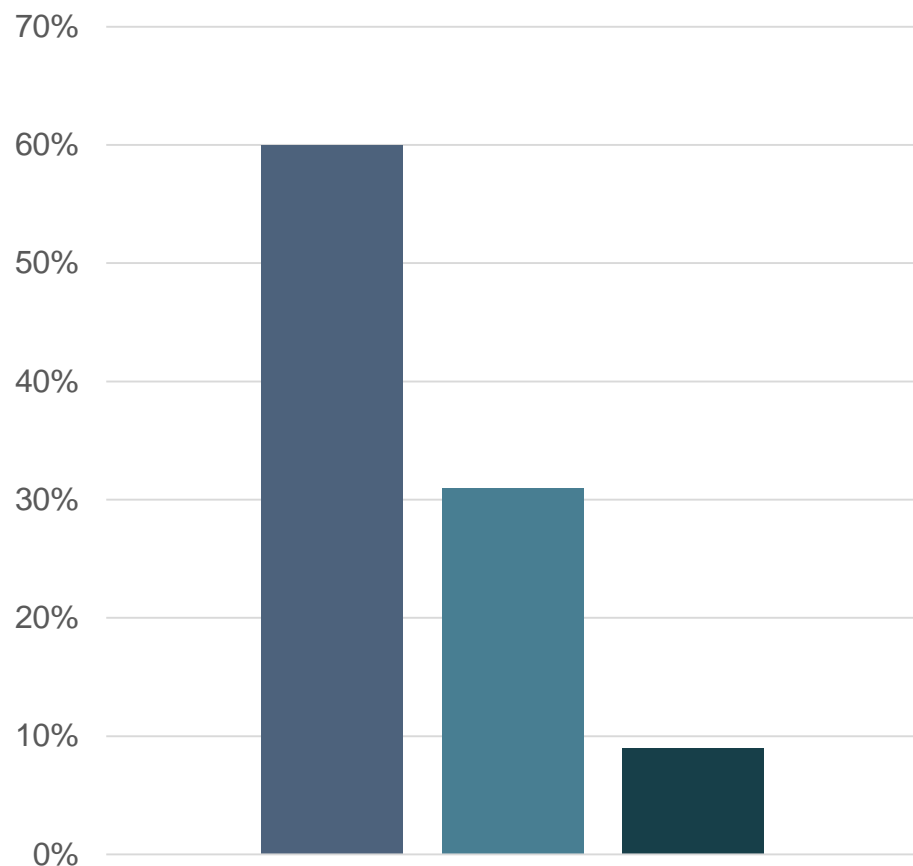
- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

Would you be concerned that if your local area was overseen by a single council at a county wide level, your voice may not be heard on local issues?

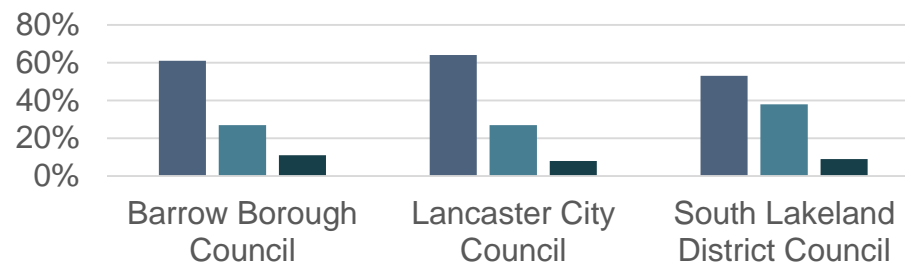
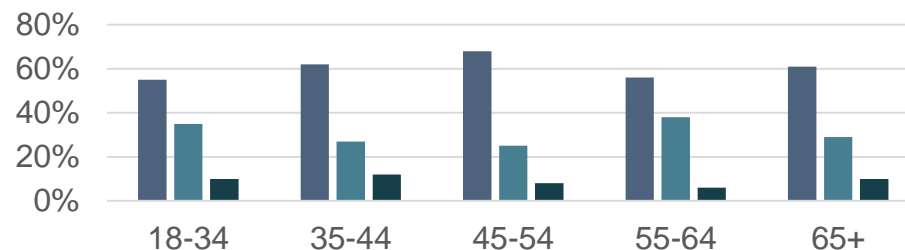
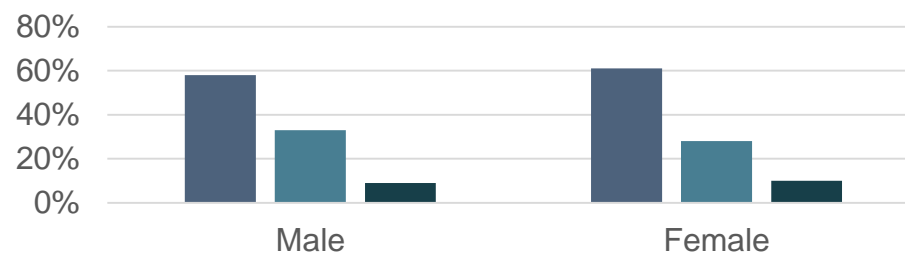


- All concerned
- All not concerned
- Don't know

Q1. Which of the following statements best reflects your view? The Morecambe Bay area would be best served by...

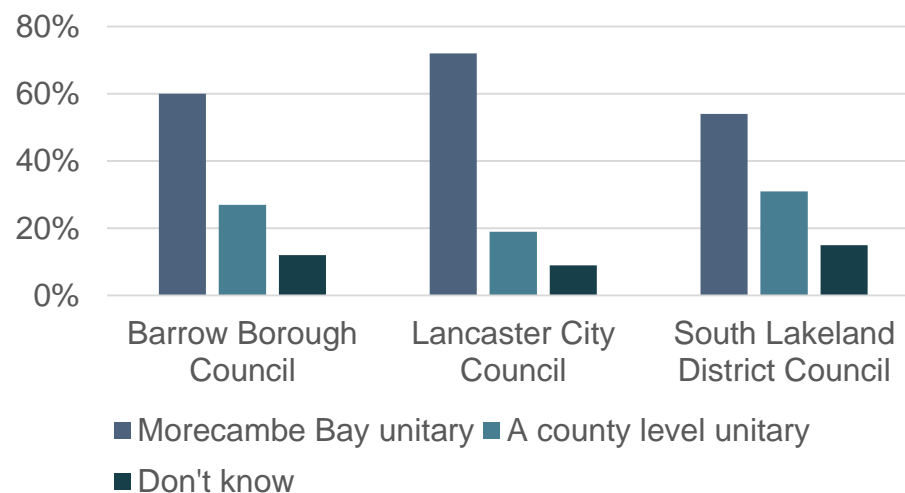
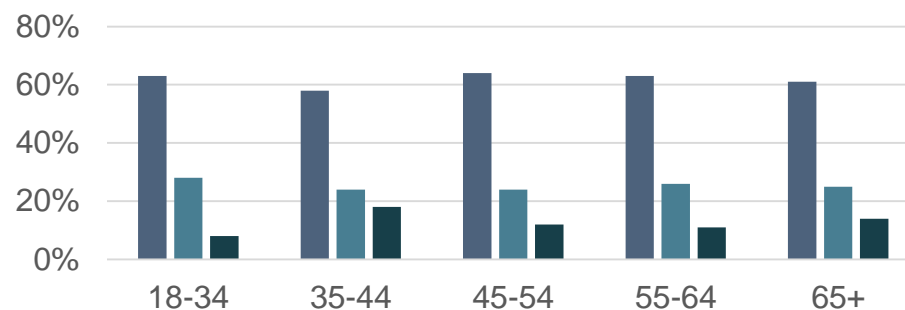
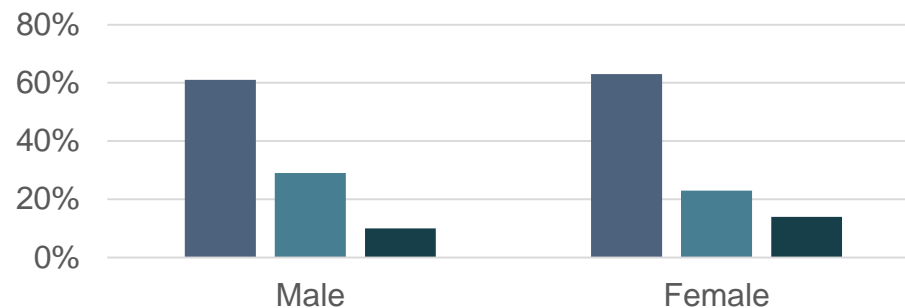
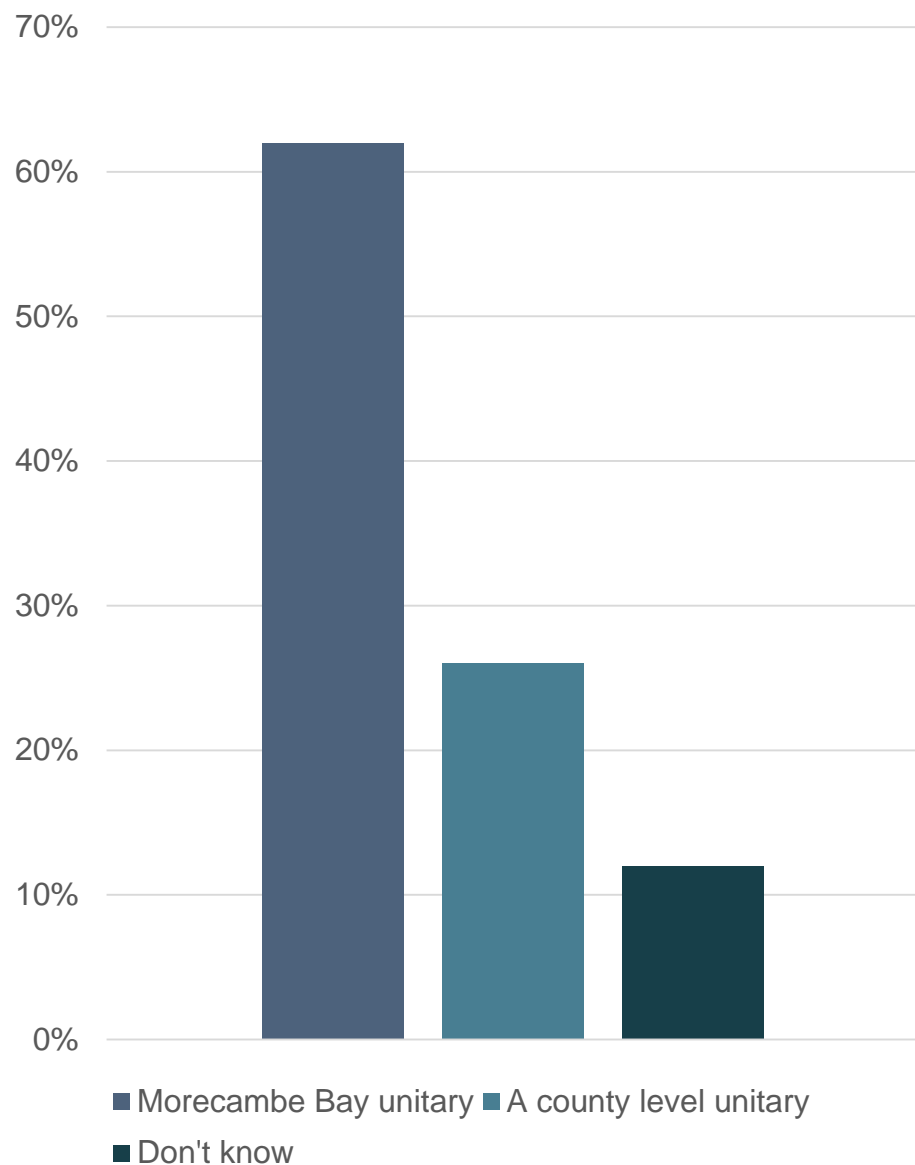


- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

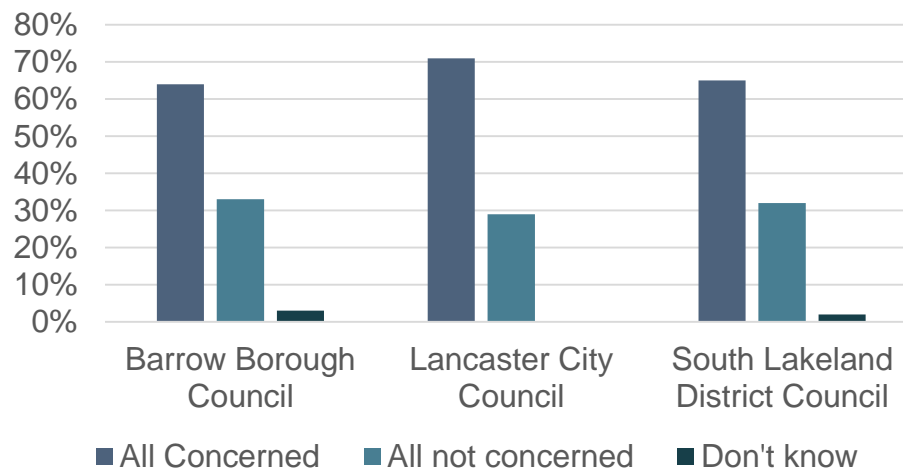
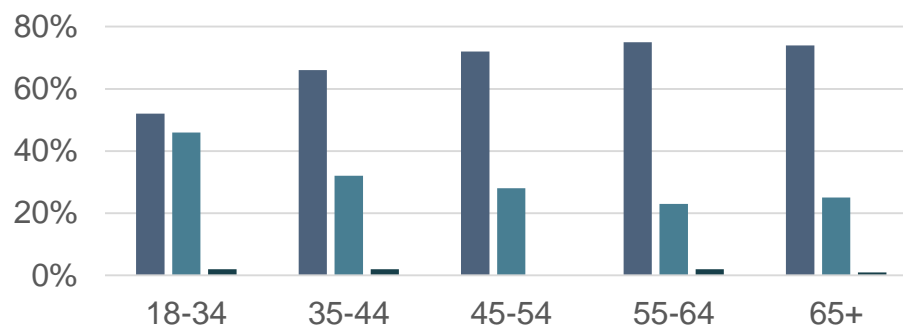
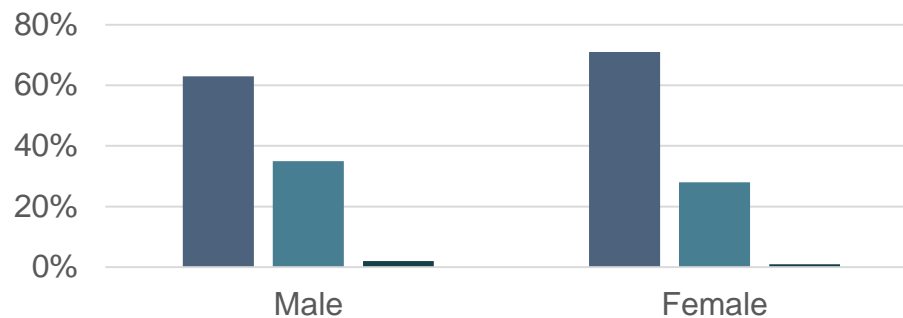
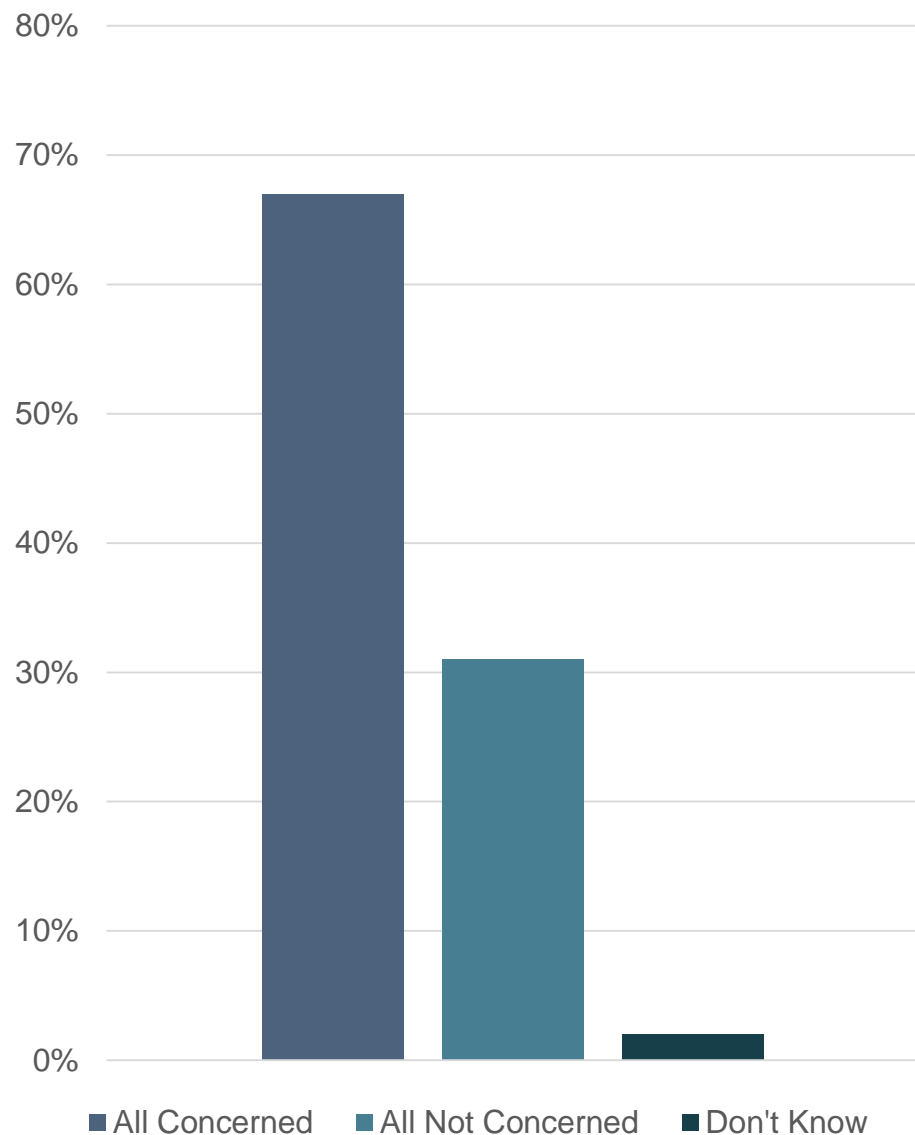


- A unitary council for Morecambe Bay based on the geographies of Barrow, Lancaster and South Lakeland districts
- A whole county unitary for Cumbria and separate arrangements in Lancashire
- Don't know

Q2. In your view, what option would be most likely to improve the quality of services provided by councils?



Q3. To what extent, if at all, would you be concerned that if your local area was overseen by a single council at a county wide level, your voice may not be heard on local issues?



Council Survey

- The three authorities consulted extensively with local residents. An online survey was conducted from 10-30 November 2020 and was promoted via councils' usual communications channels.
- The survey attracted 2796 responses, with robust response rates across the Bay area and across different demographic groups.
- The Survey included closed questions as well as the opportunity to give spontaneous free text feedback. This generated over 500 comments and the sentiment was generally supportive. We have presented a sample alongside the quantitative results.
- The results show strong support for the proposed Bay authority, concern that a county-level unitary would not be responsive to local people and a clear belief that a Bay authority is best placed to shape a sustainable local economy for the area.
- These results are consistent across demographic groups and across the Bay area.

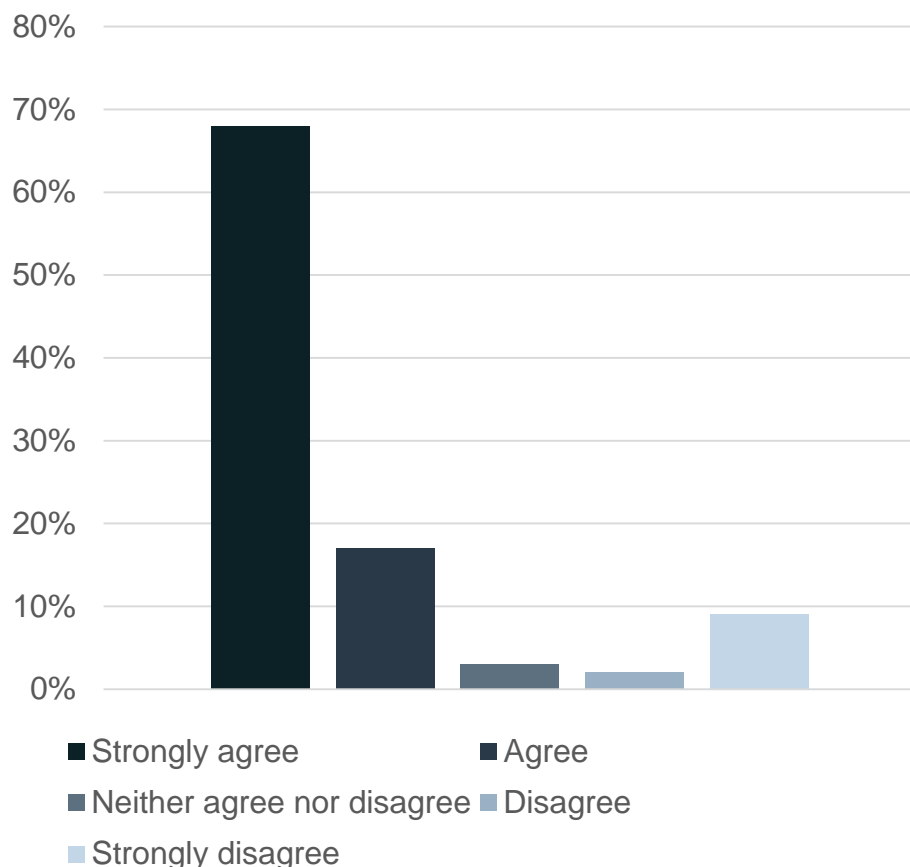
District	Respondents
Barrow	420
Lancaster	1213
South Lakeland	1071
Other/unspecified	92

Sex	Respondents
Female	1397
Male	1193
Other/ prefer not to say	206

Age	Respondents
16-29	194
30-39	307
40-49	406
50-59	617
60-69	644
70 and above	464
Unspecified	164

Council Survey

Q1. To what extent do you agree with the statement: "a new local authority that covers Barrow, Lancaster and South Lakeland would be preferable to one based further afield e.g. in Carlisle (Cumbria County Council) or covering a bigger geography (Lancashire County Council)".



“This option makes perfect sense...and it forms a more economically, socially and culturally coherent region than either of the other two options.”

“The Bay authority would cover a reasonable geographic area, one which people can identify with.”

“Carlisle is a long way from Barrow. Some people have never even visited it. Keep services closer.”

“Everyone in South Lakeland associates themselves with Morecambe Bay and Lancaster. Carlisle is not on our radar. I can't remember last time I travelled North.”

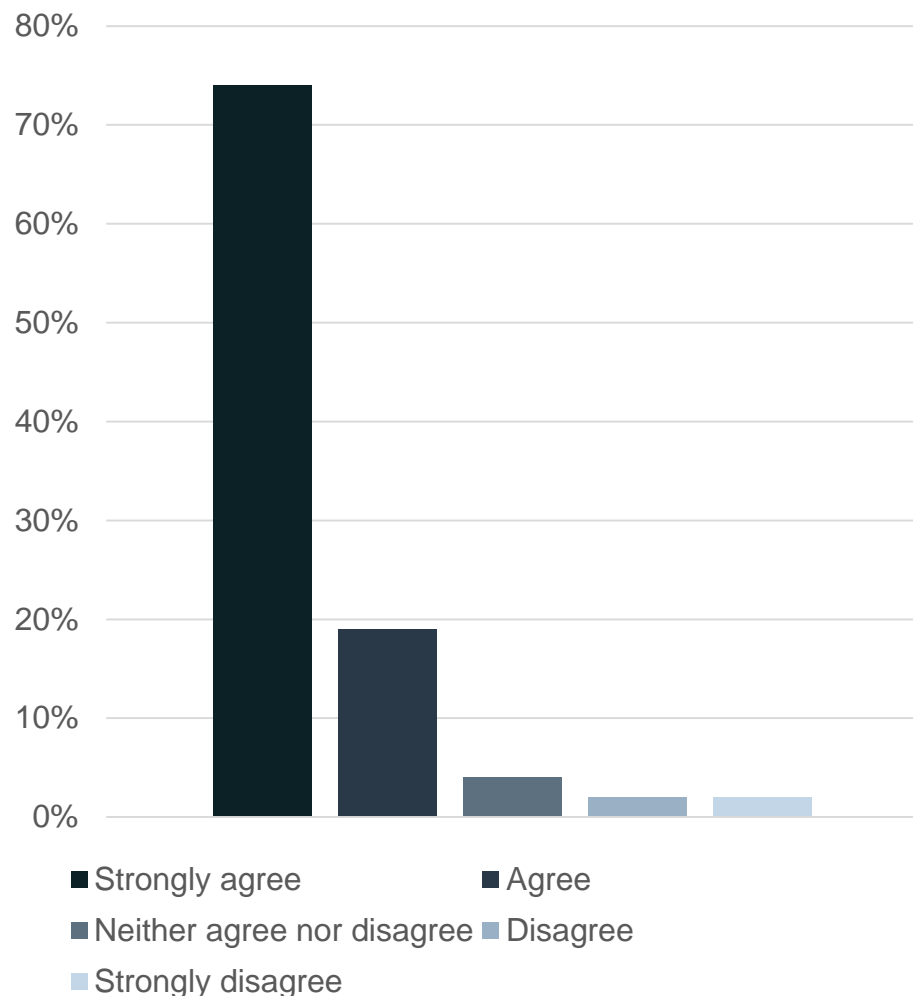
“Lancaster naturally blends with South Cumbria for jobs, education, health and tourism.”



	All agree	All disagree	Neither
Barrow	86%	10%	4%
Lancaster	93%	5%	2%
South Lakeland	76%	19%	4%

Council Survey

Q2. To what extent do you agree with the statement: "local services should be decided and delivered close to where people live and work."



“The closer the constituent authorities are the better the chances of success. The balance between being big enough to succeed and small enough to be local is difficult. This proposed authority meets that challenge.”

“The pandemic in particular has shown the strength of localism in protecting and enhancing communities and people's sense of belonging.”

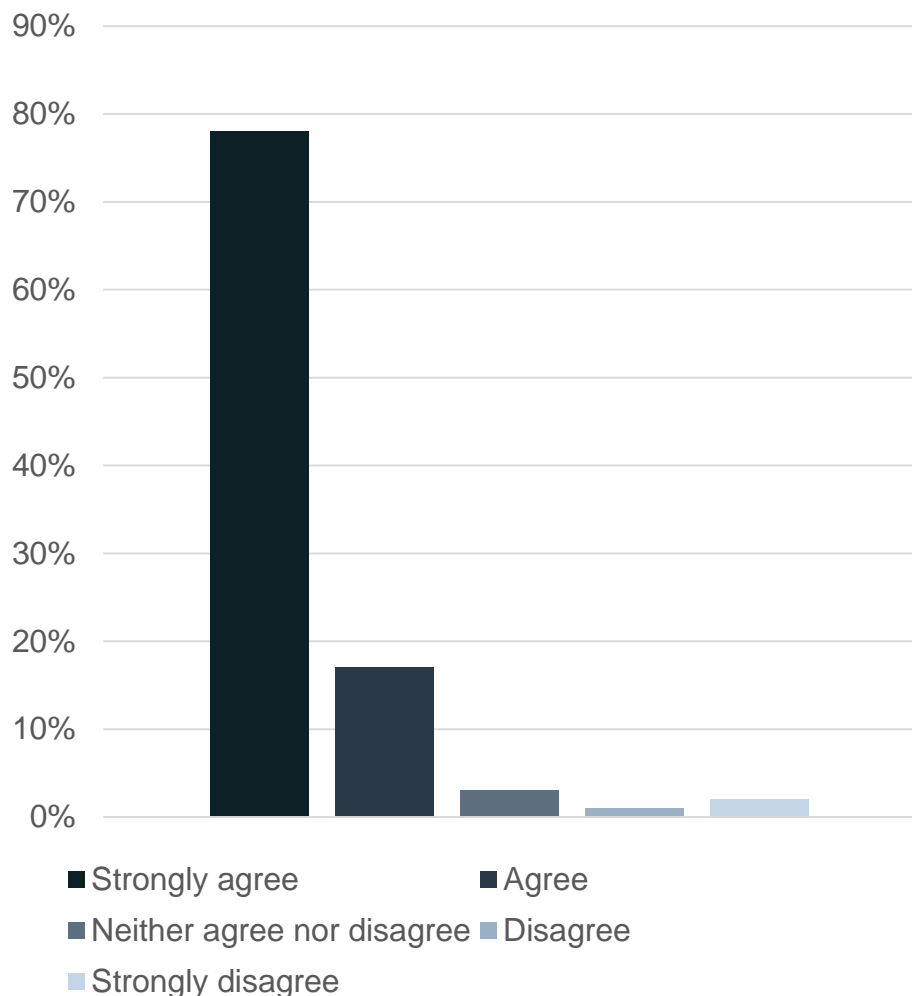
“A locally delivered transport service would be much better.”



	All agree	All disagree	Neither
Barrow	96%	2%	2%
Lancaster	96%	2%	2%
South Lakeland	86%	7%	6%

Council Survey

Q3. To what extent do you agree with the statement: “local people should be represented by people that are close to the community and democratically accountable to local people.”



“I think the new Bay authority would attract younger people to stand as councillors and improve democratic accountability.”

“The area is best served by keeping administration local so our needs are better understood”

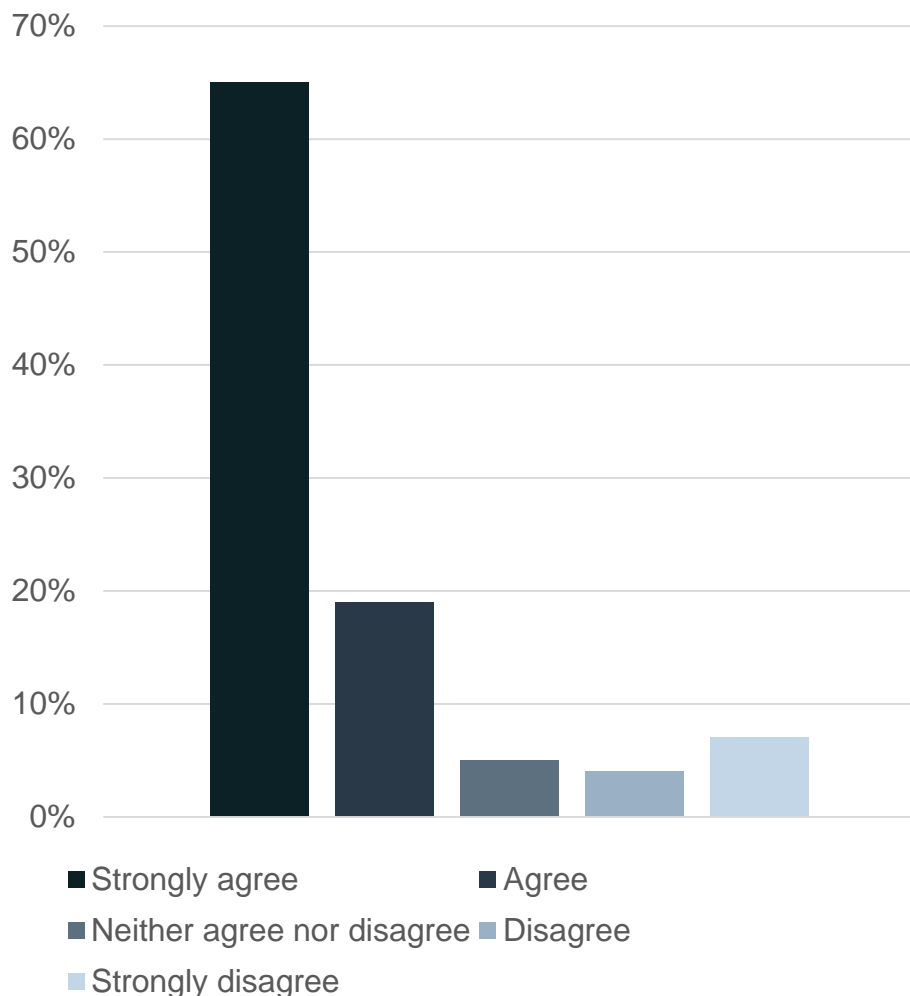
“This is fundamental to community cohesion and giving residents a voice...local representation and accountability is crucial.”



	All agree	All disagree	Neither
Barrow	96%	1%	2%
Lancaster	97%	1%	1%
South Lakeland	90%	5%	4%

Council Survey

Q4. To what extent do you agree with the statement: “a new local council for the Bay will be best placed to shape a sustainable local economy for our area.”



“We already share a Health Trust and so working across and identifying with this area is already established.”

“There is a strong geographic and economic integrity to the Bay area.”

“The Barrow-Lancaster train service is a good communications link which many people use.”

“Linking the Bay area and sharing resources, vision, and goals will improve the whole area”

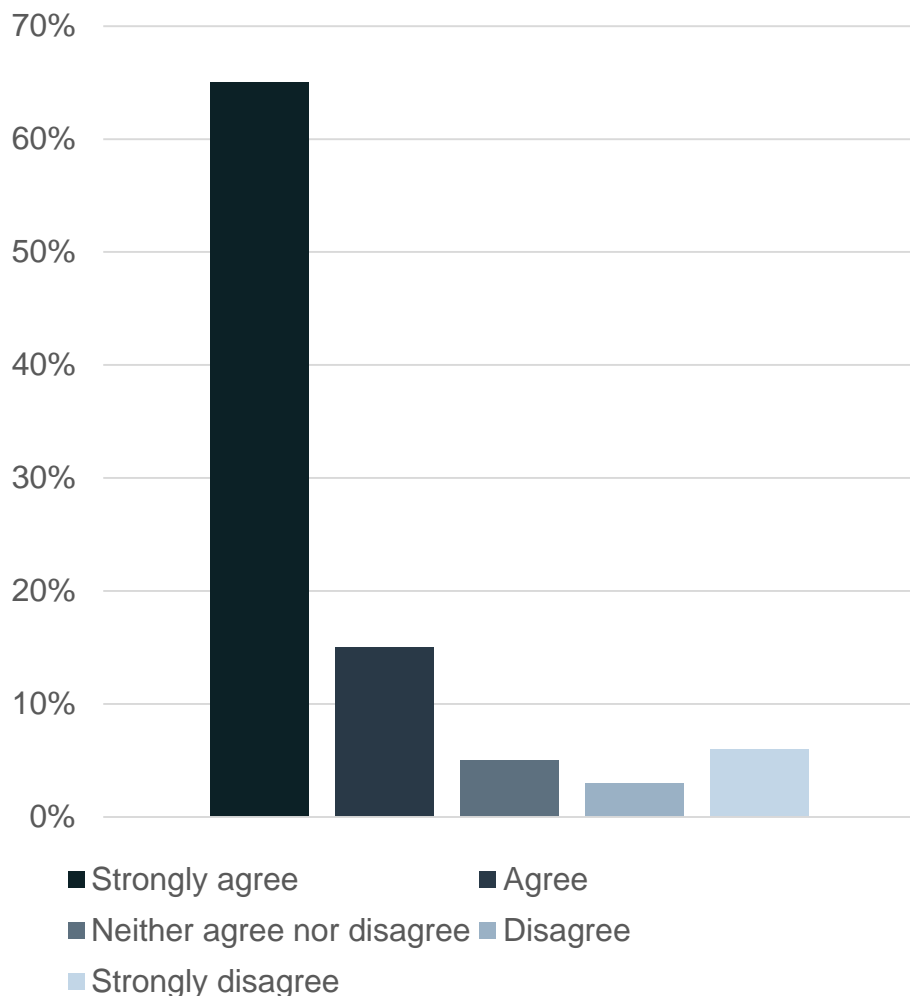
“I think our social, environmental and political outlook maybe has more in common than with the north of the county.”



	All agree	All disagree	Neither
Barrow	86%	8%	5%
Lancaster	90%	5%	5%
South Lakeland	75%	18%	6%

Council Survey

Q5. To what extent do you agree with the statement: “our local environment is better protected by a single council focused on Barrow, Lancaster and South Lakeland”.



“The Bay’s natural environment underpins the economy, social and cultural fabric of the place, it needs to be sustained and improved...I believe a more local authority is best placed to deliver this.”

“The Bay area is an area with environmental integrity...there should be one local authority serving this area.”

“These councils are definitely committed to tackling climate change and will form a stronger force together.”



	All agree	All disagree	Neither
Barrow	83%	6%	5%
Lancaster	88%	4%	4%
South Lakeland	71%	13%	7%

Public consultation

Methodology

To ensure as broad a range of views as possible in the given timescales, a series of stakeholder events were held. Each local authority held sessions, introduced by CEOs and senior officers and chaired by Leaders and portfolio holders for:

- The business community
- Community and voluntary sector (CVS) partners
- Town and parish councils
- Young people

Business, CVS and town and parish council stakeholders were contacted between 13-18 November, letting them know Barrow, Lancaster and South Lakeland had submitted an outline business case on 9 November. Stakeholders were invited to an engagement event to learn more about the full business case being developed, to ask any questions they may have about The Bay and understand how they could engage and influence its development. A consultation event with young people was held jointly across the Bay to hear young people's views on The Bay proposal as key stakeholders, recognising that decisions made today will impact upon their future.

Stakeholders were also invited to complete and share the survey link and also invited to provide written feedback.

At the outset, the authorities' approach was to encourage open and transparent dialogue, with clarity around the fact that the engagement sessions would likely underline areas that stakeholders had identified as a priority that would be developed further in a detailed business case or through a detailed public consultation process in 2021.

Within the context of the COVID-19 pandemic and restrictions on physical meetings, all engagement was conducted online, via Zoom meetings and social media platforms, for example Facebook Live.

Social media engagement took place on Twitter and Facebook in order to share the survey and raise awareness with the general public. Postal addresses were available to minimise digital exclusion.

At every stage, Barrow, Lancaster and South Lakeland have taken decisions through committees and Full Council, demonstrating transparency and engagement at every stage.

"There is a natural alliance between Lancaster, South Lakes and Barrow in both trade and culture. It makes a lot of sense to connect up along those ancient lines. I look forward to jointly solving problems and creating opportunities benefiting from each areas special and complimentary qualities, creating a dynamic region."

Adam Sutherland,
Director of Grizedale Arts
backs The Bay

Have you?
Survey closed on
30 November

THE BAY #backTheBay

DON'T LOSE YOUR VOICE
Have your say and #backTheBay
Closes on Monday 30 November

- Online survey
- Facebook live events
- Twitter campaign
- Targeted stakeholder meetings
- Independent polling
- Dedicated webpages with FAQs
- Briefings with local media and press releases
- Local Government Chronicle
- Article in winter edition of council newsletter to residents

Public consultation

Business community

The Bay is host to a range of SMEs and major employers, who employ thousands of local residents and contribute millions to the nation's economy.

A key theme that arose among the business community was how a new Bay authority would enhance the area's economic attractiveness to businesses and investors, building on existing positive relationships and removing a layer of government to make stakeholder engagement more cohesive and direct, with 2 organisations instead of 7. Of those attendees that were neutral, there was a strong majority in favour of a two-unitary model and wanted at a later stage to understand the detail of how a new Bay unitary authority would work.

There were reservations about replacing one distant bureaucracy with structures that would replicate their inefficiency and it was agreed that the formation of a Bay authority is an opportunity for a stronger local connection between the council and businesses.

The role of LEPs in a new authority was a key discussion point. Businesses were keen to hear how The Bay would help make the case to Government for strategic inward investment. Businesses want to retain the positive aspects of the Industrial Strategy; infrastructure improvements (including broadband, roads and public transport); cross border relationships with the National Parks authorities. Businesses also emphasised the importance of developing skills, and key to this is engaging young people with developing the proposed new authority. The challenge of housing was raised and its role as key infrastructure to support the "natural market" of The Bay.

The LEP itself has not expressed a view on the LGR options at this stage but conversations with regard to the principle have been positive.



"The format of the Bay is very good...There is a massive opportunity to create prosperity for the north and set ambitious targets" – Director, Agribusiness, South Lakeland

"All of our access points are from the south...no-one I know would ever think of going to Carlisle for shopping, services or anything else...freeing ourselves from Carlisle and becoming part of a North Lancashire/South Cumbria authority would be a constructive step." – Director, SME, Barrow

"We support this...we draw all of our workforce from around The Bay and we know it's a natural demographic area ."– Large employer, The Bay area.

"There is significant affinity between Barrow and Lancashire. From that standpoint, the proposal makes sense. Having a larger unit will give the resources to move some of these things forward [e.g. tourism]." – Large employer, Barrow

"A strong tourism economy has seen major private sector investment of some £100 million in the past ten years but is supported by poor infrastructure. This needs urgent investment. The Morecambe Bay economy is the 6th biggest in the North West. It has real growth potential if it had a focused administration rather than the fraught system that currently exists" – local resident, South Lakeland."



Business Community

We have communicated with business organisations, major employers and SMEs. The following business organisations, major employers and SMEs were asked to submit views on the outline proposal and invited to attend one of three briefing meetings. **Meeting attendees indicated in bold.**



Barrow

Arshall Property

Associated British Ports

BAE Systems

Baines Wilson

Barrow AFC

Barrow BC

Barrow Business Improvement District

Barrow College

Barrow Market Liaison Committee

Barrow Raiders RLFC

Blake Henderson Ltd

Britain's Energy Coast Business Cluster

BERGG and CLEP Board and sub sector groups

Brathay Trust

Chamber of Commerce

Chris Brammall Ltd

Copeland Community Fund

Corrie and Co

Cumbria Community Foundation

Cumbria Family Business

Cumbria Local Enterprise Partnership

Cumbria Tourism

Ethica

Denbrook Limited

Duke of Edinburgh Hotel

Federation of Small Businesses

Forge Europa

Furness Building Society

Furness Education and Skills Partnership

Furness College

Furness Internet

Furness Tourism Forum

Glaxo Smith Kline

Heaths Toymaster

Hiltongrove

Holiday Inn

The Islands and Bays of Barrow

and Furness Coastal Community Team

Langdale Estates

Kimberley Clark

Manhattans

Maritime Apartments

Optech Fibres

Orsted

Oxley Group

Phoenix Business Centre

Ryman Chair of BID

South Lakes Safari Zoo

Special Occasions

Playdale Playgrounds

RM Letting and Development

Robert McBride

Stagecoach

University of Cumbria

Lancaster

Avanti West Coast

Digital Lancashire

EDF Energy

Small Traders Association

Factored Studio

Federation of Small Businesses

Furness Economic Development Forum

Highways Agency

Lakes Garage Doors

Lancashire Enterprise Partnership

Lancaster & District Chamber of Commerce

Lancaster Business Improvement District

Miralis

Morecambe Business Improvement District

Northern Rail

Peel Ports Heysham

Seatruck Ferries

Small Green Consultancy

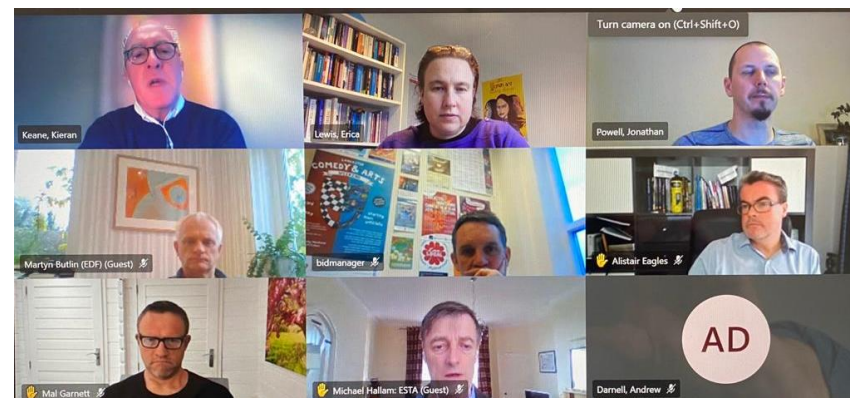
Stagecoach

Tech Lancaster

Transpennine Express

Business Community (continued)

We have communicated with business organisations, major employers and SMEs. The following business organisations, major employers and SMEs were asked to submit views on the outline proposal and invited to attend one of three briefing meetings. Meeting attendees are indicated in bold.



South Lakeland

Acrastyle Ltd

BAE Systems

Billerudkorsnas Beetham Ltd

The Black Bull

Booths

Brewery Arts Centre

Cartner Hones

CGP Books

Clarks

Cumbria Chamber of Commerce

Cumbria LEP

Cumbria Tourism

English Lakes Hotels

Family owned farm

Farfield Mill

Federation of Small Businesses

Fidget Design

Forge Europa

Furness Engineering & Technology

Gilkes

GLL

Grizedale Arts

GSK

Hawkshead Relish

Herdy

Holker Group

Houghton Parkhouse

Impact International

James Cropper

Kendal BID

Kendal College

Kendal Mountain Festival

Kendal Nutricare

L&W Wilson

Lake District Estates

Lakeland

Lakeland Arts

Lakeland Arts Festivals

Langdale Leisure

Levens Hall Estate

Marl International

Moore and Smalley

Napthens

National Farmers Union

North West Auctions

Oakmore Homes

Oxley Group

Playdale Playgrounds

Plumgarths

Praxis

Russell Armer

Sedbergh School

Siemens Subsea

South Lakes Housing

Stagecoach Cumbria & North Lancashire

Treetop Trek

Ulverston BID

Ulverston Community Enterprises

University of Cumbria, Ambleside

Verse

W McClures

Westmorland Agricultural Society

Windermere Lake Cruises

Wordsworth Trust

Zeffirelli's

Public consultation

Community and voluntary sector/ public

Engagement with members of the Community and Voluntary sector (CVS) focused on how a new Bay authority would demonstrate competence in the service areas it is not currently responsible for. There was clear recognition that this competence already exists, and The Bay would draw from existing resources (staffing, physical assets).

There was a strong focus on climate emergency, biodiversity loss and poverty reduction (particularly child poverty and reference to poverty withing LDNP) and the three authorities' similar approaches to date. All have declared a climate emergency; Barrow and South Lakeland have declared a poverty emergency, with Barrow and Lancaster undertaking poverty commissions. A joined up approach with pooled human and financial resources would be well placed to deal with these issues together. Arnsdale and Silverdale AONB being under one authority was given as an example of the benefit of single unitary oversight

Members of the public

Those who did not support the proposal raised objections to any changes, citing the timing in light of the COVID-19 pandemic response they felt authorities should instead be focused on, as well as the economic impact and preparedness for Brexit. Public support for The Bay authority from people who wrote or emailed was 61%, with 39% either not in favour of any change (status quo) or against.

Members of the public and CVS members raised the issue of ceremonial vs administrative boundaries across Lancashire and Cumbria. The proposed change is purely administrative with no impact on ceremonial/ civic jurisdictions, protecting the area's sense of place and heritage.



“I believe that the merger with Barrow, Lancaster and South Lakes would be in all our best interests. We have far more links with the Morecambe Bay area than the north” – local resident, South Lakeland.

“It would make total sense to align the council with the NHS footprint which is pan Morecambe Bay and relationships that are well established in that footprint make collaborative working very effective” – Lancaster stakeholder.

“I entirely support the proposal...I agree that local people will look towards The Bay unit” – Strategic Partner, Morecambe Bay.

“The Bay has real growth potential if it had a focused administration rather than the fraught system that currently exists...The Government will get a handsome return if it invests in Morecambe Bay.” Resident – Kendal.”

“Having been born in Barrow 73 years ago and therefore being a Lancastrian but now a Cumbrian...it makes total sense, if the way forward is to have a larger authority, for Barrow to merge with South Lakes and Lancaster Councils” Resident – Barrow.”



Community and voluntary sector

We have actively engaged with a wide variety of community, public sector and charitable organisations, who have participated strongly in the consultation. The following organisations were asked to submit views on the outline proposal and invited to attend one of three briefing meetings.



Barrow

Age UK Barrow
 Alzheimer's Society
 Art Gene
 Barraculture
 Barrow & District
 Disability Association
Barrow Citizens Advice
 Barrow Foodbank
Cumbria CVS
 Cumbria Foundation
 Cumbria Wildlife Trust
 Dalton Parish
 Drop Zone
 Family Action Barrow
 The Farmer Network
 Furness Carers
 Furness Multicultural Forum
 Groundwork
 Inspiring Barrow
 The Islands and Bays of Barrow and Furness Coastal Community Team
 Leonard Cheshire Disability
 Love Barrow Families
 Mind in Furness

Morecambe Bay Partnership
 My Zen
 Natural England
 Project John
 SAFA
 Salvation Army
 SBT Churches
 St Marks Church
 St Marys Hospice
 Signal Film and Media
The Well
 Women's Community Matters
 ZEST

Lancaster

Age UK Lancashire
 Cancer Care
 Citizens Advice North Lancashire
 Duchy of Lancaster
Eden Project
 Environment Agency
 The Exchange CIC
 GMB
 Lancaster District CVS
 Lancaster Girls' Grammar School
Lancaster Vision
Lancaster University
Lancaster & Morecambe College
 Loyne School
 Ludus Dance
 More Music
 New Life Church
 The Well
 UNISON
 UNITE

South Lakeland

Action with Communities in Cumbria
 Age UK South Lakeland
 Alzheimer's Society
 Arnside & Silverdale AONB Partnership
 Arts Council England
 AWAZ
 Barnado's
 Captain French Surgery
 Barra Culture
 Cartmel Surgery
 Cartmel Village Society
 Cumbria Action for Sustainability
 Cumbria County Scouts
 Cumbria CVS
 Cumbria Deaf Association – South Lakes
 Cumbria Inter-faith Forum
 Cumbria Rural Housing Trust
 Cumbria Wildlife Trust
 Cumbria Youth Alliance
 Dr Johnston and Partners
 Dr Murray and Partners
 Duddon Valley Medical Practice
 Eden Housing Association
 Fair oak
 Flookburgh Youth Club
 Frances C Scott Charitable Trust
Friends of Lake District
 Ford Park Community Group
 Furness MIND
 Girlguiding Cumbria South
 Greener Ulverston

Haverthwaite Surgery
 Home Group
 Homes for Ulverston
 The James Cochrane Practice
 Kirkby Lonsdale Civic Society
 Lake District National Park
 Lakeland Housing Trust
 Lakes Line Community Rail Partnership
 Lakes Line Rail User Group
 Lunesdale Surgery
 Manna House
 National Federational of Gypsy Liaison Groups
 Nutwood Medical Practice
 Oklea Trust
 One Boice – Kendal 7 South Lakes Centre for Independent Living
 Park Community Group
 Park View Surgery
 Peninsula Medical Practice
 Riverside Housing Association
 Sight Advice South Lakes
 South Cumbria Dyslexia Association
 South Lakes Action on Climate Change
 Station House Surgery
 Stoneleigh Surgery
 Two Castles Housing Association
 Westmoreland County FA Ltd
 Yorkshire Dales National Park

Public consultation

Town and Parish councils

The scale and number of Town and Parish councils across the Bay area is hugely varied, with three in Barrow (two parishes and one town council), 40 in Lancaster and 69 in South Lakeland.

Ahead of the submission of the outline business case, authorities offered to deliver briefings to towns and parishes, explaining LGR and The Bay proposal. Leaders also attended informal meetings where requested as part of their ongoing engagement with towns and parishes where The Bay was discussed. These took place at the beginning of November, prior to the submission of the outline business case.

As a stakeholder group, Town and Parish councillors welcomed The Bay's proposed closer relationship with them to address key concerns raised by local residents such as roads and potholes; local planning; traffic (particularly around schools), speeding and pollution.

The Bay proposal received broad support from a large number of individual Town and Parish councillors, including in cases where there has not been the opportunity, given the tight timescales, to convene a formal meeting. The proposal did receive formal support from Askam and Ireleth Parish Council and Halton-with-Aughton Parish Council, Kirkby Lonsdale Town Council, Pennington Parish Council and Natland Parish Council.

Other councils who were able to debate the proposal decided to remain neutral on whether to support The Bay or the County proposal until more information was available.

No responses were received from parish councils opposing The Bay.



“I’m representing Colton PC. We are officially neutral as we would like more information, but I’m very happy to express the views of many parish councillors who have spoken to me and we are almost universally in favour of The Bay proposal.” – Colton Parish Councillor.

“Following the meetings I attended on 26th November and feeding back to our councillors, I am pleased to say that Halton-with-Aughton Parish Council offers its full support in the bid to form The Bay Unitary Authority.” – Letter from Halton-with-Aughton Parish Council.

“At our meeting on 26-11-2020, New Hutton Parish Council discussed whether to support a Cumbria County unitary authority or a Morecambe Bay one. After canvassing the opinions of parishioners and discussing the issue at length, the Parish Council concluded that it could not decide which proposal to support. – Parish Clerk.”

“In response to the recent discussions regarding the proposal for a Bay unitary authority, the Parish Council for Askam and Ireleth are unanimous in supporting this endeavour. The Parish Council believe that this opportunity will bring economic and social benefits provided by a single authority for the area, allowing better access to services and support with also greater accountability to the residents.” Letter from Askam and Ireleth Parish Council.

“Thank you for giving us the opportunity to discuss the proposal and provide our comment. I can confirm that the parish council support the proposal to create the Bay Unitary Authority.” – Pennington Parish Council.



Parish Councils

Town and Parish Councils across the Bay has been engaged in the process, invited to attend a briefing and to participate in the consultation.

Some parishes took a formal position of support and there was general support for a locally-focused unitary.

Barrow

Askam and Ireleth Parish Council
Dalton with Newton Town Council
Lindal and Marton Parish Council

Lancaster

Aldcliffe-with-Cawood Parish Council
Bolton-le-Sands Parish Council
Borwick Parish Meeting
Cantsfield Parish Meeting
Caton-with-Littledale Parish Council
Carnforth Town Council
Cockerham Parish Council
Ellel Parish Council
Gressingham Parish Council
Halton-with-Aughton Parish Council
Heaton-with Oxcliffe Parish Council
Heysham Neighbourhood Council
Hornby-with-Farleton Parish Council
Ireby and Leck Parish Council
Melling-with-Wrayton Parish Council
Middleton Parish Council
Morecambe Town Council
Nether Kellet Parish Council
Over Kellet Parish Council
Over Wyresdale Parish Council
Overton Parish Council
Priest Hutton Parish Meeting
Quernmore Parish Council
Scotforth Parish Council
Silverdale Parish Council
Slyne-with-Hest Parish Council
Tatham Parish Council
Thurnham with Glasson
Warton Parish Council
Wennington Parish Council
Wray-with-Botton Parish Council
Whittington Parish Council
Yealand Conyers Parish Council
Yealand Redmayne Parish Council

South Lakeland

Aldingham Parish Council
Allithwaite and Cartmel
Arnside
Barbon
Beetham Parish Council
Blawith and Subberthwaite Parish Council
Broughton East Parish Council
Burneside Parish Council
Burton-in-Kendal Parish Council
Cartmell Fell
Casterton Parish Council
Claife Parish Council
Colton Parish Council
Coniston Parish Council
Crook Parish Council
Crosthwaite and Lyth Parish Council
Dent Parish Council
Docker Parish Meeting
Duddon Parish Council
Egton-with-Newland, Mansriggs and Osmotherley Parish Council
Fawcett Forest Parish Meeting
Firbank Parish Meeting
Garsdale Parish Council
Grange-over-Sands Town Council
Grayrigg Parish Meeting
Haverthwaite Parish Council
Hawkshead Parish Council
Helsington Parish Council
Heversham Parish Council
Hincaster Parish Meeting
Holme Parish Council
Hutton Roof Parish Council
Kendal Town Council
Kentmere Parish Meeting
Killington Parish Meeting
Kirkby Ireleth Parish Council
Kirkby Lonsdale Town Council
Lakes Parish Council
Lambrigg Parish Meeting

Levens Parish Council
Lindale and Newton-in-Cartmel
Longsleddale Parish Meeting
Lower Holker Parish Council
Lowick Parish Council
Lupton Parish Council
Mansergh Parish Meeting
Middleton Parish Meeting
Milnthorpe Parish Council
Natland Parish Council
New Hutton Parish Council
Old Hutton and Holmescales
Parish Council
Pennington Parish Council
Preston Patrick Parish Council
Preston Richard Parish Council
Satterthwaite Parish Council
Sedbergh Parish Council
Sedgwick Parish Council
Skelsmergh and Scalthwaiteirigg
Parish Council
Skelwith Parish Council
Stainton Parish Council
Staveley-in-Cartmel Parish Council
Staveley-with-Ings Parish Council
Torver Parish Council
Ulverston Town Council
Underbarrow and Bradleyfield
Parish Council
Urswick, Bardsea and Stainton
Parish Council
Whinfell Parish Meeting
Whitwell and Selside Parish
Meeting
Windermere & Bowness Town
Council
Witherslack, Meathop and Ulpha
Parish Council

Public consultation

Young people

The stakeholder engagement for young people and young people’s organisation was attended by a diverse range of people from across the three authorities, covering a broad age range and priority areas for future development.

There was a strong desire to be involved in the development of a Bay area proposal, with a range of age-appropriate materials so that young people could shape the way in which services are delivered in future, irrespective of whether The Bay authority is taken forward, which all leaders agreed to.

Key themes that came up were a focus on children’s social services and how that would be improved, from the current emergency-only fragmented delivery, to a more proactive service shaped by young people and those who care for or work with them, for example greater investment in mental health support.

Young people also raised the issue of affordable housing and the impact of holiday homes, particularly in the South Lakes area. They wanted to see measures to ensure local people could access long-term homes they could afford.

Separate follow-on sessions have been organised to capture the views of young carers as part of the process of developing The Bay proposal, to ensure the full business case and any subsequent work around service redesign fulfils their needs and aspirations.

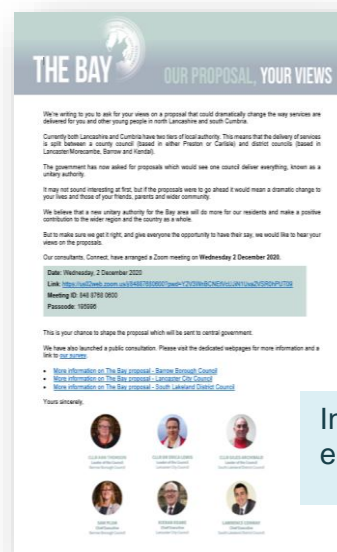
Young people were keen to hear about all the options and were reassured that if the Government proceeds with LGR, there will be a further consultation process.



“I would like to hear more about improving mental health services. It is almost impossible to access them.”

“At the moment talking about Cumbria, it feels it is all about Carlisle.”

“What plans are there for affordable housing? In Cumbria particularly, where we are inundated with holiday cottages and lodges, renting is pretty difficult. Also, what are your plans to develop support within sheltered housing for 16-18s who have had to leave home?”



Invitation to young people’s engagement event

Young People

In the very limited time available we have sought to engage with young people and youth organisations across The Bay. Conversation was focused on how a new Bay authority could deliver better outcomes for young people than current arrangements. At the main consultation meeting with Leaders, around 20 young people took part and shared their views. A further session was held with young carers, with a greater focus on education, future aspiration and housing.

All of the following organisations were contacted and invited to participate in the consultation.

Barrow

ACE
BBC Spokesperson FYP
Dropzone Youth Services
 FMCF
 Furness College
 Furness Education Consortium
Furness Young Carers
 Inspiring Barrow
 Walney Community Trust
Youth Board
 YouthAbility

North Lancs Directions Group
 Jennifer's Dancers
 Lancs Fire Rescue
 Lancaster SU
 Lonsdale Scouts
 Ludus Dance
 Marsh Community Centre
 More Music
 Propup
 Stanleys Community Centre
 University of Cumbria Students' Union

South Lakeland

Lancaster
 Cancer Care
 CEEP
 EMUES U KCIC
 Escape 2 Make
 A Family's Best Friend
 Lancashire Youth Challenge
 The Methodist Church

Barnado's
 Cartmel Priory School
 Cllr Sue Sanderson
Cumbria County Scouts
 Curious Minds
 Drop Zone
 Dallam School
 Furness Education Consortium

Girlguiding Cumbria South

Inspira
 John Ruskin School
 Kendal Brewery Arts Centre
 Kendal College
 Kendal Cycle Club
 Kirby Kendal School
 Lakes School
 Queen Elizabeth School
 Queen Katherine School
 Settleback School
 South Lakes Federation
 Targeted youth support CCC
 Ulverston Victoria High School
 Unity
 University of Cumbria
 Westmoreland County Football Association Limited
 Cllr Suzie Pye



Local support – meeting the Government’s LGR criteria

Barrow, Lancaster and South Lakeland councils believe that our consultation and engagement activity demonstrates strong local support, meeting a key element of the Government’s criteria for assessing LGR proposals.

- An Independent opinion poll conducted by Survation showed that 62% of local people felt that The Bay option would be “most likely to improve the quality of services provided by councils”.
- An online survey which attracted responses from 2796 local residents confirmed strong support for the proposal, including 68% who said "a new local authority that covers Barrow, Lancaster and South Lakeland would be preferable to one based further afield e.g. in Carlisle (Cumbria County Council) or covering a bigger geography (Lancashire County Council)".
- Stakeholder consultation meetings across The Bay with residents, businesses, young people, town and parish councils have been very positive.

“

**A proposal should seek to
...command a good deal of local
support as assessed in the
round overall across the whole
area of the proposal**

”

THE BAY

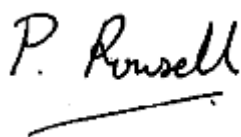


LOCAL GOVERNMENT AND PUBLIC INVOLVEMENT IN HEALTH ACT 2007
INVITATION FOR PROPOSALS FOR A SINGLE TIER OF LOCAL GOVERNMENT

The Secretary of State for Housing, Communities and Local Government, in exercise of his powers under Part 1 of the Local Government and Public Involvement in Health Act 2007, hereby invites any principal authority in the area of the county of Cumbria to submit a proposal for a single tier of local government, in accordance with paragraphs 1 to 3 below.

1. If an authority wishes to make a proposal in response to this invitation it must submit by 9 November 2020 at least an outline proposal, and if a full proposal has not been submitted by that date, the full proposal must be submitted as soon as practicable thereafter and by no later than 9 December 2020.
2. In responding to this invitation an authority must have regard to the guidance from the Secretary of State set out in the Schedule to this invitation, and to any further guidance on responding to this invitation received from the Secretary of State.
3. An authority responding to this invitation may either make its own proposal or make a proposal jointly with any of the other authorities invited to respond.

Signed by authority of the Secretary of State for Housing, Communities and Local Government.

A handwritten signature in black ink that reads "P. Rowsell". The signature is written in a cursive style and is underlined with a single horizontal stroke.

P Rowsell

A senior civil servant in the Ministry of Housing, Communities and Local Government

9 October 2020

SCHEDULE

Paragraphs 1 to 2 below set out guidance from the Secretary of State.

1. A proposal should seek to achieve for the area concerned the establishment of a single tier of local government, that is the establishment of one or more unitary authorities:

a. which are likely to improve local government and service delivery across the area of the proposal, giving greater value for money, generating savings, providing stronger strategic and local leadership, and which are more sustainable structures;

b. which command a good deal of local support as assessed in the round overall across the whole area of the proposal; and

c. where the area of each unitary authority is a credible geography consisting of one or more existing local government areas with an aggregate population which is either within the range 300,000 to 600,000, or such other figure that, having regard to the circumstances of the authority, including local identity and geography, could be considered substantial.

2. The following matters should be taken into account in formulating a proposal:

a. A proposal should describe clearly the single tier local government structures it is putting forward, and explain how, if implemented, these are expected to achieve the outcomes described in paragraph 1 above.

b. The need for evidence and analysis to support a proposal and any explanation of the outcomes it is expected to achieve, including evidence of a good deal of local support.

c. The impact of any proposed unitary authorities on other local boundaries and geographies. If the area of any proposed unitary authority crosses existing police force and fire and rescue authority boundaries, the proposal should include an assessment of what the impact would be on the police forces and/or fire and rescue authorities and include the views of the relevant Police and Crime Commissioners and Fire and Rescue Authorities.

d. Any wider context for any proposed unitary authorities around promoting economic recovery and growth, including possible future devolution deals and Mayoral Combined Authorities.

e. If the proposal submitted by 9 November 2020 is an outline proposal it should indicate what further material is expected to be provided and when this would be submitted which should be no later than 9 December 2020.

Lawrence Conway
Chief Executive
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
Cumbria
LA9 4UF



Ministry of Housing,
Communities &
Local Government

By email:
l.conway@southlakeland.gov.uk

9 October 2020

Dear Chief Executive,

The Secretary of State has today in accordance with the Local Government and Public Involvement in Health Act 2007 invited any principal council in Cumbria to submit a proposal for unitary local government for the area. Your council therefore is invited to make such a proposal, and if it decides to do so, it may make its own proposal or make a proposal jointly with any other councils in Cumbria. I enclose a copy of the invitation.

As you will see, if a council decides to make a proposal, it must submit by 9 November 2020 at least an outline proposal, and if a full proposal has not been submitted by that date, the full proposal must be submitted as soon as practicable thereafter and by no later than 9 December 2020. A proposal should be submitted by email to Paul.Rowsell@communities.gov.uk and Helen.McStravick@communities.gov.uk

Some councils have already shared a draft or initial proposal with the department; where this is the case the proposal should now be formally submitted in response to this invitation.

You will also see that in response to this invitation a council may make any of the types of proposal permitted under the 2007 Act. Section 2 of the 2007 Act provides for the following types of proposal:


Paul Rowsell CBE
Head of the Governance Reform and Democracy Unit
Ministry of Housing, Communities and Local Government
2nd Floor North East Corner Fry Building
2 Marsham Street
London SW1P 4DF

Email paul.rowsell@communities.gov.uk
Telephone 0303 444 2568

- Type 'A' is a proposal for a single, unitary tier of local government for the area which is the county concerned.
- Type 'B' is a proposal for a single, unitary tier of local government for an area which is currently a district, or two or more districts, taking on county functions, within the county concerned, to be specified in the proposal.
- Type 'C' is a proposal for a single tier of local government for an area specified in the proposal which currently consists of the county concerned or one or more districts in the county concerned; and one or more relevant adjoining areas.
- A combined proposal which is a proposal that consists of: two or more Type B proposals: two or more Type C proposals: or one or more Type B proposals and one or more Type C proposals,

If you have any queries about this letter or enclosed invitation, please contact Helen McStravick at Helen.McStravick@communities.gov.uk or 07458 135243.

Yours Sincerely,



P ROWSELL

Paul Rowsell CBE
Head of the Governance Reform and Democracy Unit
Ministry of Housing, Communities and Local Government
2nd Floor North East Corner Fry Building
2 Marsham Street
London SW1P 4DF

Email paul.rowsell@communities.gov.uk
Telephone 0303 444 2568