

PLACE, ECONOMIC GROWTH AND ENVIRONMENT SCRUTINY BOARD

***Overview & Scrutiny Committee
Agenda***

Date Thursday 31 August 2023

Time 6.00 pm

Venue Crompton Suite, Civic Centre, Oldham, West Street, Oldham, OL1 1NL

Notes 1. DECLARATIONS OF INTEREST- If a Member requires advice on any item involving a possible declaration of interest which could affect his/her ability to speak and/or vote he/she is advised to contact Paul Entwistle or Constitutional Services at least 24 hours in advance of the meeting.

2. CONTACT OFFICER for this agenda is Constitutional Services Tel. or email

3. PUBLIC QUESTIONS - Any Member of the public wishing to ask a question at the above meeting can do so only if a written copy of the question is submitted to the contact officer by 12 noon on Date Not Specified.

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MEMBERSHIP OF THE PLACE, ECONOMIC GROWTH AND ENVIRONMENT SCRUTINY BOARD

Councillors Ghafoor, Hince, Hindle, Ibrahim, Iqbal, McLaren (Chair), Moores and Williamson

Item No

- 1 Apologies
- 2 Minutes of the Previous meeting (Pages 1 - 4)

The Minutes of the meeting of the Health and Wellbeing Board held on 15 June 2023 are attached for approval.
- 3 Declarations of Interest

To receive Declarations of Interest in any contract or matter to be discussed at the meeting.
- 4 Urgent Business

Urgent business, if any, to be introduced by the Chair.
- 5 Public Question Time

To receive Questions from the Public, in accordance with the Council's Constitution.
- 6 Assurance Framework on Grant Funded Programmes (Pages 5 - 14)

To receive the report of the Director of Finance regarding capital grant funding administered by the Department of Levelling Up, Housing and Communities (DLUHC).
- 7 Temporary Accommodation Deep Dive (Pages 15 - 30)

To receive and discuss Temporary Accommodation Deep Dive report which informs Scrutiny of advance notification that has been received from the Department of Levelling up, Housing, Communities and Local Government (DLUHC) that Oldham Council's Chief Executive was due to be contacted to ask the Council to participate in a deep dive around its temporary accommodation use.
- 8 Draft Environment Strategy (Pages 31 - 48)

To receive and discuss the Draft Environment Strategy.
- 9 Cemeteries and Crematorium (Pages 49 - 56)

To receive and discuss the Cemeteries and Crematorium report which informs the Scrutiny Committee of the opportunities and current/future challenges that exist within the cemetery service that is within the Environment Directorate.



Oldham
Council

10 Work Programme
 To Follow

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Present: Councillor McLaren (Chair)
Councillors Ibrahim, Iqbal, Moores and Williamson

Also in Attendance:

Emma Barton – Executive Director (Place and Economic Growth)

Paul Clifford – Director of Economy

Nasir Dad – Director of Environment

Mark Stenson – Assistant Director of Corporate Governance and Strategic Financial Management

Peter Thompson – Constitutional Services

1 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Hince and Hindle.

1 **APPOINTMENT OF VICE CHAIR**

The Committee was requested to appoint a Vice Chair for the 2023/24 Municipal Year.

Resolved:

That Councillor Moores be appointed as Vice Chair of the Place, Economic Growth and Environment Scrutiny Board for the 2023/24 Municipal Year.

2 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Hince and Hindle.

3 **DECLARATIONS OF INTEREST**

There were no declarations of interest received.

4 **URGENT BUSINESS**

There were no items of urgent business received.

5 **PUBLIC QUESTION TIME**

There were no public questions for the meeting to consider.

6 **TERMS OF REFERENCE**

The Scrutiny Board considered its terms of reference which had previously been approved at the Annual Council meeting on 24th May 2023.

Resolved:

That the terms of reference for the Place, Economic Growth and Environment Scrutiny Board, be noted and supported.

7 **PROPOSED AUDIT COMMITTEE WORK PROGRAMME FOR 2023-24**

The Scrutiny Board was presented with the Audit Committee's work programme for 2023/24 for information. There were elements of work that the Audit Committee may be asked to undertake that was similar in nature to the remit of the Place, Economic Growth and Environment Scrutiny Board. Therefore, Members looked at the possibility of joint working.

Resolved:

That the Audit Committee's Work Programme, 2023/24, be noted.

8 **WORK BOOK ON SCRUTINY**

Consideration was given A Councillor's Workbook on Scrutiny produced by the Local Government Association (LGA) which had been designed as a learning aid for Councillors. The LGA considered that the Workbook serves as a useful tool for some of the key skills, approaches and tactics that make for an effective ward Councillor.

Resolved:

That the Councillor's Workbook on Scrutiny produced by the Local Government Association be noted.

9 **PLACE AND ECONOMIC GROWTH**

The Committee received a detailed presentation which outlined the work and functions of the Place and Economic Growth Directorate. The Directorate was headed by the Executive Director, who was supported by a Director of Economy and a Director of Environment.

The Director of Economy was responsible for the following areas:

a. Planning

The principal functions of the Planning Service were outlined as: Development Control, Planning Policy and Transportation. The priorities of the Planning Service were: the development of a resident focused Planning System; the development of the Greater Manchester wide (except for Stockport) Places for Everyone initiative; the Local Plan refresh; development and maintenance of District Plans; and the implementation of the Borough's Transport Strategy.

b. Housing

The main aims of the Housing Services were to deliver the 'Warm Homes Oldham' plan; tackling Homelessness; developing Housing Options (in consultation with local providers) and Market Interventions. The current priorities for Housing Services were: an accelerated delivery of housings sites, promoting the Town Centre Strategic Partnership; and revitalising the Housing Options place based delivery model.

c. Economic Development and Growth

The main aims of the Economic Development Service was providing support, where necessary and possible for local businesses, Investment, the 'Get Oldham Working' initiative and developing the Borough's town centres and markets. Their current priorities included the delivery of Green Shoots and The Hive; Investment and Place Marketing; Delivery of Restart and the National Careers Service; Markets transition into Spindles; and development of the Atom Valley development site.

d. Property and Projects

The main areas of focus for the Property and Projects Service included: Estates Management; Property Maintenance; Facilities Management; Parking; and the School Catering Service the Service's current priorities included – development of a Facilities Management Target Operating Model; a strategic review management of asset base and the establishment of an Oldham Strategic Estates Group.

The Director of Environment was responsible for the following areas:

a. Public Protection

The main areas covered by the Public Protection Service were: Licensing, Trading Standards' First Response Security, Environmental Health (including Health and Safety, Food Safety and Selective Licensing), the development of the Greater Manchester Clean Air Plan, Neighbourhood Enforcement and Building Control. The Service's priorities included periodic and fundamental service reviews; resident focused systems and technology; and the development of mobile working options for officers across all services to improve efficiency and response times.

b. Waste Management, Street and Highways Operations

The main elements of this service included - Waste Management (Domestic, Trade and Bulky), Fleet Management and Highways Operations (including winter maintenance). The service's priorities included the implementation of the 'Bartec' Collective'; dealing and managing DEFRA consultations; the roll out of handheld technology to 'front-end' the Highways' service's workforce; to review grit bin locations; to review Gully maintenance work and the delivery of quality services; and the procurement of replacement vehicles.

c. Highways and Engineering

The functions of the Highways and traffic teams were to - manage and improve the Borough's highways; to carry out planned inspections of all the highway's network; to design and to provide site supervision of all capially funded schemes. The priorities included – carrying out highway's infrastructure network management, including planned safety inspections; the prioritisation of defects, such as potholes; management of traffic and safety engineering; maintain the responsibilities under the New Roads and Streetworks Act; and project delivery, including capital funded projects and programmes.

Grounds Maintenance and Environmental Services

The main duties and responsibilities of these services included the development of grounds maintenance and landscape development; street cleansing; arboriculture and countryside service and cemetery and crematorium services. The main priorities currently were – the development of phase 1 of the ‘ECO centre’; completion of the ‘Don’t Trash Oldham’ (DTO) ‘Betterment’ Programme - by September 2023; completing a framework agreement for the management of the borough’s tree stock; to continue to increase biodiversity across the borough’s greenspaces over the next five years; and to ensure that cremators are replaced so as that they comply with legal requirements.

Resolved:

1. That the presentation be noted and welcomed.
2. That the projects and initiatives contained within the presentation, with respect to both the Economy Service and the Environment Service be used to develop the Committee’s 2023/24 Work Programme.

10 **WORK PROGRAMME**

The Committee considered its Work Programme for 2023/24.

Resolved:

That the Place, Economic Growth and Environment Scrutiny Board’s Work Programme 2023/24, be noted.

11 **KEY DECISION DOCUMENT**

The Scrutiny Board reviewed the Key Decision Notice which provided an opportunity for the identification of items or policy or service development, not otherwise listed on Work Programme.

Resolved:

That the Key Decision Notice be noted.

The meeting started at 6.00pm and ended at 8.25pm



Oldham
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Report to the Place, Economic Growth and Environment Scrutiny Board.

Assurance Framework on Grant Funded Programmes

Portfolio Holder: Cllr Abdul Jabbar MBE, Cabinet Member for Finance and Corporate Resources

Officer Contact: Anne Ryans - Director of Finance

Report Author: Mark Stenson – Assistant Director of Corporate Governance and Strategic Financial Management

Email: mark.stenson@oldham.gov.uk

31 August 2023

Reason for Report

The Council has been successful in obtaining capital grant funding from three sources administered by the Department of Levelling Up, Housing and Communities (DLUHC). These grant funding streams are detailed below:

- Future High Street Funds; expected grant related expenditure to be completed by 31 March 2024;
- Town Deals Fund; expected grant related expenditure to be completed by 31 March 2025 (the Future High Streets Fund and Town Deals Fund are collectively known as the Towns Fund); and
- Levelling Up Fund; expected grant related expenditure to be completed by 31 March 2025.

In addition, it is expected that there will be a further opportunity to bid for a further programme of Levelling Up Funding which has the potential to attract a further £20m in capital grant funding to the Council

This report outlines the review expected from the scrutiny function in respect of the guidance issued by DLUHC on overseeing these grant programmes.

Executive Summary

The Permanent Secretary at DLUHC is the Accountable Officer for any grant spend on the Future High Streets Fund, Town Deals Fund and Levelling Up Fund. It has been reported in the Local Government financial press that the oversight of grant funds including those linked into Levelling Up were subject to enhanced scrutiny by His Majesty's Treasury.

On 16 June 2023 DLUHC issued guidance (Levelling Up Funds Local Authority Assurance Framework) which clarified the oversight that DLUHC expects regarding the grant schemes. It sets out a common approach as to how DLUHC will assure the use of the funds in scope (from an Oldham perspective these are as detailed above, the Levelling Up Fund, Town Deal Funds and Future High Street Funds (the latter two are collectively known as Towns Fund)).

The Framework sets standards in line with the principles of Managing Public Money (MPM) with regard to regularity, propriety and securing value for money. It provides DLUHC, His Majesty's Government (HMG) and more widely stakeholders and the public with the necessary assurances that grant recipients have the policies and procedures in place to ensure the robust stewardship of public money.

The key points from the guidance in relation to Oldham are:

- In accordance with the Cabinet Office Government Functional Standards, the Assurance Framework provides for 3 separate and defined levels of assurance referred to as the three lines of defence;
- The first line of defence should be delivered at an operational management level. This is specified as the Chief Finance Officer. In Oldham this is the Director of Finance. This officer has the responsibility for the delivery of HMG investment, through the agreed projects, with propriety, regularity and value for money;
- When signing the assurance letter and statement of grant usage the Chief Finance Officer will be required to provide written confirmation that they have actively undertaken all necessary checks to ensure proper administration regarding the funding programme, particularly with regard to financial administration and transparency of governance;
- The second line of defence will be independent of the first line of defence and will be undertaken by DLUHC. It will require Local Authorities to engage with and provide supporting information in response to further assurance activity undertaken by DLUHC and other Government departments;
- The third line of defence will be undertaken by an independent audit or an independent body to secure an "objective opinion on the effectiveness of governance, risk management and internal controls".

The guidance implies that these grant funded projects are reviewed in line with the Council's arrangements for scrutiny. Should the Council be selected for a more detailed

review as set out in the second/ third line of defence then the level of scrutiny undertaken will be reviewed.

For the financial year 2023/24 it is suggested that two reports be submitted by Officers to this Scrutiny Board. This report setting out the Assurance Framework and a further report to the meeting on 19 March 2024 setting out progress in relation to each of the funding streams/capital expenditure programmes in line with the basis upon which the funding has been approved, i.e based on forecast outcomes, milestones and financial profiles.

For the municipal year 2024/25 it is recommended that a further 2 reports outlining the progress on the oversight of these grant programmes are included in the workplan of this Committee.

Recommendation

That the Place, Economic Growth and Environment Scrutiny Board:

- 1) Notes their responsibility to undertake scrutiny on the detailed grant programmes
- 2) Considers the incorporation of a review on progress on the Future High Streets Fund, Town Deals Fund and Levelling Up Fund twice in a municipal year.

1 Grant Programmes Assurance Framework

- 1.1 On 16 June 2023 DLUHC issued guidance (Levelling Up Funds Local Authority Assurance Framework) which clarified the oversight DLUHC expects regarding the grant schemes falling within the remit of Levelling Up. It sets out a common approach to how DLUHC will assure the use of the funds in scope (from an Oldham perspective these are the Levelling Up Fund, Town Deals Fund and Future High Street Fund).
- 1.2 The Framework sets standards in line with the principles of Managing Public Money (MPM) with regard to regularity, propriety and securing value for money. It provides DLUHC, His Majesty's Government (HMG) and more widely stakeholders and the public with the necessary assurances that grant recipients have the policies and procedures in place to ensure the robust stewardship of public money.
- 1.3 This guidance expands the previous assurance regime implemented by DLUHC whereby the Chief Financial Officer was required to certify a statement of estimated grant usage twice per annum. It follows a reported challenge to DLUHC from HM Treasury about its processes on the administration of capital grants for which it has departmental responsibility.
- 1.4 As advised above, there are three capital grant programmes for which this Scrutiny Board may be expected to provide oversight under this Assurance Framework. These are:
- Future High Street Funds (FHSF); expected grant related expenditure to be completed by 31 March 2024;
 - Town Deals Fund (TDF); expected grant related expenditure to be completed by 31 March 2025 (the FHSF and the TDF are collectively known as the Towns Fund); and
 - Levelling Up Fund; expected grant related expenditure to be completed by 31 March 2025.

In addition, it is expected that there will be a further opportunity to bid for a further programme of Levelling Up Funding which has the potential to attract a further £20m in capital grant funding to the Council. As Oldham Council is a priority 1 area in terms of bidding it will have a reasonable chance of securing funding subject to it identifying appropriate schemes.

- 1.5 It is important to note that when grant funding has been awarded for the Future High Streets Fund and Levelling Up Fund, there is a requirement for a Local Authority to agree a Memorandum of Understanding (MOU) with DLUHC setting out what is expected of grant recipients with regard to issues such as:
- Eligible expenditure;
 - Reporting;
 - Accountability and assurance;
 - Monitoring and evaluation;
 - Branding and communication; and
 - Performance management.

The Council has signed such MOU's.

1.6 Whilst the FHSF element of the Towns Fund is subject to a Memorandum of Understanding between DLUHC and the Council, the Town Deal is an agreement in principle between Government, the Accountable Body (the Council) and the Town Deal Board, confirmed in a Heads of Terms (HoT). The HoT is signed by the Chair of the Town Deal Board, the accountable body (the Council) and the Minister for Levelling UP. DLUHC therefore provides funding to Oldham through the Council to the Town Deal Board. As such the responsibility of the Council as Accountable Body is clear.

2 Assurance Framework

Principles of the Assurance Framework

- 2.1 A key element of the Central Government Assurance Framework is the role of the Accountable Officer. For DLUHC this is the Permanent Secretary who for each of the grant funding regimes is required to sign an Assurance Statement. To discharge this requirement “The Levelling Up Funds Local Authority Assurance Framework” (to which a link is provided as Appendix 1 to this report) has been developed. The guidance acknowledges the principles of the Framework.
- 2.2 The key points from the guidance in relation to Oldham are:
- In accordance with the Cabinet Office Government Functional Standards, the Assurance Framework provides for 3 separate and defined levels of assurance referred to as the 3 lines of defence;
 - The first line of defence should be delivered at an operational management level. This is specified to be the Chief Finance Officer who for Oldham is the Director of Finance. This officer has the responsibility for His Majesty’s Government (HMG) investment, through the agreed projects, with propriety, regularity, and value for money, particularly with regard to financial administration and transparency of governance. When signing the assurance letter and statement of grant usage the Chief Finance Officer will be required to provide written confirmation, they have undertaken all necessary checks to ensure proper administration regarding the funding programme;
 - The second line of defence will be independent of the first line of defence and will be undertaken by DLUHC. It will require Local Authorities to engage with and provide supporting information in response to further assurance activity undertaken by DLUHC and other Government departments;
 - The third line of defence will be undertaken by an independent audit, or an independent body provided via Central Government to secure an “objective opinion on the effectiveness of governance, risk management and internal controls”.
- 2.3 The guidance implies that these grant funded projects are reviewed in line with the Council’s arrangements for scrutiny. Should the Council be selected for a more detailed review as set out in the second line of defence, then the level and effectiveness of scrutiny undertaken will be reviewed.
- 2.4 For the financial year 2023/24 it is suggested that two reports be submitted by Officers to this Scrutiny Board. This report setting out the responsibilities expected via the Assurance Framework with a further report to the meeting on 19 March 2024 setting out the progress on delivering the three funding streams/capital expenditure programmes in line with the basis upon which the funding has been approved, i.e. based on forecast outcomes, milestones and financial profiles.

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- 2.5 In respect of the municipal year 2024/25 it is recommended that a further 2 reports outlining the progress on the oversight of these grant programmes are included in the future workplan.

First Line of Defence

- 2.6 The Chief Financial Officer is the first line of defence and DLUHC will expect this Officer via the completion of the assurance letter and statement of grant usage, to provide written confirmation that they have undertaken all the necessary checks to ensure proper administration of the financial affairs of the funding programme.
- 2.7 The statement of grant usage is to be completed on an annual basis and has the requirements detailed below:
- Details of the checks that the Chief Finance Officer (or deputy) has taken to assure themselves that the Local Authority has in place the processes that ensure proper administration of its financial affairs relating to these grant funds .
 - Provision of responses to the required questions addressing the governance and transparency for grant management including procurement, conflict of interest, subsidy control/ state aid, counter fraud, and risk management.
- 2.8 The Chief Financial Officer will also complete an assurance letter which is addressed to the Permanent Secretary in their role as DLUHC Accounting Officer. In this letter the Chief Financial Officer must express an opinion on whether the individual grant programmes are being properly administered, and if not, provide information on their concerns with how the risks/ issues are to be resolved.

Proposed Assurance to be applied by the Director of Finance

- 2.9 To provide the assurance, it is proposed that the Director of Finance relies on the following for the financial year 2023/24 and future financial years:
- A report to the Place, Economic Growth and Environment Scrutiny Board on 19 March 2024 by the Executive Director for Place and Economic Growth on the progress made on the three grant programmes as outlined in this report. This will include the comments of the Director of Finance as the first line of defence. In future financial years it is envisaged this officer will produce two of these reports which will include the comments of the Director of Finance.
 - The integration of this guidance into the programme management arrangements overseen by the Place and Economic Growth Portfolio aligned to the operation of the Creating a Better Place Programme Board.
 - Appropriately published Electronic Decision Recording System Reports outlining the key decisions undertaken on project management to ensure they are taken in accordance with the Council's decision-making framework.
 - Finance and Contract Procedure Rules which are subject to regular updating and regular reviews to ensure that these are complied with;
 - An up to date suite of Counter Fraud Policies which are subject to appropriate review by the Audit Committee.
 - A targeted programme of internal audit work on the 3 grant funded programmes. The outcomes of any audit work will be reported to the Audit Committee as part of

the routine reports. A summary of the findings will also be reported to this Committee on 19 March 2024 by the Executive Director for Place and Economic Growth and in the year-end report to this Scrutiny Committee for the municipal year 2024/25.

- A detailed analysis of the Subsidy Control implications for each project within the 3 capital grant programmes. This analysis should be completed by the project officers from the Place and Economic Growth Portfolio, Legal Services and the Procurement and Finance Teams.
- Regular reports to the Audit Committee including the regular updates provided on the issues either already identified or to be identified within the Annual Governance Statement. At present the potential risks to the capital programme and grant funding regime delivery have been identified as specific risks. This is due to increased costs and/ or the requirement to reprofile schemes and resulting in challenges to delivery within grant funding timelines;
- Oversight of this Scrutiny Board of the programme management arrangements in place for the Future High Streets Fund, Town Deals Fund and Levelling Up Fund capital grants regimes.

Second Line of Defence

- 2.10 The second line of defence will be undertaken by the Assurance and Compliance Team within DLUHC. It is important to note that the DLUHC is quite heavily reliant on the first line of defence, i.e., the information provided by the Chief Finance Officer and hence the robustness of the operational and management arrangements of a Local Authority.
- 2.11 DLUHC will take a risk based approach to the second line of defence with deep dives being undertaken based on a suite of risk factors and random sampling. Sample based deep dives will be undertaken using a random selection tool and will be established on an annual basis.
- 2.12 In addition to random sampling the determination of a need for a deep dive will involve the consideration of a series of risk triggers as detailed below for each separate capital grant programme:
- Any concerns of Chief Financial Officer highlighted via the Assurance Letter and Statement of Grant Usage;
 - Evidence that financial performance is not in line with the previous performance returns (note returns have to be submitted on a 6 monthly basis);
 - Concern that delivery performance is at risk based on the deliverability review undertaken twice a year;
 - Area led intelligence based on local relationships with DLUHC officials;
 - The External Auditor's annual report which is based upon the Authority's last certified published accounts as published on the website;
 - Assurance intelligence based on the shared intelligence of the various DLUHC teams overseeing the capital funding programmes.

2.13 One key measure in determining whether to take a more detailed review will be if financial performance. Where the spend is either 40% below or above the quarterly threshold submitted for two quarters in succession a more detailed review is likely from DLUHC.

2.14 A deep dive review will involve an examination of:

- Key documentation such as the Terms of Reference, Programme Management Arrangements including agendas, oversight by Scrutiny Boards/Committees and risk policy.
- Counter Fraud oversight including managing conflicts of interest;
- Compliance with the Authority's own decision making framework which will include procurement protocols;
- Compliance with State Aid and Subsidy Control requirements.

2.15 It will involve the Local Authority providing evidence as requested and key meetings involving officers which will include the Director of Finance.

Third Line of Defence

2.16 The third line of defence is an independent review to secure an "objective opinion on the effectiveness of governance, risk management and internal controls". This will be undertaken by the Government Internal Audit Agency (GIAA) and will take the form of a review of the activity completed by DLUHC as the second line of defence. The GIAA will provide notice of their planned review and set out the scope and information required at the time.

Assurance for Members

2.17 The Council already has many of the requirements in place to provide assurance should it be requested by the second line of defence. The approach outlined in this report will give Members assurance about the robustness of the first line of defence. At Member level it will require appropriate liaison between the Audit Committee and Scrutiny Board to ensure the appropriate oversight of the capital grant programmes is undertaken.

3 Options/Alternatives

3.1 The Place, Economic Growth and Environment Scrutiny Board can:

- a) Undertake Scrutiny of the Grant Programmes for the Future High Streets Fund, Towns Fund and Levelling Up Fund by considering two reports per annum. This requirement has been included in the proposed work programme detailed elsewhere on the agenda.
- b) Choose not to undertake scrutiny twice a year of the 3 capital grant funded regimes, preferring to rely on reporting by exception should there be a challenge with regard to compliance with the DLUHC Assurance Framework.

4 Preferred Option

4.1 The preferred option is Option set out at 3.1(a) so that this Scrutiny Board to considers matters on the 3 capital grant programmes twice in a Municipal Year.

5 **Consultation**

5.1 N/A.

6 **Financial Implications**

6.1 The choice of the External Auditor's annual report as one key feature of the second line of defence is interesting given the well reported backlogs in External Auditors completing Local Authority audits and hence providing an opinion on accounts. There is at least one Local Authority which does not have its accounts certified for 2015/16.

6.2 This report sets out how it is proposed to support the undertaking of the first line of defence which is a responsibility of the Director of Finance. It will involve regular reports to both the Scrutiny Board and the Audit Committee with appropriate regular reviews of key policies to ensure they remain up to date.

6.3 The approach set out in the DLUHC Assurance Framework seems sensible. It is important to note that it has been introduced retrospectively and there is therefore a need to ensure future decisions balance the need to implement the schemes (some of which are complex) in line with the guidance in an extremely challenging timescale.

6.4 The risk to the Council should any of the 3 capital grant funding regimes covered by the DLUHC Assurance Framework go off track, is a potential loss of grant and increased requirement for Council resources to complete the schemes. There is also a reputational risk. The discipline required by the regular reporting of the grant funding regimes and reporting in relation to the Assurance Framework should provide an early warning if there are any perceived risks.

(Anne Ryans Director of Finance)

7 **Legal Services Comments**

7.1 N/A.

8 **Cooperative Agenda**

8.1 N/A.

9 **Human Resources Comments**

9.1 N/A.

10 **Risk Assessments**

10.1 The Annual Governance Statement to support the 2022/23 Draft Statement of Accounts alludes to the perceived risks on these capital grant funding programmes relating to the ability of the Council to deliver the projects in the required timescale. It is important that this risk is managed to prevent any loss of grant or additional cost to the Council.

(Mark Stenson)

11 **IT Implications**

11.1 N/A.

12 **Property Implications**

12.1 N/A.

13 **Procurement Implications**

13.1 N/A.

14 **Environmental and Health & Safety Implications**

14.1 N/A.

15 **Equality, community cohesion and crime implications**

15.1 N/A.

16 **Equality Impact Assessment Completed?**

16.1 None.

17 **Key Decision**

17.1 N/A.

18 **Forward Plan Reference**

18.1 N/A.

19 **Background Papers**

19.1 The following is a list of background papers on which this report is based in accordance with the requirements of Section 100(1) of the Local Government Act 1972. It does not include documents which would disclose exempt or confidential information as defined by the Act:

File Ref: Levelling Up Funds Local Authority Assurance Framework
published by DLUHC on 16 June 2023 (DLUHC website)
Officer Name: Mark Stenson
Contact: mark.stenson@oldham.gov.uk

20 **Appendices**

20.1 Appendix 1; Link to the Levelling Up Funds Local Authority Assurance Framework

<https://www.gov.uk/government/publications/levelling-up-funds-local-authority-assurance-framework>

Temporary Accommodation Deep Dive

Portfolio Holder(s):

Cllr Elaine Taylor, Deputy Leader of the Council and Cabinet Member for Housing and Licensing

Officer Contact: Paul Clifford, Director of Economy

Report Author(s): Victoria Wood, Housing Strategy Manager

31 August 2023

Reason for this report

Advance notification was received from the Department of Levelling up, Housing, Communities and Local Government (DLUHC) that Oldham Council's Chief Executive was due to be contacted to ask the Council to participate in a deep dive around its temporary accommodation (TA) use.

This context for this contact and the deep dive is concern about the particularly acute pressures on the TA market at present, and the increase in poor quality, poor value-for-money accommodation types; including Bed and Breakfast and 'nightly paid' TA.

DLUHC is keen to understand more about the drivers of these changes and will be carrying out 'deep dive' sessions in collaboration with local authorities in a number of areas, which will look at the reason these forms of TA are used and work together to identify some potential solutions.

Scrutiny Committee Members are asked to note the content of this report, to discuss the challenges with TA at this time, and to reflect on any additional areas which need exploring ahead of the deep dive discussions with DLUHC.

1 Deep Dive Details

- 1.1 DLUHC have advised that the details of the Deep Dive are yet to be confirmed, but similar exercises have been carried out around service areas such as the Rough Sleeping Initiative and have taken approximately two days, requiring on-site visits and follow-up work.
- 1.2 The Deep Dive is likely to involve:
- Focus sessions with key staff and residents
 - Visits to properties to review quality
 - Analysis of budgets
 - Case studies
- 1.3 DLUHC have advised that they are looking to work with six local authorities across England, whom they have selected in regional pairs. In the north, this is Oldham and Manchester. Oldham and Manchester have been invited to participate. Selection has been based on ensuring a diversity of areas across the six, and in areas which are using Bed and Breakfast / Nightly Paid accommodation according to statistical returns made to DLUHC.
- 1.4 As well as hoping to identify potential solutions, another aim of the Deep Dive is to potentially build a business case around TA. Whilst this may not provide additional funding for Oldham, this could be utilised towards future service change.
- 1.5 DLUHC have noted that they are aware of Oldham being a Levelling Up area and have advised that they will ensure there is no duplication with work around this.

2 TA overview

- 2.1 TA utilised in Oldham is split into several categories:
- **Nightly paid, privately managed accommodation:** this is the largest category of accommodation used by the Council. The majority is self-contained and of varying sizes from dispersed houses to bedsits within larger blocks, but some is House of Multiple Occupation (HMO) style accommodation where residents have en-suite rooms but may share a kitchen and other facilities
 - **Accommodation within registered provider stock:** this includes properties leased from providers by the Council, and properties that the Council refers to where the provider fully manages the accommodation as well as providing on-site support
 - **Accommodation leased from a private sector landlord:** the Council has arrangements in place where some properties are facilitated via arrangements with landlords on an ongoing basis. This is an area of current and future growth for the Council within its Temporary Accommodation Strategy
 - **Accommodation within the Council's own stock:** this forms the smallest group of TA, with the service only owning a handful of properties
 - **Bed and Breakfast hotels:** the Council spot-purchases accommodation with hotel providers on a nightly basis for up to a maximum of 6 weeks for families with children, although this can occasionally be longer for single people /

couples within dependants. These will usually be en-suite roomst but will not have cooking facilities so are not intended to be used as long-term accommodation.

- **Refuges:** the Council will refer victims of domestic abuse to refuge accommodation where this is the most appropriate option to meet their needs and circumstances. These are safe and secure facilities, usually with on-site support.

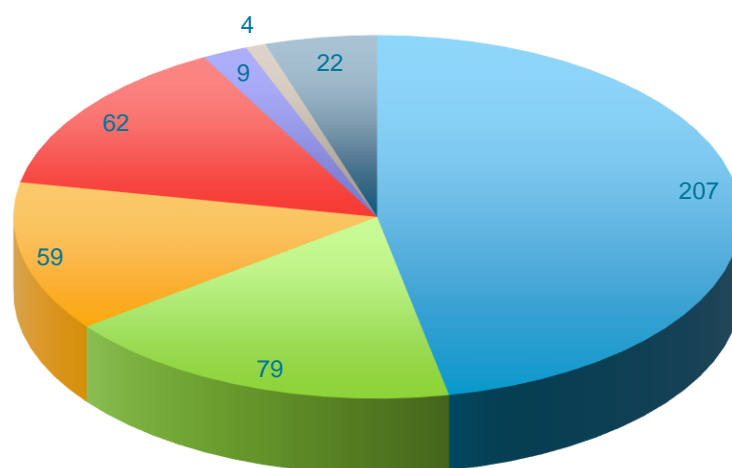
2.2 Other options that could be considered for temporary accommodation, but are not currently utilised in Oldham, are hostels and reception centres. There were previously utilised, but such large, semi-shared environments were considered unsuitable and decommissioned several years ago in favour of a dispersed model.

3 TA data

3.1 The 'deep dive' will primarily look to focus on Nightly Paid and Bed and Breakfast Accommodation. Nightly paid currently represents Oldham's largest proportion of TA – although households within this vary – and Bed and Breakfast.

3.2 The table below shows the current split of TA types as of 30/06/2023. 'ABEN residents' are people accommodated in the A Bed Every Night scheme which is comprised of two Houses of Multiple Occupation.

TA 30.06.2023



■ Nightly Paid ■ Private Rented ■ Social Rented ■ Bed and Breakfast ■ Refuge ■ Council ■ ABEN residents

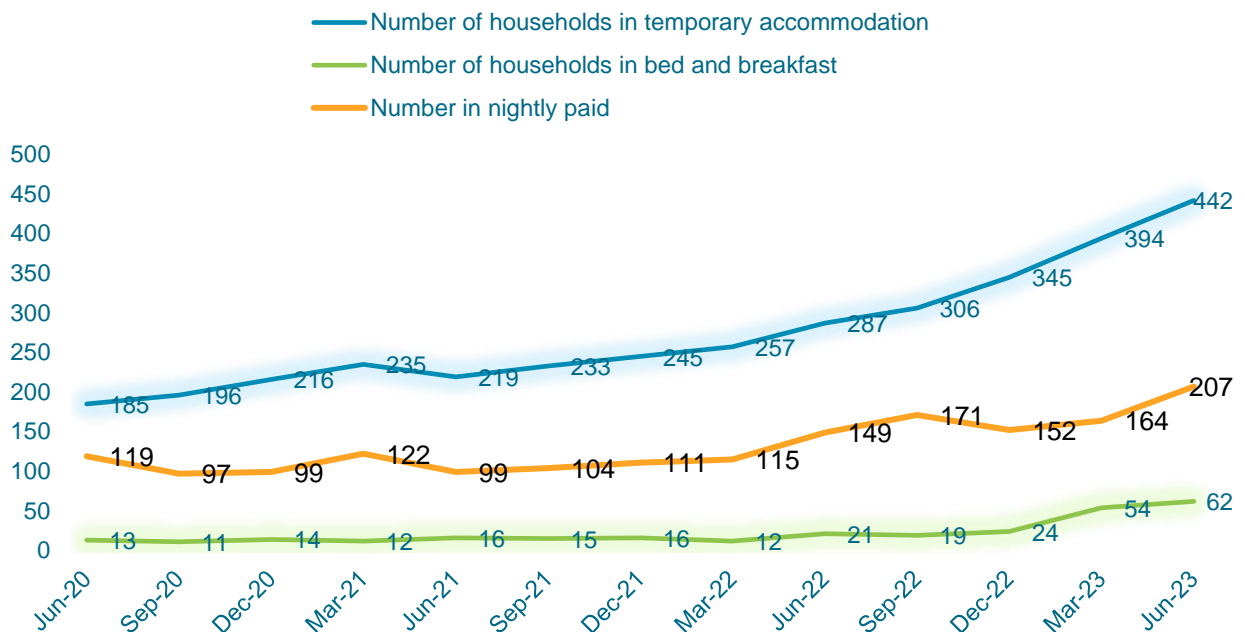
3.3 TA in Oldham has increased over the past year, which may be why DLUHC has identified the borough as an area for the deep dive exercise. Nightly paid accommodation has particularly increased since the Covid-19 pandemic, due to these units providing a self-contained accommodation option that is available at relatively short notice. For single people the option of 'bedsit' or HMO style

accommodation for example offers an improved alternative to Bed and Breakfast or hostels, as the resident has access to cooking facilities. However, it does however carry a 'nightly' cost implication.

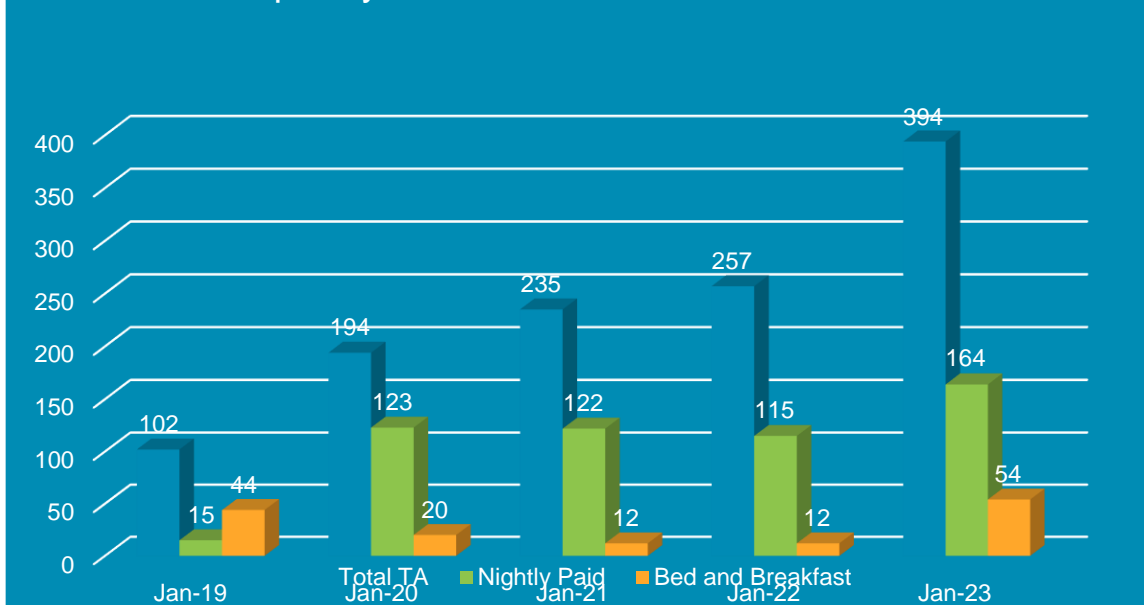
3.4 Some nightly paid provision has since been moved or replaced by providers who are able to offer an Intensive Housing Management / supported accommodation arrangement, hence the slight reduction / slowing in numbers in the chart below.

3.5 Despite efforts to bring alternative options to Bed and Breakfast, numbers in this form of accommodation have unfortunately increased in recent months in line with overall demand.

Households in TA / B&B



Temporary Accommodation - 5 Year Overview



3.6 Usage of TA has been driven by the following reasons for homelessness over the past year:

- Asked to leave by family (23%) – up 1%
- End of private rented tenancy (22%) – up 3%
- Domestic abuse (16%) – up 2%
- Asked to leave by friends (9%)
- Relationship breakdown (7%) – up 1%
- Departure from institution: custody (5%) – up 1%
- Required to leave accommodation provided by Home Office as asylum support (5%) – up 1%
- Non-racially motivated / other motivated violence or harassment (3%)
- Eviction from supported housing (3%)
- End of social rented tenancy (2%) – down by 4 %

5. TA Costs

5.1 Council expenditure on temporary accommodation over the past three financial years is summarised in the following table –

Financial Year	Annual Total Spend
2020/21	£1,997,716
2021/22	£2,278,687
2022/23	£3,244,018

5.2 A thorough analysis of 2023/24 temporary accommodation expenditure has been undertaken, ensuring all forecasts are as accurate as possible. Invoices from temporary accommodation providers have been scrutinised to ensure costs are accurate and to identify where invoice billing is up to within the current financial year. The following table highlights spend by key TA providers and again helps emphasise the growing demand for TA over the last few years

TA Provider	2020/21 (£)	2021/22 (£)	2022/23 (£)	2023/24 * (£)
Carepoint	182,478.07	320,087.00	694,408.27	321,177.50
Cromwood	371,625.90	558,235.64	754,545.93	478,316.14
Hendham House		122,760.00	263,558.00	211,056.00
Howarth Housing	742,582.76	759,890.00	611,420.00	184,656.00
24/7 Hotel	93,847.20	113,958.40	235,482.87	106,347.50
Total	1,390,533.93	1,874,931.04	2,559,415.07	1,301,553.14

* 2023/24 expenditure to date

6. Suitability

- 6.1 Despite the increases in TA and service demand, there are several positive aspects to highlight, and learning opportunities to be gained from the forthcoming Deep Dive:
- Oldham is committed to monitoring its statutory duties around not using Bed and Breakfast for families with children for longer than 6 weeks and monitors this indicator closely. Only one family exceeded this in Quarter 4 (January) of 2022/23 and one so far in Quarter 1 2023/24, and solutions soon put in place
 - As previously mentioned, the increase in 'Nightly Paid' accommodation is partly due to moving away from Hostel and Bed and Breakfast accommodation, which include shared facilities and a lack of amenities. This has promoted better facilities such as their own bathrooms and kitchens, and families having access to dispersed properties in the community. However, this does come at a cost
 - Oldham recently commissioned a TA Framework and providers are contract managed and monitored to ensure quality and consistency to ensure their provision meets standards
 - The household may be able to ask for a review by a Senior Officer of any TA that is offered or challenge the Council via judicial review if they do not feel it is suitable, and this will be carefully considered and dealt with appropriately.

7. Areas of challenge

7.1 Homelessness Prevention Grant formula

7.1.1 DLUHC have updated Homelessness Prevention Grant (HPG) funding arrangements from 2023/24 from 2023/24 with the intention to better reflect current pressures, improve understanding of how the grant is used and improve the quality of homelessness data.

7.1.2 This updated grant combines several previous grants and funding methodologies into two sections.

- **£200m reflecting homelessness and temporary accommodation pressures**, calculated by adding the total number of prevention and relief cases to the number of prevention and relief cases achieved by securing a private rented sector tenancy, with the following adjustments:
 - To take account of different private sector rental costs in different areas
 - To ensure a minimum allocation level of £40,000
 - To ensure that no authority receives an allocation less than 90% of their 3-year average historic spend share on temporary accommodation costs
- The £200m above has been calculated using data up to 2021/22, so will not reflect current costs; however, this applies to every local authority.
- Unfortunately for Oldham, outcomes achieved by securing private rented sector tenancies are low due to the availability of stock and low LHA rates in the borough; therefore, this element of the grant calculation is not favourable whilst the housing market remains in this position.
- **£110m reflecting homelessness prevention and relief pressures** 20% of which is based on single homelessness pressures owed a prevention or relief duty, and the remaining 80% is based on a combination of relative homelessness pressures including:

- The number of housing benefit claimants at December 2021: DLUHC expect this to reflect the relative number of households becoming homeless
- Lower quartile monthly private rented sector rents for 2-bedroom properties 2021-22. It is not yet known if/when DLUHC will update this in line with current property prices or use anything other than the lower quartile, but despite property prices increasing this element does result in higher grant for more affluent areas than Oldham.
- Area cost adjustment, as used in allocating COVID-19 related funding to lower-tier authorities. This is intended to reflect the relative costs of prevention in terms of staff time, which includes factors such as wages, commercial rents and other geographical features which affect the cost of delivering services. Given some of these are lower in Oldham than other areas, this may be why grant is also lower.

New grant breakdown



Funding levels awarded to GM Local Authorities

Authority	Homelessness Grant - total allocation for 2023-24 (£322.8m)	Homelessness Prevention Grant - total allocation for 2024-25 (£331.3m)
Manchester	446	244
Oldham	977	958
Sheffield	6,444	9,074
Stockport	770	599
Tameside	181	777
Torquay	2,747	7,685
Wigan	800	941
Widnes	333	663
Wolverhampton	865	824
Worthing	447	370

7.2 Temporary Accommodation subsidy rules

7.2.1 DWP assesses the amount of subsidy grant allowed against expenditure using Local Housing Allowance rates set in 2011. These rates are as follows:

Description	Rate (£)
Shared	59.00
1 bedroom	91.15
2 bedrooms	103.85
3 bedrooms	121.15
4 bedrooms	160.38
5 bedrooms	219.23

7.2.2 Subsidy is determined by a formula based on:

- the type of accommodation (leased/licensed/board and lodging (or B&B))
- whether it is self-contained or non-self-contained
- the size of the property (number of bedrooms) and
- the January 2011 LHA rate appropriate to the size of the property
- The subsidy is also limited by an upper cap based on the Broad Market Rental Area (BRMA) of the accommodation.

7.2.3 For residents placed into non-self-contained accommodation (board and lodging or licensed), Housing Benefit (HB) subsidy will be limited to the one-bedroom self-contained Local Housing Allowance (LHA) rate based on the location of the property. For those in self-contained licensed and short-term lease accommodation, the maximum HB subsidy will be determined by using 90% of the LHA rate for the size of the property.

7.2.4 These subsidy rules have a significant impact depending on the income the Council can recoup, and the type of accommodation used, particularly when this is Bed and Breakfast or Nightly Paid accommodation. The following is a worked example of a current temporary accommodation property using actual figures, and shows the following:

- Local authorities are, in some ways, disadvantaged – as to claim the most economically beneficial intensive housing management subsidy (see example below) an arrangement with a registered provider or other eligible organisation is required
- Leasing arrangements are clearly a positive way forward, but require resources to deliver the management of properties, and the acquisition of stock. There also needs to be long-term certainty around revenue funding for local authorities to be able to take on the financial risk of leasing arrangements, and the staffing needed to support these. These arrangements are still, however, subject to a 90% LHA subsidy – unlike the IHM arrangement above.

Worked Examples

Provision	Housing Benefit per week	Charge per week	Budget pressure per week
Bed and breakfast	£91.15	£280	£188.81
Nightly Paid (self-contained)	£109.04	£346.50	£45.05
Nightly Paid (shared)	£91.15	£245	£24.53
Leased	£82.04	£90	£7.96
Registered Provider – Intensive Housing Management	£121.42	£128.50	£7.08

7.3 Cyclical grant funding

7.3.1 Long-term revenue funding is a particular source of uncertainty for local authorities, with the Housing Options service affected by grants such as:

- The Rough Sleeping Initiative (RSI), which funds three posts internally and a commissioned service supporting rough sleepers in the borough. These are all currently due to end in March 2025, and without which would leave Oldham with no support provision for this group
- A Bed Every Night (ABEN): This grant is actually provided by the Greater Manchester Combined Authority (GMCA) but it funds the majority of Oldham's non-statutory rough sleeping accommodation, alongside Housing Benefit and the Homelessness Prevention Grant. Without ongoing funding commitment around RSI and other funding streams, Oldham will not be able to continue to deliver its commitment to the Government's Ending Rough Sleeping Strategy
- Accommodation for Ex-Offenders (AfEO) / Community Accommodation Service (CAS-3): Both programmes aimed at supporting ex-offenders, but both due to end in March 2025, Oldham is currently in the process of re-recruiting to posts within these services at present and is experiencing difficulties attracting candidates due to fixed-term contracts. Ongoing funding certainty would help with this, and with securing outcomes for people being supported by the programme.
- Domestic Abuse Safe Accommodation funding, which funds staff within the refuge and housing services and again is only confirmed until March 2025, despite this ongoing duty to support victims of domestic abuse and increasing numbers of residents in need in Oldham.

7.3.2 The impact of short-term funding has been felt particularly in the ability to recruit and retain staff, and – where this has been successful – in the level of experience and training required by new people joining the local authority. These factors combined undoubtedly impact service delivery and ability to prevent homelessness and support residents effectively.

7.4 Local Housing Allowance

7.4.1 The freezing of LHA rates since 2020 despite rising rents and living costs has severely impacted the ability of residents and the local authority in Oldham to secure affordable accommodation.

7.4.2 As detailed in section 5.1, the inability of the Council to discharge prevention and relief duties into the private rented sector also impacts on Homelessness Prevention Grant levels, creating an ongoing, vicious cycle for both residents and the local authority.

7.4.3 LHA rates in Rochdale in Oldham are as follows:

Number of rooms	Rate
Share room or bedsit	£66.39
1 bedroom	£90.90
2 bedrooms	£103.85
3 bedrooms	£126.58
4 bedrooms	£159.95

7.4.4 Average rental costs based on a current market search however are clearly well in excess of this, with the most affordable 2-bedroom property for example being marketed at £700pcm:

Number of rooms	Average rent per month
1 bedroom	£579
2 bedrooms	£843
3 bedrooms	£1,026
4 bedrooms	£1,495

7.5 Out of Borough Procurement and Placements

7.5.1 As with other neighbouring authorities in the North-West, Oldham's housing market is affected by procurement activity undertaken in respect of other local authorities and government departments. For example:

- S208 placements under homelessness legislation
- Procurement of properties utilised to provide accommodation under Children's Act duties
- Accommodation acquired to provide asylum support
- Community Accommodation Service housing for individuals on licence or bail orders
- Supported accommodation acquired by non-commissioned providers, some of which is established without prior consultation with the local authority

7.5.2 The extent of this accommodation is difficult to quantify and map, but it is known that:

- SERCO were accommodating just over 660 asylum seekers across approximately 200 dispersed properties in Oldham, with a further 159 individuals

being accommodated in hotels. This figure fluctuates, with dispersed properties having reached almost 220 in December 2022

- Oldham has received 37 property procurement requests from SERCO since October 2022; although the majority have been declined, full feedback has not yet been received. Terms offered by SERCO are generous, including 5-year leases, full repair and maintenance and no arrears. Payment terms have not been shared with the Council
- This issue is now being compounded by high prices being paid by local authorities procuring properties on behalf of Afghan families leaving bridging hotels via the 'Find Your Own' scheme. Amongst notifications so far have included three properties at over double Local Housing Allowance rate, with an offer to cover the rent shortfall for 12 months. Whilst this may encourage landlords to rent to tenants, it does not offer long term security of tenure to tenants and may leave families homeless in Oldham after this time.
- In terms of s208 placements, current numbers of families accommodated are not known as by its nature this accommodation is temporary and local authorities only notify when households are placed, not when they leave. However, of notifications received it is known that there were:
 - 404 placements into Oldham in 2021/22
 - 285 by Manchester Council, 190 into Bed and Breakfast and 95 into dispersed / nightly paid accommodation
 - 65 by Rochdale Council into Bed and Breakfast accommodation
 - 52 by Salford Council into dispersed / nightly paid accommodation
 - 2 by Tameside Council into Bed and Breakfast accommodation
 - 440 placements into Oldham in 2022/23
 - 341 by Manchester Council, 270 into Bed and Breakfast accommodation and 71 into dispersed accommodation
 - 79 by Rochdale Council, all into Bed and Breakfast accommodation
 - 18 by Salford Council, 13 into dispersed / nightly paid accommodation and 5 into Bed and Breakfast accommodation
 - 1 by Tameside Council into Bed and Breakfast accommodation
 - 1 by Trafford Council into Bed and Breakfast accommodation

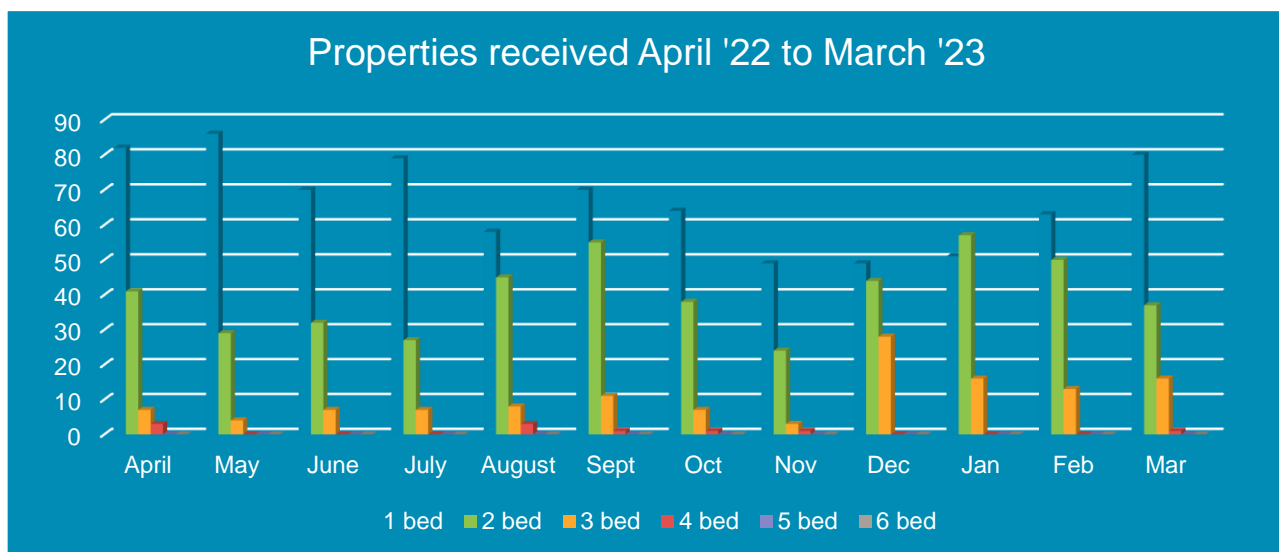
7.5.3 Whilst B&B placements are concerning due to the lack of suitability for families, placements into dispersed and assured shorthold tenancy accommodation are of particular concern due to the long-lasting impact on Oldham's housing market and community cohesion.

7.5.4 It is acknowledged that Oldham Council did also make approximately 300 out of borough placements in 2022/23, although predominantly into B&B accommodation due to the lack of available alternatives in borough.

7.6 Part VI Allocations

7.6.1 The demand for social housing continues to grow with the supply of accommodation falling. During the financial year 2022/23 the following number of properties were received

Bed size	April	May	June	July	August	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Total
1 bed	82	86	70	79	58	70	64	49	49	51	63	80	801
2 bed	41	29	32	27	45	55	38	24	44	57	50	37	479
3 bed	7	4	7	7	8	11	7	3	28	16	13	16	127
4 bed	3	0	0	0	3	1	1	1	0	0	0	1	10
5 bed	0	0	0	0	0	0	0	0	0	0	0	0	0
6 bed	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	133	119	109	113	114	137	110	77	121	124	126	134	1417



7.6.2 The number of households with a housing need has increased. At the end of Quarter 3 2021/22 there were 6,919 households on the Council's Housing Register

Applicants on the Council's Housing Needs Register 31 Mar 22

Bed size	Band 1	Band 2	Band 3	Band 4	Total
1 bed	742	1393	661	132	2928
2 bed	402	858	354	69	1683
3bed	309	927	311	47	1594
4 bed	173	328	79	16	596
5 bed	38	48	9	3	98
6 bed	8	10	1	0	19
7 bed	1	0	0	0	1
Total	1673	3564	1415	267	6919

7.6.3 At the end of Quarter 4 2022/23 there were 7,349 households on the Council's Housing Register

Applicants on the Council's Housing Needs Register 31 Mar 23

Bed size	Band 1	Band 2	Band 3	Band 4	Total
1 bed	809	1344	710	174	3037
2 bed	455	938	355	89	1837
3 bed	332	1050	307	51	1740
4 bed	169	347	83	17	616
5 bed	40	49	10	2	101
6 bed	7	9	1	0	17
7 bed	1	0	0	0	1
Total	1813	3737	1466	333	7349

8. Areas of development

8.1 Compliance

8.1.1 Oldham works hard to ensure that the service is compliant in terms of meeting its statutory duties, which includes:

- Ensuring temporary accommodation is provided where there is 'reason to believe' a household is eligible, homeless and in priority need
- Only one family having spent longer than 6 weeks in bed and breakfast in the past 6 months. This happens only in exceptional circumstances, and a plan to move the family was in place

8.1.2 The service also supports its partners with wider strategic and corporate commitments such as:

- Corporate Parenting duties such as not making care leavers intentionally homeless
- Promoting support for babies and children through safe sleep advice and provisions through partnership working with local health agencies.

8.2 Temporary Accommodation Strategy

8.2.1 Oldham Council published its Temporary Accommodation Strategy in 2021/22, and as part of this mobilised a new Framework agreement in March 2023.

8.2.2 Lot 1 of this agreement was Nightly Paid accommodation, which – whilst incurring some financial costs – as discussed in section 4, does offer a greater degree of suitability than other options and can be mobilised quickly to meet need. The rationale for increasing access to this type of accommodation part of wider step-down model that sought to offset the use of expensive and unsuitable B&B with cheaper and more practical self-contained options.

8.2.3 The changes to TA subsidy calculations in 2017 namely, the removal of the management fee payable to local authorities for leasing TA has significantly the Council's ability to procure cost-effective TA. This has been compounded over the years by housing market challenges leading to the "perfect storm" we're now experiencing.

8.2.4 In response the Council's TA strategy has mobilised Lot 3, Leased Accommodation, with a view to delivering longer-term, sustainable temporary accommodation options for the local authority. Despite the challenging economic and housing landscape, this will be made more achievable with support to overcome challenges such as LHA, TA subsidy and HPG outlined above, given the need to source and adequately staff properties, as well as prevent future homelessness.

8.3 Homelessness Prevention

8.3.1 Oldham Council's long-term goal is to move towards a more prevention-focused service than being reactive and reduce the number of placements being made into temporary accommodation.

8.3.2 One of the notable changes introduced by the Homelessness Reduction Act 2017 was the Prevention Duty. It placed a legal duty on Councils to take earlier steps to resolve homeless, extending the period which households are considered threatened with homelessness from 28 to 56 days.

8.3.3 Successful homelessness prevention not only negates the use of emergency accommodation, but it also contributes to additional funding via the HPG. Hence, a dedicated Housing Options Project Team has been set up to shape the service in a way that supports Place Based Integration, joined up systems and services and sufficient resources to enable early intervention.

8.3.4 DLUHC would be aware that out of 10 GM districts, Oldham is ranked 8th for successful Prevention outcomes. Therefore, it's important to reflect the ongoing work that colleagues are progressing to address this and implement solutions.

9. Risks

9.1 The following outlines some of the potential risks of the Deep Dive:

- The Deep Dive will be published, which, if there are any negative implications, will pose reputational risks for the Council
- The Deep Dive will require time resources from teams across the Council, including Housing, Finance and Executives
- Whilst Oldham Council has carried out a recent re-procurement in terms of its TA providers and they are expected to adhere to established standards, it would be prudent to undertake further communications and checks to ensure current TA not managed by itself meets expected standards to minimise any potential risk
- Oldham Council currently has some staffing vacancies within the Housing Options Team, including the Senior Officer for TA – although this role is filled

by agency staff. This may affect the ability of the service to fulfil the demands of the Deep Dive

10 Benefits / Opportunities

10.1 The following outlines some of the potential benefits and opportunities of the Deep Dive:

- DLUHC have advised that, whilst there are no confirmed financial incentives attached, the Deep Dive may be able to build a future business case that can be utilised towards policy and service change
- Oldham Council has the potential to learn best practice from advisors at DLUHC as well as other local authorities from participating in the Deep Dive
- Oldham would be contributing to research which will directly influence central government policy
- Positive participation may improve the Council's reputation

11 Next steps

11.1 Oldham's CEO has now been contacted and held an initial call with the Director for Homelessness and Rough Sleeping at DLUHC. Whilst dates are still to be confirmed, the Deep Dive is likely to take place mid-September to mid-October or mid-November to mid-December.

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Draft Environment Strategy

Portfolio Holder(s):

Cllr Arooj Shah, Leader of the Council and Cabinet Member for Reform and Regeneration

Cllr Chris Goodwin, Cabinet Member for Environment

Cllr Abdul Jabbar, Cabinet Member for Corporate Services and Finance (and Green)

Officer Contact: Nasir Dad, Director of Environment

31 August 2023

Reason for the report

Oldham Council declared a climate emergency in Sep 2019 and committed to achieving carbon naturality by 2025, with boroughwide carbon neutrality by 2030. The council is currently working towards the above targets as part of the Green New Deal, and this approach ties in with that of Greater Manchester Combined Authority (GMCA) 5 Year Environmental Plan.

The GMCA plan has 6 main strands; in Oldham, 3 of the strands are covered as part of the Green New Deal and, the other 3 stands, detailed below, will be covered through the Environment Strategy.

- Climate Adaptation & Resilience
- Production & Consumption of Resources, and,
- The Natural Environment

The Environment Strategy will apply until 2025, after which, the strategy will be reviewed and then sync with that of the GM Environment Plan – this will allow synergy in approach with GM partners and the Green New Deal, but also allow Oldham to focus its resource and attention on areas that are relevant and specific to its unique geography, climatic and environmental challenges, especially around adaptation and resilience.

The report also recognizes, as part of the three strands above, that there are other key areas and regulatory regimes that will feed into the Environment Strategy and must be incorporated into the planning and delivery of the Councils environmental aims and objectives. These are:

-
- **City of Trees** – The Council aims to plant an additional 1,000 trees and 5 hectares of woodland each year from 2024. This will take place in conjunction with City of Trees, which is delivered at a GM level. Oldham has taken the lead in identifying sites that are suitable for planting trees and these have been put forward to maximise the number of trees that can be planted in Oldham – both in public areas as well as dedicated greenspaces such as country parks and our larger urban parks/networks
 - **Biodiversity Net Gain (BNG)** – BNG is a new requirement, coming into effect from Autumn 2023 and one that applies to all planning developments. The aim of this is to ensure that all developments through the planning process result in a ‘biodiversity net gain’ of 10% and this will be delivered at a GM level.

Developers cannot be compelled to make the investment in the area where the development is taking place – they can do this at a national level. In order to maximise the gain at a local level, Oldham Council Planning Services are working closely with the Environment Directorate to identify suitable areas and to then raise these at GM level to ensure they are considered when developments are taking place.

- **Local Nature Recovery Strategy (LNRS)** – The government introduced legislation under the Environment Act 2021 outlining measures to support the reversal in the decline in nature and biodiversity. This included a new mandatory requirement for local areas in England to develop a spatial strategy for nature recovery, referred to as Local Nature Recovery Strategies (LNRS). The government will provide separate guidance to explain what this means in practice and has previously stated that LNRS will not be a barrier to development, nor will it introduce new/different designations.

The regulations state that the responsible authority must take reasonable steps to involve all supporting authorities (for GM, this includes the 10 GMCA metropolitan district councils, Natural England and Peak District National Park Authority). This work will be delivered at a GM level but will be delivered locally through planning policy and will complement the councils overall aim to increase green space, trees coverage and biodiversity.

The purpose of presenting this draft Environmental Strategy at Scrutiny Committee is to gain feedback and consideration for the approach being proposed with key elements of the Draft Environment Strategy outlined in the Summary section. The complete Draft report is attached in **Appendix A**.

1.0 Summary

Recognising the global environmental challenge and the impacts of climate change, Oldham Council declared a climate emergency in September 2019, and set the ambitious target of achieving carbon neutrality for the Council by 2025, and for the borough by 2030. This commitment recognises that, along with changes at a national level, the borough and the Council also need to make changes to many aspects of our lives to reduce the environmental impact of day-to-day activities and the damage they cause to the environment.

As part of this approach, Oldham Council will work closely with partners across the local, regional, and national landscape to ensure the ambitious environmental targets set are achieved, and where challenges are identified, we will work closely and collaboratively to overcome them by sharing resources, ideas and leverage the regional strength through the Greater Manchester Combined Authority (GMCA). This includes rationalising the Oldham approach with that of the GMCA; for Oldham, this means that this Environment Strategy will last until 2025, after which, it will be revised and will work to the same timeframe as that of the GMCA Environment Plan. The main aspects of the current 5-year GMCA plan are outlined in **Figure 1**, below.

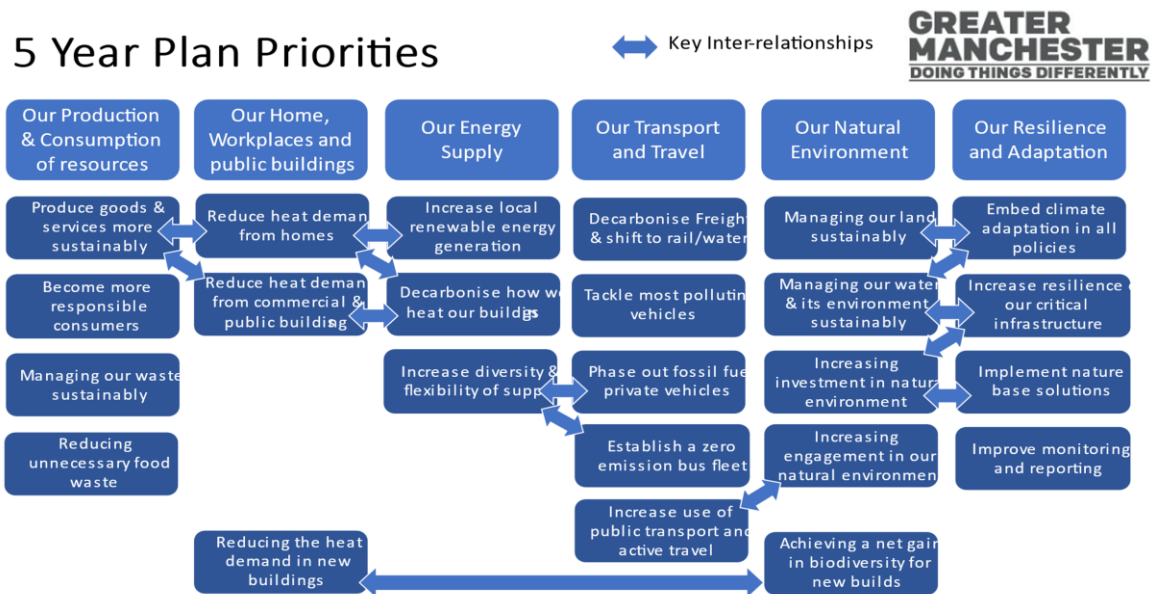


Figure 1: The GMCA 5-year Environment Plan

The Environment Strategy for Oldham has 3 main strands, which are listed below and are based on the GMCA 5-year Environmental Plan. These are:

- **Natural Environment** (green spaces / parks sustainable planting and land use, and air quality)
- **Resilience and Adaptation** (Blue Green Infrastructure/flooding/wildfires and heatwaves/public health & climate impact on services)
- **Production and Consumption of Resources** (recycling & waste, new ways of working/fleet and equipment electrification)

Oldham Council recognises the significant local and regional climatic variations as well as the scientific evidence from the Met Office which has shown that 20 of the warmest years on record, globally, have been in the past 22 years and the 10 hottest years in the UK since records began in 1884, have all occurred since 2002. Furthermore, UK Climate Projections (UKCP), which is used by the Met Office and the Department for Environment, Food and Rural Affairs (DEFRA), show that the northwest of England is projected to experience ‘warmer, wetter winters and hotter drier summers with increased unpredictability of extreme weather events’.

The weather extremes described above can have a range of economic and social impacts on the residents, businesses, visitors and environment of Oldham and the surrounding areas. Warm weather events, like those experienced in 2022, are likely to increase in frequency, leading to localised droughts as well as increasing the risk of moorland fires. Similarly, the other extremes of wetter winters /colder temperatures, can cause significant travel and transport problems but also, and more damagingly, result in increased and greater flooding events. **Figure 2**, below, shows the risks associated with climate extremes.

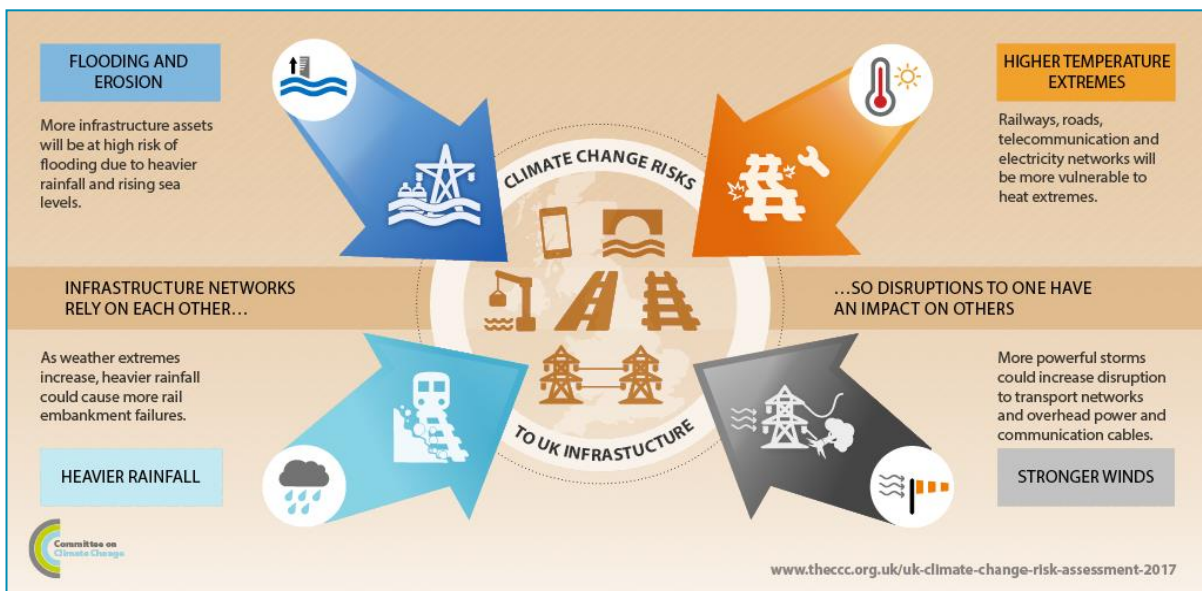


Figure 2: Image showing impact of climate extremes on UK infrastructure (Climate Change Committee, 2017)

2.0 Legislation, National Context and Duties of Local Government

England’s legislative adaptation and mitigation framework is primarily set out in the Climate Change Act 2008. The Act places a duty on Local Authorities to set out the actions that they will take to adapt to the challenges of climate change in the UK.

As a member of Greater Manchester Combined Authority (GMCA), Oldham Council needs to ensure that its climate change actions are in sync with those of the GMCA. The current 5-year plan ends in 2024, with the next iteration running from 2025-2029. Therefore, as suggested above, this strategy will operate until 2025 and will be refreshed and operate in sync with that of the GMCA, ensuring consistency in approach, maximising use of government support and funding to deliver the best possible outcomes in Oldham.

The Civil Contingencies Act 2004 places a duty on the local authority to respond to extreme weather events when they occur and to work in partnership with other key organisations through Local Resilience Forums. In addition, local authorities are required to maintain a Risk Register which takes account of both national and local risks – climate related challenges and extremes are a significant consideration. Once the risks are identified, clear action / mitigation plans must be drawn up, responsible individuals and organisations identified, and work must be done to ensure that the Council is able to respond to incidents and emergencies.

Finally, the National Adaptation Programme (NAP) sets out the government's plan to prepare for and respond to the impacts of climate change. It also highlights the need for individuals, communities and organisations to better understand the risks from climate change and collaborate with authorities to put in place long-term plans to manage these risks. Going forward, the council's work on climate adaptation will generally seek to support the delivery of the NAP at a local level and will work with partners, both public and private, residents, businesses, academia, and regional and national colleagues to ensure Oldham continues to meet the needs of residents and to increase the boroughs resilience.

3.0 What is Climate Adaptation and Resilience?

There is a recognition that society, business, industry and residents need to be more resilient and more adaptive to the impact of climate change given the likelihood of extreme events discussed above.

Climate adaptation is broadly defined as any 'activity that minimises the impact of current, expected, and potential climate change and its effects'. Climate change poses a threat to lives, livelihoods and the local environment. Climate related risks will continue to increase—even if the global commitments of the Paris Agreement succeed in limiting warming to well below 2°C—until global net zero carbon emissions are achieved.

From an Oldham Council perspective, this means increasing and improving our Blue & Green infrastructure – more parks, soft landscaped areas, planting more trees and introducing systems that better manage, retain, and hold water in urban environments, thus reducing the pressure on urban water management systems and sewer networks. Whereas resilience refers to the ability to recover (bounce back to the original state before the exposure to shock) from the effect of climate change.

4.0 Strategy & Governance

Introduction and successful delivery of the Oldham Environment Strategy is an important step in meeting the wider objectives. This approach can only be successful if the correct strategy, governance, and reporting structures are in place to ensure direction, joined up approach and oversight. The Environment Strategy must also work alongside the Councils Corporate Plan that aims to deliver the following between 2022 and 2027:

- Healthy, safe, and well supported residents
- A great start and skills for life
- Better jobs and dynamic businesses
- Quality homes for everyone
- A clean and green future

The Environment Strategy is cross cutting across all the 5 areas listed above – all are susceptible to environmental factors and the above can be significantly impacted by the climate challenge. The Corporate Plan also identifies both the climate challenge and the importance of the environmental strategy in achieving the above outcomes for residents and businesses.

The Oldham Environment Strategy will be monitored through a new structure, which is outlined in **Figure 3**, below. The structure is split between Environmental themes (yellow boxes) and those that make up the Green New Deal (green boxes). The strands will report to the respective Director and then up to the Oldham Environment Board, Economy Subgroup, and the Oldham Leadership Board, which will oversee strategic decisions in response to the Climate Adaptation & Resilience. Overall progress will be monitored by the Climate Emergency Board, which will include senior management team and elected members.

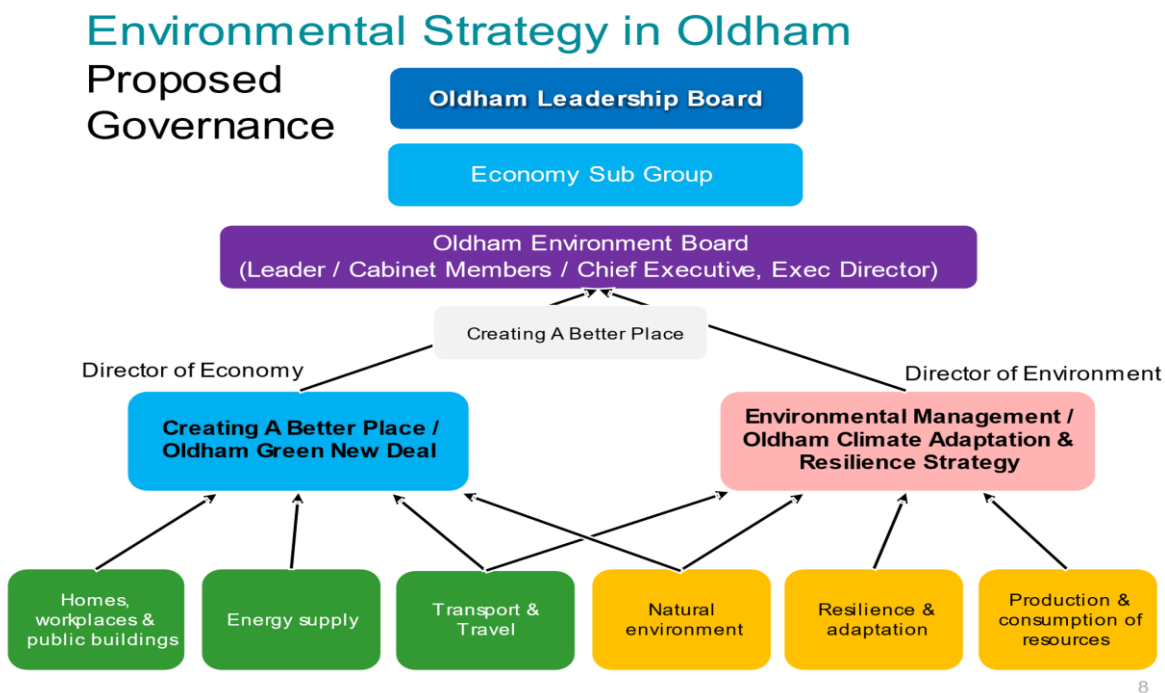


Figure 3: Outlines the proposed governance structure for the Oldham Council Environment Strategy & Green New Deal

The Oldham Environment Board, to be chaired by the Chief Executive and attended by the Leader and Cabinet members for Environment and Economy, the respective Portfolios, will be established and will meet in Spring 2023.

The new Board will provide governance for the two programmes with a view to a refresh in 2025 in line with the GMCA work and a new strategy, covering the period 2026-2030, will be produced for Oldham. The above governance will ensure that the Environment Strategy remains a priority for the Council across all business and operational areas. This will also need ongoing and sustained staff, resident (individual households, schools, community hubs, faith groups, voluntary organisations) and business engagement to embed behaviours, practices, raise awareness and educate all about the council strategy and direction. At the same time, the organisation and the board will have to be honest and pragmatic about delivery timescales, economic impact of decisions and where practical issues mean targets will not be achieved or implementation dates will be delayed.

5.0 Delivery, Implementation & Next Steps

As an organisation, there are many examples of good practice that have been introduced and worked on by Oldham Council as part of the 2019 Climate Emergency declaration. Workshops and staff conferences have been held to gauge the opinion and ideas of colleagues and there is also close working with GM partners. As part of this strategy, the various strands must be brought to together and moving forward, the Environment Strategy and Climate Adaptation and Resilience must be considered at each stage of the decision-making process to ensure due consideration is given and the impacts / benefits of each proposed scheme and decision are clear.

To ensure all service areas are aware of, and working towards the same target(s), there will be an ongoing process through which respective service areas consider their role in addressing the climate challenge and a similar exercise for residents.

1. Council Adaptation and Resilience – this section focusses on how the authority will adapt and become resilient to a changing climate to ensure business continuity and essential service provision across the borough
2. Borough Adaptation and Resilience – this section focusses on the direction measures that the Council can provide to support residents, businesses, and communities to adapt and enhance their resilience to climate change

All of the above will feed into an action plan, set clear timelines, clear targets and a responsible person(s) or service area(s). Proposed actions will also provide key performance indicators, resources and financing that may be required, partner organisations and service teams that can provide additional support as well as political support or endorsement from elected members.

Many actions within the plan will be intrinsically linked to other climate change action themes, and also crosscut other Council priorities and strategies. Actions will have to be combined in order to avoid duplication and to ensure that lead service areas can include these actions within their targets as any other form of service delivery.

The purpose of this strategy is to raise awareness of the challenges surrounding adaptation to climate change and the ability of the borough in being resilient to its impact. It will also provide a strategic overview, guidance and planning to ensure that the Council and the borough are progressing towards a future that is more resilient to climate-induced risks and impacts.

6.0 Recommendations for Scrutiny Committee

The key areas of work, outlined above, will follow Council processes and additional reports/consultation will take place with relevant departments and stakeholders, internal and external before appropriate sign off. However, for the purposes of this report, it is requested that the Scrutiny Committee:

1. Discuss and consider the approach set out in this report as an interim Environment Strategy/Baselining position
2. Agrees with a refresh of the Environment Strategy in 2025 to sync with the GM Environment Plan refresh
3. Supports a climate adaptation and resilience driven approach
4. Supports the approach towards tree planting/woodland creation
5. Supports incorporation of BNG and LNRS into the 'Natural Environment' strand of the Environment Strategy

Oldham Council Environment Strategy

2023-2025

DRAFT

V1.0

Foreword (Leader/Portfolio/Chief Exec, Proposed Wording)

There is global recognition and acceptance that the climate crisis is one of the biggest risks faced by mankind, and if the world fails to address this challenge, fails to address the causal factors, and fails to take steps to mitigate the impact, the consequences could be significant for current and future generations. The impacts, on a local level could affect the lives, livelihood and wellbeing of every resident in Oldham and the Council's ability to deliver the services and to provide a safe, healthy and vibrant borough.

As a global community, we must do everything within our power, and more, to transition to sustainable modes of living and dramatically reduce our greenhouse gas emissions as quickly as possible. However, even if all emissions were stopped today, we would continue to see a level of global warming occur for at least several decades to come. Therefore, there is an urgent need for us to adapt and become resilient to the increasing impacts of a changing climate and prepare for a future that is likely to present significant climate related challenges, some of which are already being witnessed.

Given the above, it is no surprise that Oldham will follow the same trend, this being warmer, wetter winters and hotter, drier summers with less frequent but more intense extreme weather events including storms, droughts and heatwaves. These events have the potential to impact all areas of our lives through flooding, increased incidence of weather-related illnesses, damage to physical and environmental infrastructure and significant impacts on health and wellbeing and these will disproportionately affect the poorest and most vulnerable in society.

Notwithstanding the above, all is not lost. While some of the effects of climate change will continue for the next 30-40 years no matter what we do now, we can affect what happens after that. Through introduction of the Oldham Environmental Strategy, by working with our residents, businesses, academia, regional and national groups, we can mitigate the impacts of our activities and, at the same time, become more resilient so we are better able to adapt to the climatic changes and are more resilient when / if the worst does happen.

Given the above challenge and obvious risks, we believe that this Environment Strategy, focusing on all the contributory factors and working with our partners across the City Region will help deliver the understanding, policy and practical steps that are needed to ensure Oldham is a borough that is adaptive and resilient in the face of the climate challenge.

Introduction

Recognising the global environmental challenge and the impacts of climate change, Oldham Council declared a climate emergency in September 2019, and set the ambitious target of achieving carbon neutrality for the Council by 2025, and for the borough by 2030. This commitment recognises that, along with changes at a national level, the borough and the Council also need to make changes to many aspects of our lives to reduce the environmental impact of day-to-day activities and the damage they cause to the environment.

As part of this approach, Oldham Council will work closely with partners across the local, regional, and national landscape to ensure the ambitious environmental targets set are achieved, and where challenges are identified, we will work closely and collaboratively to overcome them by sharing resources, ideas and leverage the regional strength through the Greater Manchester Combined Authority (GMCA). This includes rationalising the Oldham approach with that of the GMCA; for Oldham, this means that this Environment Strategy will last until 2025, after which, it will be revised and will work to the same timeframe as that of the GMCA Environment Plan. The main aspects of the current 5-year GMCA plan are outlined in **Figure 1**, below.

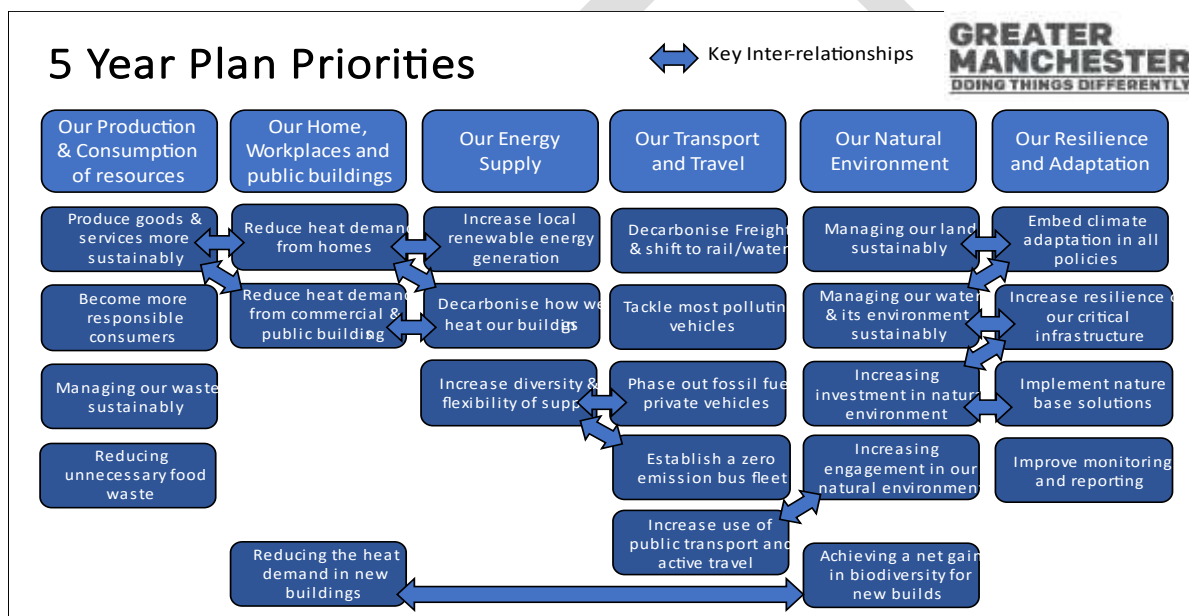


Figure 1: The GMCA 5-year Environment Plan

The Environment Strategy for Oldham has 3 main strands, which are listed below and are based on the GMCA 5-year Environmental Plan. These are:

- **Natural Environment** (green spaces / parks sustainable planting and land use, and air quality)
- **Resilience and Adaptation** (Blue Green Infrastructure/flooding/wildfires and heatwaves/public health & climate impact on services)
- **Production and Consumption of Resources** (recycling & waste, new ways of working/fleet and equipment electrification)

Oldham Council recognises the significant local and regional climatic variations as well as the scientific evidence from the Met Office which has shown that 20 of the warmest years on record, globally, have been in the past 22 years and the 10 hottest years in the UK since records began in 1884, have all occurred since 2002. Furthermore, UK Climate Projections (UKCP), which is used by the Met Office

and the Department for Environment, Food and Rural Affairs (DEFRA), show that the northwest of England is projected to experience 'warmer, wetter winters and hotter drier summers with increased unpredictability of extreme weather events'.

The weather extremes described above can have a range of economic and social impacts on the residents, businesses, visitors and environment of Oldham and the surrounding areas. Warm weather events, like those experienced in 2022, are likely to increase in frequency, leading to localised droughts as well as increasing the risk of moorland fires. Similarly, the other extremes of wetter winters /colder temperatures, can cause significant travel and transport problems but also, and more damagingly, result in increased and greater flooding events. **Figure 2**, below, shows the risks associated with climate extremes.

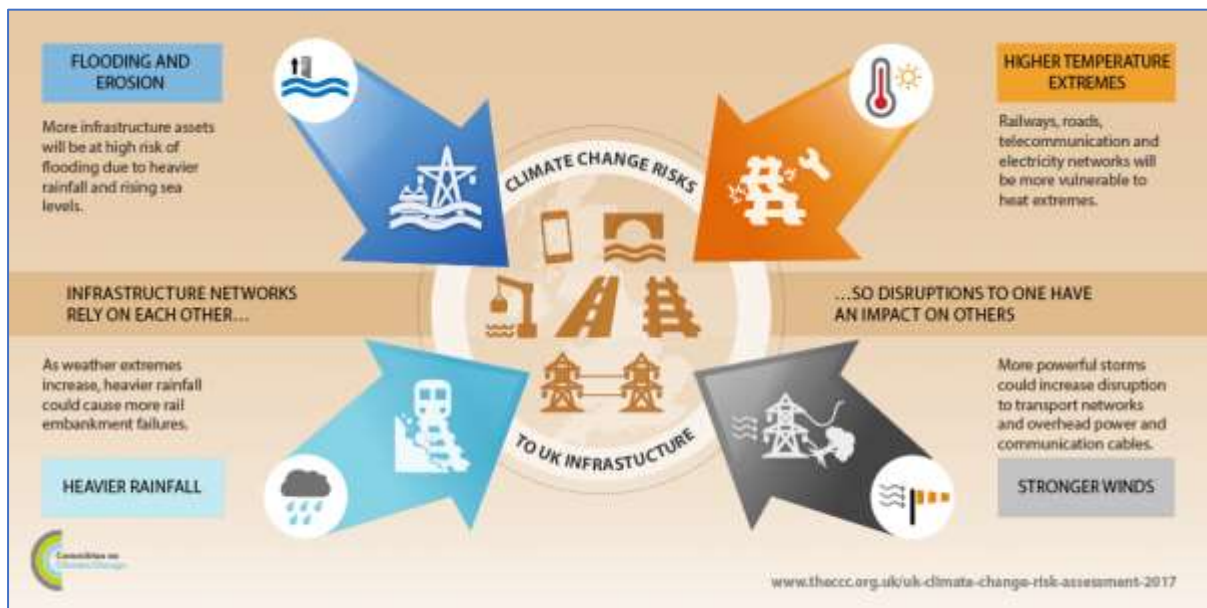


Figure 2: Image showing impact of climate extremes on UK infrastructure (Climate Change Committee, 2017)

Although there are strenuous efforts to limit global warming, further climatic changes are inevitable, and the UK will need to manage the growing risks from climate change. UK Climate Projections 2018 (UKCP18), provides users with scientific evidence on projected climate changes. The Intergovernmental Panel on Climate Change (IPCC) also summarises the increasing impact of climate change, and highlights in its latest report that the projections are following a worsening scenario.

Even if we were to stop all greenhouse emissions today, the earth will continue to warm because of the volume of emissions in the atmosphere and the level of warming as we move forward is dependent on the decisions we make today and over the next decade. Given that we cannot undo the impact that has already, and continues to take place, it is important, for the reasons outlined above, that we have a coherent, balanced and supported climate adaptation and resilience strategy so Oldham is able to mitigate the impact of likely future weather extremes.

Adaptation and resilience are key elements of our climate change strategy and are essential measures to ensure business continuity in the delivery of the Council's services and the wellbeing of the borough. Therefore, this Environment Strategy will set out the way that Oldham Council will look to achieve adaptation and resilience, support the natural environment and manage and reduce the production & consumption of resources over the next 2 years until 2025. Given the commitments already made as part of the climate emergency declaration, the remainder of this report will focus on climate adaptation and resilience with the other two aspects (production & consumption of resources

& natural environment) running concurrently and feeding into the overall outcomes in terms of adaptation and resilience.

Legislation, National Context and Duties of Local Government

England's legislative adaptation and mitigation framework is primarily set out in the Climate Change Act 2008. The Act places a duty on Local Authorities to set out the actions that they will take to adapt to the challenges of climate change in the UK.

As a member of Greater Manchester Combined Authority (GMCA), Oldham Council needs to ensure that its climate change actions are in sync with those of the GMCA. The current 5-year plan ends in 2024, with the next iteration running from 2025-2029. Therefore, as suggested above, this strategy will operate until 2025 and will be refreshed and operate in sync with that of the GMCA, ensuring consistency in approach, maximising use of government support and funding to deliver the best possible outcomes in Oldham.

The Civil Contingencies Act 2004 places a duty on the local authority to respond to extreme weather events when they occur and to work in partnership with other key organisations through Local Resilience Forums. In addition, local authorities are required to maintain a Risk Register which takes account of both national and local risks – climate related challenges and extremes are a significant consideration. Once the risks are identified, clear action / mitigation plans must be drawn up, responsible individuals and organisations identified, and work must be done to ensure that the Council is able to respond to incidents and emergencies.

Furthermore, the third Change Risk Assessment (outlined in the Climate Change Risk Assessment) is an official document assessing the ways in which climate change will impact the UK economy, environment, health and wellbeing. It informs the Government's National Adaptation Programme (NAP), last published in 2018, and due to be published again in 2023. The CCRA also reviews the costs and benefits of adaptation policies and concludes that many adaptation investments would deliver good value for money as well as many co-benefits. Although this is an overarching statement, the efficacy, value for money and environmental benefits of each scheme will have to be considered on a case-by-case basis. As part of this strategy, and the Council's overall approach, it is important to ensure that these key factors are considered at each stage of the decision-making process.

Finally, the National Adaptation Programme (NAP) sets out the government's plan to prepare for and respond to the impacts of climate change. It also highlights the need for individuals, communities and organisations to better understand the risks from climate change and collaborate with authorities to put in place long-term plans to manage these risks. Going forward, the council's work on climate adaptation will generally seek to support the delivery of the NAP at a local level and will work with partners, both public and private, residents, businesses, academia, and regional and national colleagues to ensure Oldham continues to meet the needs of residents and to increase the boroughs resilience.

What is Climate Adaptation and Resilience?

There is a recognition that society, business, industry and residents need to be more resilient and more adaptive to the impact of climate change given the likelihood of extreme events discussed above.

Climate adaptation is broadly defined as any 'activity that minimises the impact of current, expected, and potential climate change and its effects'. Climate change poses a threat to lives, livelihoods and the local environment. Climate related risks will continue to increase—even if the global commitments of the Paris Agreement succeed in limiting warming to well below 2°C—until global net zero carbon emissions are achieved.

From an Oldham Council perspective, this means increasing and improving our Blue & Green infrastructure – more parks, soft landscaped areas, planting more trees and introducing systems that better manage, retain, and hold water in urban environments, thus reducing the pressure on urban water management systems and sewer networks. Whereas resilience refers to the ability to recover (bounce back to the original state before the exposure to shock) from the effect of climate change.

Adaptation and resilience measures can be planned or can be introduced in response to a local event. Measures could include large scale infrastructure changes such as building defences to protect against flooding, improving the quality of road surfaces to withstand hotter temperatures as well as behavioural shifts, such as residents utilising less water, increased recycling, reducing their energy usage and more households and businesses protecting themselves against the risk of flooding.

Why do we need to adapt?

Climate change adaptation and resilience is significantly important to Oldham Council because the borough is likely to be impacted by climate change. In order to enable our residents, communities, businesses and infrastructure to have the capacity to survive, adapt and grow in the face of these challenges, efforts and investments need to be underpinned by robust action on climate adaptation (and resilience) to protect our economy, key infrastructure and our natural environment.

Climate Change is also more likely to have a greater impact on those residents who are already dealing with fuel or food poverty, those on low incomes and those with disabilities. Therefore, it is vitally important that we strengthen our adaptation actions, so that we may protect the most vulnerable within our communities.

Although, environmental concerns are a primary driver, there is also clear recognition that any changes and adaptation have to take place with economic considerations at the heart of the process as the long term prosperity of residents, business and environmental protection and wellbeing can only be assured when supported by a strong and sustainable economic base. This means increasing the use of renewables, reducing energy use, insulating properties, and maximising the use of electric vehicles. This also means investing more in active travel schemes, improving the walking and cycling infrastructure and supporting the shift to greater use of public transport.

Why do we need to be resilient?

For the purposes of this strategy, resilience must be considered across the piece – it applies equally to residents, business and infrastructure and this must be firmly embedded. This means that future buildings, roads and other developments must be able to respond to the environmental challenges that arise. For example, where large areas of hard standing are introduced (buildings/car parks), we must ensure sustainable drainage systems are installed so as not to overwhelm the water network. Furthermore, when areas are being redeveloped and renovated, especially public space, introduction of soft landscaping and greenspace should be seriously considered as this also provides urban water management capacity. The above means that the Council must work closely with business and developers to ensure that the resilience aspect of the strategy is considered integral to future planning

and infrastructure developments. This approach extends to electric vehicle infrastructure, local development plans and planning policy to ensure these take account of current and future climate related challenges.

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Strategy & Governance

Introduction and successful delivery of the Oldham Environment Strategy is an important step in meeting the wider objectives. This approach can only be successful if the correct strategy, governance, and reporting structures are in place to ensure direction, joined up approach and oversight. The Environment Strategy must also work alongside the Councils Corporate Plan that aims to deliver the following between 2022 and 2027:

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The Oldham Environment Strategy will be monitored through a new structure, which is outlined in **Figure 3**, below. The structure is split between Environmental themes (yellow boxes) and those that make up the Green New Deal (green boxes). The strands will report to the respective Director and then up to the Oldham Environment Board, Economy Subgroup, and the Oldham Leadership Board, which will oversee strategic decisions in response to the Climate Adaptation & Resilience. Overall progress will be monitored by the Climate Emergency Board, which will include senior management team and elected members.

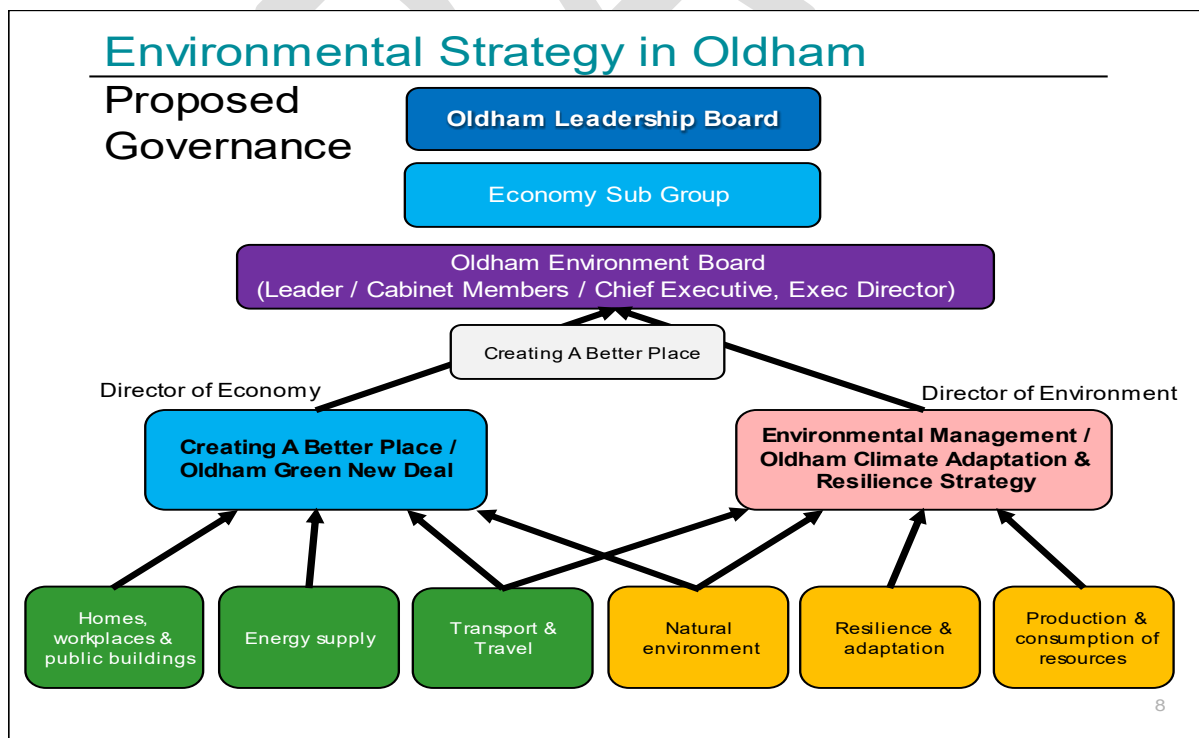


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Delivery, Implementation & Next Steps

As an organisation, there are many examples of good practice that have been introduced and worked on by Oldham Council as part of the 2019 Climate Emergency declaration. Workshops and staff conferences have been held to gauge the opinion and ideas of colleagues and there is also close working with GM partners. As part of this strategy, the various strands must be brought to together and moving forward, the Environment Strategy and Climate Adaptation and Resilience must be considered at each stage of the decision-making process to ensure due consideration is given and the impacts / benefits of each proposed scheme and decision are clear.

To ensure all service areas are aware of, and working towards the same target(s), there will an ongoing process through which respective service areas consider their role in addressing the climate challenge and a similar exercise for residents.

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All of the above will feed into an action plan, set clear timelines, clear targets and a responsible person(s) or service area(s). Proposed actions will also provide key performance indicators, resources and financing that may be required, partner organisations and service teams that can provide additional support as well as political support or endorsement from elected members.

Many actions within the plan will be intrinsically linked to other climate change action themes, and also crosscut other Council priorities and strategies. Actions will have to be combined in order to avoid duplication and to ensure that lead service areas can include these actions within their targets as any other form of service delivery.

The purpose of this strategy is to raise awareness of the challenges surrounding adaptation to climate change and the ability of the borough in being resilient to its impact. It will also provide a strategic overview, guidance and planning to ensure that the Council and the borough are progressing towards a future that is more resilient to climate-induced risks and impacts.

As a result of the above, Key outcomes from the strategy and associated working groups must include:

Need clear timelines for each of these actions – some will be ongoing and cyclic; others will have clear completion dates and this needs to be built into the forward plan. Also, list isn't exhaustive and more could be added – probably better in a table format which shows baseline / Identify Challenges and Confirm Vision, Strategic Objectives and Medium-Term Targets / Identify, Prioritise and Develop Actions / Implementation, Monitoring and Evaluation – this format could be completed for each strand / service area and feed into the overall approach.

- Oldham Environment Board to meet in Summer 2023
- Collation of all climate change related strategies and policies adopted to date (flood risk / fires / droughts) – clear baseline of what's been completed and what is in the 'pipeline'
- Understand how planning policy, local development plans, public health, transport and infrastructure plans impact and contribute to the climate change challenges (recorded annually and reported through the governance process)
- Collation of all projects completed/those planned which have a direct / indirect impact on climate change
- Ensure Emergency Planning /Risk Register is complete and takes account of environmental risks
- Continue working with GM partners for clean air zone and electric vehicle infrastructure roll-out (subject to national government advice / direction)
- Continue to explore funding and development opportunities for flood risk / management and sustainable drainage
- Ensure climate resilience is a priority in all Council activities, including procurement
- Raise awareness and understanding of adaptation and resilience across Oldham
- Implement engagement and education activities that link in with the wider climate change themes and promote self-resilience for communities across the borough
- Collaborate with partner organisations who may have developed local resilience forums within the community
- Engage with local businesses and organisations to promote the development of their own adaptation and resilience plans

**Report to the Place, Economic Growth and Environment
Scrutiny Board**



Crematorium and Cemeteries

Portfolio Holder:

Cllr Chris Goodwin, Cabinet Member for Neighbourhoods

Officer Contact: Nasir Dad, Director of Environment

Report Authors:

Glenn Dale, Head of Environmental Services

Jayne Murphy, Cemeteries and Crematorium Manager

31 August 2023

Reason for the report

To inform the Scrutiny Committee of the opportunities and current/future challenges that exist within the cemetery service that is within the Environment Directorate. The report outlines the current approach to addressing these challenges, as well as the future plans being devised while we continue to provide a high level of service to residents during, what is often, a stressful and difficult time in their lives.

The report outlines the Service's approach towards ensuring the following:

- Future burial capacity that meets all residents needs
- Ensuring a consistent approach to memorials and headstones at all graveyards
- The risk of flooding at cemeteries
- Ensuring the service meets the needs of all the residents in terms of access/out of hours burials
- Ensure upgrade of cremators in a timely manner for continued compliance with legal requirements

Further detail and narrative for each of the above is provided in the summary, below with discussions points and recommendations for member consideration in the closing recommendations section.

SUMMARY:

1 Background

- 1.1 Oldham Council manages seven cemeteries and one crematorium, which is situated with Hollinwood Cemetery and serves a population of around 240,000. During 2022, 470 full interments, 151 cremated remains interments and 1,726 cremations were carried out.

The table, below, highlights some facts and statistics for each cemetery site:

	Opened	Size (Acres)	Interments	Memorials
HOLLINWOOD	1889	26	37116	5808
CHADDERTON	1857	31	102753	11090
GREENACRES	1857	35	109556	12601
FAILSWORTH	1887	8	19113	3598
LEES	1879	6	11229	2012
CROMPTON	1891	14	16424	3168
ROYTON	1879	7	20435	3114
TOTAL			316626	41431

- 1.2 The cemetery service provides burials out of normal working hours, covering weekends, Bank Holidays, and evenings (until dusk). During 2022/23, 33 evening and 33 weekend / bank holiday burials took place.

2 Current Position

2.1 Improvements

Hollinwood Crematorium has recently undergone extensive resurfacing works through section 106 funding to enhance the area around the Crematorium Chapel and under the porte cochere to ensure residents waiting to attend funerals and the funerals arriving have a positive experience.

2.2 Issues

2.2.1 Burial Capacity

Currently, there is 39 years of remaining burial capacity borough wide, and we are aware that we need to ensure future capacity.

Chadderton Cemetery has land that can be developed, potentially adding a further 20 years of burial space. In addition, the Service is currently working with Planning Services to identify other sites that could be developed to provide future burial capacity. It is important to identify these sites as part of the Local Plan.

Once suitable sites have been identified, there will be a requirement to undertake initial design and planning work to enable this land to be utilised as a burial site. This work will include necessary assessments (ecological/hydrological etc.) as well as regulatory and planning compliance.

The same approach will be undertaken at other sites boroughwide where additional land has been identified but requires development and assessment before use. The Service will ensure sites are brought into use in a timely manner so that there is capacity moving forward.

2.2.2 Memorials

All placement of memorials and headstones must be agreed to by Oldham Council and there is a criteria that must be met – this relates to the size/dimension/materials and fixing methods of the stonework and any planting on graves. However, there are instances in which permitted sizes have been exceeded. This has resulted in access problems to ensure maintenance and has, on occasion, also prevented visitors to adjacent graves from being able to access the area.

In order to address the above, guidance and requirements regarding all memorials has been revised. The revised guidance also clearly stipulates enforcement options for securing compliance where the stonework/dimensions or fittings exceed the agreed limits. The revised/proposed regulations are attached in **Appendix A**.

It is proposed, that, once agreed (a consultation exercise to take place in the near future), these standards will apply to all new gravesites and will be clearly communicated to all funeral directors, organisations and individual grave owners as will the fact that any memorials that fail to comply will be removed and the grave owners charged for the costs of removal.

2.2.3 Flooding

There is a national problem around standing water across all areas after periods of heavy rain. Understandably, this is also an issue in some of our cemeteries where, after prolonged or heavy rain, there is some standing water over graves. The water does dissipate relatively quickly but this issue has been raised over recent years.

In order to improve the surfacy hydrology, the Council has undertaken repair of culverts, improved highway drainage, and more recently, introduced additional drainage channels between graves to allow water to dissipate (Crompton, Greenacres and Chadderton Cemetery). Although an understandable concern, digging of ground for new graves while there has been heavy rain hasn't shown water ingress or saturated soils at depth. This reaffirms that the problem is mainly surface water related.

Nonetheless, we are mindful that as climate extremes become more frequent, the issue of standing water/flooding at gravesites is likely to become an issue. The Service will continue to monitor ground and water conditions and undertake reasonable and practical steps to mitigate problems when they arise.

2.2.4 Out of hours access and fees

The Service provides out of hours access for burials, and this option is available for all residents of Oldham. However, it is mainly used by the Muslim community given the religious requirement to bury the deceased as soon as practically and legally possible. As a result, the Service works close with Muslim Funeral Services in Oldham to ensure a timely and suitable provision.

Where out of hours access is needed (evenings, weekends & bank holidays), this does carry an extra charge to cover the costs of service provision outside of normal working hours. The out of hours fees charged by Oldham are commensurate with the works completed and comparable regionally. Based on current figures, Oldham is the 4th cheapest, with 6 other authorities in Greater Manchester charging more for out of hours access.

2.2.5 Cremators

The Crematorium's 3 cremators are nearing the end of life and due to be replaced in the next 2-5 years. This is to ensure they continue to operate efficiently and to comply with legislative requirements for mercury abatement. This replacement programme will have to be carefully managed to ensure service provision and capacity, both to meet resident and budget needs. A separate report outlining the course of action as well as timelines for replacement is currently being produced and will go through necessary consultation before procurement/replacement can commence.

Recommendations

The key areas of work, outlined above, will follow Council processes and additional reports/consultation will take place with relevant departments and stakeholders, internal and external, before appropriate sign off. However, it is requested that the Scrutiny Committee Members:

1. consider the main areas of concern around burial capacity and the proposed course of action
2. consider the approach towards a consistent policy for memorials and headstones moving forward
3. discuss the proposed compliance led approach towards memorial stones
4. note of the programme of works and interventions with regards to flooding, out of hours access / fees and the cremator replacement programme

Appendix A

MEMORIAL WORK

4.1 PERMISSION TO PLACE MEMORIAL

No memorial, vase, cross or tablet is allowed to be placed on any grave without written consent of the Manager of Cemeteries and Crematorium.

Memorials may only be erected over graves for which exclusive rights of burial are granted.

No ornamentation other than those set out above and subject to consent therein mentioned will be permitted.

4.2 APPLICATION FOR TO ERECT A MEMORIAL

Prior to work commencing, an Application for Memorial erection must be completed by both the grave owner (or his authorised representative) and the monumental mason.

The completed form should be handed in to the Registrar or his representative at least two weeks before the permit is required.

No monumental mason will be allowed to commence work without a signed permit.

Only Registered Memorial Masons will be permitted to work in the Cemeteries.

4.3 MATERIALS FOR MEMORIALS

Only granite, marble, hard natural stone and permitted hardwoods may be used in the construction of memorials. Artificial stone of any type will not be permitted.

Any photograph of the deceased person must not exceed 6 inches in any dimension and must be permanently attached to the memorial.

4.4 RESPONSIBILITIES FOR MEMORIALS

Memorials will be erected at the sole risk and liability of the registered grave owner or his representative.

The responsibility for memorials is that of the grave owner or other authorised person, however, the Council reserves the right to take any action as it deems necessary in accordance with Section 1.5 of these regulations.

4.5 MEMORIALS AND FOUNDATIONS: TYPES AND SIZES

All permitted memorials are limited to lawn type headstones or simple marker stones or wooden crosses and therefore will not exceed:

Headstone sizes:

3 feet or 900 millimetres in height
3 feet or 900 millimetres in width
6 inches or 150 millimetres in thickness
not less than 3 inches or 75 millimeters in thickness.

All memorials exceeding 18 inches in height will be required to have a concrete foundation, which will be installed in accordance with the current guidelines in force, issued by the National Association of Monumental Masons and be fitted with the recommended ground anchor and dowels to accommodate the size of the memorial.

4.6 IDENTIFICATION OF MEMORIALS/GRAVE AREA

The section, square, row and grave number must be cut in or plated onto all memorials, in a position readily visible after erection.

The mason's name, title or other such information shall only be permitted on the back of memorials in letters no larger than one half inch.

4.7 GRAVE SURROUNDS

Grave surrounds are permitted subject to them being built of materials in accordance with Section 4.3 of these regulations, excluding wood and any other material.

The dimensions allowed for kerb surrounds are as follows:

LAWNED (GRASSED) GRAVE AREAS

3 feet or 900 millimeters in width.

18 inches or 450 millimetres from the front of the memorial N.B. Both measurements include surrounds.

This size is to allow for access to maintenance equipment that will maintain the lawned grave areas. The area of 450 millimetres surrounds are the responsibility of the grave owner to maintain.

The Council reserve the right to remove any kerb surrounds that have fallen into disrepair.

NON LAWNED GRAVE AREAS (Areas not maintained by the Council)

3 feet or 900 millimetres in width

6 feet or 1800 millimetres in length.

Non lawned areas are not maintained by the Council and no access is required for maintenance equipment. All graves with surrounds of 1800 millimetres in length are the responsibility of the grave owner to maintain.

The Council reserve the right to remove any kerb surrounds that have fallen into disrepair.

4.8 REMOVAL OF MEMORIAL

No memorial can be taken down or removed, for any purpose whatsoever, without the permission of the Manger of Cemeteries and Crematorium or his representative, and/or (b)

the grave owner. Unless for safety purpose or to demonstrate correct fixings have been installed.

4.9 ADDITIONAL INSCRIPTIONS ON MEMORIALS

All additional inscriptions must obtain a permit prior to work commencing.

Any memorials removed for an additional inscription or further interment, must be re-fixed with a ground anchor to National recommended standards.

Where memorials are fully inscribed and where additional inscriptions are required, this can be accommodated on an additional plinth, which should be placed at the base of the memorial within the grave surround area.

No other additional planting area will be permitted.

4.10 ACCEPTANCE OF MEMORIALS

The Council reserves the right to reject memorials that are not of the required standard, are not erected by a Registered Memorial Mason or that are not identified by the correct grave number (see Section 4.6).

SECTION 5. GENERAL ON-SITE WORK

5.1 All memorials must be conveyed into or through the cemetery in such a manner as to cause no damage to roads, pathways and grave areas and in a safe manner.

5.2 All spare building material or rubbish arising from the work should be removed, to the satisfaction of the Cemetery Manager.

5.3 All work should be carried out in such a manner befitting that of a cemetery and without causing interference or interruption to interments or mourners or other visitors and in accordance with Section 2 (Admission of Visitors) – of these regulations.

5.4 All work must be carried out during the normal working week - Monday to Friday - and during the normal working day, unless previously agreed by the Council.

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