

Report author: Franklin Riley

Tel: 247 8138

Report of the Director City Development

Report to Executive Board

Date: 25th June 2014

The First White Cloth Hall and the Lower Kirkgate Townscape Heritage Initiative

Are specific electoral Wards affected?		☐ No
If relevant, name(s) of Ward(s): City and Hunslet		
Are there implications for equality and diversity and cohesion and integration?	⊠ Yes	☐ No
Is the decision eligible for Call-In?		☐ No
Does the report contain confidential or exempt information?		☐ No
If relevant, Access to Information Procedure Rule number: 10.4(3) Appendix number: 5 and 6		

Summary of main issues

- 1. There have been significant strides in recent years to develop and improve the retail offer within the city centre, including Trinity and the emerging Victoria Gate shopping developments. But there is also a need to ensure that the city centre remains distinctive and able to provide shopping facilities for a wide range of ages, incomes, cultures and interests. The independent sector can help to complement the current 'high street' provision as the success of Kirkgate Market has shown over a many years. Lower Kirkgate will provide a significant opportunity for the development of an independent retail offer that would see this setting, on Leeds' oldest street, as an opportunity to develop a distinctive and vibrant identity within a short distance from some of the busiest shopping streets in the county.
- 2. The Heritage Lottery Fund has awarded the council £1.505m to undertake conservation standard repair and restoration works to Lower Kirkgate. This Lower Kirkgate Townscape Heritage Initiative (THI) will provide grant to help owners re-use vacant and underused space and to restore historical features up until April 2018. The most important building within this part of Kirkgate is the grade II* First White Cloth Hall (FWCH), arguably Leeds' most important building at risk. What remains of the structure has been recently secured by the owners, but it is in a fragile state and requires significant investment in the next few years to ensure its long term survival. However, even with the availability of the Townscape Heritage Initiative grant a commercial solution is proving challenging for the owner. This report seeks approval to enter into a two year agreement with the owner of the building to see if it can be restored in a financially sustainable manner. The decision on whether to enter into any subsequent

- lease of the FWCH would be for Executive Board to decide at a future date the agreement with the owner of the building will not commit the council to take a lease.
- 3. For the other less challenging properties the THI provides the opportunity to help create a critical mass of independent retailing and to revitalise vacant floorspace for the benefit of the local economy would send a positive message about the resolve of the council and its partners to support economic prosperity despite the challenges posed.

Recommendation

- 4. Executive Board is recommended to:
 - give authority for the Council to enter into an agreement with the owner of the First White Cloth Hall on the basis outlined in the heads of terms in Appendix 5 of this report;
 - ii. delegate authority to the Director of City Development to settle the final terms of that agreement:
 - iii. give authority to spend £1.505m on the works outlined in this report;
 - iv. note that the Programme Manager (Major Projects) will be responsible for implementation
 - v. note the feasibility timescales outlined in Appendix 3.

1 Purpose of this report

1.1 This report seeks approval to enter into an agreement with the owner of First White Cloth Hall on the basis of the heads of terms included within Appendix 5. This report also seeks authority to spend the £1.505m awarded by the HLF.

2 Background information

2.1 In April 2013, the Heritage Lottery Fund (HLF) awarded the council a new Townscape Heritage Initiative (THI) for the Lower Kirkgate area of the city centre. The THI consists of a 5 year programme of capital investment in commercial properties backed by grant aid and private sector match funding. The amount awarded by the HLF was £1.505m, match funded by £668k from the capital programme. On 12th March 2012 Executive Board gave authority to spend the £668k on the condition that the HLF bid was successful. Since then a further £30k has been approved by English Heritage to fund feasibility works on the First White Cloth Hall (Appendix 1), with an additional £250k earmarked subject to the completion of this feasibility work and the approval of a development fund bid.

Funding Sources and Status

Source	Amount £(000)	Status
Heritage Lottery Fund	1505	Secured
Capital Programme	668	Secured
English Heritage*	250	Unsecured (capital)
	30	Secured (feasibility)
Total	2453	

^{*} Development funding for design work between feasibility and implementation is also available but these costs are yet to be finalised.

2.2 The Lower Kirkgate THI is characterised by a close knit group of mainly 18th and 19th century three storey terrace buildings with narrow facades and limiting internal space standards (Appendix 2). The iconic structure within the THI is the grade II* listed First White Cloth Hall – a covered market for the sale of cloth made in the

townships surrounding Leeds - which set the scene for the city's rapid mercantile expansion from the 1700s. As trade in cloth grew another two cloth halls superseded the First White Cloth Hall in order to adapt to the changing commercial climate and the growth of the city. As a result Lower Kirkgate was left behind.

3 Main issues

3.1 There are two main issues for which an Executive Board decision is important, securing the future of the First White Cloth Hall and seeking authority to spend HLF grant. These are dealt with in turn below.

The First White Cloth Hall

- 3.2 The most critically important project within the THI is the repair and restoration of the 1710 First White Cloth Hall which is arguably Leeds' most important building as it is here that the city's mercantile culture began. The First White Cloth Hall and about two thirds of the other Kirkgate buildings are owned by a company called City Fusion (see Appendix 2). In the current economic climate, City Fusion has been unable to bring forward a refurbishment scheme for their properties and the condition of the First White Cloth Hall continues to deteriorate. In principle the HLF and English Heritage have offered substantial financial assistance towards the refurbishment of the First White Cloth Hall, but City Fusion has been unable to secure the balance of funding required.
- 3.3 Due to the historical significance of the building, it is recommended that the Council considers acquiring the building to secure its future and to bring about its refurbishment and reuse, subject to finding a tenable financial and design solution. The owner has proposed granting a 300 year leasehold interest to the council at a peppercorn rent. It is proposed to enter into an agreement with the owner of the building which would give the council up to 2 years to undertake financial, technical and conservation based analysis of the building and its potential before making a decision on whether to take a lease. Heads of terms for the proposed agreement are set out at Appendix 5. The agreement would not bind the council to taking a lease of the property and the final decision would rest with Executive Board.
- 3.4 Whilst initial discussions with City Fusion have indicated that the agreed heads of terms do provide a basis for entering into formal negotiations for an agreement, time is of the essence. Therefore, officers have prepared a licence agreement that would give the Council access to the building to carry out safe access works and preliminary surveys whilst negotiations on the agreement continue. If an agreement cannot be reached, within a reasonable period say 3-4 months, then it is proposed that a further report be considered by Executive Board to look at other options for safeguarding the building.
- 3.5 An initial scoping exercise suggests that the council may be able to find a feasible and sustainable solution to the restoration of the FWCH but to confirm this requires additional feasibility work. As such officers have worked with English Heritage and the West Yorkshire Archaeological Advisory Service (WYAAS) to develop a feasibility programme that will address the design and feasibility work envisaged by the agreement (Appendix 3). The feasibility will encompass the following work all of which will be funded by English Heritage or THI monies.
 - Stage 1 Clarify what's important and what condition the building is in:

- safe access assessment and works
- archaeological building recording of the first white cloth hall to inform future listed building consent and planning permission submissions
- a structural condition survey to inform costs for repair of the east and south wings
- consultation with heritage interest groups and the public on the future of the building
- conservation statement to draw together recent work to clearly articulate the building's significance, issues and vulnerability and a conservation policy for its repair, restoration and reconstruction to inform the development of a viable reuse project

Stage 2 - Develop the preferred option:

- develop a preferred option for the whole building re-use with supporting building appraisal of its suitability for that use and a development appraisal
- consideration of legal and ownership issues
- a design brief and sketch plans for the whole building

Stage 3 - Develop detailed design:

- detailed design to tender of the repair and restoration works
- 3.6 Each stage will also involve consultation with council members and other key stakeholders including funders and amenity bodies such as the Civic Trust. In addition to the stages outlined above it is also recognised that a business plan and fund raising strategy for the FWCH will need to be undertaken. To this end officers have been in discussion with the Princes Regeneration Trust who have expressed an interest in supporting this project.

The Lower Kirkgate Townscape Heritage Initiative

3.7 The THI has three main components: the capital works facilitated through grant aid to match private sector investment, public realm improvements and complementary activities including training and awareness raising. The capital investment will be prioritised as follows in order to secure the re-use of vacant commercial space together with the repair and restoration of historical building fabric:

HIGH - Critical	98-100 Kirkgate (First White Cloth Hall)		
MEDIUM - Target	83, 84, 85, 86, 87, 88/89, 90, 91, 92, 93, 94, 95, 96 and 97 Kirkgate		
LOW - Reserve	103/104 Kirkgate; 1-2, 3, 5, 7, 9 to 11 Call Lane and 1, 3-5, 7B and 11 Crown St.		

3.8 On the Kirkgate frontage there are a total of 7 (43%) vacant properties in addition to upper floor vacancies or low level storage uses across most of the occupied properties. The THI proposals will seek to return 2971m2 floorspace back into productive use by generating increased commercial vitality through the introduction of new uses attracted by the areas visible improvements. Depending on the configuration of uses it is estimated that this could increase employment within the Kirkgate frontage by 28-80 people. Grants would be based on the cost of the repairs and restoration costs, minus any increase in property value. Professional advisors assisting the applicants would have to be accredited architects or chartered surveyors and builders would have to have experience of working on traditional (pre-

- 1919) buildings. Grant eligibility will include items such as shopfronts, structural and roof repairs and the restoration of key architectural features. The improvements would also include enhancing energy efficiency and promoting skills development and training.
- 3.9 Project oversight is being provided by a project board of senior officers including the director of City Development and any key decisions will be made in consultation with the Executive Member for Transport and Economy.

4 Corporate ConsiderationsConsultation and Engagement

- 4.1.1 In 2011 members of the public were asked about their views on Lower Kirkgate and construction craft training. A total of 265 people responded showing considerable interest in and support for the then proposed THI, training and education initiatives linked to heritage construction. There was particular support for training aimed at young people, builders and existing businesses. These findings help lead to the development of the Re-Making Leeds heritage construction project considered by Executive Board on 4th September 2013.
- 4.1.2 Ward Members, City Centre Plans Panel, Inner South Area Committee, Richmond Hill Forum and a range of heritage organisations including English Heritage, Leeds Civic Trust, Victorian Society and the West Yorkshire Archaeological Advisory Service (WYAAS) have also been consulted on the general THI proposals. Ward Members, Executive Member for Transport & Economy and Legal Services have been consulted on the option agreement proposal.

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 Giving due regard to equality, the proposals in this report has been subject to an Equality Screening, which is appended to this report (Appendix 4). The grant application process will mirror that of the existing THI schemes where the Council's monitoring standards are used to retrospectively evaluate the performance of applications from different groups. However, the THI was subject to an equality screening and this concluded that the training and awareness raising will potentially give rise to equality impacts in terms of the selection of candidates.

4.3 Council Priorities

4.3.1 The project will support the Best Council Plan 2013-17 objective to **promote** sustainable and inclusive economic growth. It will do this by providing grant aid and development expertise to help address market failure in marginal and heritage rich buildings on the edge of the city. Without this intervention it is possible that some of the built environmental that helped to make Leeds a regional centre will be lost or that vacant spaces that could be used by new enterprises remain unavailable losing an opportunity to create a distinctive independent commercial offer to complement existing city centre businesses.

4.4 Resources and value for money

4.4.1 The project will bring investment to the city in the region of £3m, most of which would not otherwise occur. The restored buildings will create space of between 28-80 employees and will assist in promoting better energy efficiency and building maintenance practices within the THI and beyond through promotional activity. As

such the project represents good value for money for Leeds residents and businesses. The level of match funding required to support the initiative, some £668k is already part of the council's capital programme.

4.4.2 Capital Funding Cashflow

Previous total Authority	TOTAL	TO MARCH		F	ORECASI	Г	
to Spend on this scheme		2013/14	2014/15	2015/16	2016/17	2017/18	2018 on
	£000's	£000's	£000's	£000's	£000's	£000's	£000's
LAND (1)	0.0						
CONSTRUCTION (3)	0.0						
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	0.0						
OTHER COSTS (7)	668.0		68.8	95.3	151.5	352.4	
TOTALS	668.0	0.0	68.8	95.3	151.5	352.4	0.0
Authority to Spend	TOTAL	TO MARCH			O R E C A S 1		
required for this Approval		2013/14	2014/15	2015/16	2016/17	2017/18	2018 on
	£000's	£000's	£000's	£000's	£000's	£000's	£000's
LAND (1)	0.0						
CONSTRUCTION (3)	63.0					63.0	
FURN & EQPT (5)	0.0						
DESIGN FEES (6)	7.0					7.0	
OTHER COSTS (7)	1 4 3 5 . 0		153.8	214.7	3 4 1 . 5	725.0	
TOTALS	1505.0	0.0	153.8	214.7	3 4 1 . 5	795.0	0.0
Total overall Funding	TOTAL	TO MARCH			ORECASI		
(As per latest Capital		2013/14	2014/15	2015/16	2016/17	2017/18	2018 on
Program m e)	£000's	£000's	£000's	£000's	£000's	£000's	£000's
LCC Supported Borrowing	668.0		68.8	95.3	151.5	3 5 2 . 4	0.0
Heritage Lottery Fund	1505.0	0.0	153.8	2 1 4 . 7	3 4 1 . 5	795.0	0.0
Total Funding	2173.0	0.0	222.6	3 1 0 . 0	493.0	1147.4	0.0
Balance / Shortfall =	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Parent Scheme Number: 16275 / 000 / 000

Title: Lower Kirkgate Townscape Heritage Initiative

Revenue Effects

4.4.3 There are no direct revenue effects envisaged by the project. The funding within the capital funding and cashflow table incorporates staff costs and overheads to manage the project.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The City Council has legal authority to bid for and implement the provisions of the Lower Kirkgate THI under its well-being powers within Section 1 of the Localism Act 2011 which allows local authorities to "do that individuals generally may do", unless explicitly prohibited elsewhere in law. THI schemes are compatible with the State Aid provisions under Article 87(3) d) of the EC Treaty. On 27th May 2003 the then European Commission (NN 11/2002) considered the impact of THIs and found that in cases where the retention or appropriate repair of historic assets entails additional costs part or all of which are to be funded through grants, they are seen to preserve heritage without affecting trading conditions and competition and are therefore compatible with the State Aid provisions. The feasibility investigations for the FWCH will be undertaken using powers under Section 2 of the Local Authorities (Land) Act 1963 which permit the council to "erect any building and construct or carry out works on land" (not just our own land) where this is for "the benefit or improvement" of the city. In relation to the potential lease agreement with City Fusion the council has powers under Section 120 of the Local Government Act 1972 to acquire land by agreement for the "benefit, improvement or development" of the city.

4.5.2 The information in Appendix 5 and 6 of this report has been identified as exempt because it contains information which relates to City Fusion Ltd as a business and its release may prejudice their commercial interests and withholding the information is considered to outweigh the public interest benefit or its release. Further risks, in addition to those outlined in section 4.6, are identified in the confidential Appendix 6 attached to this report which relate to the financial or business affairs of the Council. Disclosure of those risks would be prejudicial to the interests of the Council. It is considered that the public interest in treating this information as confidential outweighs the public interest in disclosing it and that these elements of the report should be treated as exempt under Rule 10.4.3 of the Access to Information Procedure Rules. The report is subject to call in.

4.6 Risk Management

- 4.6.1 A separate risk log has been prepared and is regularly updated. The main risks are as follows:-
 - Project Governance no public funding will be released without the appropriate
 cost checks, architects certificates and legal, financial and planning agreements
 being secured. Despite the risks associated with having one main owner the
 benefit, if the scheme is successful, is that the impact is likely to be
 comprehensive, avoiding the pepper-potting that can occur where ownerships are
 fragmented. The ownership position also means that the Council will need to
 ensure that the interests of the smaller landowners are represented fully and this
 has been done through regular correspondence and face to face briefings through
 a stakeholder forum;
 - The Economy in addition to the capital constraints facing the council the private sector is also facing challenging times as the economy emerges from recession. However, given the focus on distinctive and independent retailers in contrast with much of the city centre offer together with the availability of THI support it is thought, following discussions with owners and traders, will be sufficient to stimulate private investment in Lower Kirkgate. Indeed six of the seven owners have already employed building professionals, drawn up building plans or secured planning permission as a pre-cursor to engagement with the THI process;
 - Critical Project (FWCH) all THI projects carry the risk that should the critical
 properties fail to be delivered then HLF could clawback all or some of the funding.
 This action can be mitigated by demonstrating that all reasonable steps have
 been taken to secure development and participation by owners and occupiers.
 The additional measure outline in this report pertaining to the FWCH will help to
 reduce the risks of project failure.

5 Conclusions

5.1 Securing the successful rejuvenation of an area which has suffered market failure is complex. However, the funding opportunities available are unlikely to be repeated in the near future. During that time the fabric of Leeds' first street is likely to have deteriorated further even with the use of the Council's planning and building regulations powers. Restoration of the First White Cloth Hall would secure Leeds' most important building at risk. The opportunity to help create a critical mass of

independent retailing and to revitalise vacant floorspace for the benefit of the local economy would send a positive signal about the resolve of the Council and its partners to support economic prosperity despite the challenges posed.

6 Recommendation

6.1 Executive Board is recommended to:

- give authority for the Council to enter into an agreement with the owner of the First White Cloth Hall on the basis outlined in the heads of terms in Appendix 5 of this report;
- ii. delegate authority to the Director of City Development to settle the final terms of that agreement;
- iii. give authority to spend £1.505m on the works outlined in this report;
- iv. note that the Programme Manager (Major Projects) will be responsible for implementation
- v. note the feasibility timescales outlined in Appendix 3.

7 Background documents¹

7.1 None

_

¹ The background documents listed in this section are available to download from the Council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.

Appendix 1: FWCH images now and a restored option

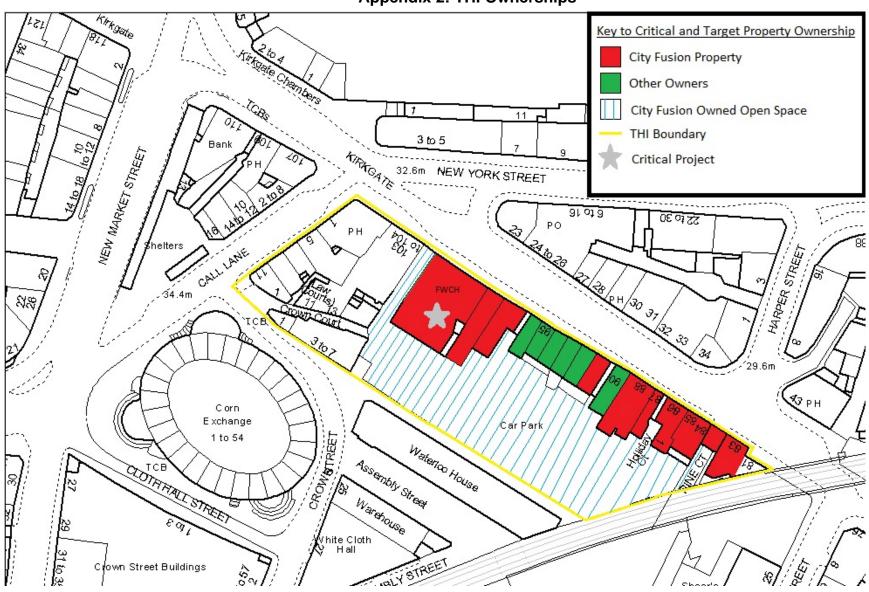


Photo 1 - FWCH (Present Day)

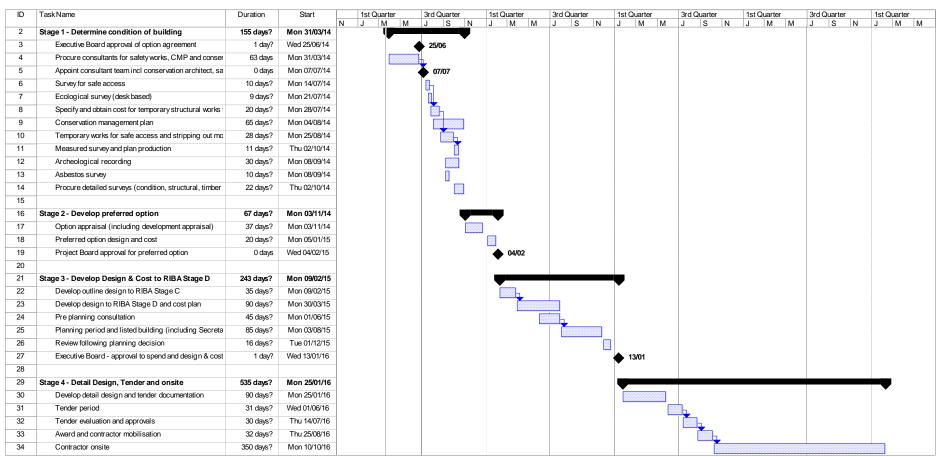


Image A - FWCH (a restored option; image courtesy of Ian Tod Architects)

Appendix 2: THI Ownerships



Appendix 3: Feasibility Timescales



The programme for feasibility works assumes that the option agreement is approved in June 2014

APPENDIX 4: Equality, Diversity, Cohesion and Integration Screening

Directorate: City Development



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions. Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion and integration.
- whether or not equality, diversity, cohesion and integration is being/has already been considered, and

Service area: Regeneration

• whether or not it is necessary to carry out an impact assessment.

Directorator only Development	ooi vioo ai oai itogoiloi alioii
Lead person:	Contact number:
Franklin Riley	247 8138
1. Title: The First White Cloth Hall	
Is this a:	
Strategy / Policy Servi	ce / Function Other
If other, please specify	

2. Please provide a brief description of what you are screening

The Lower Kirkgate THI will provide capital grants to help property owners address the market failure within Leeds' oldest street. This failure has resulted in valuable floorspace remaining vacant and employment potential unfulfilled especially for new independents operators. The main focus of the grants will be in helping to restore vacant and underused buildings as any increase in property value will have to be surrendered as match funding by the owners. Therefore, the main focus of the equality screening will be the beneficiaries of the ancillary training and awareness raising being provided by the project.

The project will raise awareness of local heritage amongst schools, local communities, construction companies and property professionals. This will include the provision of short courses to fill discrete heritage construction skills gaps of construction SMEs based in the city. This work will complement the Re-Making Leeds scheme that was subject to Equality Screening in May 2014.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies/policies, services/functions affect service users, employees or the wider community – city wide or more local. These will also have a greater/lesser relevance to equality, diversity, cohesion and integration.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, carers, disability, gender reassignment, race, religion or belief, sex, sexual orientation and any other relevant characteristics (for example socio-economic status, social class, income, unemployment, residential location or family background and education or skills levels).

Questions	Yes	No
Is there an existing or likely differential impact for the different equality characteristics?		✓
Have there been or likely to be any public concerns about the policy or proposal?		✓
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?		✓
Could the proposal affect our workforce or employment practices?		✓
 Does the proposal involve or will it have an impact on Eliminating unlawful discrimination, victimisation and harassment Advancing equality of opportunity Fostering good relations 	√	

If you have answered **no** to the questions above please complete **sections 6 and 7**

If you have answered **yes** to any of the above and;

- Believe you have already considered the impact on equality, diversity, cohesion and integration within your proposal please go to section 4.
- Are not already considering the impact on equality, diversity, cohesion and integration within your proposal please go to **section 5**.

4. Considering the impact on equality, diversity, cohesion and integration

If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.

Please provide specific details for all three areas below (use the prompts for guidance).

• How have you considered equality, diversity, cohesion and integration? (think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected.

The main beneficiaries' of the capital grants will be the building themselves as the owners will have to contribute any increase in property value as match funding. Whilst there are only seven owners all applicants will be asked to provide equalities information which will be retrospectively monitored to help safeguard against unfairness.

The marginal location of Lower Kirkgate and the rental levels that it is likely to attract will be of particular importance to emerging independent retailers who might otherwise be priced out of other more expensive parts of the city centre. Whilst the council cannot guarantee that rental is likely to remain low, it location is a strong indicator that in relative terms this will remain the case. The grant scheme is also encouraging the re-use of upper floor accommodation that often remains vacant or underused within commercial areas. This space could be used flexibly to provide workshop and low cost city centre living accommodation to artists and others needing to be located centrally.

In practice the main equality considerations surround the beneficiaries of any training or awareness raising provided by the project and this is the focus of the following narrative. The report and the training opportunities it seeks to create will affect two main groups, local communities and those involved in the construction industry. Firstly, the THI will provide awareness raising courses and events for local communities. Secondly, Construction SMEs and construction professionals will be recruited to take up short courses to fill discrete training gaps in their organisations.

Consultation was carried out in January 2013, to see if local SMEs supported the training project and the overwhelming majority did so. Public consultation was also carried out in 2011 which showed Leeds residents support for heritage based training, especially aimed at the young. There is limited equalities information on the heritage construction sector. However, information on the general construction industry suggests that BAME communities and in particular women are under represented. Whilst there is anecdotal evidence that there has been some progress in recruiting women to plumbing, painting and decorating and management skills they represent only 11% of the Leeds construction sector. BAME communities make up 7.1% of the Leeds total.

The project will work closely with the Re-Making Leeds initiative to promote heritage and construction to groups such as women and ethnic minorities who tend to be under-represented in these professions. It will also work with local communities and schools to promote a shared sense of heritage through advisory groups, taster sessions and careers advice.

Key findings

(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)

Opportunities

Kirkgate provides an accessible example of how history and culture have shaped the city. Bringing communities in Richmond Hill, Holbeck and elsewhere to celebrate a shared built heritage will help to promote community cohesion through shared experiences and the ability to connect with the past through a range of local activities and promotions, including hands on craft events. This awareness raising will also help to increase the

diversity of the pool of trainees for this and the Re-Making Leeds project.

Actions

(think about how you will promote positive impact and remove/ reduce negative impact)

The work mentioned above is designed to increase the diversity of the pool of trainees and provide a progression recruit to scheme offering formal qualifications in heritage construction such as Re-Making Leeds. The project will also make use of ethnic monitoring to provide retrospective analysis of fairness in participant involvement.

5. If you are not already considering the impact of integration you will need to carry out an impact as:	
Date to scope and plan your impact assessment:	N/A
Date to complete your impact assessment	N/A
Lead person for your impact assessment (Include name and job title)	N/A

6. Governance, ownership and approval			
Please state here who has approved the actions and outcomes of the screening			
Name	Job title	Date	
Christine Addison	Chief Asset Management	15 th May 2014	
	& Regeneration Officer	-	

7. Publishing

This screening document will act as evidence that due regard to equality and diversity has been given. If you are not carrying out an independent impact assessment the screening document will need to be published.

Please send a copy to the Equality Team for publishing

Date screening completed	9 th May 2014
Date sent to Equality Team	15 th May 2014
Date published (To be completed by the Equality Team)	