

Cabinet Agenda



Date: Tuesday, 6 February 2024

Time: 4.00 pm

Venue: The Council Chamber - City Hall, College Green, Bristol, BS1 5TR

Distribution:

Cabinet Members: Marley Bennett, Mayor Marvin Rees, Donald Alexander, Nicola Beech, Craig Cheney, Asher Craig, Kye Dudd, Helen Holland, Ellie King and Tom Renhard

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Issued by: Amy Rodwell, Democratic Services

City Hall, P O Box 3399, Bristol, BS1 9NE

E-mail: democratic.services@bristol.gov.uk

Date: Monday, 29 January 2024



Agenda

PART A - Standard items of business:

1. Welcome and Safety Information

Members of the public intending to attend the meeting are asked to please note that, in the interests of health, safety and security, bags may be searched on entry to the building. Everyone attending this meeting is also asked please to behave with due courtesy and to conduct themselves in a reasonable way.

Please note: if the alarm sounds during the meeting, everyone should please exit the building via the way they came in, via the main entrance lobby area, and then the front ramp. Please then assemble on the paved area in front of the building on College Green by the flag poles.

If the front entrance cannot be used, alternative exits are available via staircases 2 and 3 to the left and right of the Conference Hall. These exit to the rear of the building. The lifts are not to be used. Then please make your way to the assembly point at the front of the building. Please do not return to the building until instructed to do so by the fire warden(s).

2. Public Forum

Members of the press and public who plan to attend a public meeting at City Hall are advised that you will be **required to sign in** when you arrive and you will be issued with a visitor pass which you will **need to display at all times**. **(Pages 6 - 8)**

Up to one hour is allowed for this item

Any member of the public or Councillor may participate in Public Forum. Petitions, statements and questions received by the deadlines below will be taken at the start of the agenda item to which they relate to.

Petitions and statements (must be about matters on the agenda):

- Members of the public and members of the council, provided they give notice in writing or by e-mail (and include their name, address, and 'details of the wording of the petition, and, in the case of a statement, a copy of the submission) by no later than 12 noon on the working day before the meeting, may present a petition or submit a statement to the Cabinet.

- One statement per member of the public and one statement per member of council shall be admissible.



- A maximum of one minute shall be allowed to present each petition and statement.
- The deadline for receipt of petitions and statements for the 6 February Cabinet is 12 noon on **Monday 5th February 2024**. These should be sent, in writing or by e-mail to: Democratic Services, City Hall, College Green, Bristol, BS1 5TR
e-mail: democratic.services@bristol.gov.uk

Questions (must be about matters on the agenda):

- A question may be asked by a member of the public or a member of Council, provided they give notice in writing or by e-mail (and include their name and address) no later than 3 clear working days before the day of the meeting.
- Questions must identify the member of the Cabinet to whom they are put.
- A maximum of 2 written questions per person can be asked. At the meeting, a maximum of 2 supplementary questions may be asked. A supplementary question must arise directly out of the original question or reply.
- Replies to questions will be given verbally at the meeting. If a reply cannot be given at the meeting (including due to lack of time) or if written confirmation of the verbal reply is requested by the questioner, a written reply will be provided within 10 working days of the meeting.
- The deadline for receipt of questions for the 6 February Cabinet is 5.00 pm on **Wednesday 31st January 2024**. These should be sent, in writing or by e-mail to: Democratic Services, City Hall, College Green, Bristol BS1 5TR.
Democratic Services e-mail: democratic.services@bristol.gov.uk

PLEASE NOTE – The Public Forum deadline for questions has been extended for the following item:

- Highway Contract Procurement (item 10)

The Public Forum deadline for questions for this item has been extended to **Thursday 1st February at 5pm.**

When submitting a question or statement please indicate whether you are planning to attend the meeting to present your statement or receive a verbal reply to your question



3. Apologies for Absence

4. Declarations of Interest

To note any declarations of interest from the Mayor and Councillors. They are asked to indicate the relevant agenda item, the nature of the interest and in particular whether it is a **disclosable pecuniary interest**.

Any declarations of interest made at the meeting which is not on the register of interests should be notified to the Monitoring Officer for inclusion.

5. Matters referred to the Mayor for reconsideration by a scrutiny commission or by Full Council

(subject to a maximum of three items)

6. Reports from scrutiny commission

7. Chair's Business

To note any announcements from the Chair

PART B - Key Decisions

8. Review of High Needs Block (HNB) Element 3 non-statutory top up funding

(Pages 9 - 198)

9. Green Recovery Fund – Public Electric Vehicle Infrastructure

(Pages 199 - 215)

10. Highway Contract Procurement

(Pages 216 - 234)

11. Housing Revenue Account (HRA) Energy Efficiency Strategy

(Pages 235 - 271)

12. New Property Licensing Schemes

(Pages 272 - 452)



13. A37/A4018 Victoria Street & Colston Avenue Full Business Case (FBC)

Appendices published as a supplement to this agenda

(Pages 453 - 458)

14. Frome Gateway Regeneration Framework

(Pages 459 - 739)

15. Recommissioning of adult homelessness supported accommodation pathways

(Pages 740 - 768)

16. Extension of We Can Make area of operation

(Pages 769 - 799)

17. Estate Rationalisation and Disposals

(Pages 800 - 821)

18. Hard Facilities Management Contract Extension, re-procurement and Capital Health and Safety Programme

(Pages 822 - 841)

19. The future of the Homelessness Prevention Youth Hub Service

(Pages 842 - 870)

20. Critical Assets Harbour River Wall Asset - Remedial Works

(Pages 871 - 1035)

PART C - Non-Key Decisions

21. Bristol's first Citizens' Assembly recommendations

(Pages 1036 - 1083)

22. Finance Exception Report (P9)

(Pages 1084 - 1098)



Public Information Sheet

Inspection of Papers - Local Government (Access to Information) Act 1985

You can find papers for all our meetings on our website at www.bristol.gov.uk.

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Public meetings including Cabinet, Full Council, regulatory meetings (where planning and licensing decisions are made) and scrutiny are held at City Hall.

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Please be advised that you may be asked to watch the meeting on a screen in another room should the numbers attending exceed the maximum occupancy of the meeting venue.

COVID-19 Safety Measures

We request that no one attends a Council Meeting if they:

- are suffering from symptoms of COVID-19 or
- have tested positive for COVID-19

Other formats and languages and assistance for those with hearing impairment

You can get committee papers in other formats (e.g. large print, audio tape, braille etc) or in community languages by contacting the Democratic Services Officer. Please give as much notice as possible. We cannot guarantee re-formatting or translation of papers before the date of a particular meeting.

Committee rooms are fitted with induction loops to assist people with hearing impairment. If you require any assistance with this please speak to the Democratic Services Officer.

Public Forum

Members of the public may make a written statement ask a question or present a petition to most meetings. Your statement or question will be sent to the Committee Members and will be published on the Council's website before the meeting. Please send it to democratic.services@bristol.gov.uk.

The following requirements apply:



- The statement is received no later than **12.00 noon on the working day before the meeting** and is about a matter which is the responsibility of the committee concerned.
- The question is received no later than **5pm three clear working days before the meeting.**

Any statement submitted should be no longer than one side of A4 paper. If the statement is longer than this, then for reasons of cost, it may be that only the first sheet will be copied and made available at the meeting. For copyright reasons, we are unable to reproduce or publish newspaper or magazine articles that may be attached to statements.

By participating in public forum business, we will assume that you have consented to your name and the details of your submission being recorded and circulated to the Committee and published within the minutes. Your statement or question will also be made available to the public via publication on the Council's website and may be provided upon request in response to Freedom of Information Act requests in the future.

We will try to remove personal and identifiable information. However, because of time constraints we cannot guarantee this, and you may therefore wish to consider if your statement contains information that you would prefer not to be in the public domain. Other committee papers may be placed on the council's website and information within them may be searchable on the internet.

During the meeting:

- Public Forum is normally one of the first items on the agenda, although statements and petitions that relate to specific items on the agenda may be taken just before the item concerned.
- There will be no debate on statements or petitions.
- The Chair will call each submission in turn. When you are invited to speak, please make sure that your presentation focuses on the key issues that you would like Members to consider. This will have the greatest impact.
- Your time allocation may have to be strictly limited if there are a lot of submissions. **This may be as short as one minute.**
- If there are a large number of submissions on one matter a representative may be requested to speak on the groups behalf.
- If you do not attend or speak at the meeting at which your public forum submission is being taken your statement will be noted by Members.
- Under our security arrangements, please note that members of the public (and bags) may be searched. This may apply in the interests of helping to ensure a safe meeting environment for all attending.
- As part of the drive to reduce single-use plastics in council-owned buildings, please bring your own water bottle in order to fill up from the water dispenser.

For further information about procedure rules please refer to our Constitution

<https://www.bristol.gov.uk/how-council-decisions-are-made/constitution>



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Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Review into the effective and sustainable use of statutory and non-statutory high needs block ('Element 3') funding [Delivering Better Value in SEND, Workstream 2]		
Ward(s)	All Wards		
Author: Reena Bhogal-Welsh		Job title: Director of Education and Skills	
Cabinet lead: Councillor Asher Craig, Cabinet Member for Children’s Services, Education and Equalities		Executive Director lead: Stephen Peacock, Chief Executive Officer	
Proposal origin: Other			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: The report presents the key findings and recommendations from the external review into top-up funding for children and young people with special educational needs and disabilities (SEND).			
Evidence Base:			
Introduction:			
<ol style="list-style-type: none"> 1. Bristol City Council recognise that although there are pressures within the local systems of High Needs, children and young people with Special Educational Needs and Disability (SEND) deserve to have better experiences to enrich their lives. As a local authority, our aim is to reform SEND services by listening to partners, leaders and families and rapidly implementing an effective plan, whilst creating a sustainable financial future for children, young people (CYP) and families. 2. We know to achieve a sustainable future it will take good partnership and leadership that is both ambitious and bold in its plans to reform SEND services in Bristol. Through genuine collaboration across Education, Health, Care and Finance we will be able to identify innovative and appropriate strategies and service led solutions maximising delivery with the dedicated schools grant (DSG). To tackle this challenge, it is important to understand that a multi-faceted approach is needed, SEND systems need to be consistent, high quality, integrated, co-produced, shared and financially sustainable. The approach we are taking in Bristol is outcomes focused, evidence based and rooted in co-production. 3. We want to ensure our local offer meets the needs of all our children and young people with SEND, in the right provision, at the right time. This means working collaboratively across all phases from Early Years through to Post – 16 and then into adulthood. Support needs to be available to ensure early systematic identification of need, effective use of resources for children and young people in mainstream settings and equitable experiences for families. We value the voices of families, partners and most importantly CYP. 4. By galvanising the leadership through a city wide SEND Inclusion Strategy, Bristol City Council will be able to ensure there is full, unwavering support and commitment to address the high needs deficit. Our vision of genuine reform and improvement to services will enable us to successfully collaborate, innovate and change the future of SEND for the benefit of all CYP. 			

Delivering Better Value in SEND

5. In early 2023 Bristol City Council was awarded £1m of funding from the DfE's Delivering Better Value (DBV) in SEND programme. To support Workstream 2 of this programme, Bristol City Council commissioned an independent delivery partner to review our use of High Needs Block top-up funding, specifically the element known in Bristol as non-statutory funding. The goal was to design changes to top-up funding that can both improve outcomes for children and young people and help the system find long-term sustainability.
6. This review has arrived at several recommendations. This includes the tightening up of current processes that are cumbersome, resource intensive and over which the council lacks transparency and scrutiny. However, there is also a significant opportunity to re-think how high needs funding is used overall, shifting away from a focus primarily on discharging statutory duties. Instead thinking strategically about how it can be invested at points that can re-focus the whole system towards providing early identification, intervention and inclusion. This is characteristic of the most resilient local authorities' which focus on parents and children not accessing services and target early support to children and young people with primary need types identified through data analysis.
7. Over the next five years Bristol City Council will continue to invest significant levels of funding above the current financial envelope to support children and young people with SEND in Bristol. The mitigations outlined in our High Needs Block (HNB) Recovery Plan, shared with Cabinet in October 2023 is both aspirational and far reaching. It demonstrates our understanding of the challenges we face and what we need to do to meet the needs our most vulnerable children and young people. It outlines our commitment to continued investment in specialist places, early identification, early intervention, and support for mainstream schools. The recommendations outlined in this paper are clearly aligned to this approach ensuring the needs of children and young people are at the centre of our decision making.
8. The findings of our delivery partner's review of our current processes, national best practice, and the subsequent city-wide public consultation, details of which can be found in Appendices A1 & B1, have informed our recommendations. It is our intention to repurpose a proportion of current non-statutory top-up funding and i) create a Targeted Support Fund, and ii) commission two school outreach services. The goal of these changes is to build SEND capability within mainstream schools and improve the quality and consistency of their ordinarily available provision (OAP). This will in turn both improve outcomes of SEN Support pupils and enable greater inclusion of pupils with EHC plans.
9. If these recommendations are approved, the implementation phase must be developed alongside schools, Post-16 providers and families. This approach will strengthen our efforts to improve relationships with schools and provide greater shared leadership around effective SEND practice. With these measures in place, we are confident that schools will see the benefits to their pupils from using high needs funds more effectively and that the changes can help build a more inclusive school system, which is ultimately what will lead to better outcomes and long-term sustainability.

Main recommendations – a Targeted Support Fund alongside new commissioned outreach services

10. The first recommendation is that the Council bring the current non-statutory top-up funding arrangements to an end and create instead a new Targeted Support Fund. A transition period will ensure children and young people currently in receipt of this funding continue to receive this support in line with their current agreement and for a period of up to three years. Following a key decision on the recommendations outlined

in this paper the Council will begin co-developing the new model with schools, post-16 providers and families to ensure it meets the needs of and improves outcomes for children and young people.

11. The Targeted Support Fund would come into full effect for new applicants from the start of the next academic year (2024/25). Until the new Fund is ready to launch in September 2024 the non-statutory top up process will continue as normal for panels in February and June, although funding commitments will be restricted to a maximum of one academic year and the panel process will be streamlined.
12. The purpose of this fund is to provide schools with flexible, time-bound funding for a more specific group of pupils than now: those with emerging needs that are beyond what mainstream schools would ordinarily be expected to support, but who, with effective and timely early intervention, can continue to be educated in a mainstream setting without needing to proceed to statutory assessment. Funding would be for specific interventions rather than aligned to a needs banding. The Fund will have a much clearer purpose within the spectrum of available SEND support in Bristol and tighter eligibility criteria. A proposed implementation plan is outlined in Appendix A1 – this report will be used to inform the co-production of this offer with schools, Post-16 providers and families
13. We expect this approach will support pupils to either i) achieve better outcomes through more timely early intervention via the Targeted Support Fund, or ii) be supported by schools' OAP without any additional funding. The outcome of this approach will be continuously reviewed to ensure support is both effective and delivering value.
14. Following a review into national best practice it was found that the most resilient local authorities typically provide additional high needs funding into mainstream schools to help them maintain effective OAP and inclusive practice, which is recognised as good practice by the Department for Education.
15. Our second recommendation is aligned to this model of best practice, whereby we create a newly commissioned outreach service. This would support and challenge mainstream schools to improve the quality and consistency of their OAP and approach to inclusion. The outreach model would use the school improvement model, emphasising the training and capability building of school staff (and families where appropriate), though with some resource for working directly with pupils. It is proposed that the initial focus of this service would be in two areas where needs and expenditure have been rising most rapidly in recent years: emerging Speech, Language and Communication Needs (SLCN) in younger children (early primary), and Social, Emotional and Mental Health (SEMH) in later primary and early secondary. The council could commission either a single combined service to meet these two needs, or two separate services.
16. The full report (Appendix A1) includes initial recommendations from our delivery partner for the more granular design of the outreach services (e.g. staff roles, providers, linkages with current services, commissioning and contracting approach), though these would need to be developed further in a full co-design process over the coming months. Only one additional BCC FTE would be required, to provide a combination of administrative support over the process (e.g. convening panels), and continually communicating the fund purpose and eligibility etc. to school SENCOs. Outreach services would not incur an additional business as usual cost.

Implementation plan

17. The final report deck (Appendix A1) provides further information on the timelines and further considerations for implementation of these recommendations. Whilst some immediate, modest changes will be made for the last two top-up panels this academic year (Feb 24 & June 24), the full implementation of the new process

will be from the 2024/25 academic year – subject to the successful design and implementation of the Targeted Support Fund and Outreach Service. To summarise the implementation plan in brief:

What	By When
Communicate consultation output and Cabinet decision. Move to 1-year maximum (non-statutory) funding allocation for remaining top-up panels in current format.	February 2024 Top-Up Panel (Current Format)
Co-designed new application/allocation process and funding criteria for targeted support fund.	End April 2024
Co-designed new Bristol Universal Descriptors (BUDs) to support statutory top-up standardisation.	End May 2024
Pilot needs matrix and portal with partners; decisions on EHC needs assessment and funding made at single panel.	June 2024 Top-Up Panel (Current Format)
Go Live with new process for targeted support fund.	September 2024 (& Nov 24 Panel)
Changes implemented from one year of ongoing refinement and review of the new process. Transition to Business as Usual.	September 2025

Costs and benefits

18. As of October 2023, there were 1,066 non-statutory top-up plans in place with an annual projected expenditure of £5.3m. To minimise the impact of the proposed changes for these children and young people we will continue to meet their needs up to the end of their current plan period which is estimated to cost around £9.0m. At the end of this funding term these children and young people will be supported either through transition onto an EHCP, or via the Targeted Support Fund or through their school's OAP.
19. For the Targeted Support Fund, we propose an annual budget of £1m, which will rise year on year in line with inflation which is estimated to be circa. 3%. In the short-term we recognise that these changes will lead to an increase in Education, Health and Care (EHC) assessment requests, but in the long-term this transformation will aid the strengthening of inclusion in mainstream schools and support children earlier. To mitigate the short-term impact BCC is currently implementing the finding of a review into our current EHCP process to improve the timeliness and quality of plans. In addition to this we are currently redesigning the current operating model for the service to align it with our wider plans for reforms and the implementation of these recommendations.
20. For outreach services, we propose a combined annual budget of c. £1m for both services. This would sustain c. 7 staff members in each service plus a management resource to oversee both. The more universal model for the outreach services (school capability building) means their impact are harder to predict. However, if the services can help schools to continue supporting c. 125 pupils at SEN Support rather than applying for an EHC plan or help schools to continue educating c. 67 pupils with EHC plan in mainstream settings rather than moving to a special school, they will justify the additional investment in this service.

Additional findings and recommendations

21. Non-statutory funding, Post-16: we recommend that the Targeted Support Fund (TSF) covers Post-16 students as well as school-age pupils, with a single set of SENCO guidance and application/panel process, and the same council staff administering and overseeing the process. We would naturally expect a smaller number of applications from Post-16 providers due to the TSF's focus on emerging needs, though we suggest that the SEMH/speech and language outreach service is made available to Post-16 providers to help improve the quality of support for older learners in general. Initial testing of this recommendation has been positive.

22. Funding for pupils with an EHC plan: we recommend that funding decisions for pupils with and without an EHC plan are kept separate in future. Pupils without an EHC plan would be allocated funding via the Targeted Support Fund (as above). For pupils with EHC plans, we recommend that funding decisions are integrated within the usual workflows of the SEND Team. For pupils with a new EHC plan, this would mean funding is discussed and agreed as the final step in the process of approving a new EHC plan. Any subsequent changes would then be decided through the annual review process.
23. Wider changes to amplify the main recommendations: while the two main recommendations above can improve inclusion and help manage future demand, they cannot create a fully sustainable mainstream school system by themselves. Wider changes to relationships, culture, and systems/processes will need to happen at the same time to re-centre the whole SEND system towards early intervention and inclusion. Three specific initiatives suggested by our delivery partner are:
- i) refresh school guidance/support around the graduated response and OAP and embark on a programme of continuous communication and training with schools;
 - ii) build relationships with school leaders, especially around the need for a shared response to SEND;
 - iii) commit additional council resource for scrutiny and stewardship of the SEND system. Detail for these three proposals are included in the full report (Appendix A1). It should be noted that there are already activities either planned or underway in these areas, but it is necessary to re-emphasise them as they will be the bedrock of a sustainable system.

Cabinet Member / Officer Recommendations:

That cabinet:

1. Note the findings of the public consultation, as outlined in this report in brief and in full at Appendix B
2. Approve the implementation of a Targeted Support Fund for children and young people not in receipt of EHC plans
3. Approve the commissioning of Outreach services to support and challenge mainstream schools to improve the quality and consistency of their ordinarily available provision and approach to inclusion
4. Authorise the Director Education and Skills in consultation with the Cabinet Member Children's Services, Education and Equalities to take all steps required to implement recommendations 2 and 3 including procuring and awarding contracts over the key decision threshold.

Corporate Strategy alignment:

This programme is well aligned to priorities for our Children and Young People set out within the Corporate Strategy,

CYP3: Equity in education

Over the course of this Corporate Strategy, we expect our SEND provision to continue improving, co-designing appropriate support with children and families to meet their needs. We want to create the right conditions that will enable more young people with SEND and from disadvantaged backgrounds to enter further education, employment, or training. Supporting children and young people to experience an inclusive education that meets their academic, health, social and emotional needs is a crucial step to entering employment and becoming independent and economically active within the city, which supports their lifelong wellbeing.

Our ambition is that children and young people have access to an education that develops their potential both in what they learn and who they become, so that they have skills for life and work. Additionally, an education that is inclusive and values diversity, and that provides opportunities where they learn from each other and benefit from understanding their different experiences is important. In achieving this, we will work both directly and with partners across the entire system to maximise opportunities for all. This includes access to further and higher education, and other training providers to help people find pathways to employment; acknowledging and building upon much existing work by the council and partners in these sectors to address the educational disadvantage in the city.

City Benefits:

That funding which supports provision for pupils and students with SEND is spent in fair, transparent and sustainable way.

Consultation Details:

Consultation and engagement on changes to non-statutory top-up ran from Wednesday 1st November for 6 weeks, with a short extension for any respondents requesting an easy read version.

- Prior to this consultation, extensive engagement with Bristol council and school stakeholders was conducted to develop an understanding of the “as-is” situation. 61 interviews were held during this period alongside best practice research and data analysis. A first iteration of the options tested in public consultation was presented to Bristol Schools Forum in October 2023 for initial feedback.
- During the consultation period a series of information and engagement sessions were held to capture more qualitative insights and feedback about the proposed options. In total 58 individuals attended, including head teachers, school governors, SENCOs and parent carer forum representatives.
- An online survey was also undertaken and made available in Easy Read format, capturing feedback from 196 respondents.

Schools and VCSE organisations were encouraged to support young people with SEND to also complete the survey. A summary of the consultation findings is included in the main report above, with further detail provided in the Consultation Report submitted at Appendix B1.

Background Documents:

1. DfE [Guidance on our work with local authorities](#), October 2022
2. DfE [Sustainability in high needs systems: guidance for local authorities](#), June 2022
3. [The Dedicated Schools Grant \(DSG\) Management Plan Update including mitigations](#) Sept 22
4. [6a Appendix A DSG Management Plan.pdf](#) Sept 22
5. [6i 2022-09-27 DSG Mitigations Covering Report.pdf](#) Sept 22
6. [Appendix A DSG Mitigations plan](#) Sept 22
7. [Progress Report on the Dedicated Schools Grant \(DSG\) High Needs Block Recovery Plan](#), Oct 23
8. [Report to Bristol Schools Forum, 12 January 2023 – Delivering Better Value in SEND](#) Jan 23
9. Report to Bristol School Forum, [DSG 2023/24 Quarter 1 \(Q1\) forecast report as at May 2023 \(Period 02 / P02\)](#) July 2023
10. Report to Bristol School Forum, [Delivering Better Value \(DBV\) in SEND Programme July](#) 2023

Revenue Cost	General Fund: £75,000 per annum Dedicated Schools Grant: to be determined during co-design process	Source of Revenue Funding	General Fund Dedicated Schools Grant
Capital Cost	£N/A	Source of Capital Funding	N/A
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:**1. Finance Advice:**

The financial implications of the proposals within this report align with those in the Council’s current Dedicated Schools Grant Management Plan and are therefore within projected available funding resources.

Finance Business Partner: Guy Marshall, Finance Business Partner 23 January 2024

2. Legal Advice: The consultation responses must be conscientiously taken into account in finalising the decision. The leading cases on consultation provide that consultation should occur when proposals are at a formative stage, should give sufficient reasons for any proposal to permit intelligent consideration and should allow adequate time for

consideration and response. There must be clear evidence that the decision maker has considered the consultation responses, or a summary of them, before taking its decision.

Legal Team Leader: Husinara Jones, Team Manager/Solicitor 23 January 2024

3. Implications on IT: IT are supportive and available to aid in progressing relevant work and can be engaged through the existing work request process.

IT Team Leader: Alex Simpson – Lead Enterprise Architect, 08 January 2024

4. HR Advice: There are no significant HR implications arising from this report.

HR Business Partner: Lorna Laing, HR Business Partner, 08 January 2024

EDM Sign-off	Vanessa Wilson, Interim Director of Transformation	10/01/2024
Cabinet Member sign-off	Councillor Asher Craig Cabinet Member for Children, Education and Equalities	08/01/2024
For Key Decisions - Mayor's Office sign-off	Mayor's Office - Forward Plan Published	08/01/2024

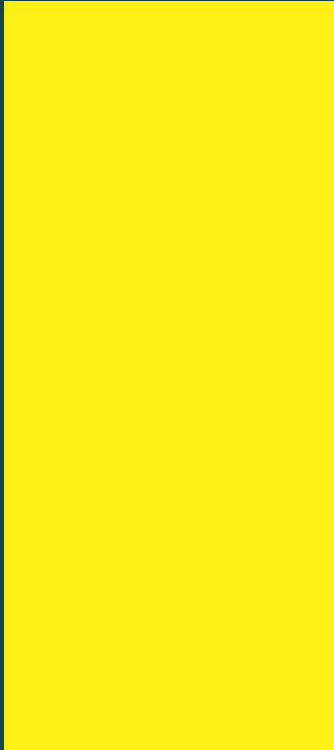
Appendix A – Further essential background / detail on the proposal A1 – Delivering Better Value in SEND, Workstream 2: Final report	YES
Appendix B – Details of consultation carried out - internal and external B1 – Full Consultation Report	YES
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	NO
Appendix E – Equalities screening / impact assessment of proposal E1 – Equality Impact Assessment	YES
Appendix F – Eco-impact screening/ impact assessment of proposal F1 – Eco-impact screening	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Delivering Better Value in SEND, Workstream 2:

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Review into the effective and
sustainable use of statutory and non-
statutory top-up funding

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February 2024

Social Finance, 87 Vauxhall Walk, London, SE11 5HJ
PPL, St Saviour's Wharf, London SE1 2BG



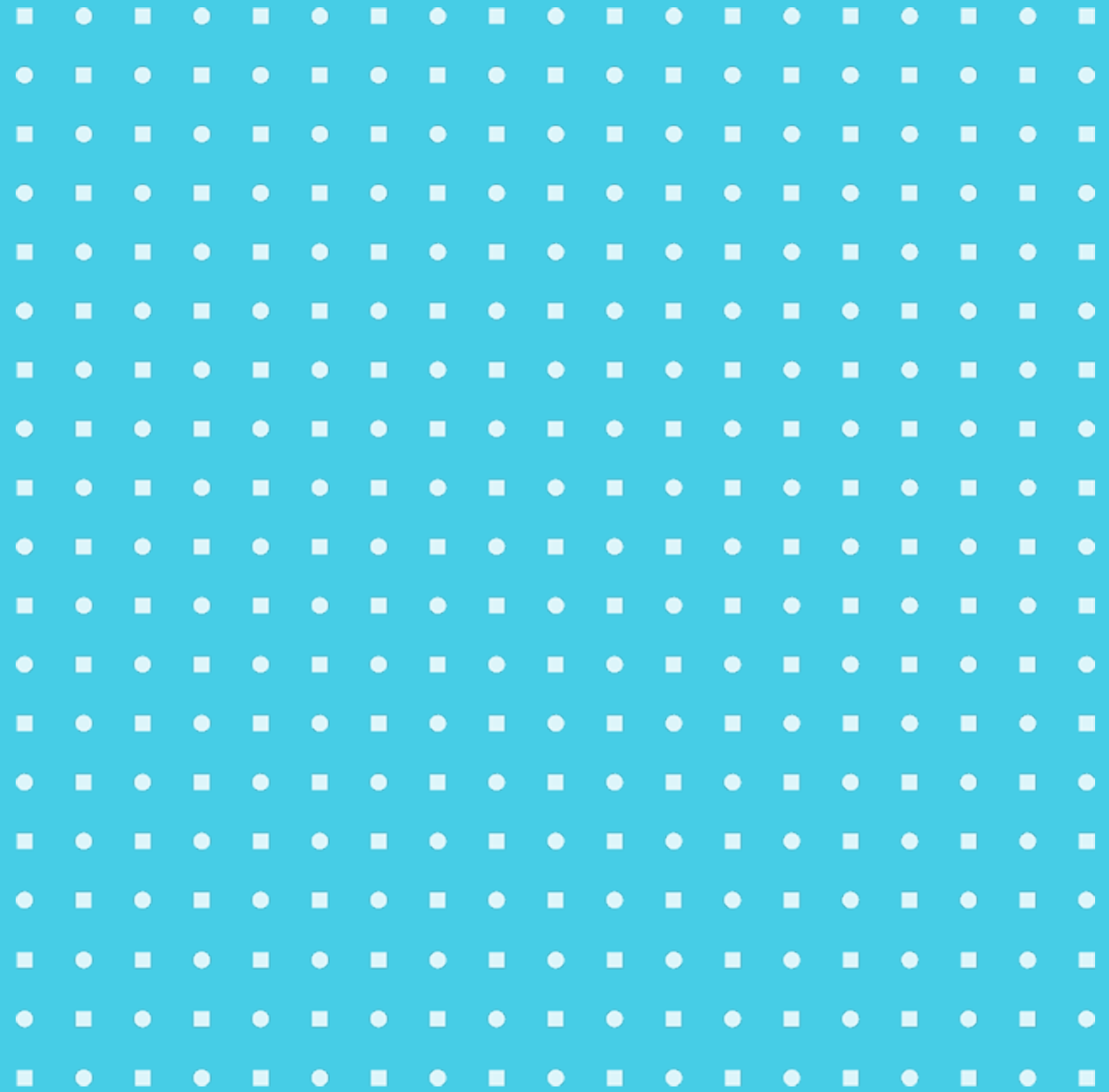
Contents

This document presents the full findings and recommendations for Workstream 2 of Bristol City Council’s Delivering Better Value in SEND programme.

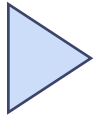
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1. Project objective, context and approach



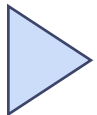
Our objective is to reform the way Bristol uses top-up funding and help attain sustainability in the SEND system



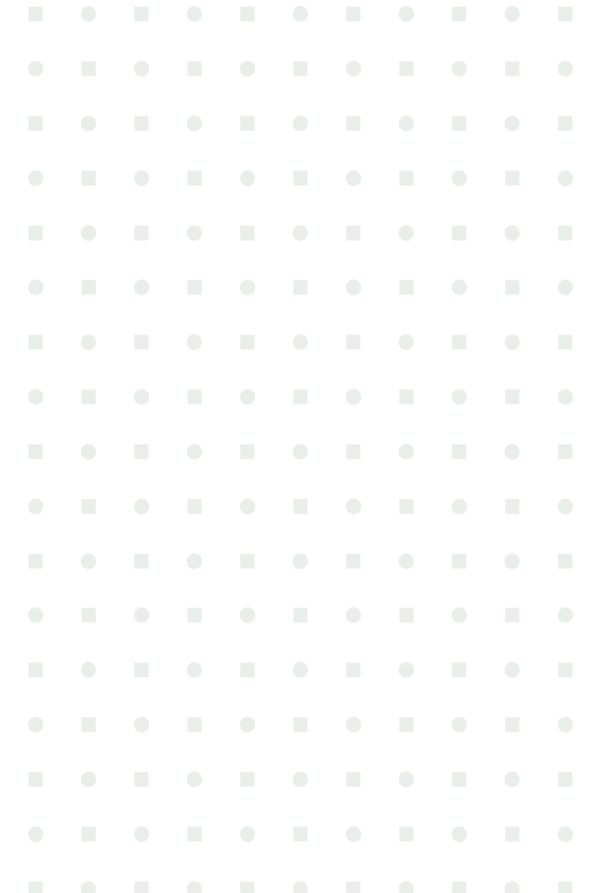
Objective: *to support the SEND local system attain sustainability by getting the greatest possible value for High Needs Block top-up funding, while also improving outcomes for children and young people.*



Scope: *Top-up (Element 3) funding including: children and young people who receive funding both with and without an EHC plan; mainstream and special settings; and school age and Post-16 education.*

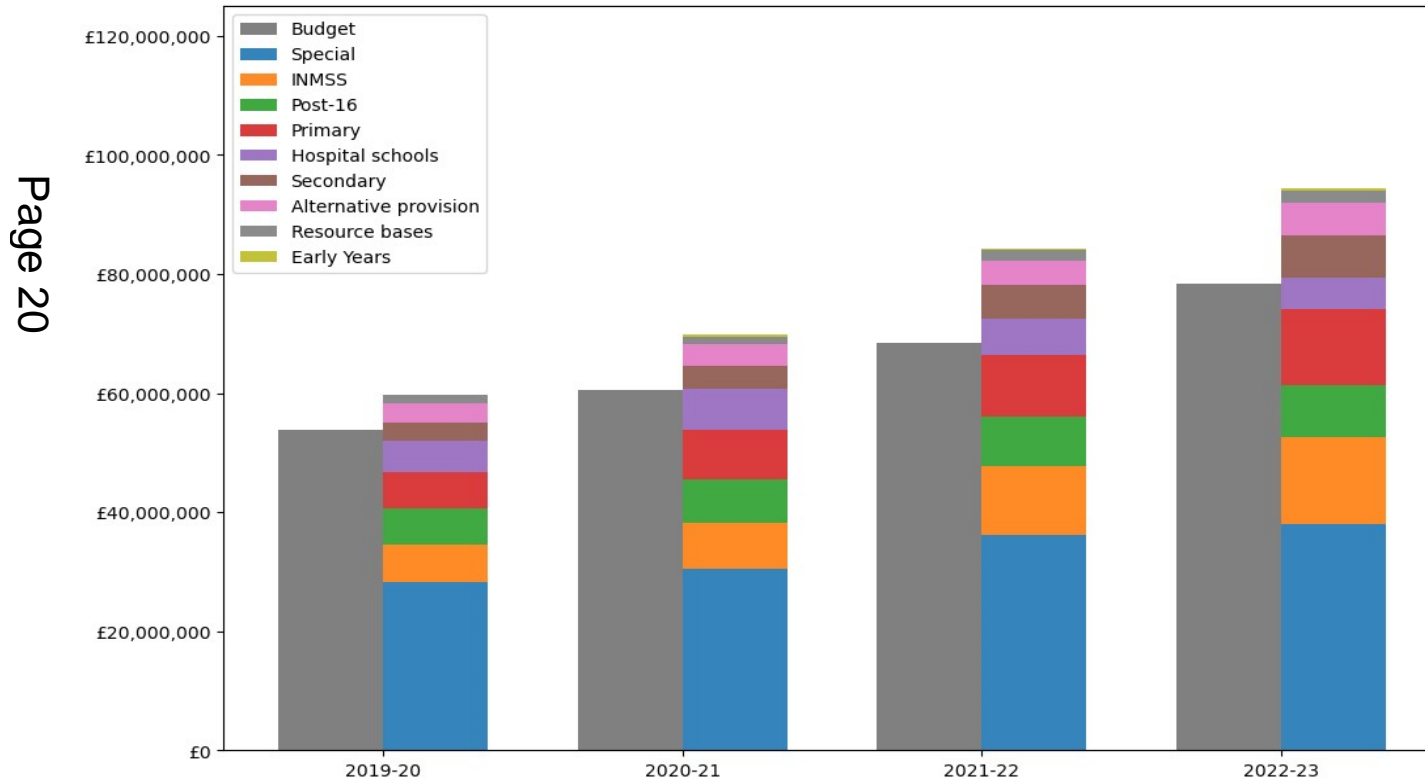


Priority: *While our focus is top-up funding, ultimately the way Bristol will achieve sustainability is through much greater and more effective early intervention and inclusion. All our work is directed towards this goal.*



Special educational needs have been rising faster than budget over recent years

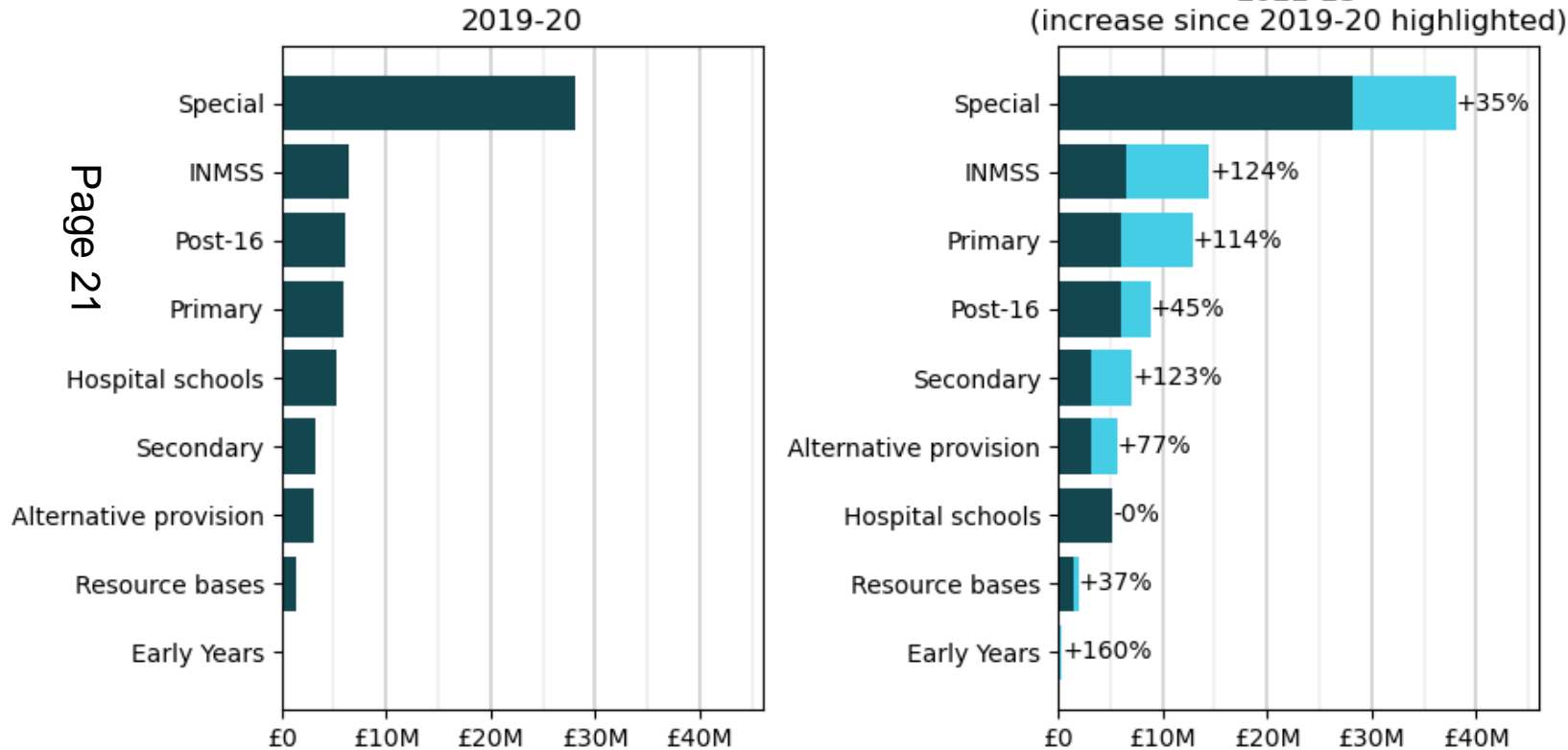
Total high needs budget and expenditure since 2019/20



- High needs budget has risen by a total of 45% since 2019/20
- However, expenditure has outpaced budget, rising by 58% in total, resulting in a cumulative deficit between 2019/20 and 2022/23 of £39.5m, forecast to reach £58.2m at the end of 23/24
- Evidence suggest that outcomes have not improved significantly despite this increased funding. For instance: the rate of exclusions in Bristol is above the national average and statistical neighbours; there is a large attainment gap between pupils with SEND and their peers; and the proportion of pupils educated in special school is growing

Special and INMSS are the largest areas of spend, but top-up funding is rising fastest

Spending by setting 19-20 vs 22-23



- Special school funding has increased by £9.9m since 2019/20. However, this represents an increase of only 35%, slightly less than the overall increase in the high needs budget over the same period
- By contrast, spending in mainstream schools (incl. EY, primary, secondary) has more than doubled (120% increase)
- Top-up funding accounts for almost all this increase. And put together, top-up funding for all settings types (excl. INMSS) has risen by 174% over the last 3 years (£28.5m to £49.5m)

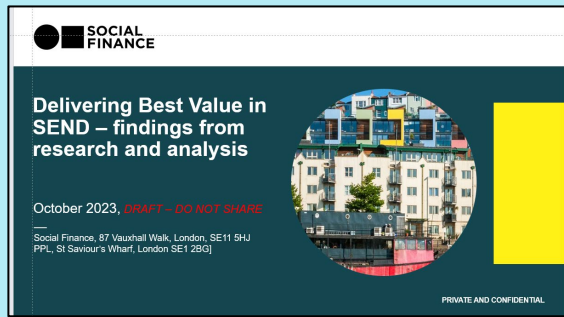
We explored top-up funding from multiple angles to arrive at full, rounded picture

Workstream	When	Overview	Summary of activities	In this report...
Stakeholder engagement	August to September 2023	Conversations with stakeholders across the local SEND system to understand current challenges.	<ul style="list-style-type: none"> 60+ interviews with council officers, schools (SENCOs, head teachers), and VCSE orgs (e.g. parent carer forum) 	Section 3 – Bristol’s top-up funding system: challenges with current approach.
Practice in other local authorities	August to October 2023	Desk based research and interviews with relevant local authorities to inform possible changes.	<ul style="list-style-type: none"> Research into characteristics of resilient local authorities incl. case studies on topics most relevant to Bristol – interviews with 8 other local authorities 	
Data analysis	September to November 2023	Analysis of patterns in needs, funding, and decision-making to identify priority drivers of rising demand and areas to improve.	<ul style="list-style-type: none"> Analysis of pupil-level data for all recipients of top-up funding (non-stat, people with EHC plans) for last 4 years 	
Public consultation	November to December 2023	Whole-system consultation on indicative options incl. survey and follow-up focus groups.	<ul style="list-style-type: none"> Public survey open for 6 weeks 14 follow-up Information and Engagement sessions with 58 stakeholders 	Section 3 – Public Consultation, options tested and key findings.
Develop & test final recommendations	December 2023 and January 2024	Synthesise combined findings from across workstreams to design final recommendations.	<ul style="list-style-type: none"> Iterative design process incl. testing drafts with key officers for feedback Formal sign-off from council governance 	Sections 5 and 6 – Final recommendations & Implementation plan.

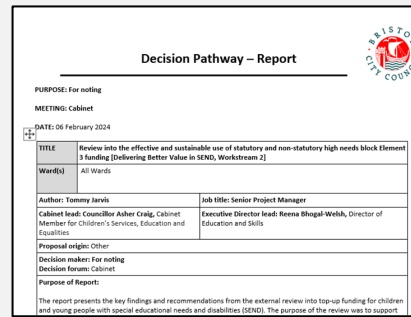
This final report is one of a number final project outputs

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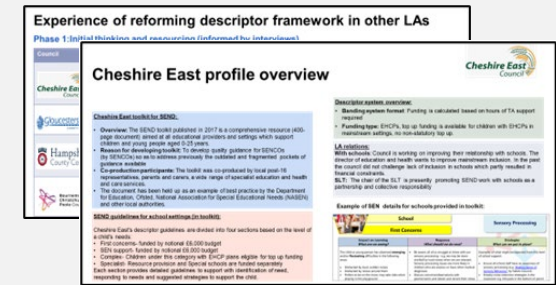
Final report



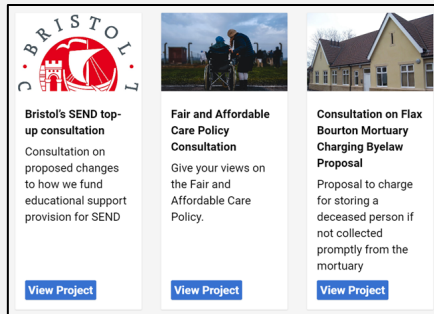
Cabinet Report



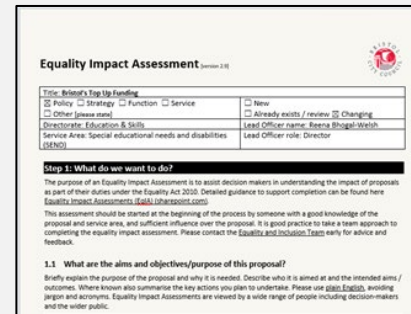
Best practice review



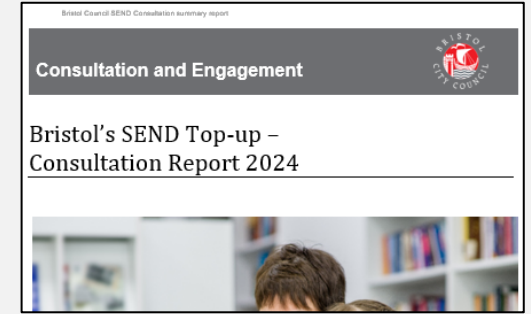
Consultation survey



Equalities Impact Assessment



Consultation report



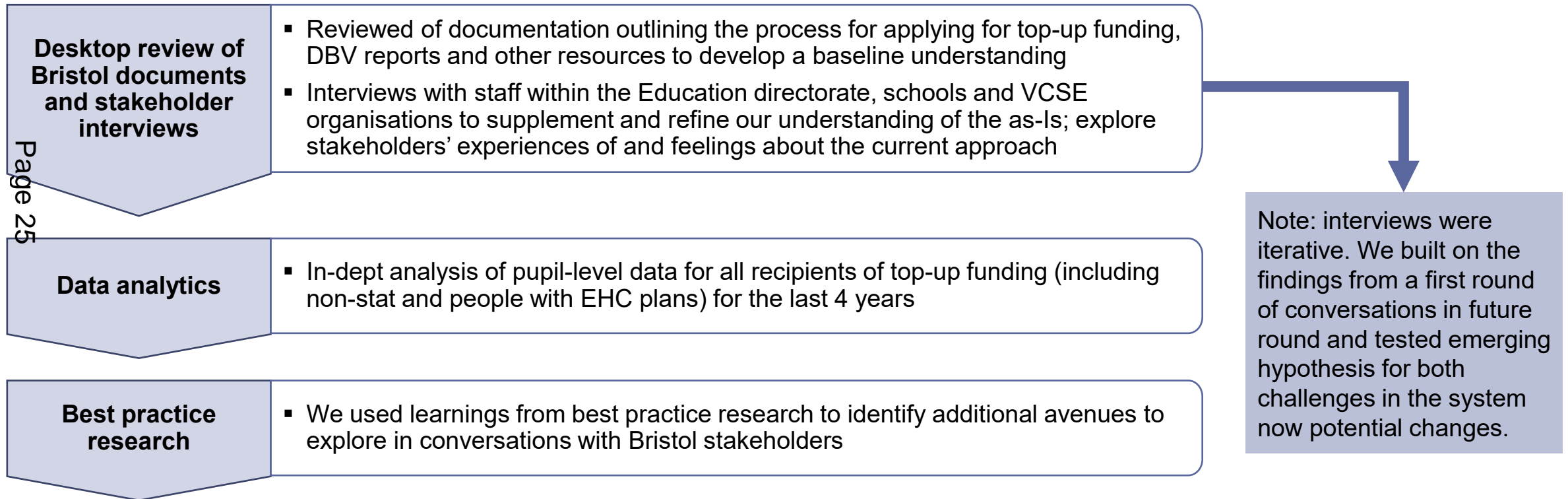
2. Top-up funding in Bristol: challenges with current approach

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Subsections:

- Bristol's current approach to using top-up funding
- Issues with current top-up funding approach
- Findings from data analysis
- Practice in other local authorities

We took a mixed-methods approach to understand the “as is” top-up funding system



Background to top-up funding: Elements 1, 2 and 3 and statutory responsibilities

There are three 'Elements' to high needs funding...

<p>Element 3: Top-up funding</p>	<p>This funding comes from the LA's high needs block and is provided when a mainstream school can evidence that an individual pupil with SEN requires more than the £6,000 element 2 funding to meet their needs.</p>
<p>Page 26 Element 2: SEN notional budgets</p>	<p>£6,000 per pupil with SEN is provided to schools directly to schools as part of their core budgets As part of the SEN Code of Practice 2014, schools have a statutory requirement to use their core funding to make sure that any pupil with SEND gets the support they need. Most provision will be part of the school's offer to all children and young people, often referred to as Ordinarily Available Provision (OAP). Some provision will be put in place using the school's Pupil Premium funding allocation. The pupil premium grant is funding to improve educational outcomes for disadvantaged pupils in state-funded schools in England, and should be drawn upon by schools, before they seek additional funding from the HNB.</p>
<p>Element 1: School core Budget</p>	<p>This is the amount of funding allocated to an education setting, based on actual pupil numbers, regardless if they have any SEN. This is called the Age Weighted Pupil Unit (AWPU) and differs according to whether the school is primary or secondary etc. Some of this money is for general SEN provision and could for example, include the cost of providing the Special Educational Needs Coordinator (SENCO).</p>



Element 3 is the primary focus of this project

Element 3 / top-up funding is typically provided to children and young people with the most complex additional needs. The council has statutory responsibilities to use this funding to:¹

- Provide funding to children and young people with an EHC plan
- Secure special education and/or health provision in accordance with the EHC plan
- Ensure that the provisions set out in the plan are delivered

It should be noted that in Bristol the council *also* makes top-up funding available to children with SEN who *do not* have an EHC plan. This is not a statutory duty. This 'non-statutory' top-up funding is the main focus of this project.

Whilst the focus of this consultation is on the sustainable use of Element 3 non-statutory top up funding (funding allocated to those without an EHC plan), successful implementation of any changes to Element 3 funding are dependent on the effective use of Elements 1 and 2 funding within schools.

There are multiple channels for allocating top-up funding in Bristol

Bristol City Council uses different processes and decision-making forums to allocate top-up funding. There is some overlap between these, which creates a lack of clarity amongst both external stakeholders (e.g. schools) and within the council. The main processes are:

1. Top-up panels [school age children both with and without an EHC plan]

SENCOs in education settings apply for funding for individual pupils outlining their needs and the additional support required. A series of panels with SENCO representatives, convened by the council, review each application and decide on the funding amount. Panels take place once every term, with applications being reviewed at a minimum of two panels, sometimes three if the first two disagree. Panels make decisions for both children who do not have an EHC plan ('non-statutory funding') and for children who have recently had an EHC plan application approved.

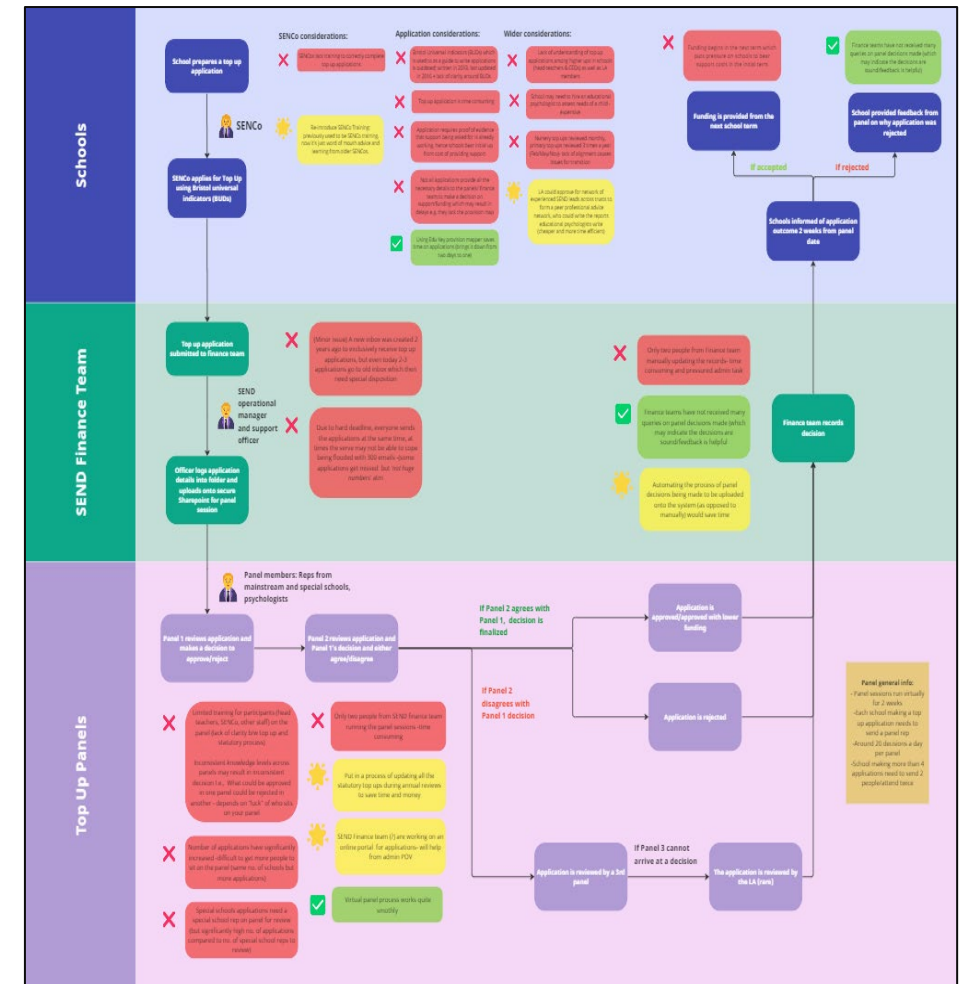
2. Annual reviews [children with an EHC plan only]

It is a statutory duty to conduct an annual review for all children with an EHC plan. SEND officers, together with families and other representatives, can decide at this point whether any funding changes are required to fulfil the provisions in the plan. Although proposed funding changes are often directed to the Top-up panel above for final decision, they are sometimes actioned directly.

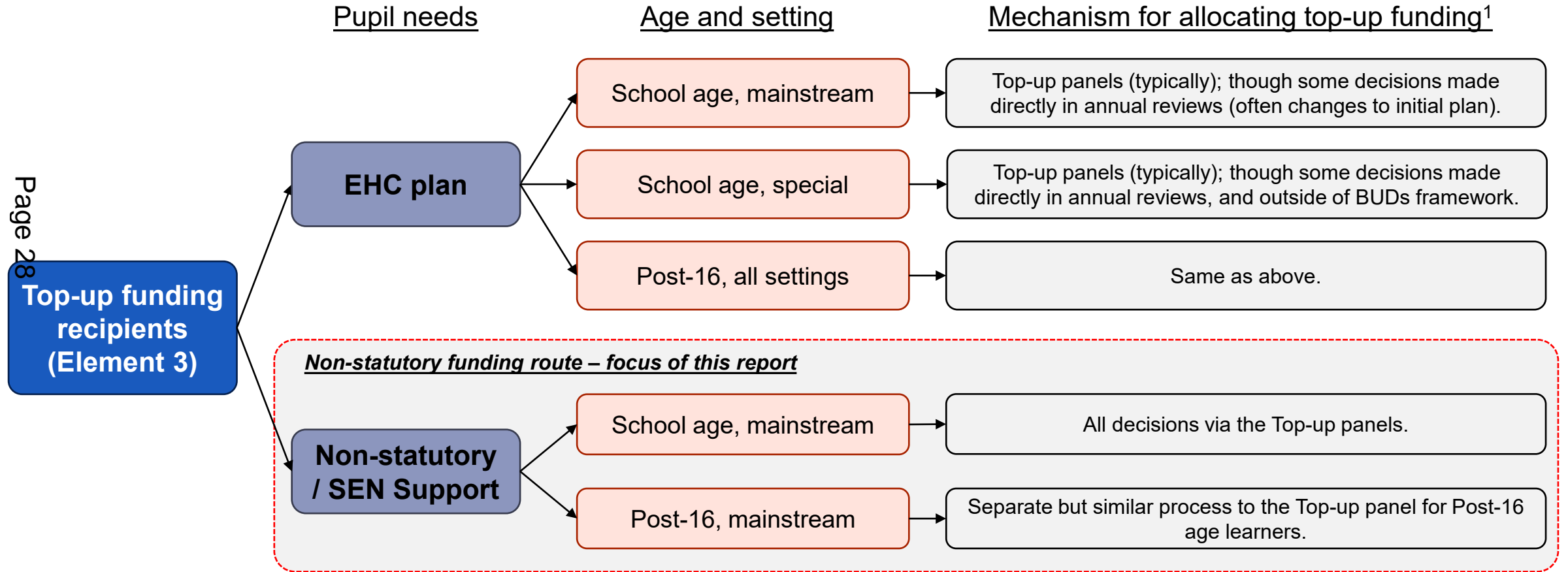
3. Post-16 Top-up panel [typically students who do not have an EHC plan]

This approach mirrors the standard Top-up panel route but is for post-16 students only. The bulk of this process takes place during September/October once enrolment has concluded.

While these are the primary top-up funding routes, interviews highlighted some exceptions that happen outside these processes. For example, special schools will sometimes agree to change the top-up funding amounts required for a pupils with more complex needs directly with SEND officers (e.g. short-term changes to arrangements previously agreed in EHC plans). These and other exceptions add to the lack of clarity around the use of top-up funding in Bristol.

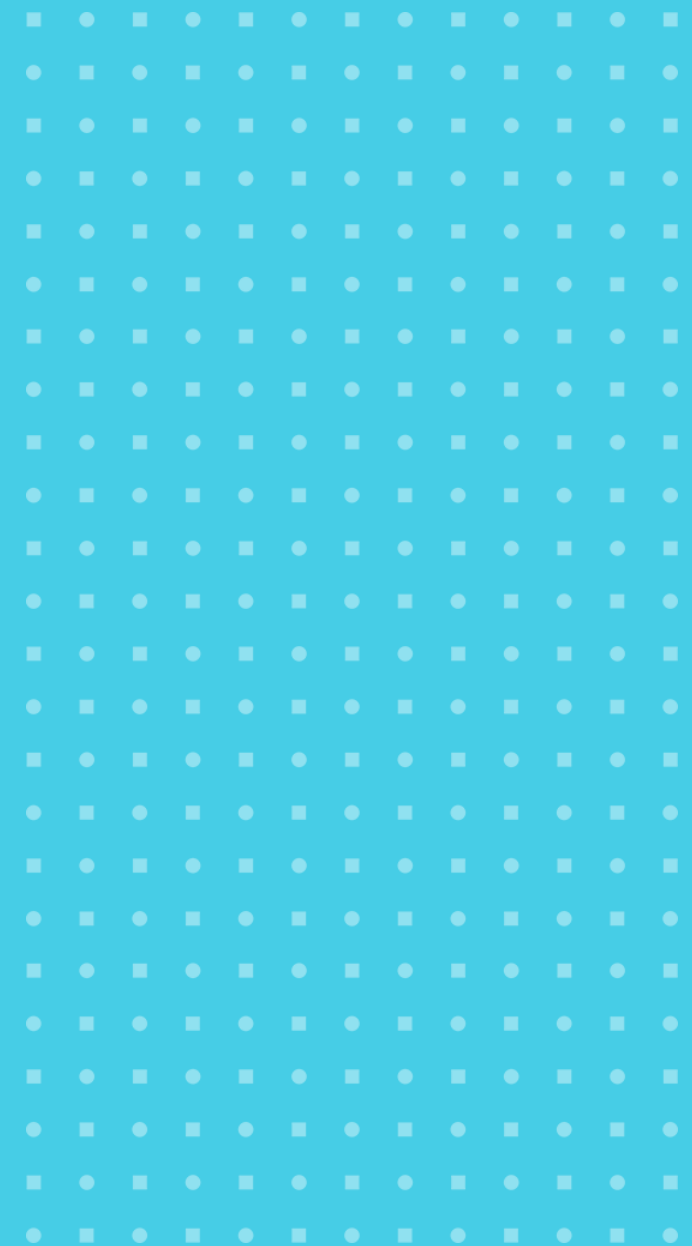


We focused in this project on non-statutory funding, but also touched on other groups and funding mechanisms

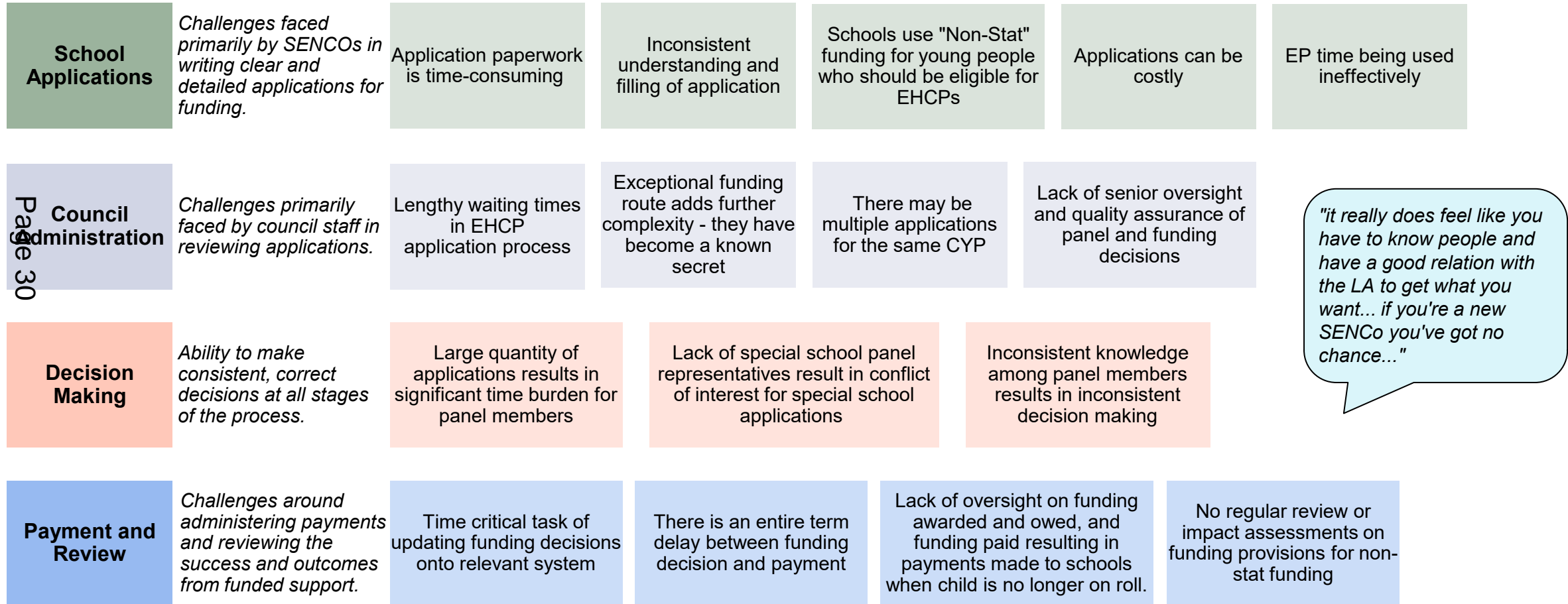


Issues with current top-up funding approach

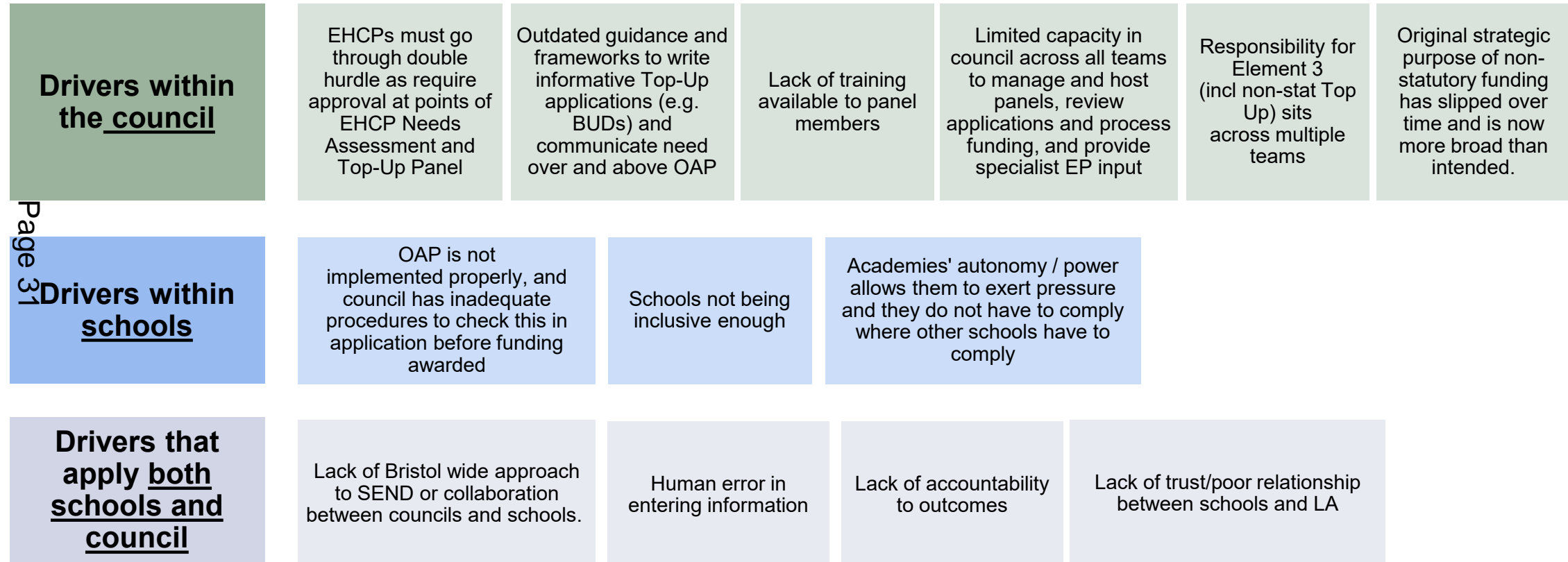
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Stakeholders experience four major challenges with current top-up funding arrangements¹



Several 'drivers' sit behind these challenges, which need to be addressed in any funding changes



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Other important findings from initial assessment of current top-up funding approach

Summary themes

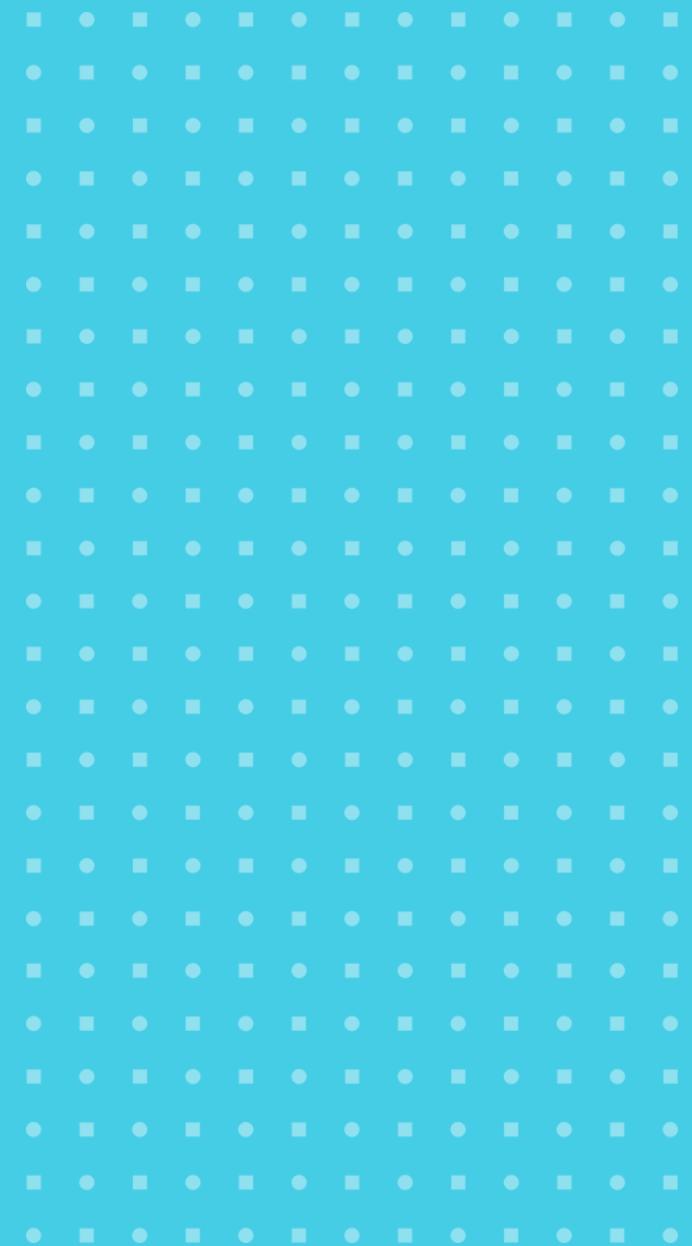
- All stakeholders were broadly supportive of providing non-statutory funding to mainstream schools, which is felt to strengthen their ability to respond to needs and be inclusive
- However, there is consensus that the current top-up funding process and approach is not fit for purpose and needs to change: non-statutory funding has moved away from its original intent (designed to be much more limited and targeted than now); capacity to manage the process and guidance for schools is limited placing the whole approach under strain; and funding is ultimately not used as effectively as possible in schools
- There is apprehension around the possible impact of removing non-statutory top-up, namely schools' ability to support and include children and young people with SEND

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What this could mean for top-up funding...

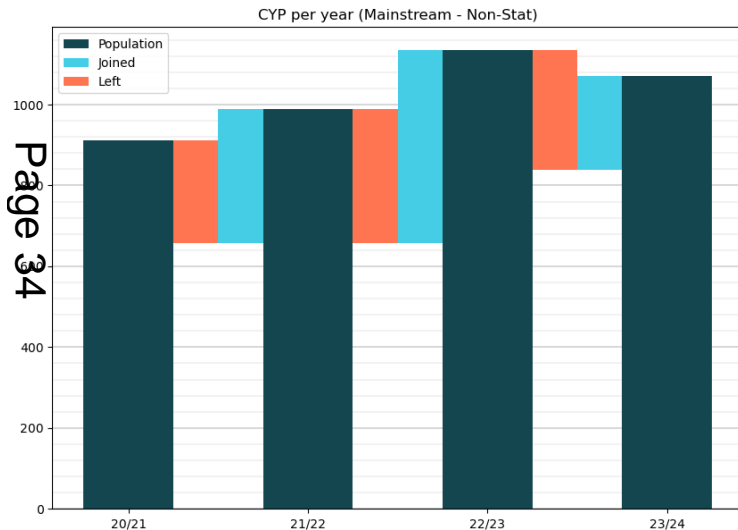
- Tighter guidance around process, eligibility, and funding available will provide clarity and streamline the process overall.
- Funding must be used in a way that better challenges and support schools to prioritise early intervention, and improves the quality and consistency of OAP and inclusion.
- Bristol will ensure compliance with statutory requirements set out within the Children and Families Act 2014 on transparency and timescales for providing funding.

Findings from data analysis



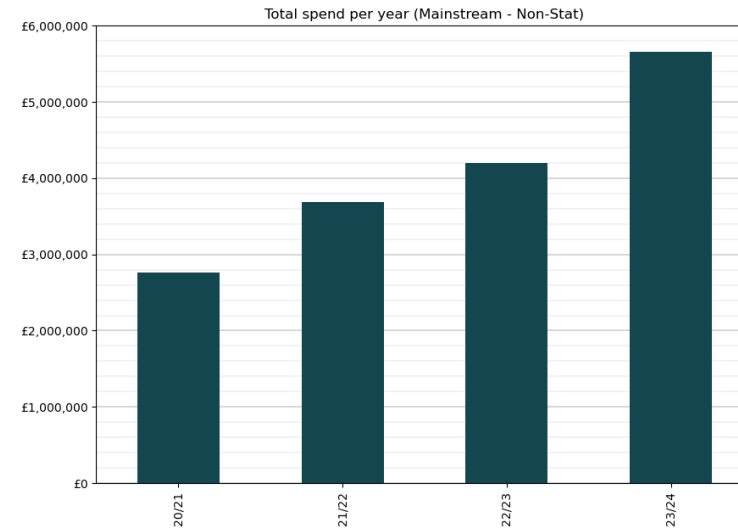
Non-statutory funding has risen rapidly over recent years, nearly doubling since 2020/21 to £5.5m as of this year¹

The number of pupils receiving non-statutory funding has risen since 2020



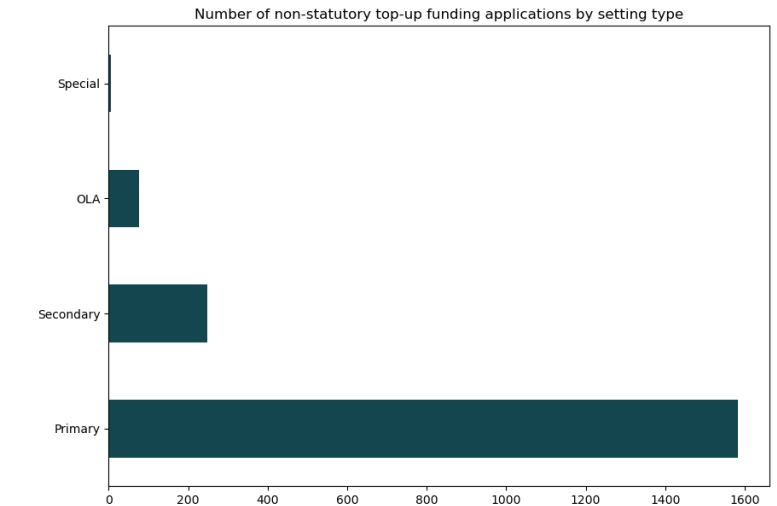
- It is typically pupils identified as SEN Support who receive non-statutory top-up funding
- While the rate of children with EHC plans is similar in Bristol to statistical neighbours, the rate of children identified as SEN Support is higher – 3 more people in 100 than stat neighbours

Over this period expenditure has increased by 51%



- This suggests non-statutory funding has moved away from its original intent – small, targeted funding for exceptional circumstances – and is now used to support a wider array of needs
- Average level of need (indicated by needs band) has also increased over this period

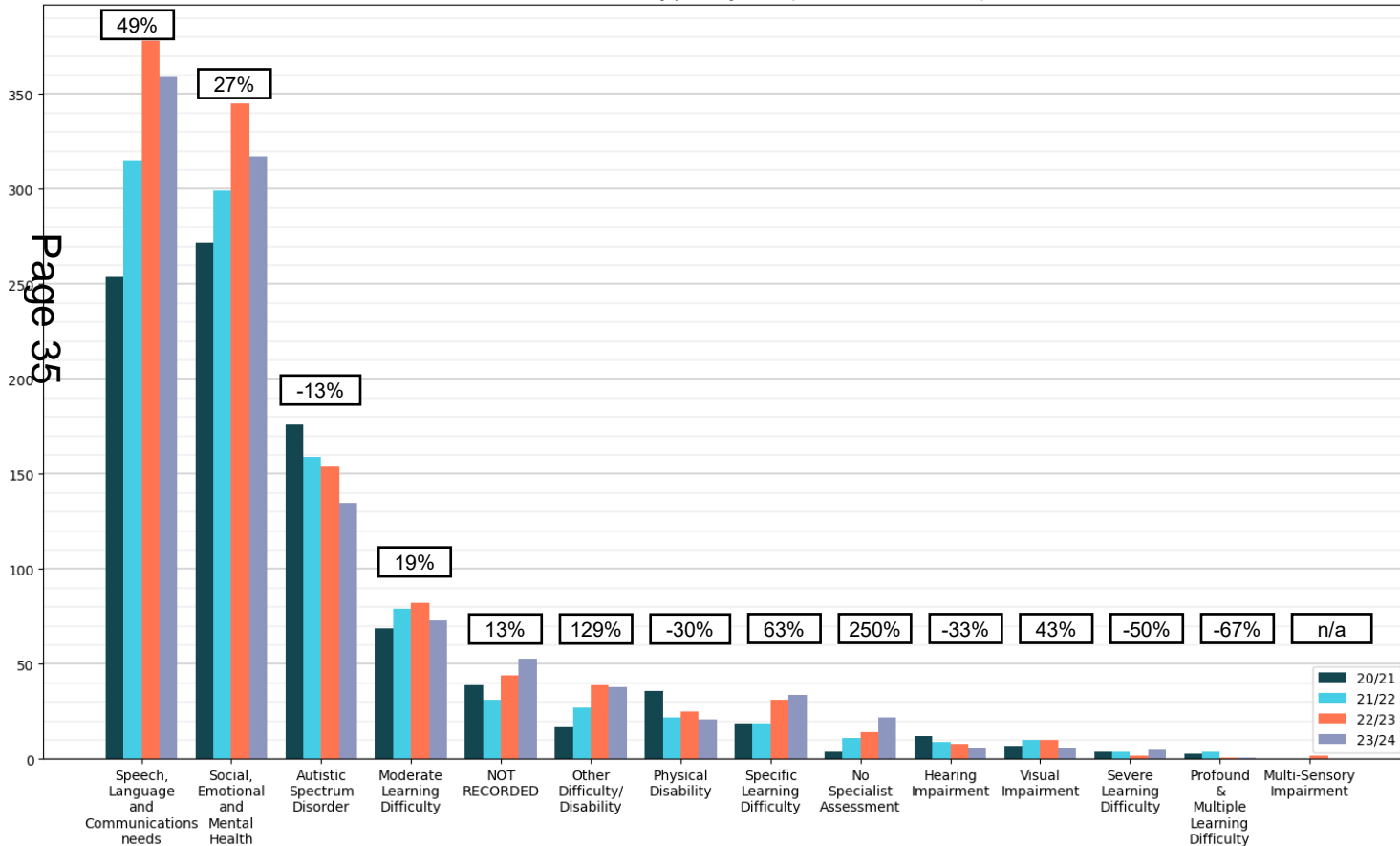
85% of successful applications are for primary school age pupils



- Non-statutory funding is predominantly directed towards primary schools, as you would expect for earlier or emerging needs
- A significant minority of applications (c. 20%) are however for funding *increases* rather than new applications

SLCN and SEMH are by far the most common needs amongst funding recipients

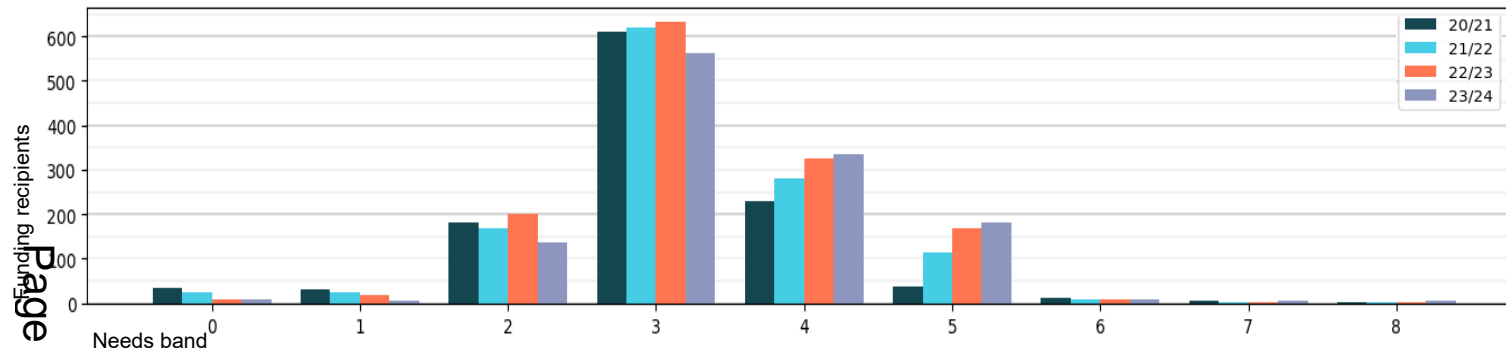
Number of individuals by primary need (Mainstream - Non-Stat)



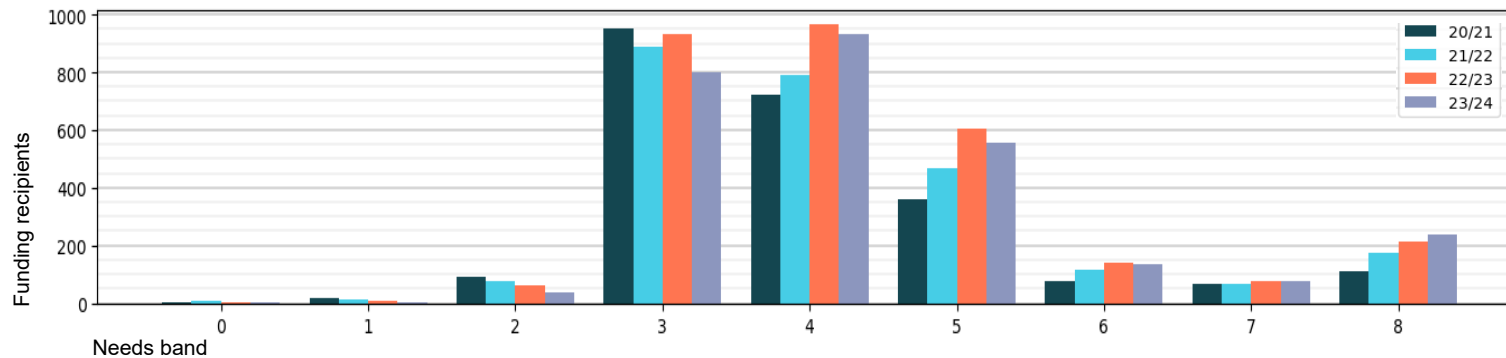
- SLCN and SEMH are the most common needs for non-statutory funding. These needs have risen rapidly in recent years
- Along with ASD, pupils with these needs now represent nearly 80% of all non-statutory funding recipients
- In Bristol, it is striking that SEMH is being identified very frequently amongst primary age pupils. This is out of sync with other similar areas
- Lower level SEMH and SCLN needs can often be supported effectively through timely, specific intervention (e.g. speech and language therapy, targeted social and emotional learning interventions).
- *Note: figures for % change are between 20/21 and 22/23*

Pupils are assessed as having higher needs now compared with 4 years ago

Needs band of pupils receiving non-statutory top-up (20/21 to 23/24)



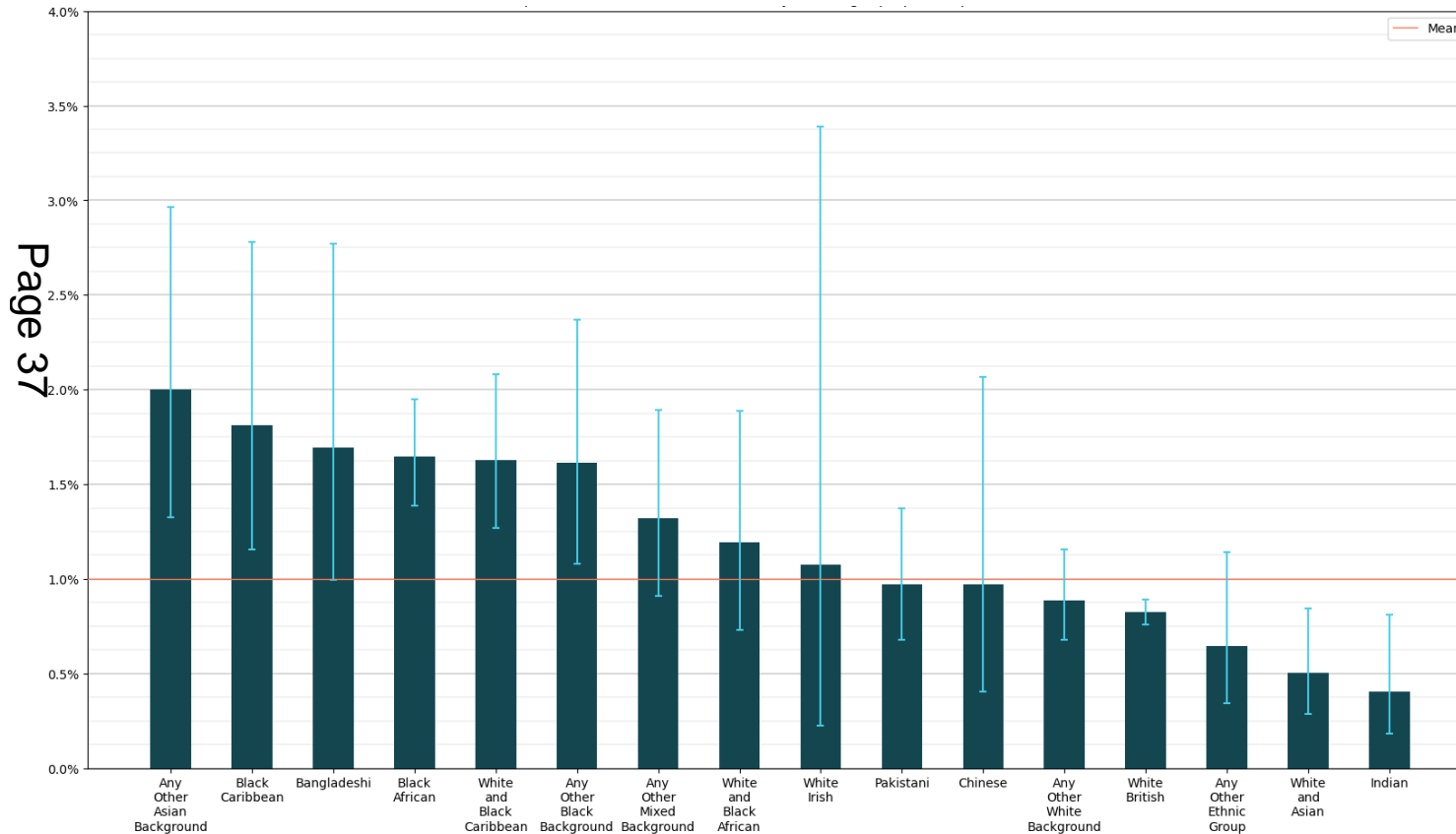
Needs band of pupils with an EHC plan (20/21 to 23/24)



- Over the last 4 years there has been a significant increase in the number and proportion of pupils receiving non-statutory funding at needs Bands 4/5¹
- The charts on the left suggest that pupils previously assessed as band 2/3 are now being assessed as Band 4/5
- The rise in SEMH at needs Bands 4 and 5 has been particularly sharp (18 pupils in 20/21 to 110 in 23/24). This suggests either that SEMH needs have become significantly more complex, or schools are no longer picking up on emerging needs early. The number of pupils with SLCN has risen at all levels of need, but especially Band 3.
- Banding data for pupils with EHC plans shows a similar pattern. Indeed, together the two charts on the left suggest a high degree of overlap in the needs of pupils receiving non-statutory funding and those with an EHC plan²

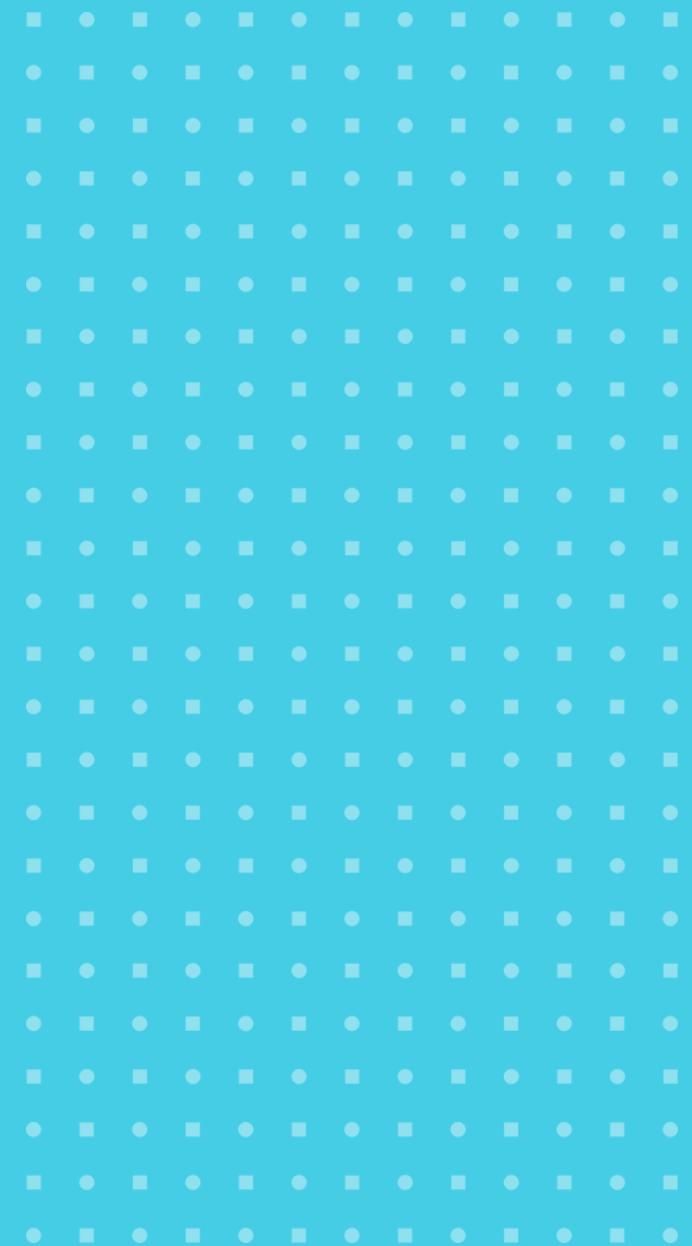
Black pupils with SEND are overrepresented at all levels of need

Proportion of children receiving top-up funding at a special school by ethnicity



- The chart to the left shows that people from black and mixed-black backgrounds are more likely than average to attend a special school. This is indicative of a general pattern within SEND in Bristol. For example:
 - Black Caribbean children are 2.8 times more likely to receive non-statutory top-up than the average
 - Black African children are 27% more likely than average to receive non-statutory top-up at a mainstream school, and 60% more likely to be at a special school
- SEMH is a particular issue: pupils of black backgrounds are more likely than their peers to be identified as having a behavioural need
- For example, in the special school population, >50% of black and mixed-black background pupils have an SEMH need. None of the Asian pupils in these settings are identified as having SEMH.

Practice in other local authorities



We undertook a review of wider local authority practice to inform possible changes¹

Objective

- Identify characteristics of resilient, sustainable SEND systems
- Identify specific approaches to using Element 3 funding from relevant local authorities that Bristol could learn from
- Understand how these have been implemented so Bristol can learn lessons from both successes and failures

What we looked at

- Desk-based research of published research / evidence to understand general characteristics of resilient SEND systems
- Targeted case studies of specific local authorities covering places:
 - i) that have made good progress in the DBV / Safety Valve programmes
 - ii) recognised as the strongest generally
 - iii) that have similar and/or especially relevant models to Bristol, incl. using high needs funding for early intervention

Progress and outputs

- Desk-based research completed for 13 local authorities
- Conversations with 8 local authorities to explore relevant models in more detail
- The following slides summarise the key learnings and takeaways for Bristol. Detailed case studies are provided in a separate document

Recent DfE research highlights 6 key areas that are essential to sustainable local SEND systems¹

Local authority good practice areas have holistic, coordinated approaches to SEND. They are underpinned by strong, open relationships with schools, who have a consistent approach to inclusion / OAP (led by the council) and who pull in the same direction around the sustainable and collective use of high needs funding. Key characteristics of their approaches include:

1. Co-production:

- Schools
- Parents/carers
- SEND children/young people

2. Culture:

- Early intervention
- Stable senior SEND leadership
- Engagement between council, schools and parents/carers

3. Strong relationships between councils and schools:

- Better communication
- Sense of collective responsibility

4. Coordination and stewardship:

- Strong comms between SEND and finance teams
- Multi-agency coordination (e.g. Education and Social Care)
- Capacity for system oversight




5. Capacity building:

- Improving mainstream inclusion
- Training/up-skilling school staff
- Increase capacity of special schools

6. Specific interventions:

- Reducing exclusions related to SEND
- Dedicated autism pathways and services
- Transition support

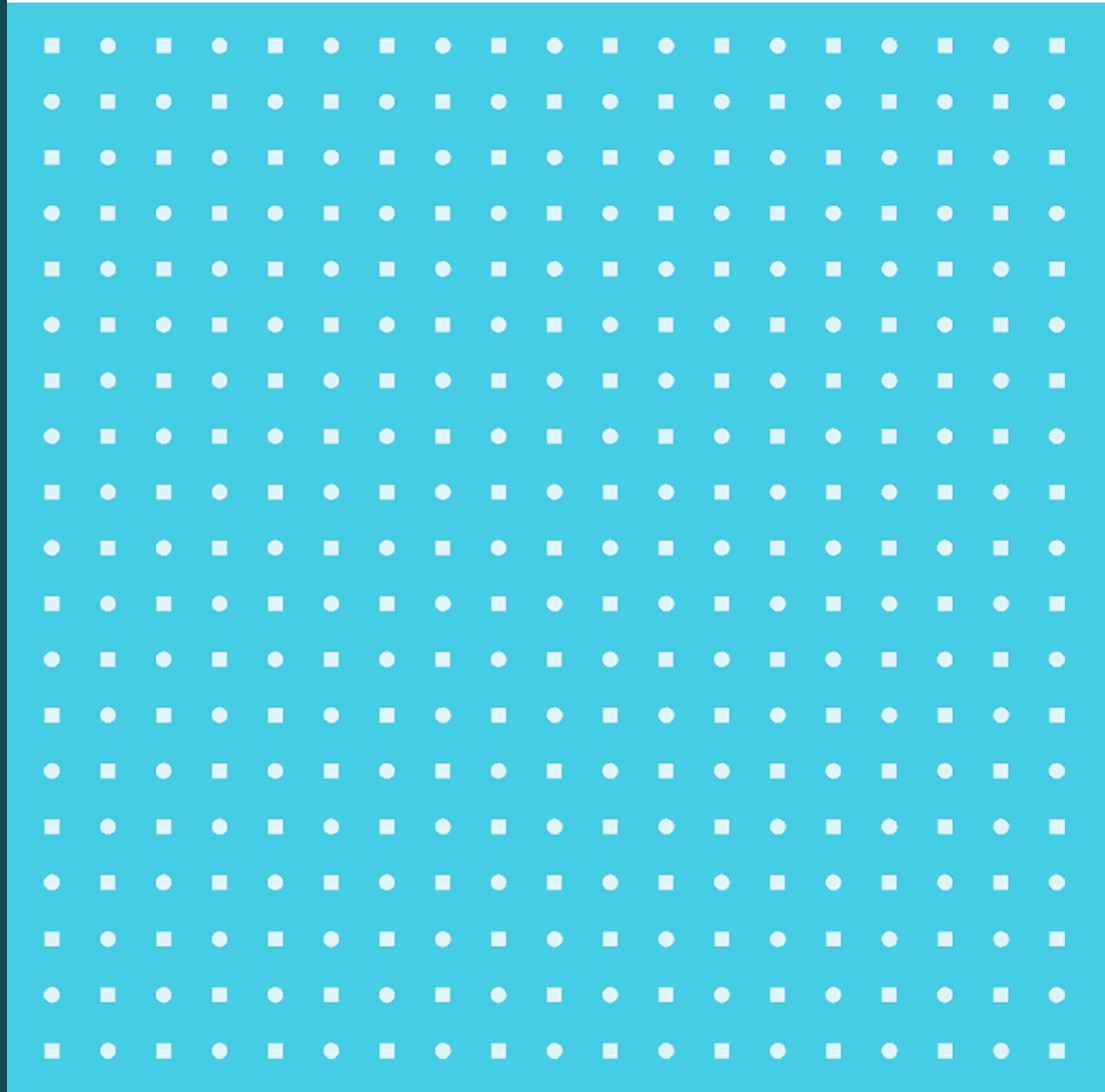
Many local authorities provide additional high needs funding to mainstream schools for SEN Support pupils

<p>Essex</p>	<p>Individual Pupil Resourcing Agreement (IPRA): This refers to additional funding which can be given to a school to help a child with special educational needs to settle into their new setting (transition funding) or to support them with medical needs. The funding is given to the school for an agreed period only, normally one or two terms and it is then expected that the school can support the child through normal OAP.</p>	 <p>Essex County Council</p>	<p>'Per pupil' funding models</p>
<p>Warrington</p>	<p>Top Up funding requests: Funding is allocated with agreement from Warrington's SEND Multi-Agency Panel. Funding is time-limited and applications for top-ups are based on the cost of providing any additional teaching interventions using the Provision Map. If the application is agreed by the SEND Panel, the school will receive the exact amount of money required to meet the child's special educational needs.</p>	 <p>WARRINGTON Borough Council</p>	
<p>Hertfordshire</p>	<p>Local High Needs Funding (LHNF): This local version of Top Up High Needs Funding meets the emerging needs of children and young people and those with complex needs who do not have an EHCP. It is managed locally within the nine different DSPL (delivering special provision locally) areas and the decisions regarding the allocation of LHNF will be made by a panel managed by the DSPL manager. If the panel decides that the child is not eligible for LHNF, they will support the school in advising how best the school can meet the child's needs.</p>	 <p>Hertfordshire</p>	<p>'Devolved' funding models</p>
<p>Croydon</p>	<p>Locality networks: Croydon started an early intervention pilot approach in 2020. Regional clusters of schools / SENCOs meet regularly to discuss their inclusion approaches and drive peer learning and improvement. £1m has been devolved to clusters, with SENCOs deciding collectively how best to use it across their schools. An additional £400k (DSG transfer) funds a small team of specialist teachers who provide support but also scrutiny over how funding is used. The model is now rolling out across the whole borough, with additional resource.</p>	<p>CROYDON</p>	

NB: several places also use high needs budget to commission or directly deliver outreach services that work in mainstream schools (e.g. Hull, Notts), while others transfer high needs funding directly to mainstream schools to support inclusion (e.g. Camden, Islington).

3. Public consultation – options tested and key findings

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We tested a series draft Options for changes to top-up funding in a public Consultation

Consultation details

The SEND Top-up Consultation was held over November and December 2023.

An online survey was available on the council's [Consultation and Engagement Hub](#) between 1 November and 13 December 2023. Easy Read formats were also available on the Consultation and Engagement Hub, for which responses were accepted until 27 December 2023.

The Consultation sought views from the public (with a particular focus on school staff, LA staff, parents/carers and children and young people) on options for more effective and sustainable use of top-up funding.

The responses to the consultation, as well as feedback through the follow-up Information and Engagement sessions, have helped to inform final recommendations. The full findings from the Consultation are published in a separate report.¹

Consultation distribution and follow-up sessions

The survey was distributed via several channels:

- All educational settings in Bristol (primary, secondary, mainstream, special schools)
- Bristol Parent Carer forum email distribution list and social media platforms
- Bristol City Council Education and Skills Directorate distribution list
- WECIL (local, user led organisation supporting Disabled people) email list and social platforms

58 people also attended one of 14 follow-up Information and Engagement sessions (in-person and virtual)

- 2 x council staff sessions
- 5 x school staff sessions
- 4 x parents / carer sessions
- 2 x governor sessions
- 1 x young people (facilitated by WECIL)

Summary response rate and respondent characteristics

- 196 survey responses (all completed online)
- 130 responses (66%) from postcodes within the Bristol City Council area
- The proportion of respondents with disabilities (12% of all respondents; 14% of Bristol respondents) is greater than the proportion of people with disabilities living in Bristol²
- White British respondents (86% of all respondents, 82% of Bristol respondents) were slightly overrepresented (72% of Bristol population). Mixed or multi-ethnic respondents (6% of all respondents, 7% of Bristol respondents) were also slightly over-represented. The following groups were under-represented:
 - Black/Black British/Caribbean/African (3% of Bristol respondents versus 6% of Bristol pop)
 - Asian/Asian British (3% of Bristol respondents versus 7% of Bristol pop)

Consultation feedback was synthesized in a rigorous way to inform final recommendations

1. Create a coding framework



Created a coding framework in line with Bristol standard procedure. The framework enabled us to tag 'positive' and 'negative' sentiment in the qualitative parts of the survey data. We also identified a list of major themes bottom up to capture more nuanced feedback.

2. Testing the coding framework



We tested the coding framework on a sample of early responses to the consultation (e.g. the applicability of the codes and the ease of applying the framework to capture feedback) and made small changes before finalizing it.

3. Synthesise all responses



We applied the framework to all responses. We also applied the framework to the recorded transcripts from the Engagement sessions. This ensured feedback from these sessions are captured alongside survey feedback.

4. Synthesis – major themes



We synthesised the data from the survey responses and Information and Engagement sessions, identifying common themes within the responses.

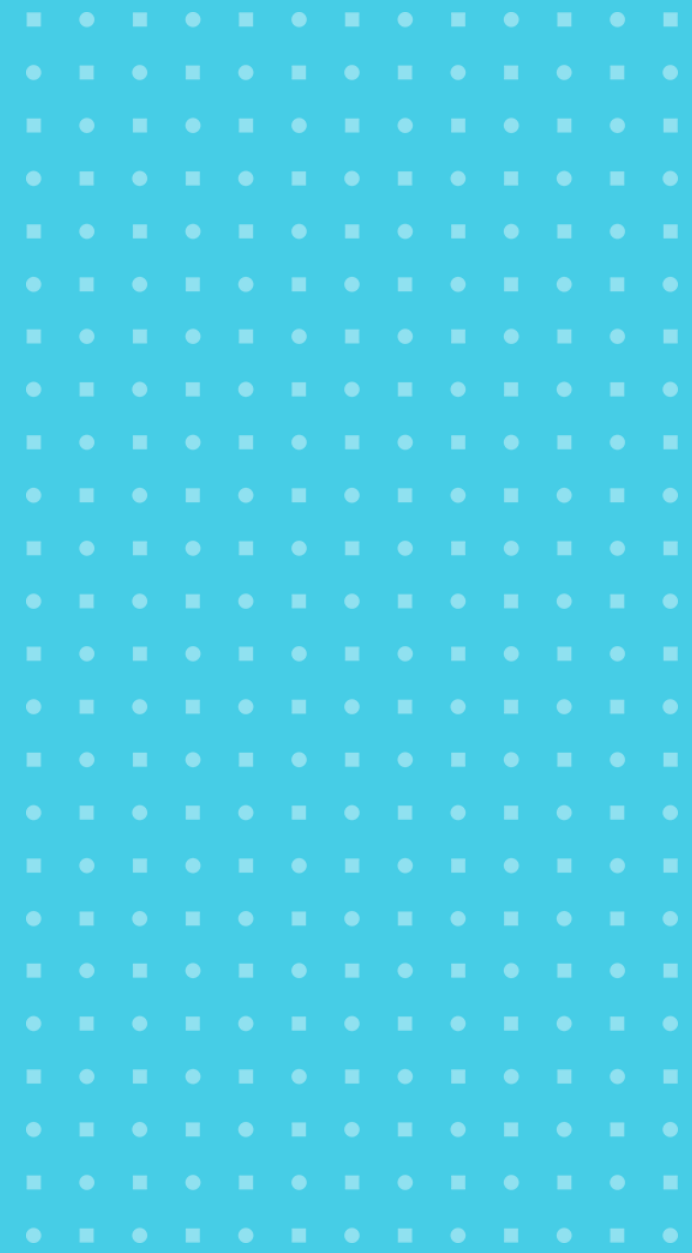
The following slides in this section outline the options tested during the consultation, and the feedback received about them. For each option, we first present the information that was provided to Consultation respondents, which includes:

- A summary of the problems that are addressed by option and the rationale behind creating it
- A summary of how we envisaged the design of the option
- A summary of the anticipated benefits and risks/implications to consider in implementing this option

For each option, we then summarise the feedback gathered through the survey and follow-up sessions.¹

Options for school-age pupils

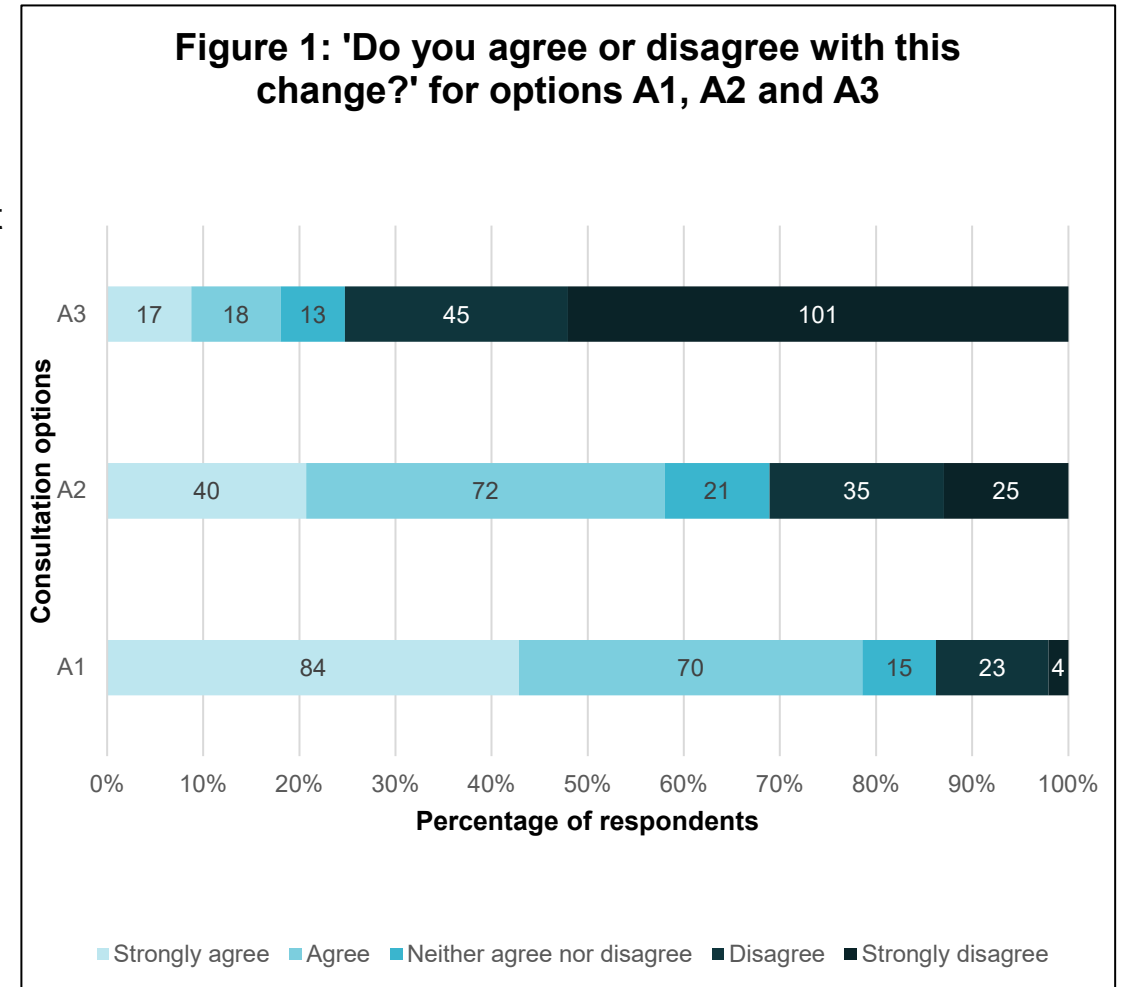
Options A1, A2 and A3



Summary of responses to options A1, A2 and A3

- Across both the survey and follow-up sessions, **Option A1** received the most positive feedback, supported by >75% of survey respondents ('Strongly agree' or 'agree'). Qualitative comments included:
 - Schools welcomed the idea of a faster, more streamlined process which reduces pressure on their staff, plus the ability to access greater support for those who do not have an EHC plan in place, which would enable schools to support SEND children in a mainstream education setting
 - However, there were some concerns that this option may not realise sufficient savings or be financially sustainable.
- **Option A2** also received support from many respondents, though not to the same extent as Option A1. Qualitative comments:
 - Respondents support the principle of early intervention, with some suggesting that this option could reduce the burden on SENCOs and other school staff or bring financial benefits by reducing long-term costs
 - However, concerns were raised about whether the funding available would be sufficient, whether it would reach all of the children and young people who need it, and how the use of the fund could be monitored
- >75% of respondents indicated that they did not support **Option A3**. Respondents reported that it would negatively impact on child outcomes and lead to more EHC plan applications. These costs would outweigh any short-term financial benefits.

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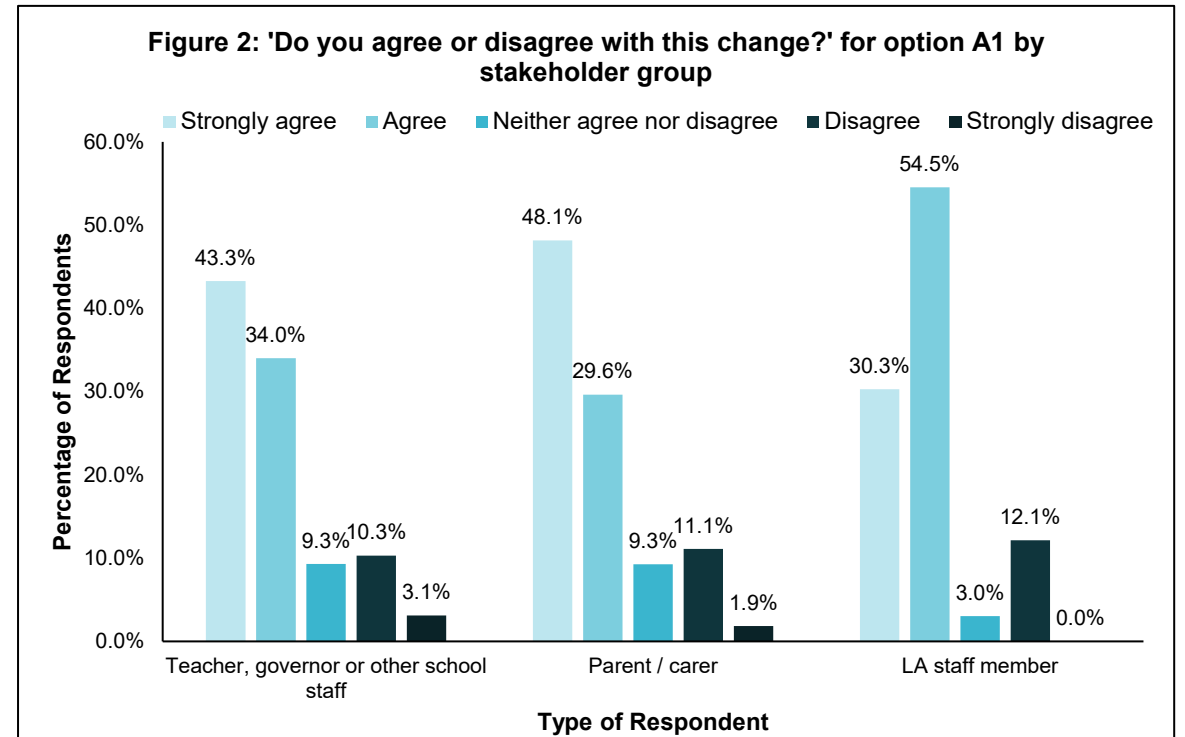
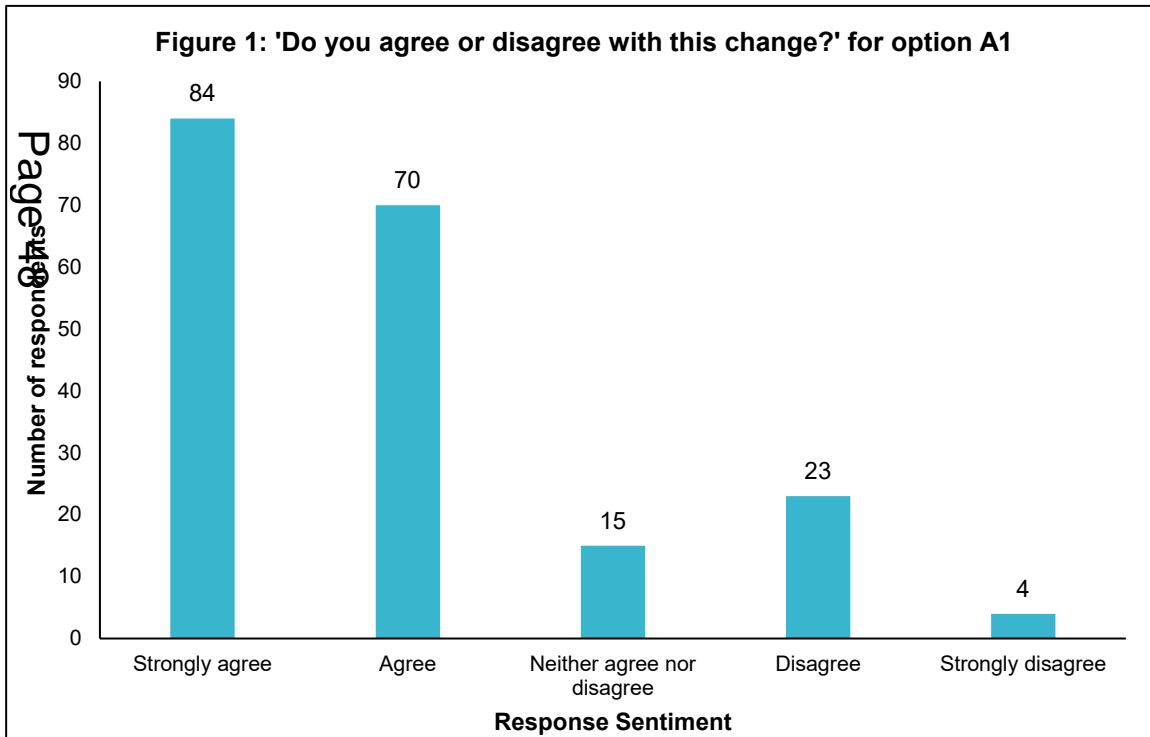
Option A1: Retain the top-up funding process for children and young people without EHC plan but make improvements to make the system more streamlined and consistent.

Page 47	Problems this option addresses	<ul style="list-style-type: none"> • Current top-up process was designed for much smaller numbers of applications. It is now very 'heavy' and time consuming at all stages and for all stakeholders • Applications are not needs-led i.e. applications are written 'in reverse' with required banding thresholds determining the application, rather than being driven by needs. • Limited quality assurance and oversight over funding allocated to schools 	<p>Anticipated benefits:</p> <ul style="list-style-type: none"> • SENCOs spending less time preparing applications and more time working with CYP directly. Application processes should run smoother and quicker. • Improved consistency of decision-making and accountability of Council spend • Positive reaction to making the process more streamlined and needs-led, and confidence in the beta web portal.
	Rationale	<ul style="list-style-type: none"> • Much more streamlined and needs-led process for top-up funding decisions reduces time burden and improves the consistency of decision-making 	
	Option details	<ul style="list-style-type: none"> • Introduce new web portal to manage the application and banding process. The portal allows for needs to be inputted into a matrix that calculates an exact amount of funding for the appropriate provision required. • Increase council admin capacity (c. 0.5 FTE), introduce senior oversight over decisions, and reduce number of panels (2 max) • Develop guidance materials and offer regular training to SENCOs 	

Quantitative data from consultation survey results on option A1

Most respondents agree with the proposals for Option A1, with more than 75% indicating that they agree or strongly agree with the change, compared to less than 15% who disagree or strongly disagree. (See Figure 1)

This remains broadly true when responses are broken down by stakeholder category, although Council staff are more likely to choose the more moderate option (e.g. 'agree' rather than 'strongly agree') (See Figure 2)



Qualitative data from consultation survey results on option A1

Positive feedback

The majority of survey respondents' views on option A1 are positive:

- Many respondents highlight the need for a faster, more streamlined process, to reduce duplication and free up SENCO time to spend directly supporting children with SEND.
- Several describe the importance of non-statutory top-up funding to support children who do not have an EHCP, because:
 - They have a lower level of needs, but still require support above OAP
 - They are in the process of going through the ECHP application process
- Several feel that option A1 would promote inclusion via education in mainstream setting.
 - Children in Care with SEND were referenced as a particular vulnerable group would that benefit from this funding to remain in school.

Specific improvements suggested in the survey information that received positive feedback:

- An online portal to make applications easier, quicker, and more standardised.
- Training for SENCOs and teachers to improve the consistency of panel decision-making.

Other positive feedback on anticipated consequences of option A1 included:

- providing the best outcomes for children with SEND
- saving the council money, either because it would be more efficient or because it would ensure needs are met quickly and do not escalate
- maintaining fewest EHCP applications

Parents/carer view: *“Support for children without an EHC is important. It takes too long to get one [EHC plan] and top up is a good way for my child to get the support they need now, not in a year's time when the EHC has been written. If my child didn't get the support they needed straight away they would have been excluded or have [had] to go to a special school”*

Questions and concerns

Some respondents voiced concerns about some aspects of option A1. These include:

- Doubts on the likelihood of realising savings from this option or argue that it would be financially unsustainable for the council.
- The amount of funding available is insufficient to meet demand, although no respondents from the local authority express this view.
- Difficulties faced by parent/carers in accessing funding or ensuring it is used appropriately for their child.

A small number of respondents raised specific concerns, in response to the survey information, which included:

- Whether SENCOs would have capacity to attend training and whether this training would improve objectivity of top-up panel decisions
- Streamlining the application processes could lead to an increase in applications and a corresponding increase in workload for the local authority

Suggestions about how SEND provision could be improved include:

- strengths-based assessments rather than having a deficit focus,
- prioritising strengthening ordinarily available provision (OAP) in order for more children to benefit in the long term
- allowing year-round applications with an end to panels that occur three times a year.

Council staff view: *“Too often top-up funding goes into a 'pot' in the school/MAT and doesn't get spent on what it was requested for. And it continues...for three years with no checks on whether it is being spent on the child or the specified provisions or what the impact has been. The funding application should be an ongoing two-way process between the school and a council team.”*

Option A2: Re-purpose a proportion of the funding currently being spent on top-up funding for children and young people that do not have an EHC plan to create a targeted early intervention fund for mainstream schools.

<p>Problems this option addresses</p>	<ul style="list-style-type: none"> • Current top-up funding is not being used strategically for early intervention and inclusion • Consistent view that some schools may be drawing on non-statutory funding for needs that should instead be met by stronger OAP
<p>Rationale</p>	<ul style="list-style-type: none"> • The SEND policy and funding framework, and the way it is implemented in Bristol, does not naturally encourage early intervention. Additional mechanisms are often required to enable this kind of working within schools.
<p>Option details</p>	<ul style="list-style-type: none"> • Establish a finite pot of funding dedicated to early intervention for use in mainstream schools • Establish a pot of funding for key ‘transition’ points • Target funding at specific priority groups, for example: <ul style="list-style-type: none"> • For children starting primary school with speech and language delays • For minoritized groups with SEMH to reduce the likelihood of being incorrectly being labelled with more complex needs • Funding could be allotted to regional clusters of schools to collectively employ specialist staff or to purchase specific interventions and support

Anticipated benefits:

- Earlier and better targeted help to children and young people with SEND
- The overall approach to SEND funding in Bristol becoming clearer and more obvious for schools and parents to navigate.
- This could address the increase in spend at Bands 4 and 5, driven by significant increases in the numbers of young people receiving support for SEMH needs.¹

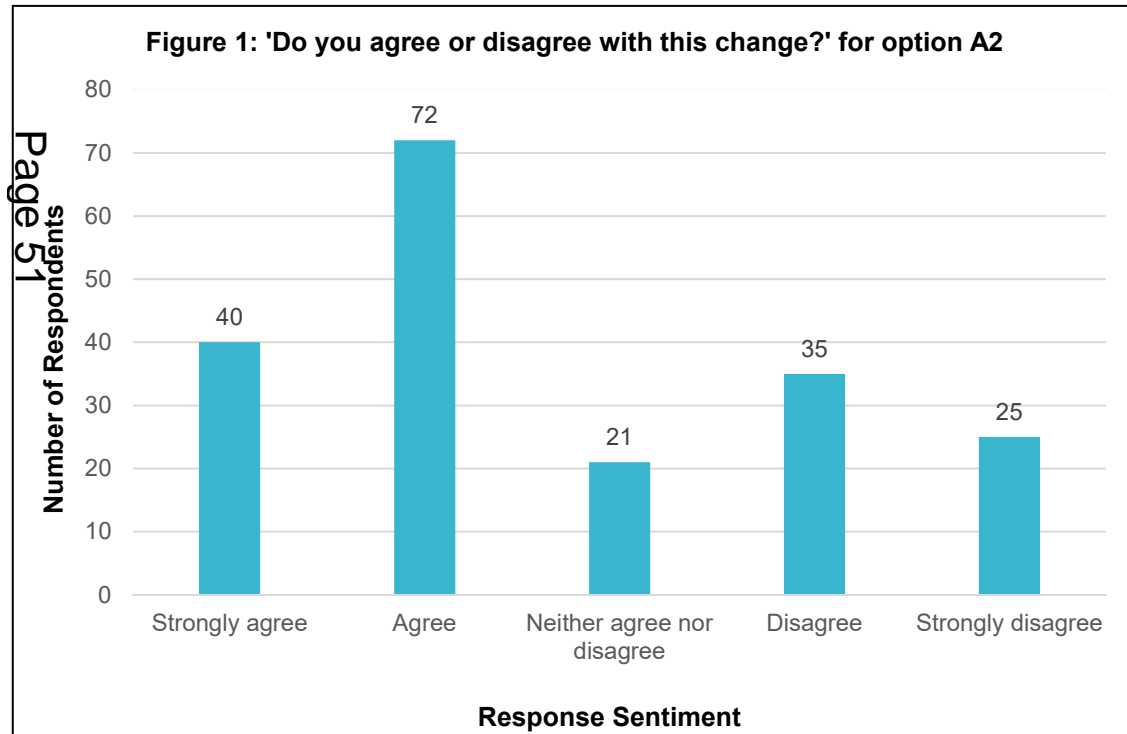
Anticipated risks/implications:

- Further work required to estimate the funding required to successfully hold needs at SEN Support and how this would be distributed fairly.
- A proportion of the children and young people who are currently receiving top-up funding with no EHC plan could potentially proceed to a statutory assessment. This would increase EHCP numbers and expenditure.
- Checks and controls will need to be put in place to provide sufficient oversight to the allocation and use of the Targeted Fund.

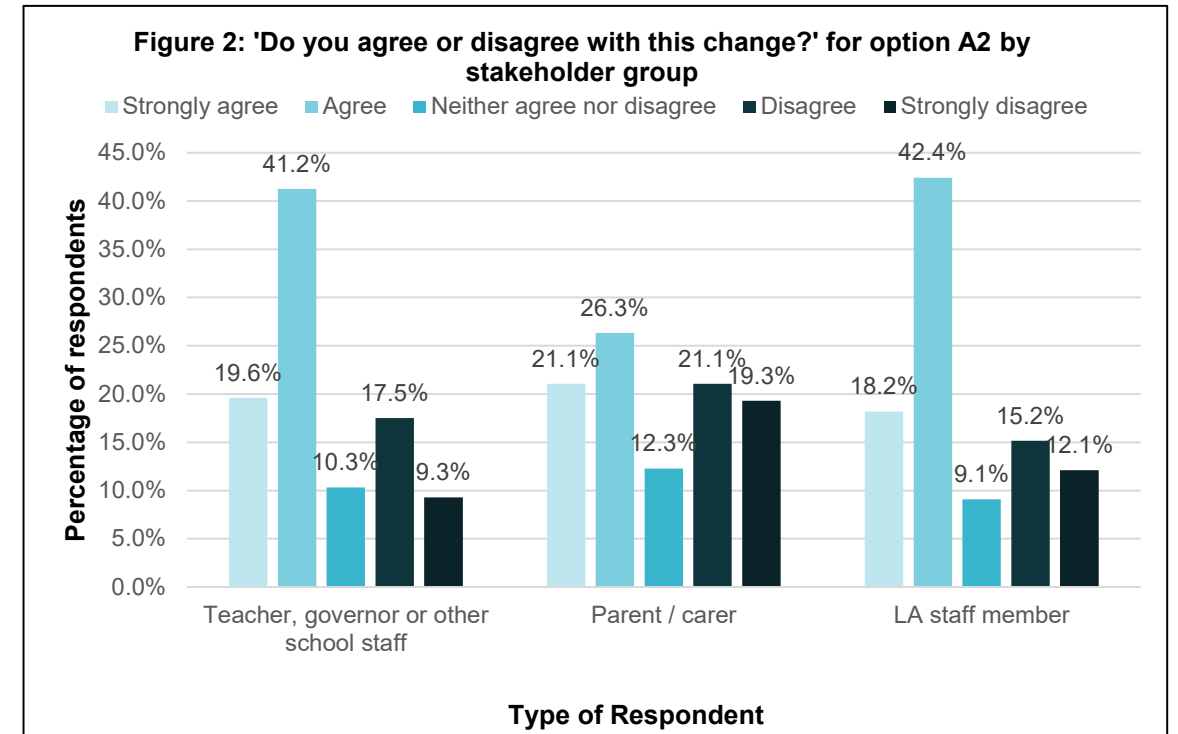
Example: in Warrington,² schools can request additional top up funding without an EHC plan. Funding is agreed for max 2 years. Funding is reviewed after 2 years and, if appropriate, escalated to an EHC plan referral.

Quantitative data from consultation survey results on option A2

A majority of respondents agree overall with the proposals for A2, though not as many as those that agree with A1, and there is notably a smaller proportion who ‘strongly agree’. (See Figure 1)



When responses are broken down by stakeholder category, the parent / carer group is more likely to disagree with the proposals under A2, with a higher proportion of those who ‘strongly disagree’ as well as being less likely to agree. (See Figure 2)



Qualitative data from consultation survey results on option A2

Positive feedback

Respondents' views on option A2 was more mixed than Option A1, though still broadly positive overall. Several respondents supported the principle of early intervention because it could:

- support children who have no diagnosis or who do not yet have funding ensure that their needs are met
- reduce the demand for EHCPs and 1-to-1 support in the long term
- help children to fulfil their full potential and improve outcomes
- reduce the administrative burden on SENCOs and free up capacity to better support children.

enable schools to address specific issues, such as emotional-based school avoidance, and support specific groups, such as children with ADHD or visual impairment.

Some respondents said that an early intervention approach may also bring financial benefits, either by:

- addressing needs at an earlier stage and therefore reducing long term support costs, or
- allowing schools to access funds to support multiple children, perhaps using group work and pooled support.

Other respondents' suggestions included:

- Implementing specific targeted interventions, including those to support with social and emotional wellbeing and speech and language

School staff view: *“It would be good to see budgets of money being used to support early intervention and targeted work for young people e.g. social skills groups, emotional and wellbeing, SALT, OT, sensory circuits and integration programmes. It would be nice to get the early support in to give the young person the best outcomes possible and also to encourage schools to become more inclusive with their cohorts.*

Questions and concerns

There was some negative feedback in response to option A2 and concerns raised regarding the implementation of this option:

- For example, some respondents raised a concern that this option is not equitable, as it would likely be focused on KS1 pupils and primary schools, and so secondary schools would miss out.

Respondents express concerns that some groups would be disproportionately impacted by any reduction in top-up funding, including:

- Children in care; Black and ethnic minority children; Children who move schools in-year without transferrable provision; Children with autism spectrum disorder (whose needs may be identified later); Children with an EOTAS package, who are home schooled or who attend an ALP; Children with SEMH needs

Other perceived challenges to the implementation of A2 include:

- A negative impact on individualised provision, Several respondents prefer the use of funding to be spent on a specific child to address a specific need, as some children require dedicated support, personalised provision or a bespoke package.
- A rise in more EHCP requests.
- A reduction in schools' ability to access funding or concern that the funding will not be sufficient to meet demand.
- An additional burden on SENCOs through additional monitoring and accounting for spend

School staff

For me, this rings huge alarm bells in terms of the bureaucracy involved - having to gather evidence, submit applications, make staff hiring decisions, setting goals and reviewing impact all within a short time period and then repeating the process if support is to continue would create a huge amount of additional work for SENDCOs and school leaders.

Option A3: Gradually phase out the use of top-up funding for children and young people who do not have an EHC plan.

<p>Problems this option addresses</p>	<ul style="list-style-type: none"> Levels of non-statutory funding have been rising rapidly in recent years, and has shifted away from its original intent – i.e. small-scale, targeted funding for pupils whose needs are beyond that of OAP, but who probably would not require an EHC plan with the right support
<p>Rationale Page 53</p>	<ul style="list-style-type: none"> Bristol is a relative outlier nationally in that it provides top-up funding for pupils without an EHC plan; and places that do provide this funding do so to a much lesser extent The current system can create confusion – encouraging schools to seek non-statutory funding for some pupils whose needs would be best supported through an EHC plan Schools would be encouraged to support more pupils through improved OAP
<p>Option – detail</p>	<ul style="list-style-type: none"> Potential for a phased removal of non-statutory funding to prepare schools and invest ahead of time in OAP (e.g. finite and progressively smaller budgets over three years) Some short-term investment also required in OAP guidance / materials and school support to improve inclusion

Anticipated benefits:

- The overall approach to SEND funding in Bristol becoming clearer and more obvious for schools and parents to navigate
- A short-term reduction in Council expenditure

Anticipated risks/implications:

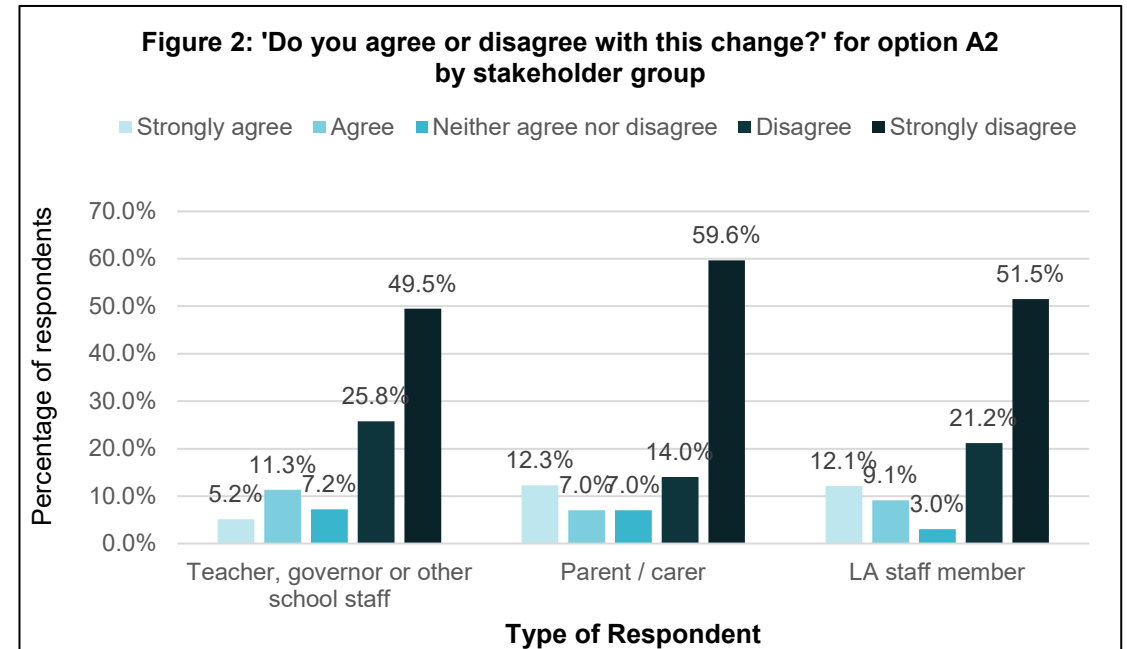
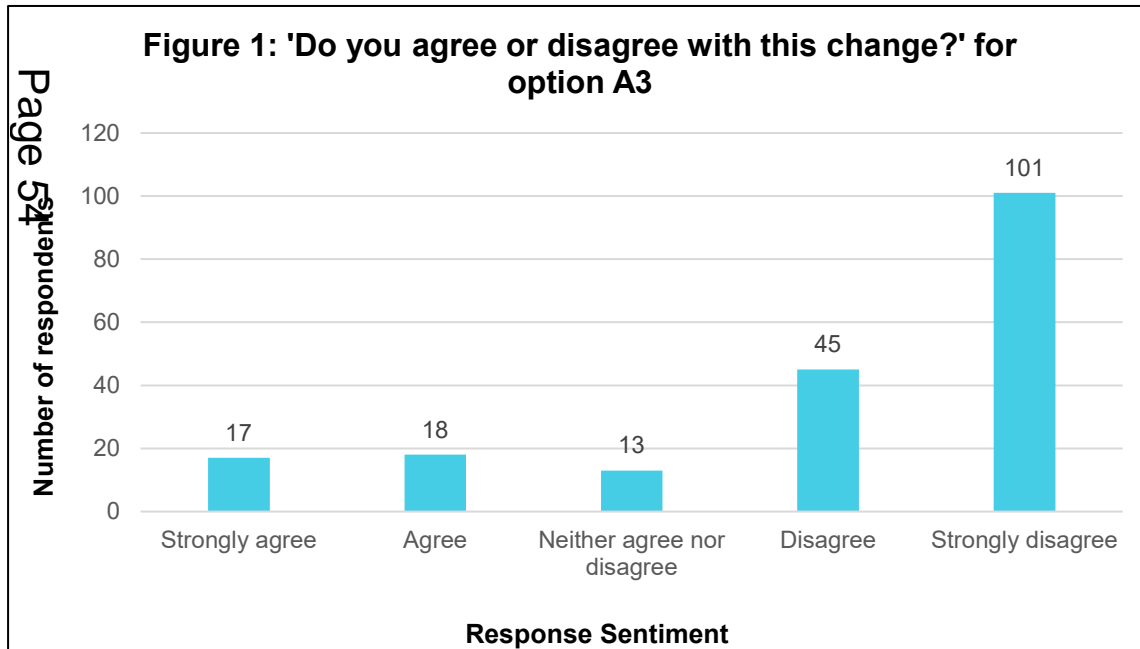
- Worse outcomes for CYP with SEN support that may develop into more complex needs.
- Stark rise in the number of children and young people with EHC plans. The SEND team will need to increase capacity to avoid being overwhelmed with EHC needs assessments.
- Rise in permanent exclusions as schools are unable to support CYP with complex needs
- It may end up costing the council more in the long-term.

Case study: Hampshire County Council removed its non-statutory funding for pupils without an EHC plan. This was partially due to overspend, but also because there was an unhelpful overlap with statutory responsibilities to provide EHC plans. This change therefore resulted in an increase in the number of pupils with EHC plans.

Quantitative data from consultation survey results on option A3

Most respondents disagree with option A3, with the majority saying that they 'strongly disagree' with this change. (See Figure 1).

This negative sentiment is broadly reflected across all of the different stakeholder types. (See Figure 2).



Qualitative data from consultation survey results on option A3

Positive feedback

Only a few respondents raise points in favour of option A3, claiming that:

- Only statutory activities should be funded
- An EHCP is the best and most appropriate way of meeting the needs of a child or young person with SEND
- This proposal may deliver financial benefits for the Council
- It would be fairer and more consistent if everyone has to apply for an EHCP
- This would be in line with other local authorities

Relatively few respondents make suggestions in relation to A3. Where they do, they propose that:

- More staff, including SALTs and EPs, are needed.
- EHCP plans should be funded automatically and funds released immediately
- Emergency funding should be allocated for key stages, such as transition, or for crisis situations
- A phased transition is required to any new approach
- Senior Council staff visit affected schools before implementing proposals
- Schools should not be tied to 1-to-1 provision through EHCP

School staff view: “Schools don’t receive much money for children without EHC plans. Therefore I don’t anticipate a massive drop in our ability to provide effective inclusion. We are already striving to provide effective inclusion with very little; a bit less won’t reduce our efforts.”

Questions and concerns

The vast majority of comments on option A3 express concern about the proposal.

The main concern was a rise in ECHP application volumes. Some use terms such as ‘massive’ or ‘exponential’ to describe any increase and that there could be a number of consequences which result from this, including:

- an increase in waiting time for EHC applications. They argue that existing wait times would need to be significantly reduced for A3 to be adopted and that if waiting times were not reduced, schools would have to manage these cases without having the funding to do so.
- an increase in EHC annual reviews, which would lead directly to an increase in workload for school staff (particularly SENCOs) and for Council staff (particularly SEND teams and EPs). They feel that these teams are already working at full capacity.
- an increase in costs for the Council as a result of lack of early support leading to greater needs in the long term, and increased need for specialist provisions. A small number say A3 could shift costs to other areas such as Social Care.

Many respondents claim that the introduction of A3 would have a negative impact on children and young people with SEND, in that it would lead to:

- an increase in unmet need, particularly for children who have a sudden increase in need and cause disengagement with or exclusion from mainstream education, as it is longer safe for children to remain in mainstream education without funded plans.
- a reliance on formal diagnosis and EHCPs could affect inclusion and might disproportionately disadvantage a number of different groups, including: Children with relatively low level of need; Minority groups; Children in care; Children with SEMH needs (including undiagnosed needs); Children with SLCN; Children with English as a second language; Children of parents with English as a second language; Children of parents with a learning disability; Children of parents with a health condition which limits their ability to support an EHCP application

Local Authority staff: “I think this will lead to a massive increase in the number of requests for EHC plan needs assessments which is already growing year by year, and will not do anything to tackle the barriers to promoting inclusion to pupils for SEND in schools. If an EHC Needs assessment for a pupil is delayed, this could lead to no appropriate funding being given to a pupil for effectively a school year.”

Options for post-16 learners

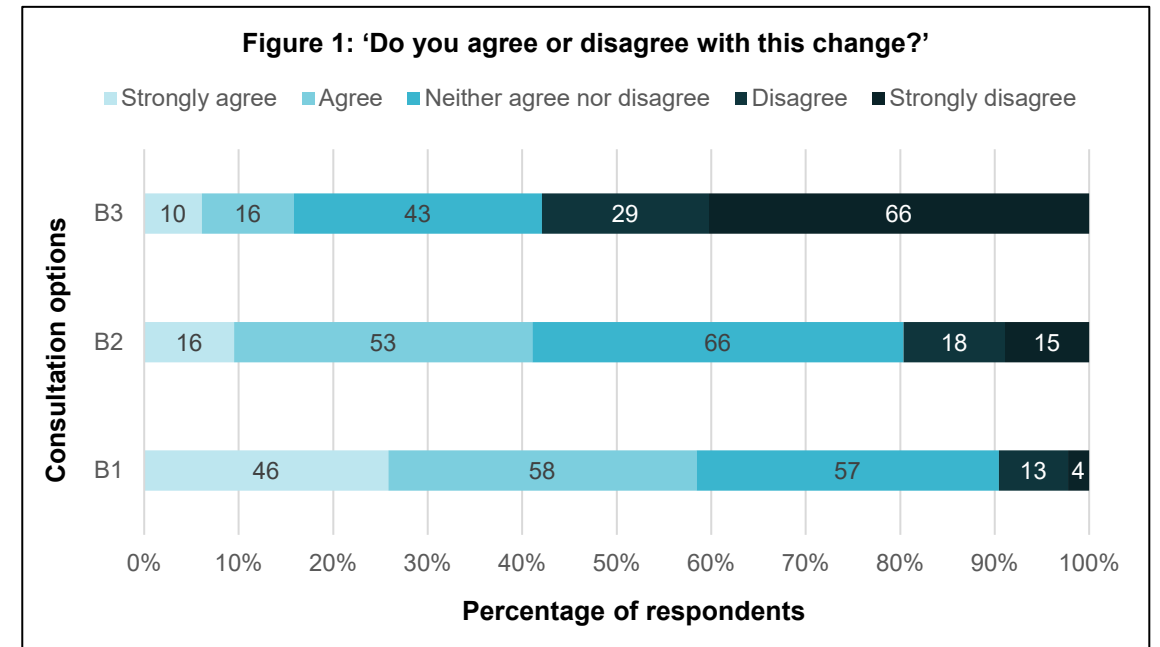
Options B1, B2 and B3



Overview of responses to options B1, B2 and B3

- Fewer survey respondents respond to questions for Post-16 and the number of respondents selecting ‘neither agree nor disagree’ was also larger. Some respondents notes that, since they do not work in the Post-16 system, they did not feel qualified to comment. However, amongst those who did comment, sentiments were broadly in line with the school-age questions.
- Across both the survey and Information and Engagement sessions, **option B1** was received the most positive feedback. Comments:
 - it is important for provision to be available for Post-16 learners as it is a very formative period in their lives and support will ensure they some learners do not become NEET
 - Some children have needs which develop later in life and it is important they are supported
- **Option B2** received support from more than 40% of respondents and was seen as a potentially more inclusive option. But there were also concerns about how it might work in practice. Comments included:
 - this proposal could ensure the needs of post-16 learners are met in a more timely and effective manner
 - colleges may be able to support whole groups and therefore be more inclusive
- There was strong opposition to **Option B3**, with the majority of respondents indicating they were against it. Concerns included that learners would not be sufficiently supported and that that EHC plan applications would increase. Qualitative comments included:
 - fear of an increase in learners who become NEET or who are excluded from education settings

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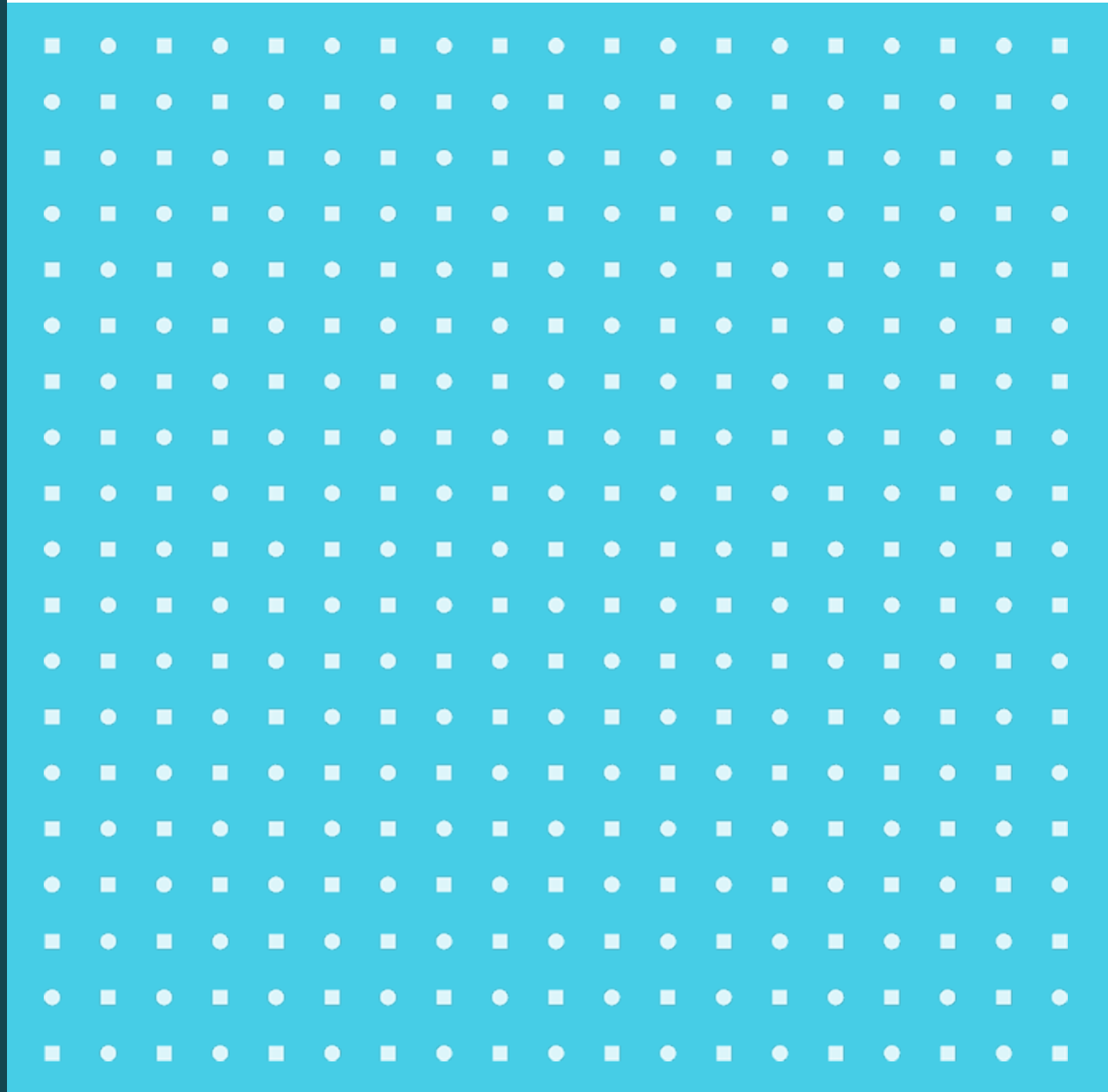


Detailed consultation feedback on Post-16 options

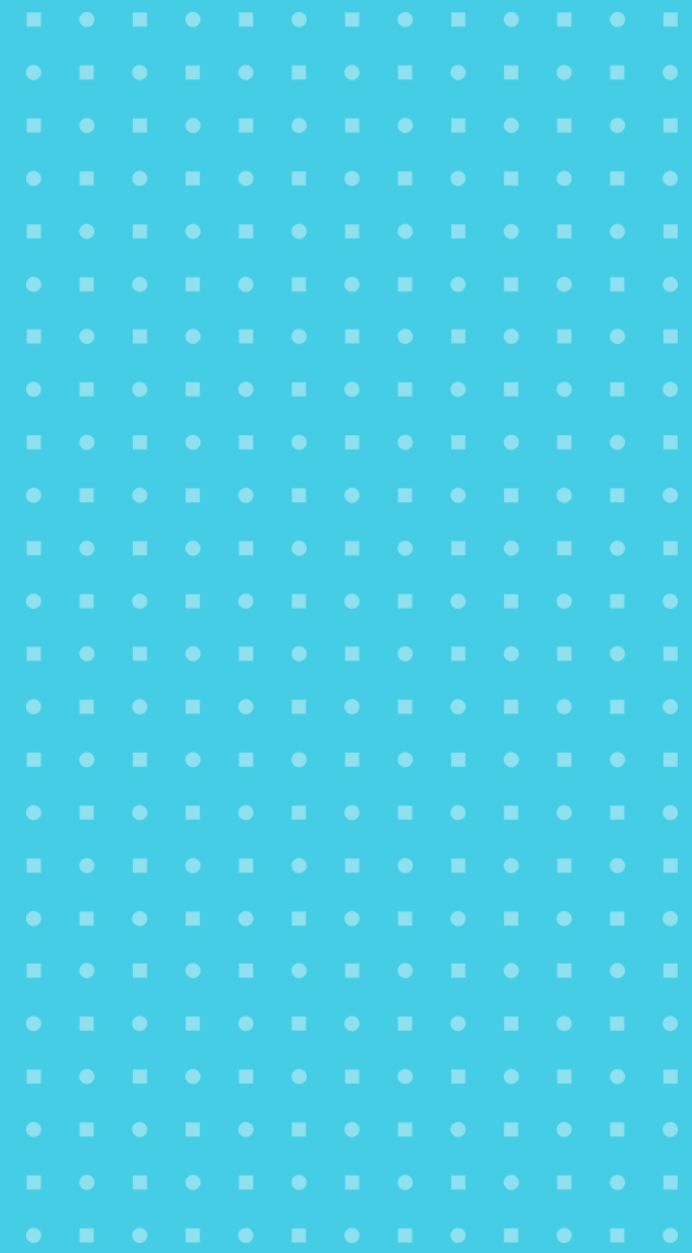
	Description	Details	Rationale	Anticipated benefits	Implications/Considerations
Page 58	B1 Retain the top-up funding process for post-16 without EHC plans but make improvements to make the system more streamlined and consistent.	<ul style="list-style-type: none"> • Introduce a new web portal • Increase Council admin capacity • Improve communication channels between schools and post-16 settings 	<ul style="list-style-type: none"> • A much more streamlined and needs-led process for top-up funding decisions reduces time burden and improves the consistency of decision-making 	<ul style="list-style-type: none"> • SENCOs spend less time preparing applications and more time working with CYP directly • Shorter delays between application submission and decision • Improved consistency of decision-making and accountability of Council spend 	<ul style="list-style-type: none"> • Schools may not have final enrolment register until October which leads to a bulk of applications simultaneously. There needs to be further work done to ensure that funding follows a pupil to post-16 setting and for timely approval of applications.
	Re-purpose a proportion of the funding currently being spent on top-up funding for post-16 learners to create a targeted fund for post-16 education settings.	<ul style="list-style-type: none"> • Establish a finite pot of funding dedicated to early intervention • Target funding at priority groups • Could be allotted to regional clusters of schools for collective actions 	<ul style="list-style-type: none"> • Allows schools to respond to new and emerging needs (as many applications are for learners who did not have a previous EHCP) • Helps post-16 settings which finalise their enrolment register later 	<ul style="list-style-type: none"> • Earlier and better targeted help for learners with SEND • Learners that have not been previously identified with SEN support will receive provision 	<ul style="list-style-type: none"> • Need to calculate estimate of funding required to successfully hold needs at SEN Support and how this would be distributed fairly. • A proportion of the children and young people who are currently receiving top-up funding (with no EHC plan) potentially proceeding to statutory assessment
	B3 Gradually phase out the use of top-up funding for post-16 learners.	<ul style="list-style-type: none"> • Potential for phased removal • Short term investment in OAP guidance and materials and school support to improve inclusion 	<ul style="list-style-type: none"> • Many local authorities do not provide top-up funding for those without an EHCP and never have • This would have the most immediate and largest impact on current budget deficits 	<ul style="list-style-type: none"> • A short-term reduction in Council expenditure • The overall approach to SEND funding in Bristol becoming clearer and more obvious for schools and parents to navigate 	<ul style="list-style-type: none"> • Worse outcomes for CYP with SEN support that may develop into complex needs. • Stark rise in the number of children and young people with EHC plans and permanent exclusions, therefore costing more in the long-term.

4. Final recommendations and Implementation plan

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Final recommendations



Two main recommendations: 1) a new Targeted Support Fund (TSF); and 2) Outreach services

The Consultation surfaced the potential negative impact of removing non-statutory funding altogether. Indeed, research with other local authorities and emerging DfE evidence suggests that to attain long-term sustainability within SEND it is essential to invest in mainstream schools.

However, any investment must be effective. This project has demonstrated clearly that current non-statutory top-up funding arrangements are not effective enough at enabling schools to support SEN pupils who need additional support. It also does not work to improve the quality and consistency of school practice (ordinarily available provision, inclusion) overall.

We therefore proposed two main recommendations to reform the use of non-statutory top-up funding. These are designed to help the council and its school partners build the quality and consistency of OAP and inclusion in mainstream setting, and ultimately improve child outcomes.

1. Targeted Support Fund

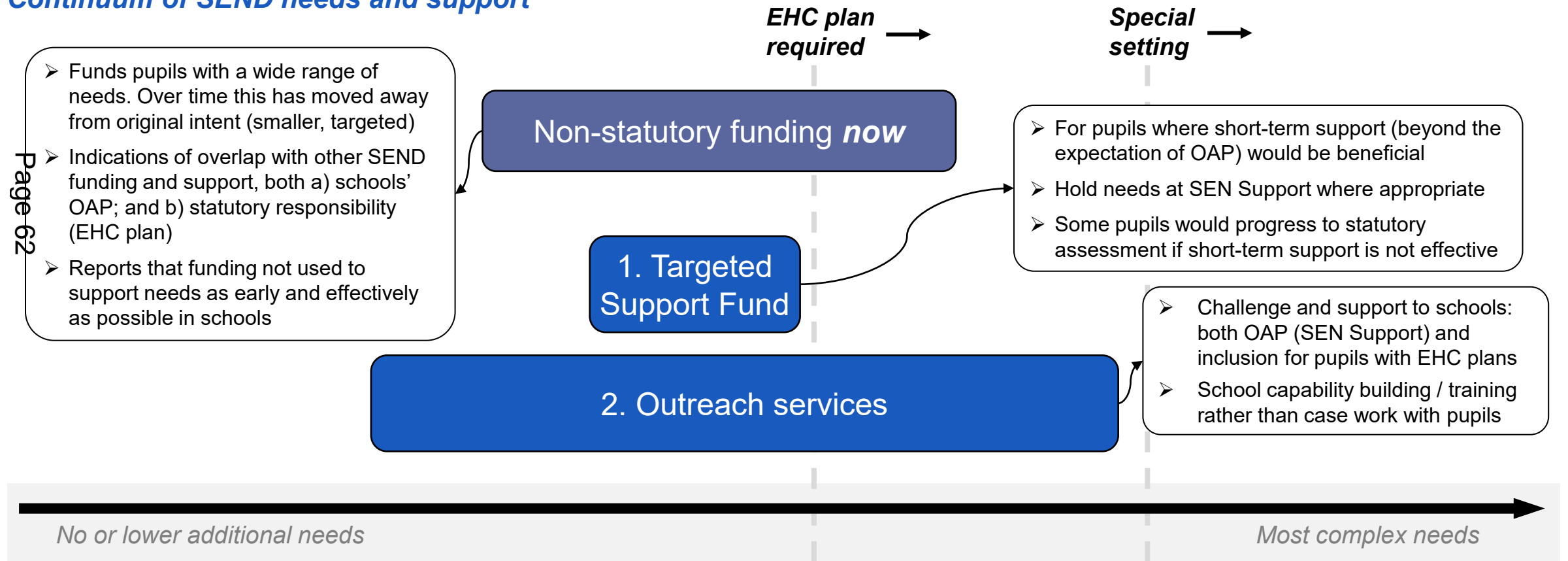
Additional top-up funding for SEN Support pupils, but smaller and more targeted than the current approach. Funding would be for time-limited interventions to address an emerging need early which is beyond what schools could be expected to support through their OAP.

2. Outreach services

Two new services to support mainstream schools to improve the quality and consistency of their OAP and inclusive practice overall. Specialist staff would provide both guidance/training but also challenge, emphasising capability building over direct work with pupils.

Summary: Outreach services improve overall school practice; with the TSF available when needed but more targeted and purposeful¹

Continuum of SEND needs and support



Recommendation 1: we propose using a proportion of current funding to create a Targeted Support Fund¹

<p>Overview: Create a more targeted fund for SEN Support pupils in mainstream settings. The process would look quite similar to now, although more streamlined and improved. The objective is to provide flexible, short-term funding for a group of pupils whose needs are beyond OAP in the short-term; but who with effective early intervention should not need to proceed to statutory assessment.</p>	
Funding type	Per-pupil funding based on individual applications from schools.
Process overview	Applications reviewed each term. Single decision-making panel and increased resource to manage and oversee process.
Eligibility	Detailed evidence required of several ‘plan, do, review’ cycles completed and need for timely, specialist intervention.
Funding	Total funding of c. £1,000,000 a year, with funding for individual pupils of one year. ²
Funding criteria	Funding application based on a costed support plan (informed by BUDs).
Governance / scrutiny	New specialist teacher roles support and challenge schools to use funding effectively.

Rationale

- Flexible non-statutory funding still provided to schools, but at a smaller scale and with much clearer strategic purpose
- Limited non-statutory funding used more effectively to support pupils early
- Much streamlined process reduces time required to manage process for both schools and the council
- Relatively straightforward to implement (i.e. in place from next year)
- Potential to target specific priority needs and parts of the system (e.g. emerging speech and language needs in primary, SEMH in older primary school children)

Note: tight budget management is essential; and longer-term, Bristol should aim to move away from pupil-level funding models

We propose that the Targeted Support Fund would receive a finite budget each academic year of £1m. Schools would apply for additional funding for individual pupils, in a similar process to now.

It should be noted, however, that there is an inherent risk in this kind of approach that over time schools apply for greater levels of funding than is available, leading to in-year overspend if applications are approved.

The council will therefore need to set clear expectations with schools from the outset about the kinds of applications that will be funded, and, importantly, that budgets will be fixed each year. The decision-making panel will also have to manage demand carefully and avoid approving too many applications early in the year to the detriment of later applicants.

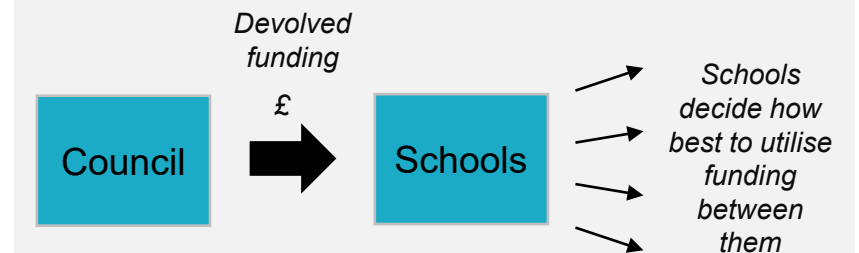
Over the longer-term, the council should therefore aim to move to a funding model that devolves funding and ownership to schools themselves. These kinds of approaches hand greater control and flexibility to schools themselves to invest in their own OAP. They are used effectively in some of the strongest and most resilient local authority areas.¹

These models cannot be transplanted directly, however. We suggest that significant groundwork would first be necessary in Bristol, including relationship building with school leaders and potentially forming local school clusters. But moving to this kind of devolved model for SEN Support pupils should be the long-term ambition.

Near-term: schools apply for additional funding for individual pupils



Medium to long-term: funding devolved to schools to invest in their own OAP



We also recommend commissioning two Outreach to build capability in schools to support SEN pupils

Overview: Bristol commissions two specialist outreach services to improve mainstream schools’ response to children with emerging speech, language and communication and social, emotional, and mental health needs. These services would focus on school and family training and capability building, though with some capacity for direct specialist intervention with pupils. High level details of the two services are as follows *[draft and subject to full co-design / commissioning process]*.

	SEMH Team	C&I Team
Staff numbers	c. 15-20 staff members across both services	
Contract size (pa)	c. £1,000,000 per annum	
Staff roles (indicative)	Team Lead, Specialist Teachers, District SENCO, Teaching Assts	Team Lead, Specialist Teachers, S&L Therapist, Teaching Assts
Commissioning approach	Council commissions services from external providers (e.g. third sector organisations or school consortiums). Services could be separate or a joint team.	

Rationale for outreach services

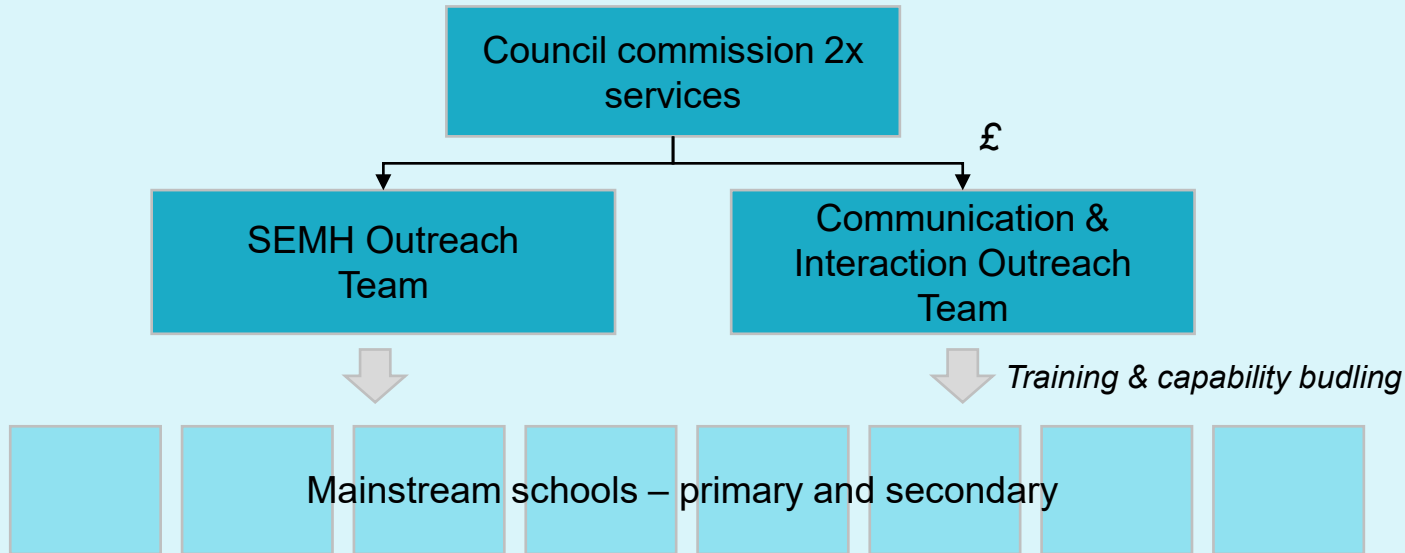
- The consultation signalled that severely reducing or removing non-statutory funding altogether could have a damaging impact on mainstream schools’ ability to provide effective OAP for pupils with additional needs in the near term
- Our wider stakeholder engagement found that the quality and consistency of OAP in Bristol is behind some parts of the country¹
- The Targeted Support Fund proposed above will not be able to drive wholesale improvements in school practice by itself
- Investing in school improvement, in the form of outreach services, is therefore also necessary to improve wider school and staff practice

Outreach services would target two areas of need (SLCN, SEMH) and prioritise school capability building

The great majority of pupils with SEND in mainstream schools who receive funded support (either via an EHC plan or non-stat top-up) have a primary need of ASD, SLCN, or SEMH (EHC plans: c. 75% of pupils; non-statutory: c. 80% of pupils).¹

We recommend that two Outreach services should be commissioned to improve school practice for pupils with these needs: i) Communication and Interaction, and ii) SEMH.

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Key considerations for service design

- Commissioning approach: Bristol could deliver services in-house instead of commissioning them externally, which has advantages in terms of ownership / control over staff. However, this might take longer to scale up and would not draw on local partners' expertise
- Responding to need: an inherent risk of outreach services is that, over time, they can shift away from their original purpose and do not respond directly enough to school needs. They must also remain networked and coordinated with other local services and support (e.g. school improvement, EP)
- Ongoing management: some council capacity would be required for close ongoing management of services to ensure they meeting school needs

Note: Post-16 would follow the Targeted Support Fund model, with support also available from SEMH Outreach service

As described in Section 2 above, there is a separate non-statutory funding process for Post-16 students. It experiences similar issues to the school-age Top-up panel, with similar stakeholder feedback coming through the Consultation.

We propose that Bristol eliminates the current separation between school-age and Post-16 approaches and that the Targeted Support Fund covers all learners aged 5-25. The funding model would be the same for Post-16: time-limited funding for students with an emerging need beyond what settings would reasonably be expected to support from their core budgets.¹

Initial testing of this recommendation (e.g. with the teams that operate both processes) has been positive, and access to Outreach to improve Post-16 provider practice is welcome. There are however some aspects of Post-16 that will not fully integrate with arrangements for school-age pupils, and which require more detailed exploration in the Implementation phase:

Areas TSF approach can be shared with Post-16

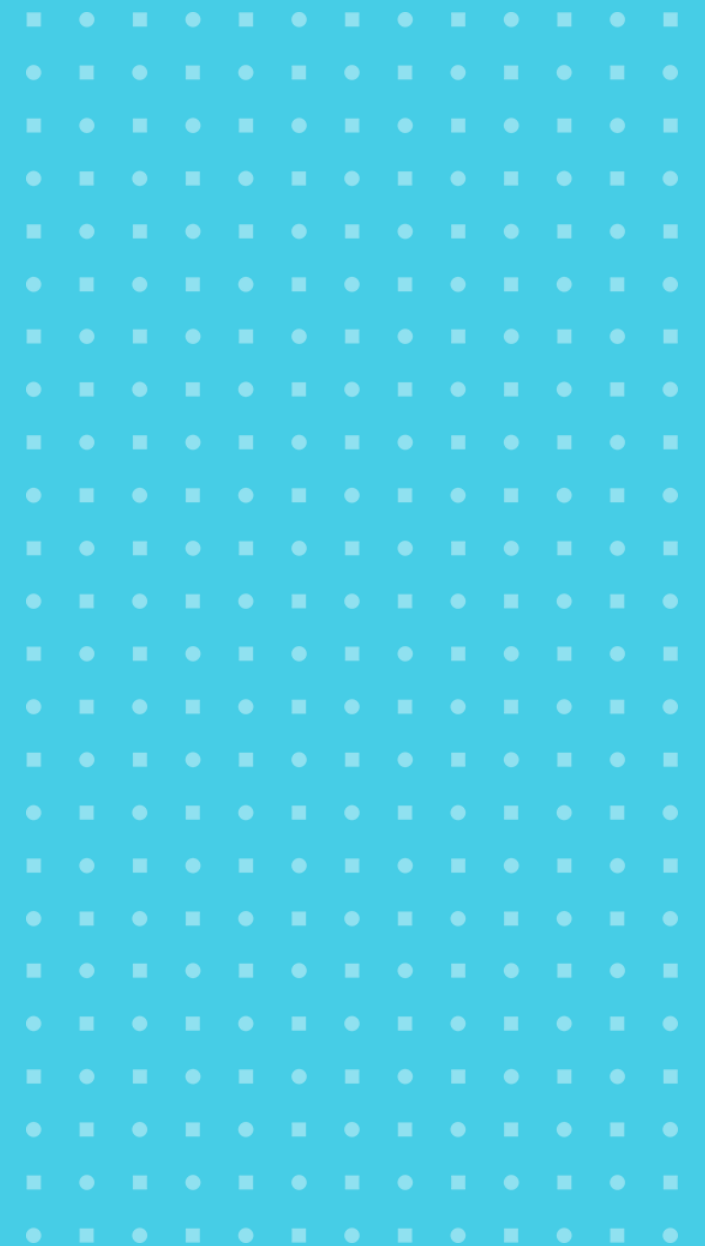
- Council staff that administer process
- Guidance and frameworks
- Application process and systems
- Governance and oversight
- School comms and training activities

Areas where a different approach may be required

- Panel timing – this is principally for the first panel of the academic year, since Post-16 students often confirm their courses / setting later in the autumn term than schools
- Panel composition

Implementation plan

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Implementation: summary

What	By When
Communicate consultation output and Cabinet decision. Move to 1-year maximum (non-statutory) funding allocation for remaining top-up panels in current format.	February 2024 Top-Up Panel (Current Format)
Co-designed new application/ allocation process and funding criteria for targeted support fund	End April 2024
Co-designed new Bristol Universal Descriptors (BUDs) to support statutory top-up standardisation	End May 2024
Pilot needs matrix and portal with partners; decisions on EHC needs assessment and funding made at single panel.	June 2024 Top-Up Panel (Current Format)
Go Live with new process for targeted support fund	September 2024 (& Nov 24 Panel)
Changes implemented from one year of ongoing refinement and review of the new process. Transition to Business as Usual	September 2025

Implementation approach

2023/24 (remaining 2 terms)

Prepare for implementation of new process in next school year

- Develop detailed documentation and guidance (e.g. processes, needs matrix) incl co-design ToR for and establish revised council management process
- Communication and relationship building with schools
- Any recruitment for additional scrutiny / support roles

Changes at remaining panels

- February 2024: Move to 1-year maximum (non-statutory) funding allocation
- June 2024: Pilot needs matrix and portal with partners; based on retrospective testing. Decisions on EHC needs assessment and funding made at single panel.

2024/25

Full roll out of new, streamlined approach to top-up funding

Overview: Bristol takes a proportion of the c. £5.5m current annual funding for non-statutory top-up and creates a smaller, more targeted fund. The process would look quite similar to now, although more streamlined and improved. The objective is to provide flexible, short-term funding for that smaller group of pupils whose needs are beyond OAP in the short-term; but who with effective early intervention do not need to proceed to statutory assessment.

Funding type	Per-pupil funding based on individual applications from schools.
Process overview	Applications reviewed each term. Single decision-making panel and increased resource to manage and oversee process.
Eligibility	Detailed evidence required that OAP / Element 2 funding exhausted and need for timely, specialist intervention.
Funding	Maximum of c £4.5k per pupil for up to a maximum of 6 terms/ 1 school year
Funding criteria	Funding application based on a costed support plan (informed by BUDs).
Governance / scrutiny	New specialist teacher roles support and challenge schools to use funding effectively.

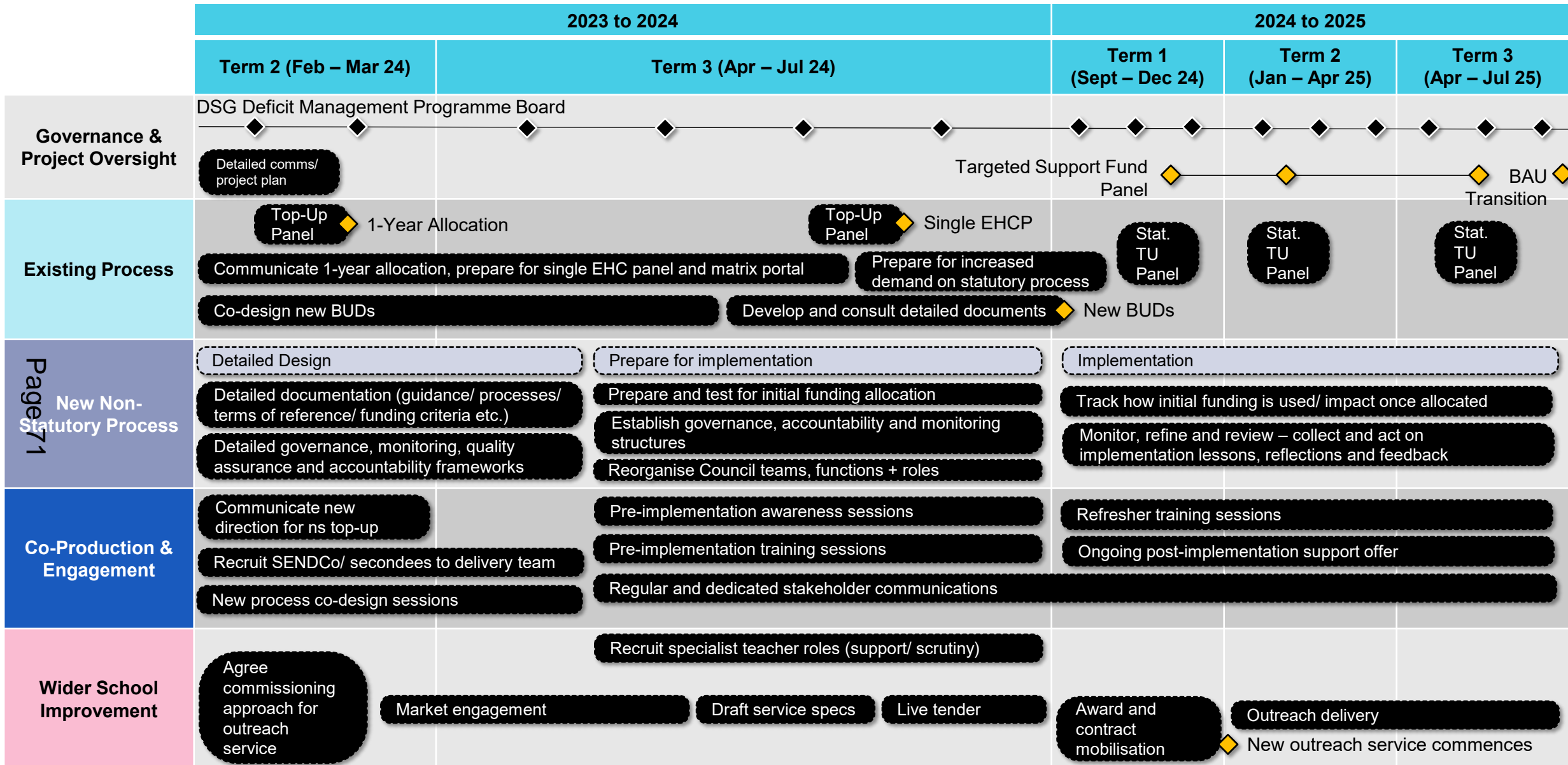
- Targeted Support Fund from start of school year
- Outreach services begin to deliver in-year
- Ongoing refinement and review

2025/26

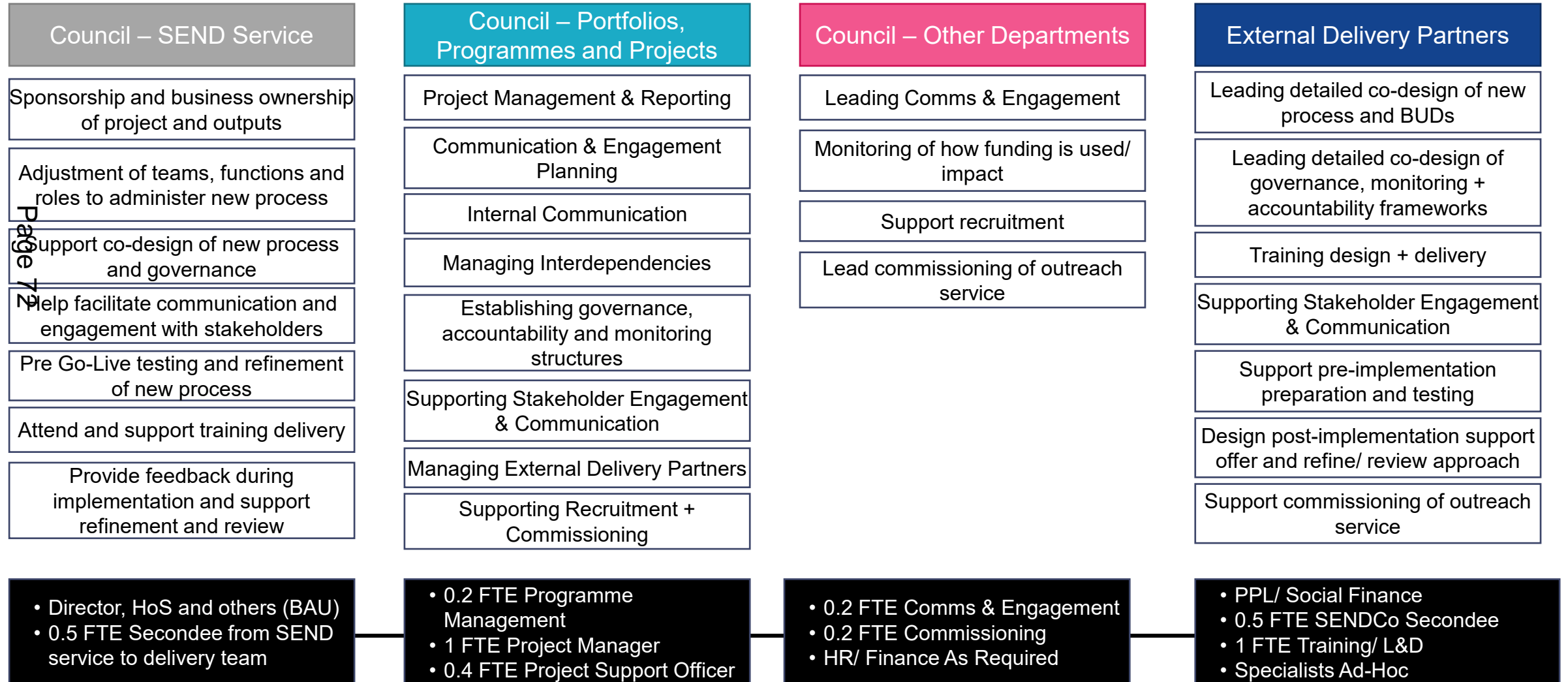
Transition to Business As Usual

- Consider medium term goal to transition to devolved funding

Implementation roadmap



Implementation resource, roles and responsibilities

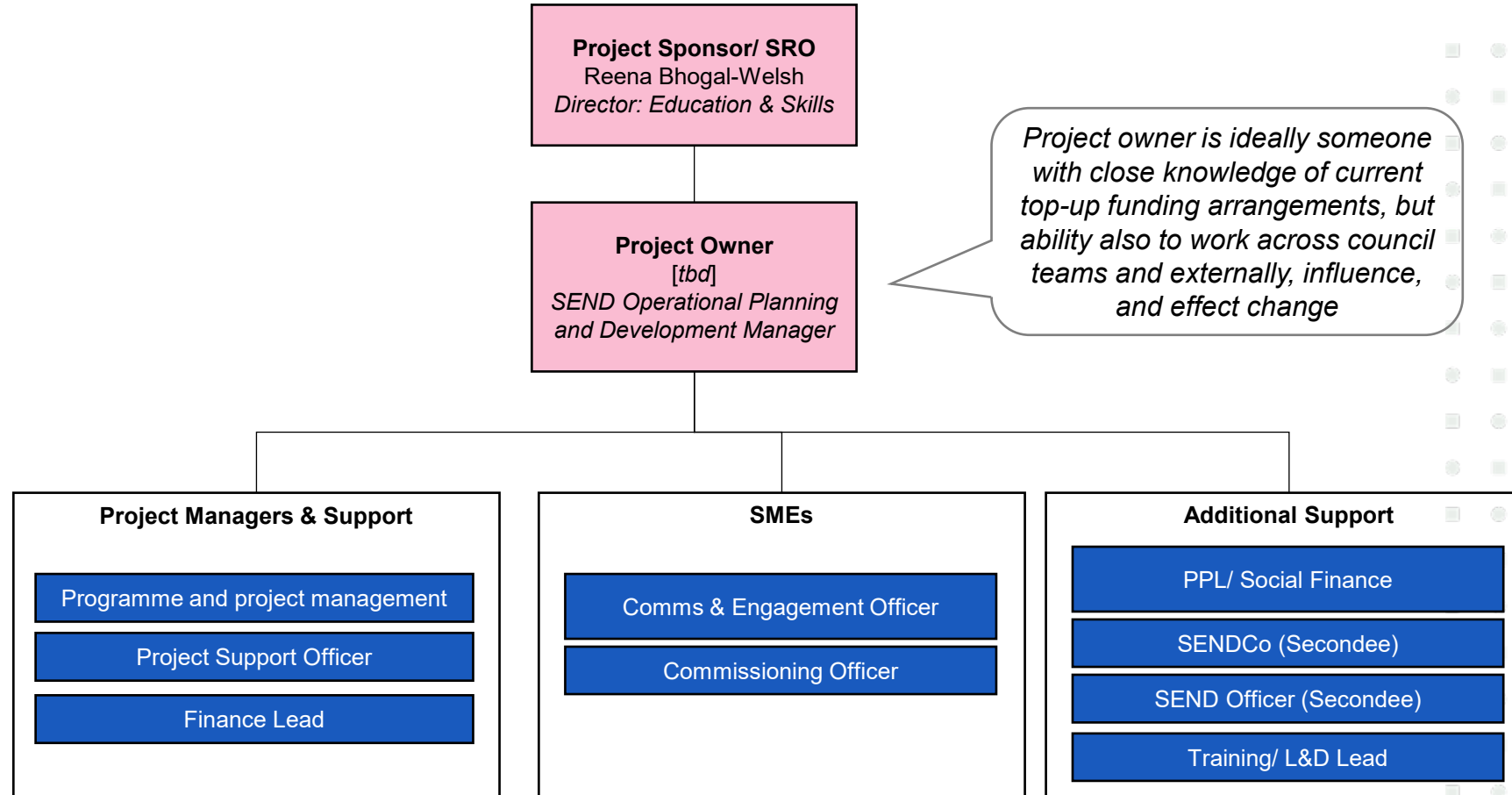


Implementation costs

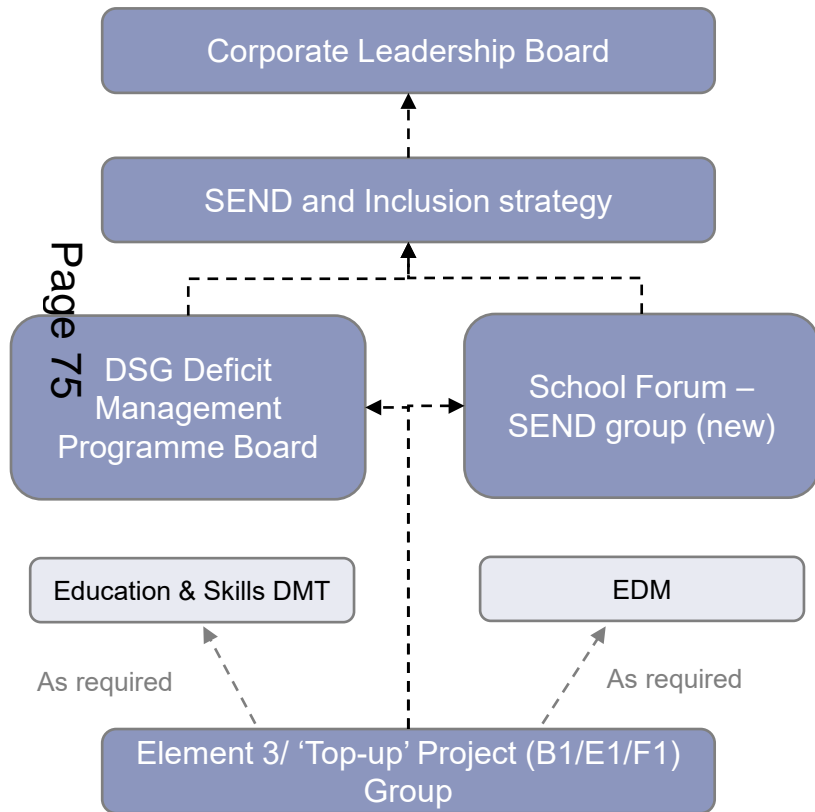
Role	% Role	Period	WTE	Assumed 1 WTE Cost	Project Cost
Director, HoS and others (BAU)	NA	Feb 24 – Jul 25	NA	NA	Nil
Seconded from SEND service to delivery team	50	Feb 24 – Aug 24	0.3	£60k	£18k
Programme Manager	20	Feb 24 – Jul 25	0.3	£60k	£18k
Project Manager	100	Feb 24 – Jul 25	1.5	£50k	£75k
Project Support Officer	40	Feb 24 – Jul 25	0.6	£40k	£24k
Comms & Engagement	20	Feb 24 – Aug 24	0.1	£50k	£5k
Commissioning	20	Feb 24 – Dec 24	0.2	£60k	£12k
HR/ Finance As Required	NA	Feb 24 – Jul 25	NA	NA	Nil
PPL/ Social Finance	NA	Feb 24 – Jul 24	NA	NA	£92k
SENDCo Seconded	50	Feb 24 – Jul 24	0.3	£45k	£14k
Training/ L&D	100	Feb 24 – Aug 24	0.6	£45k	£27k
Specialists Ad-Hoc	NA	Feb 24 – Jul 25	NA	NA	£10k
Total					£295k

Implementation delivery team

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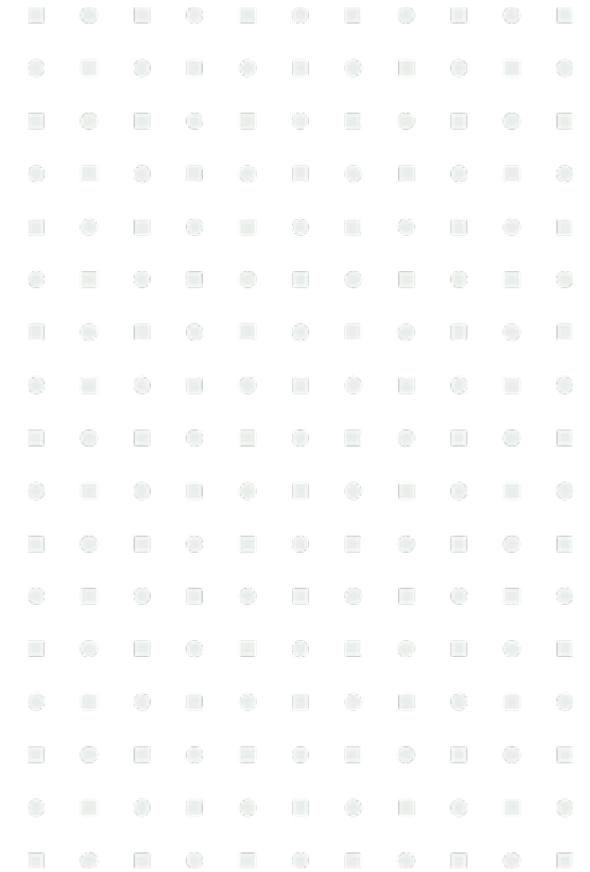
Implementation governance







Periodic updates at key decision points and as appropriate

Monthly. Key project highlights and risk/ issue escalation

Weekly/ fortnightly meeting of project team and owner. Key workstream updates, raising of risks and issues



Implementation risks

Risks	RAG	Mitigations
Schools remain disillusioned with a) the changes and b) the quick process for implementing them		Dedicated workstream around relationship building with schools, to build alignment and understanding of shared system wide pressures and rationale for changes. Additional support and guidance on OAP and eligibility criteria should support wider inclusion efforts.
Amount of early intervention funding is insufficient		First year will be a pilot phase, providing BCC and stakeholders space to reflect on the success of the fund
Rise in EHCPs and costs from reduced non-stat funding available		The modelling already assumes and figures presented includes a % of young people on non-stat funding moving to EHCPs, providing a relatively conservative estimate of the potential savings from these changes.
The process to implement changes takes longer than anticipated		Best practice research identified changes require 6months-1year of design, before any trialing can begin. The proposed plan is ambitious. However, with sufficient dedicated internal staff as proposed in the delivery team; there will be the additional capacity drive the programme forward.

Considerations / impact

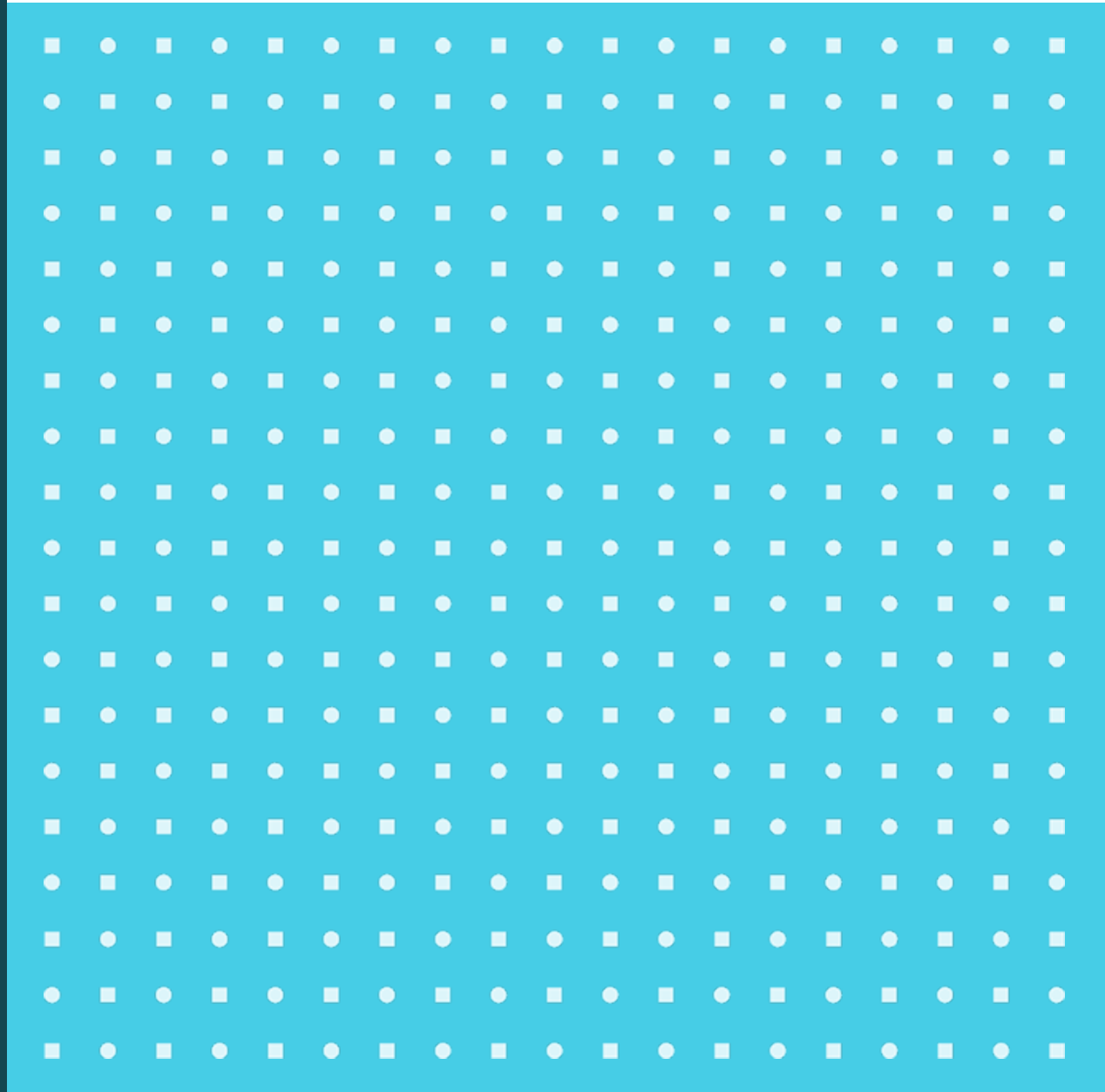
Impact Area	Impact	Further considerations
Council staff capacity	Teams will have increased capacity to administer the process efficiently and in line with statutory deadlines	Which roles are required? Which level of seniority and experience is needed? To be worked through in detailed design.
Council staff capability	Training on the revised approach will ensure everyone fully understands the process. Repeating the training at regular intervals will maintain knowledge, confidence and understanding across the council.	
SENCO capacity	<ul style="list-style-type: none"> ➤ Clearer top-up funding guidance and resources will speed up the time it takes to prepare an application ➤ Applications for targeted support fund will be shorter, taking up less SENCo time than a regular top up funding application 	
SENCO capability	<ul style="list-style-type: none"> ➤ Clearer top up funding guidance and processes will ensure all SENCos, including new SENCos, understand expectations and responsibility for submitting applications and participating on panels 	
Children and Young People	<ul style="list-style-type: none"> ➤ Clearer guidance and expectations on schools will increase inclusivity 	<ul style="list-style-type: none"> ➤ What is the decision making process for requesting and approving non-stat or EHCP funding if short term funding is deemed inefficient/ineffective due to escalating or change in needs. To be worked through in detailed design.
EHCP volume	<ul style="list-style-type: none"> ➤ Although Non-Stat funding will remain, if there is any confusion amongst school staff this may result in an increase in EHCPs 	

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Interdependencies

Project/ Activity	Management
DBV Workstream 1 Pilot programme to improve the experience of children with SEND in mainstream education. Aim of the trial is to create an eco-system of inclusive Bristol schools to act as inclusion champions, provide peer-to-peer support, disseminate learning; and model best practice	<ul style="list-style-type: none">Factor in learning from workstream 1 into “Wider School Improvement” workstream of this project
SEND Placement Sufficiency Review	<ul style="list-style-type: none">Factor outputs and plans from this work as required
Digital EHCP Process (PwC) New web forms/ content on local offer site/ robotic process automation	<ul style="list-style-type: none">Ensure alignment when making the updates to the statutory process e.g. single panelEnsure this work supports wider school improvement workstream
New Operating Model	<ul style="list-style-type: none">Confirm additional specialist teacher rolesEnsure the new operating model has the capability and capacity to administer the new targeted support fund, associated governance and monitoring mechanisms; as well as the potential increased demand on the statutory process
Other Schemes within the Deficit Management Plan	<ul style="list-style-type: none">Manage as relevant at the DSG Deficit Management Programme Board

5. Other key learnings and recommendations



Other ongoing improvements are likely required alongside our two main recommendations to attain long-term sustainability

The two main recommendations above can improve inclusion and help manage future demand. However, they will not create a fully sustainable mainstream school system by themselves. To achieve this, we suggest that three wider changes (to relationships, culture, practice, and systems/processes) that are also necessary to re-centre the whole SEND system towards early intervention and inclusion, and to make the most of the proposed changes to top-up funding.

It should be noted that there are already activities either planned or underway to achieve these things. We want to lend weight to these and propose that the council ‘doubles down’ in these areas to achieve success.

1. Refresh and prioritise support/guidance to improve ordinarily available provision

Revisit and refresh the council’s guidance around OAP and the Graduated Response and invest in greater capacity to train, support, and hold schools to account to ensure it is implemented consistently across the city.

2. Build relationships with school leaders

A fully sustainable SEND system requires *all* schools to be pulling in the same direction (e.g. mainstream inclusion, consistent OAP). This starts with building a mature understanding of the shared nature of high needs funding and the need to act together to meet challenges.

3. Scrutiny and stewardship of the SEND system

Statutory SEND frameworks can sometimes encourage an overly ‘atomised’ approach to meeting needs. Overarching oversight and stewardship of the system is also required to ensure that different teams, settings, and parts of the system are working in unison and as intended.

1. Refresh and prioritise support/guidance to improve ordinarily available provision

OAP in Bristol is implemented neither properly nor consistently, and the council has inadequate procedures to check this in application before funding is awarded.

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Details	What we heard	Recommendations	How this will support successful implementation of changes to the system
<ul style="list-style-type: none"> There is a lack of shared understanding around Bristol's model of inclusion and education settings apply OAP (i.e. Element 2) inconsistently. Some schools in Bristol are very inclusive and demonstrate strong OAP and Graduated Response whilst other schools are unable to, or do not attempt the full range of OAP before applying for additional funding. This inconsistency leads to inequitable opportunities for children and young people across Bristol, as well as poor relationships between schools There is limited guidance on how to apply OAP to standardize approaches across settings and ensure compliance. This leads to confusion among education settings 	<p><i>'Lots of top up applications are turned down for not being considered above what should be ordinarily provided. But because schools are underfunded in the first place, we can't offer that ordinarily available provision consistently'</i> (SENCO)</p> <p><i>'I've just moved my daughter from one school to another and the difference in SEN support has been incredible'</i> (Parent/carer)</p> <p><i>'I think there's a lot of work to do around what OAP means for schools'</i> (LA staff)</p>	<ul style="list-style-type: none"> Bristol should revisit its approach to OAP and develop a comprehensive and cohesive package of guidance around OAP for schools. Bristol should procure or develop training for schools to implement OAP guidance and enable all staff to better support children and young people with SEND. Bristol should procure specialist support for schools (i.e. more LSAs) to encourage inclusion and early intervention for children and young people with low level needs. 	<ul style="list-style-type: none"> All education settings and the council will have a shared understanding and clear view on how OAP is implemented. This will ensure that expectations are aligned in terms of the provision that all children and young people in Bristol receive, before schools apply for top-up funding. If education settings implement OAP properly, low-level needs may be addressed sooner, thereby achieving earlier intervention and inclusion and reducing the need for schools to apply for top-up funding. With more specialised support, schools will be able to provide relevant provision to children and young people There will be more consistency in provision available in all schools, thereby increasing equitable opportunities for all children and young people across Bristol to receive the benefits of OAP.

2. Build relationships with school leaders

There is currently weak partnership across all stakeholders in Bristol. In particular, schools have become disengaged with the council.

Details	What we heard	Recommendations	How this will support successful implementation of changes to the system
<p>Page 82</p> <ul style="list-style-type: none"> Some distrust and tensions between stakeholder groups in Bristol has developed; between individual/clusters of schools; schools and parents/carers; schools and the LA; the LA and parents/carers. This results in stakeholders pulling in different directions and a lack of a single, clear vision for inclusion Funding and decision-making can be siloed across different parts of the SEND system. This can affect relationships between schools and the council, as well inconsistent communication to parents/carers. 	<p><i>'there are some schools that are playing the system, though likely with good intentions to support children and young people, but it isn't fair.'</i> (Headteacher)</p> <p><i>'I have never been told what process the school goes through to receive top-up funding. I feel I have to advocate myself on behalf of my child'</i> (Parent/carer)</p> <p><i>'it's clearly worrying if schools think that the local authority has an infinite pot of money to offer for support'</i> (LA staff)</p>	<ul style="list-style-type: none"> The council should invest time in building trust and strengthening relationships with schools. There needs to be space for open and transparent communication to ensure alignment, consistency and clarity of service offer to children and young people. There should be a consistent channel of communication between the council and schools. The council and Bristol schools must take the time to come together to create a shared vision and approach. All stakeholders need to be pulling in the same direction around high needs funding to achieve the best outcomes for CYP and for inclusion to be a reality. This vision needs to include the voices of parents/carers and be communicated clearly to ensure that relationships improve and that the system, as a whole, is joined up. 	<ul style="list-style-type: none"> Trust and strong communication will enable positive working relations between all stakeholders in Bristol exist. Education settings, parents/carers and the local authority should be starting from the same place in order for lasting change to take place. Greater accountability and responsibility from all stakeholders for implementing changes to the system. This will make clear the shared nature of current challenges – rising demand for support – and build buy-in for a common response.

3. Scrutiny and stewardship of the SEND system

The council currently is overly focused on carrying its statutory duties (assess/ review EHC plans) at the expense of actively stewarding schools and monitoring where and how money is being spent.

Details	What we heard	Recommendations	How this will support successful implementation of changes to the system
<p>Page 83</p> <ul style="list-style-type: none"> There is a lack of monitoring how top-up funding is being spent and a lack of accountability on schools to demonstrate outcomes. The council is unable to show whether funding is having the intended impact. There is no annual review for non-statutory top-up funding. This is in contrast to EHC plan annual reviews, granting non-statutory top-up more freedom and less control on expenditure. In some cases, payments are being made to schools where the pupil is no longer attending the school. This creates an administrative burden to claw back over payments The strategic purpose of different funding routes has slipped over time due to a lack of capacity for oversight and stewardship. 	<p><i>“first things first, every penny of your high needs spend needs real scrutiny”</i> (Head of SEND at other local authority)</p> <p><i>“I think for me part of the issue is that we appear to give this money over to schools, but we’re not really 100% sure that it makes any difference”</i> (LA staff)</p> <p><i>“I was surprised that there was just three SENCOs on the panel, with no checks or balances from LA staff.”</i> (SENCO)</p>	<ul style="list-style-type: none"> Introduce greater resource at all levels including analytical resource and senior leadership is required to ensure accurate data entry and QA. This could include a SEND Commissioning or Partnership lead to steward the system e.g. ensure consistent practice, QA use of outreach services to ensure it responds to actual and changing needs over time Introduce regular review for all funding allocations, including any non-statutory allocations. Develop and implement an effective approach to outcomes measurement for education settings to be held accountable to. 	<ul style="list-style-type: none"> All stakeholders will have a better understanding of ‘what works’ for children and young people with SEND to inform future commissioning decisions If education settings are held accountable for the way that top-up funding is spent, it will encourage them to provide the best possible support, for the best-value, thereby improving outcomes for children and young people with SEND. Greater capacity for stewarding the complex SEND system overall, to ensure it functions as intended

Thank you

|
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Social Finance is a non-profit organisation, working with government and its social sector partners to create widespread and lasting change for people and communities.

Our mission to create more inclusive education and help partners deliver earlier support for children and young people with additional needs.

PPL is a social enterprise that exists to promote better health, wellbeing and economic outcomes across the UK working with individuals, communities and the organisations that support them.

We believe that every child and young person should have equal opportunities to enjoy their time at school, to learn and progress, and to participate fully in society post-education.





Consultation and Engagement

Bristol's SEND top-up Consultation Report 2024



Produced by Social Finance and PPL

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1 Introduction

Bristol City Council is reviewing the way it and local partners use high needs funding for children and young people with special educational needs disabilities (SEND), in order to achieve long-term sustainability and improve outcomes.

Bristol receives a fixed budget each year, (the high needs budget or 'High Needs Block' or HNB) from the Department for Education (DfE) to support children and young people with SEND who require more support than what is ordinarily available in school. The total amount of HNB budget available in 2022/23 was £78.5m. Some of the HNB (also referred to as 'Element 3' funding) is used for top-up funding – this equated to £49.5m in 2022/23 or 63 percent of the HNB.

Top-up funding is one element of the support available for children and young people with SEND in Bristol. It provides a school with additional funds to meet the needs of children and young people with SEND over and above the funding the school receives in its core budget (Element 1 and Element 2 funding). Bristol City Council and school partners decide how this top-up funding is allocated through a process which involves education settings applying for funding for individual pupils by demonstrating the needs of a child or young person and the necessary spend to meet those needs.

Bristol City Council, education settings, and other local partners need to change the way this funding is used to improve outcomes for children and young people with SEND and to ensure the SEND system is sustainable for the future.

In August 2023, the council commissioned a review of current approaches to using high needs funding to understand what the challenges are and to identify opportunities to improve it. The focus of the review, and this consultation, is top-up funding specifically. This includes children and young people who receive top-up funding both with and without an education, health, and care (EHC) plan, in mainstream and in special settings, for school age pupils and young people in post-16 education.

The scope has also included a high-level review into Bristol's banding systems, known as BUDs (Bristol Universal Descriptors) and a comparison into banding systems used across England.

2 Executive summary

2.1 Overview

This report summarises the findings from the consultation, including both the survey and Information and Engagement sessions.

For both school age and post-16 education settings, respondents (to the survey) and participants (in the Information and Engagement sessions) were asked to consider three different options:

1. **A1 for school age, B1 for post-16** retain the top-up funding process for children and young people without EHC plans but make improvements to make the system more streamlined and consistent.
2. **A2/B2** create a targeted early intervention fund for mainstream schools for children and young people that do not have an EHC plan
3. **A3/B3** phase out top-up funding for those without an EHC plan

For BUDs, respondents and participants were asked to respond to a number of statements and provide any thoughts they may have in order to inform a future review of the banding and BUDs system, rather than presented with options.

2.2 School age

A1 is the most popular option, receiving support from more than three quarters of survey respondents. A2 also receives support from a majority of respondents, though with a smaller proportion who 'strongly agree'. There is strong opposition to A3 – more than three quarters of respondents indicate that they do not support this option.

Survey respondents are generally supportive of the need for a faster, more streamlined process which reduces pressure on school staff. Option A1 is seen as providing the greatest support for those without an EHC plan and being the most inclusive option. However, there are concerns about whether savings could be realised or if this is a financially sustainable model.

Respondents and participants support the principle of early intervention and feel it could reduce pressure on school staff, as well as bring financial benefits by reducing long-term costs. However, there are some concerns around whether there would be sufficient funding available under A2, whether the funding would reach all the people who need it, and how the use of the funding could be monitored.

There is majority opposition to option A3 on the grounds that it would lead to more EHC needs assessments, longer wait times, increased workload for school and council staff and would negatively impact on children and young people with SEND, leading to an increase in unmet need. There is a recognition that A3 would bring financial benefits, but these are not seen to outweigh the wider disadvantages.

2.3 Post-16

Fewer survey respondents respond to both the quantitative and qualitative questions for post-16, with some saying that they do not work in this setting or do not feel qualified to comment. However, amongst those who do comment, sentiments broadly reflect those expressed in relation to the school age proposals.

B1 is the only option which receives support from the majority of respondents, although B2 receives support from more than 40 per cent. B3 is strongly opposed, with the majority of respondents stating that they disagree with this option. The number of respondents

selecting 'neither agree nor disagree' is much larger than in the school age section of the survey.

Less than a quarter of respondents provide qualitative feedback but those who do generally stress the need to support post-16 learners. B2 is seen as a potentially inclusive option, but there also concerns about how it might work for those who require individual support. B3 is strongly opposed once more, with concerns around whether learners would be sufficiently supported, as well as suggestions that EHCP applications would increase.

2.4 BUDs

There is general agreement that the BUDs require updating. The respective banding system is not seen to be representative of the costs of implementing support and survey respondents feel that the BUDs are applied inconsistently. Respondents and participants also say that not all children are well served by the descriptors (with specific concerns raised around those with multiple or complex needs) and say that they lead to children and young people being 'pigeonholed' into 'neat boxes'.

However, respondents are split on whether BUDs should be retained or replaced, and a small number say that they feel descriptors help to ensure consistency. Nonetheless, they feel the system should be simplified and aligned with Ordinarily Available Provision (OAP), annual review processes and other ongoing changes without Bristol's SEND system.

Suggestions include:

- multiple lower needs leading to a higher banding
- consistent and clear costs that reflect the real cost of provision
- person-centred rather than deficit-based or risk-based approach to assessing need
- consultation with practitioners and engagement with multi-academy trusts ahead of any changes
- provision mapping to identify groups with similar needs and ensure more cost effective provision.

3 Methodology

3.1 Survey

Prior to the design of the survey summarised in this report, we conducted extensive research and engagement to understand the situation and develop potential alternative options for using top-up funding. For example, we conducted 61 interviews across a wide range of stakeholders, including council officers, education professionals (such as Headteachers and SENCOs) from a range of different settings (e.g., primary, secondary and post-16) and health and social care professionals. We also researched good practice in other local authorities to establish alternative funding options, understand broader practice within the council SEND teams, and to ascertain which local authorities are strongest in the SEND provision. We conducted in-depth analysis into recent trends in needs and funding and analysed public and Bristol City Council data sets from the past four years.

Following on from this research, in this survey we presented options for using top-up funding differently, covering both the process for allocating funds and how they are used in schools. Options were presented separately for those of school age (primary and secondary school age) and post-16. In this survey we did not propose changes to how we fund education for children and young people who have an EHC plan. But we did propose changes to how we provide top up funding to schools and colleges for children who do have SEND, but do not have an EHC plan.

We sought feedback on the options, including their likely impact on children and young people and education settings, and their ability to help achieve sustainability over the long-term.

The SEND top-up consultation was available on the council's [Consultation and Engagement Hub](#) between 1 November and 13 December 2023.

From November 15th, Easy Read formats (a WCAG 2.1-compliant version and an interactive PDF version) were also available on the Consultation and Engagement Hub, and responses via Easy Read were accepted until 27 December 2023.

3.2 Information and Engagement sessions

A series of Information and Engagement sessions ran alongside the survey in order to hear the views of as many stakeholders as possible.

Separate sessions were run for different groups and there were 58 attendees across the 14 sessions below:

- 2 x council staff sessions
- 5 x school staff sessions
- 4 x parents / carer sessions
- 2 x governor sessions
- 1 x children and young people with SEN support session (facilitated by WECIL)

These sessions allowed us to widen the accessibility of our survey and to gather as much qualitative feedback as possible.

Participants in the sessions were also encouraged to complete the online survey.

3.3 Analysis

Closed questions

For all of the closed questions in the survey, data was aggregated and presented for respondents as a whole, but also by various stakeholder groups. See Section 4.3 for more on how stakeholder groups were categorised.

Open questions

For all of the open questions in the survey, data was collated and reviewed by analysts who applied a thematic coding framework. This framework was devised using an approach based in grounded theory (meaning it was driven by the data received) and was iterated throughout the analysis as required.

Information and Engagement sessions

The Information and Engagement session discussions were recorded, and the transcripts summarised. The notes generated through this process were then subject to the same analysis as the open questions from the survey using the same coding framework.

3.4 Reporting

This report is intended to provide a summary of the feedback provided by survey respondents and Information and Engagement session participants. There are a number of considerations which should be borne in mind when reading the report.

Reading the report

Responses have been summarised in the present tense. This is because, although the survey and Information and Engagement sessions were conducted in the past, it is assumed that the views expressed are the views held at the current time by those respondents or participants.

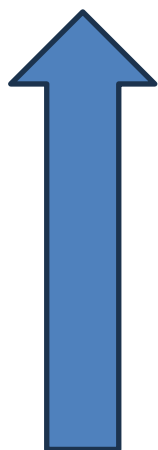
Limitations of the report

This consultation was open to anybody who chose to participate and is therefore a self-selecting sample. The findings cannot be held to be representative of the views held by a wider population and do not constitute a representative sample. However, attempts were made to ensure that the survey and Information and Engagement sessions were available and promoted to all relevant stakeholders within Bristol.

Use of percentages

Throughout the report, percentages given are of the whole relevant population unless otherwise stated. For example, in charts illustrating closed question responses, the percentages given are of all teachers and school staff who responded to the survey (including those who did not answer the question). This is because there was no 'don't know' or other similar option for the closed questions, so it is assumed that respondents who did not answer these questions did so knowingly and deliberately and must therefore be represented in the percentages stated.

Use of quantifiers



Vast majority

Most

A majority

Many

Several

Some

A few

A small number

For closed questions, numeric quantifiers are used – either a whole number or a percentage of respondents.

However, due to the nature of qualitative analysis and the subjectivity of the analysis process, the open text questions and Information and Engagement session discussions have been summarised using verbal quantifiers. These give an indication of the weight of sentiment without necessarily using number or percentages to do so. The spectrum of quantifiers used is shown here, ranging from ‘vast majority’ (the largest quantifier) to ‘a small number’ (the smallest).

Glossary

This report uses a number of acronyms which are summarised below.

ADHD	Attention Deficit Hyperactivity Disorder
ASD	Autism Spectrum Disorder
EBSA	Emotionally-Based School Avoidance
EHCP	Education and Health Care Plan
ELSA	Emotional Literacy Support Assistants
EOTAS	Education Otherwise Than At School
EP	Educational Psychologist
NEET	Not in Education, Employment or Training
OAP	Ordinarily Available Provision
SALT	Speech And Language Therapist
SENCO	Special Educational Needs and/or Disabilities Coordinator
VI	Visual Impairment

4 Survey response rate and respondent characteristics

4.1 Response rate to the survey

The SEND Top-up 2023/24 consultation survey received 196 responses, all of which were completed online.

The response rate and respondent details in sections 3.2 to 3.3 below are for respondents to the survey.

4.2 Geographic distribution of survey responses

Survey respondents were from the following postcodes:

Local Authority area	Responses
Bristol City	130 (66 per cent)
South Gloucestershire	5 (3 per cent)
North Somerset	4 (2 per cent)
Bath & North East Somerset	1 (0.5 per cent)
Unspecified locations within the four West of England authorities	5 (3 per cent)
Unidentifiable location	6 (3 per cent)
Did not provide postcode	45 (23 per cent)
Total	196

4.3 Stakeholder groups

Respondents were asked in the survey if they were interested in the top-up funding consultation because they were a:

- parent/carer of children or young person with SEND
- teachers, headteachers, SENDCO's and education professionals working with children or young people with SEND
- local authority staff working in SEND
- child or young person with SEND
- other:

The survey received responses as follows:

Respondent type	Responses
Parent/carer of children or young person with SEND	51

Teachers, Headteachers and Special Education Needs Coordinators (SENCO's) working with children or young people with SEND	69
Local Authority Staff Member working in SEND	25
Child or young person with SEND	1 ¹
All other responses	50
Total	196

However, although the question asked respondents to 'click all that apply', respondents reported that this was not possible, and this led some to describe their interest in the 'Other' open text response box. Others described variants on the existing categories in the 'Other' box rather than selecting the closest category. It was therefore decided to re-categorise these responses from 'Other' to a more appropriate category wherever possible.

For example, if someone in the 'Other' open text box had stated that they were a parent of a child with SEND or of an adult who previously had SEND needs at school then these responses were recategorized to 'Parent/carer of children or young person with SEND'.

School or college governors were categorised as 'Teachers, Headteachers and Special Education Needs Coordinators (SENCO's) working with children or young people with SEND' on the basis that they represent the perspective of their school or college.

Where respondents stated that they fitted into more than one category, the category mentioned first in their response has been taken to be their primary category to ensure consistency across all respondents.

Once this approach was applied, this led to the following response volumes:

Respondent type	Responses
Parent/carer of children or young person with SEND	57
Teachers, Headteachers and Special Education Needs Coordinators (SENCO's) working with children or young people with SEND	97
Local Authority Staff Member working in SEND	33
Child or young person with SEND	1 ²
All other responses	8
Total	196

¹ This single response was submitted as a collation of feedback collected from 8 children or young people with SEND.

² See previous comment

5 Survey results: School age

5.1 Overview

Three options were presented as part of the consultation for school age children. These options were:

Option A1 – Retain the top-up funding process for children and young people without EHC plans but make improvements to make the system more streamlined and consistent.

Option A2 – Re-purpose a proportion of the funding currently being spent on top-up funding for children and young people that do not have an EHC plan to create a targeted early intervention fund for mainstream schools.

Option A3 – Gradually phase out the use of top-up funding for children and young people who do not have an EHC plan.

For each of these options, survey respondents were asked:

Do you agree or disagree with this change?

This was a closed question with a five-point Likert scale of responses ranging from ‘Strongly agree’ to ‘Strongly disagree’.

Across both the survey and Information and Engagement sessions, Option A1 is the most popular option. In the survey it receives support (‘Strongly agree’ or ‘agree’) from more than three quarters of respondents. Option A2 also receives support from the majority of respondents. Option A3 is strongly opposed, with more than three quarters of respondents indicating that they do not support this option.

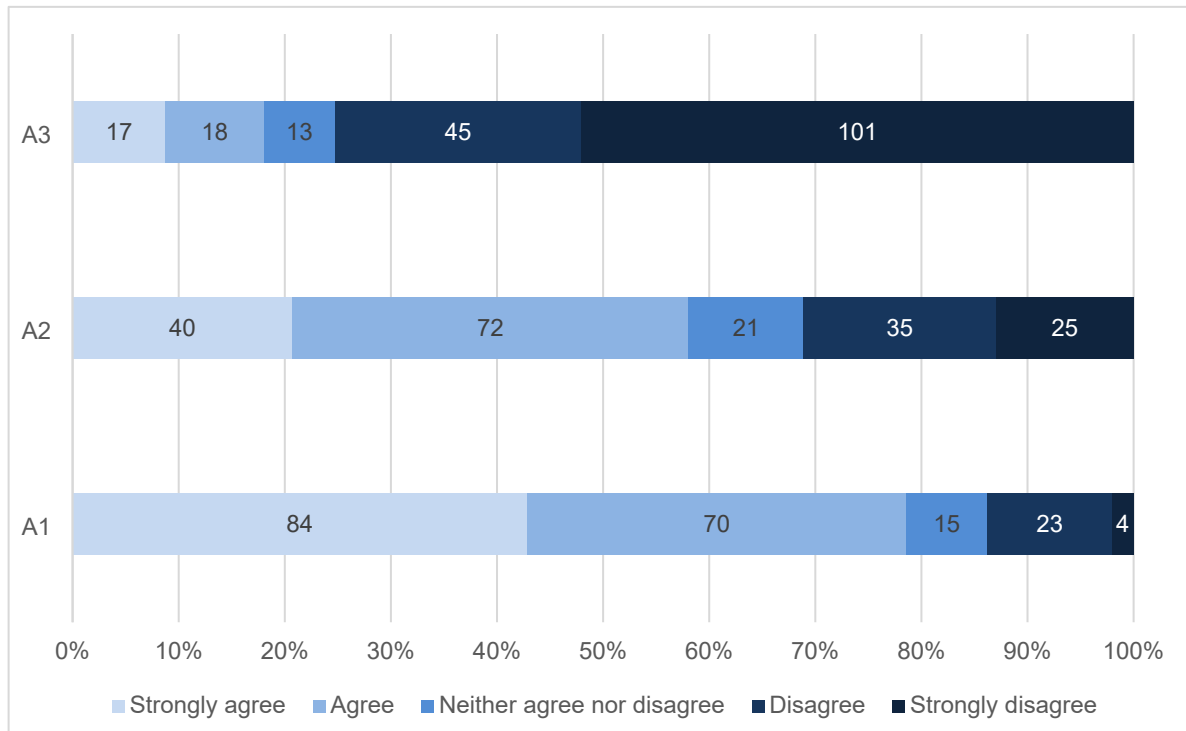


Figure 1: ‘Do you agree or disagree with this change?’ for options A1, A2 and A3

This is broadly reflected across the different stakeholder groups – these details are broken down in the closed question summaries for each option.

When asked about the potential impact of the various proposals on staff capacity, Option A1 is once again the most widely supported, although both A1 and A2 are viewed slightly less positively than the overall sentiment in Figure 1.

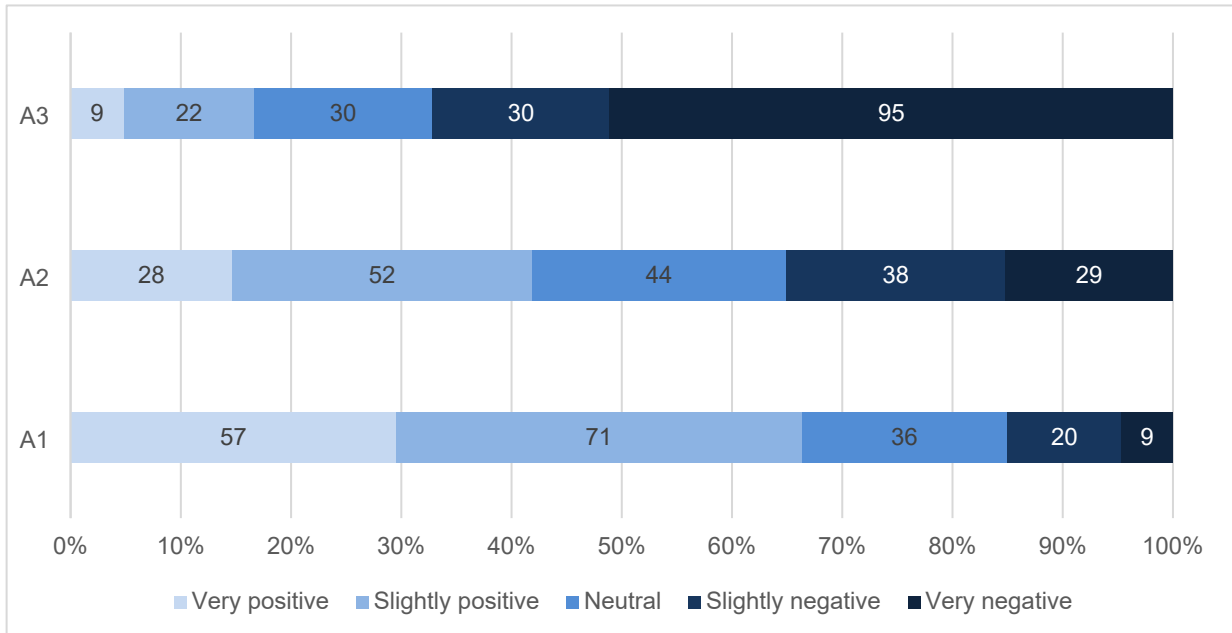


Figure 2: 'What do you anticipate to be the impact of this proposal on the following?' for options A1, A2 and A3

In terms of the possible impact on council finances, positive sentiment is spread more evenly across the three options. A2 attracts the greatest overall positive response, but A3 has a larger proportion of strong agreement.

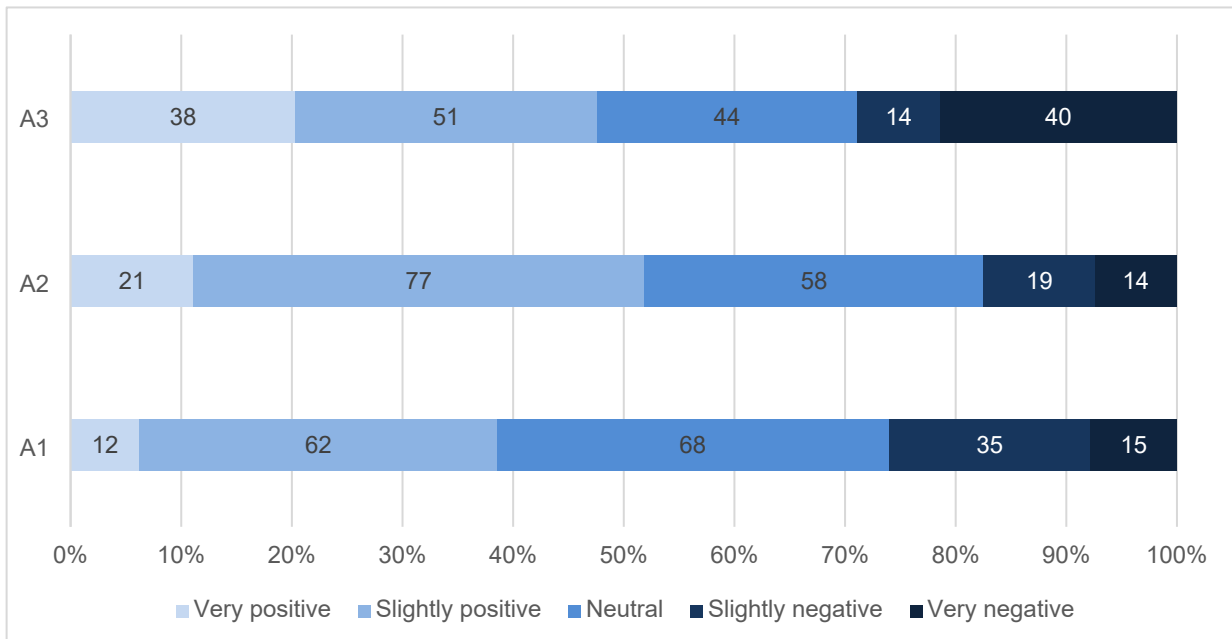


Figure 3: What do you anticipate to be the impact of this proposal on the council's SEND finances?' for options A1, A2 and A3

However, most respondents feel that A3 will have a negative impact on inclusion, with more than 65 per cent of respondents saying that they think it would have a 'very negative' effect and less than 10 per cent suggesting it would have a positive effect.

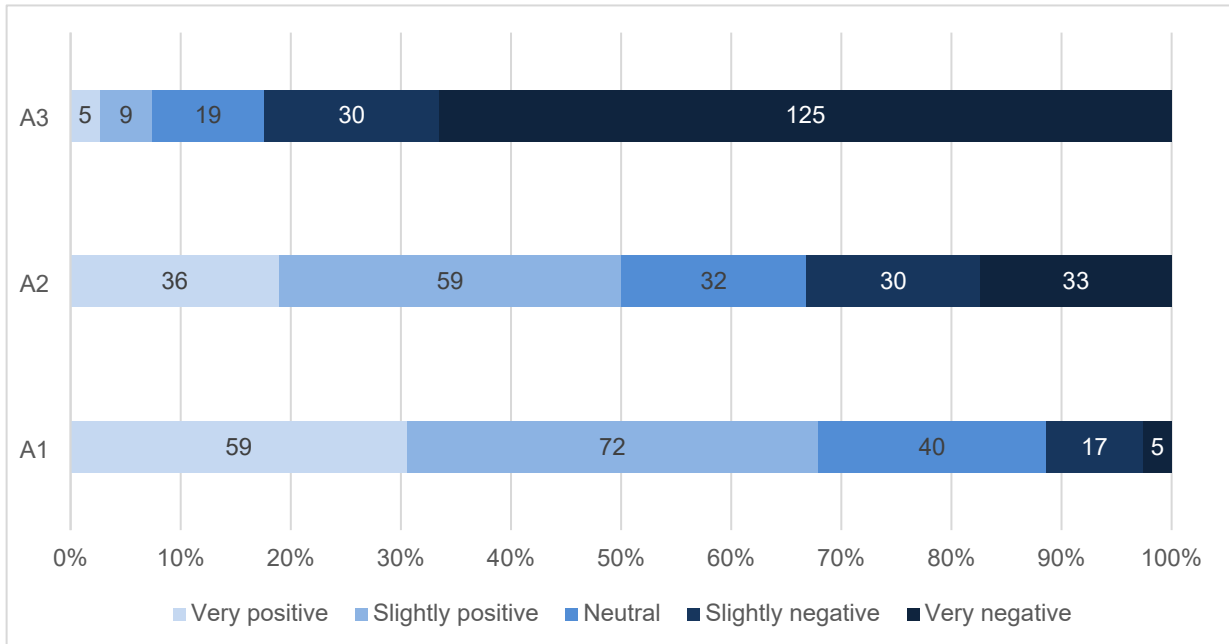


Figure 4: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for options A1, A2 and A3

Finally, responses in relation to the potential impact of the various options on quality and value for money broadly reflect those for inclusion, with a strongly negative response to A3.

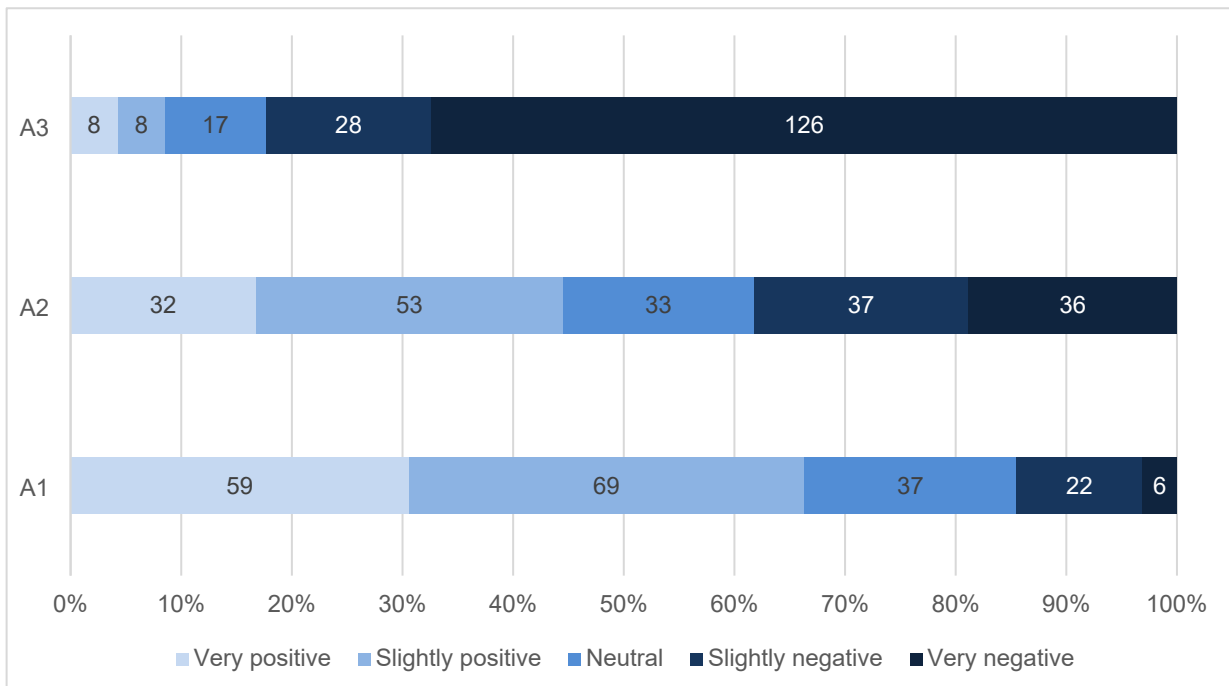


Figure 5: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for options A1, A2 and A3

Qualitative feedback also indicates a preference for option A1. Survey respondents are supportive of the need for a faster, more streamlined process which reduces pressure on school staff. Meanwhile, survey respondents and Information and Engagement session participants both feel that this option provides greater support for those without a formal EHC plan in place. Furthermore, respondents feel that A1 would be the most inclusive option and would enable schools to support SEND children in a mainstream education setting as much as possible. However, there is some concern that this option may not realise sufficient savings or be financially sustainable.

Views on A2 are more mixed, but both survey respondents and Information and Engagement session participants often support the principle of early intervention, with some

survey respondents suggesting that this option could reduce the burden on SENDCOs and other school staff or bring financial benefits by reducing long-term costs. However, concerns are raised about whether the funding available would be sufficient, whether it would reach all of the children and young people who need it and how the use of the fund could be monitored.

Survey respondents and Information and Engagement session participants are generally strongly opposed to option A3. They say it would lead to more EHC needs assessment applications, longer wait times, increased workload for school and council staff, and would negatively impact on children and young people with SEND, leading to an increase in unmet need. There is a recognition that A3 would bring financial benefits, but these are not seen to outweigh the wider disbenefits.

5.2 Option A1

5.2.1 Closed questions

Do you agree or disagree with this change?

Most respondents agree with the proposals for Option A1, with more than 75 per cent indicating that they agree or strongly agree with the change, compared to less than 15 per cent who disagree or strongly disagree.

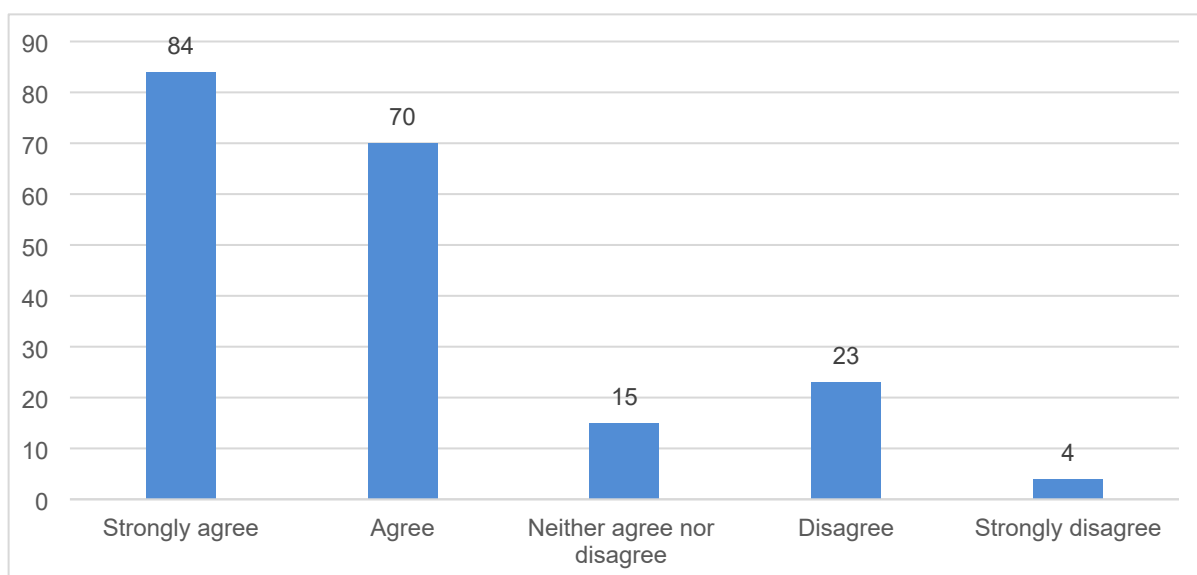


Figure 6: 'Do you agree or disagree with this change?' for Option A1

This remains broadly true when responses are broken down by stakeholder category, although council staff are more likely to choose the more moderate option (e.g. 'agree' rather than 'strongly agree').

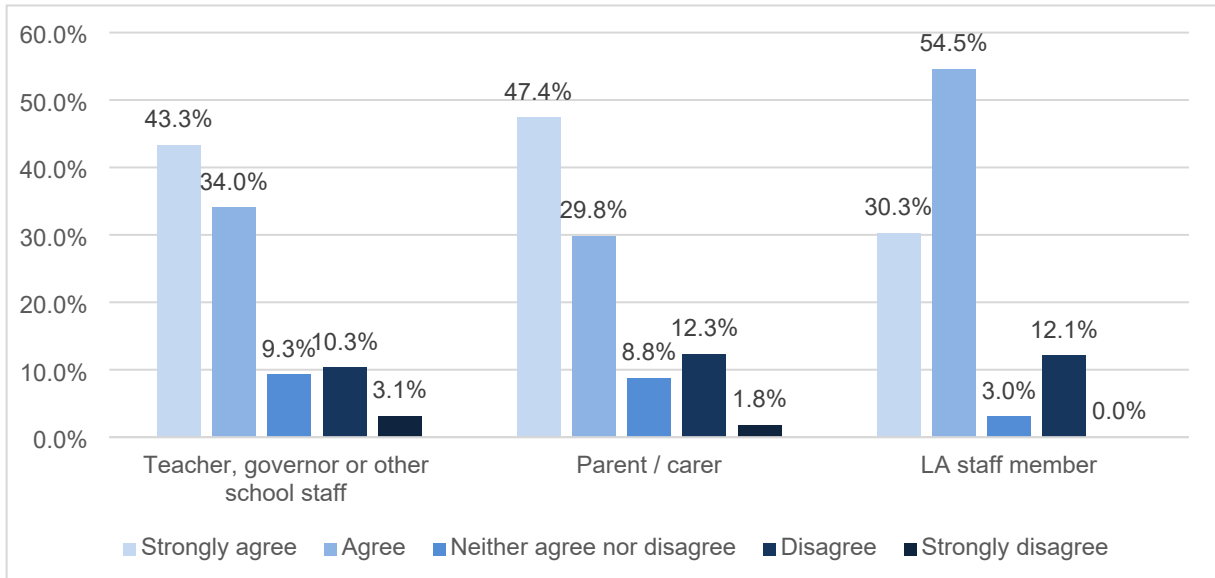


Figure 7: 'Do you agree or disagree with this change?' for option A1 by stakeholder group

What do you anticipate to be the impact of this proposal on staff capacity?

Responses around any potential impact on staff capacity are broadly aligned to the overall sentiment towards A1, with most respondents suggesting it would have a positive impact.

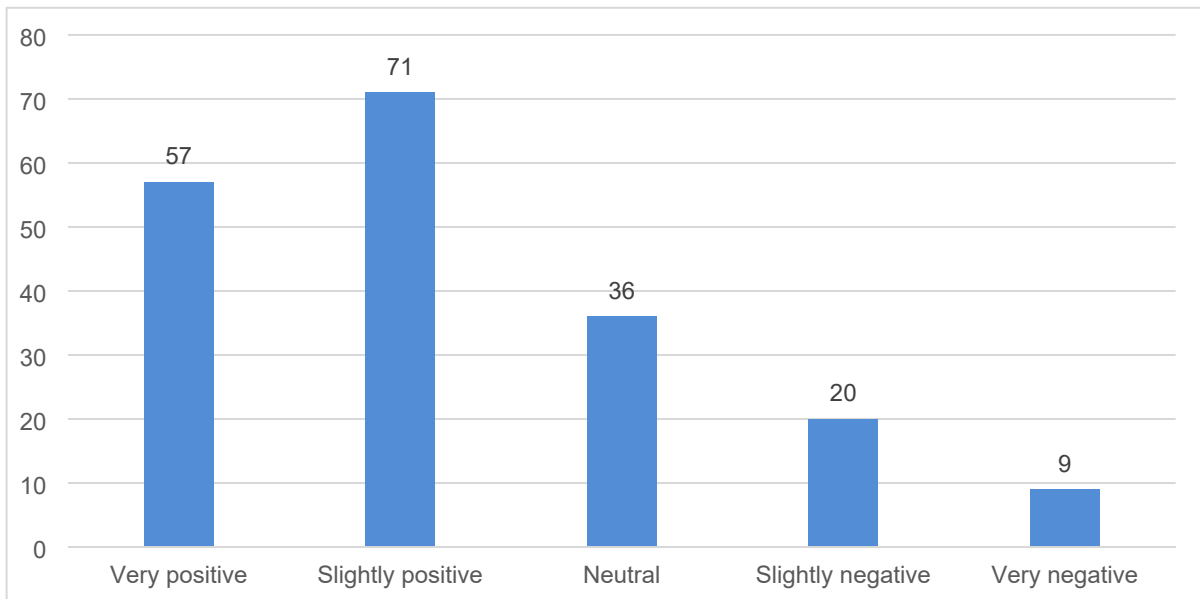


Figure 8: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A1

When broken down by stakeholder group, parents and carers are less likely to feel the impact would be positive and more likely to say that it would have a neutral impact.

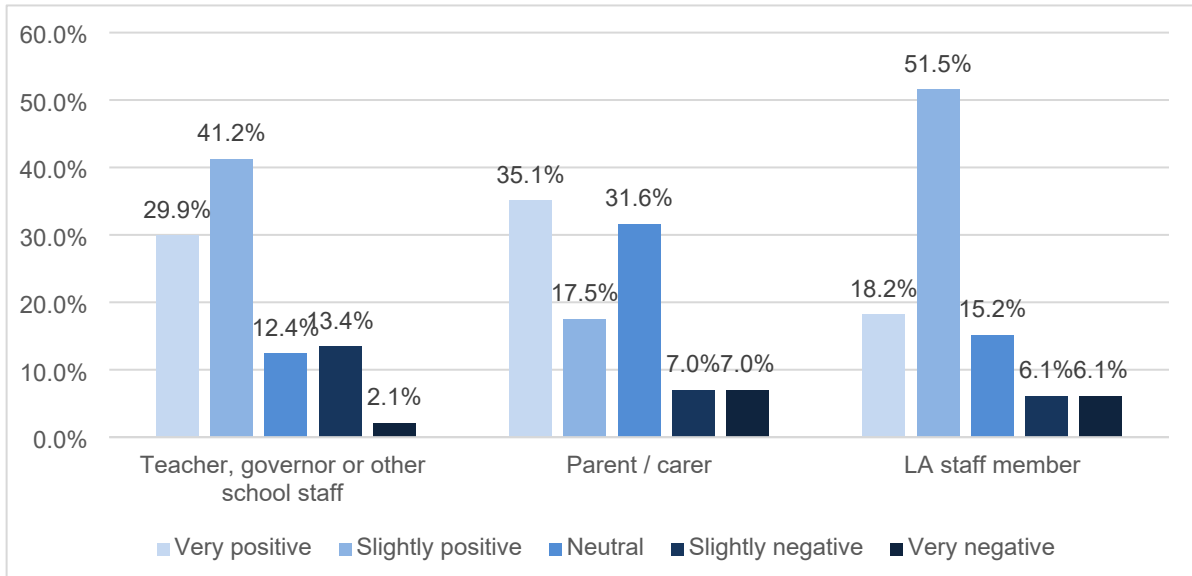


Figure 9: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A1 by stakeholder group

What do you anticipate to be the impact of this proposal on the council’s SEND finances?

Views on the potential impact of A1 on the council’s finances are mixed, with most responses falling in the ‘slight positive’ to ‘slightly range’. Only a relatively small number feel that the proposals would have either a ‘strongly positive’ or ‘strongly negative’ effect.

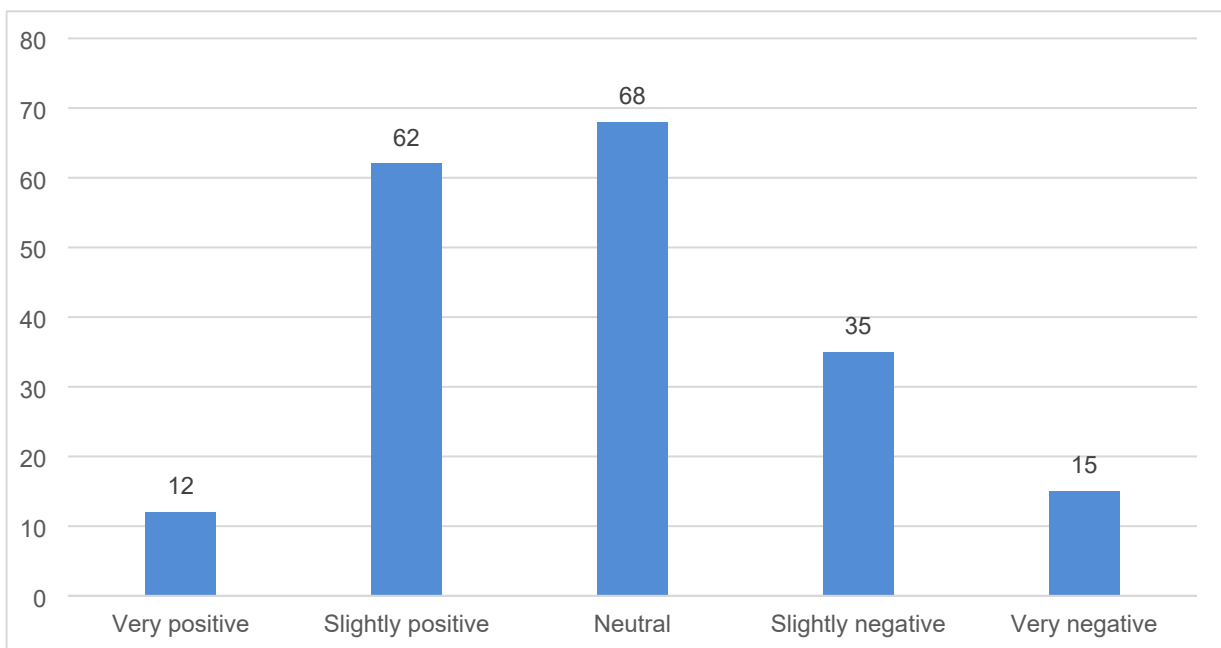


Figure 10: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option A1

Council staff are more likely to have a positive view of the potential impact of A1 on council finances, whilst parents and carers are more likely to feel it would be neutral.

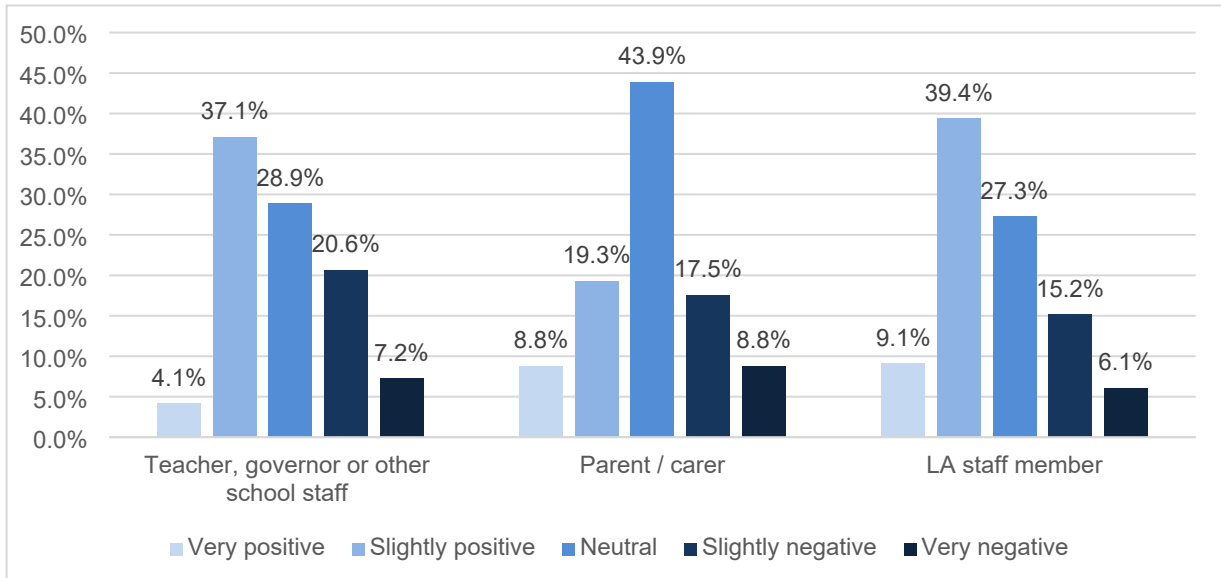


Figure 11: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?'

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

The majority of responses on the potential impact of A1 on inclusion are positive, largely in line with overall sentiments toward A1.

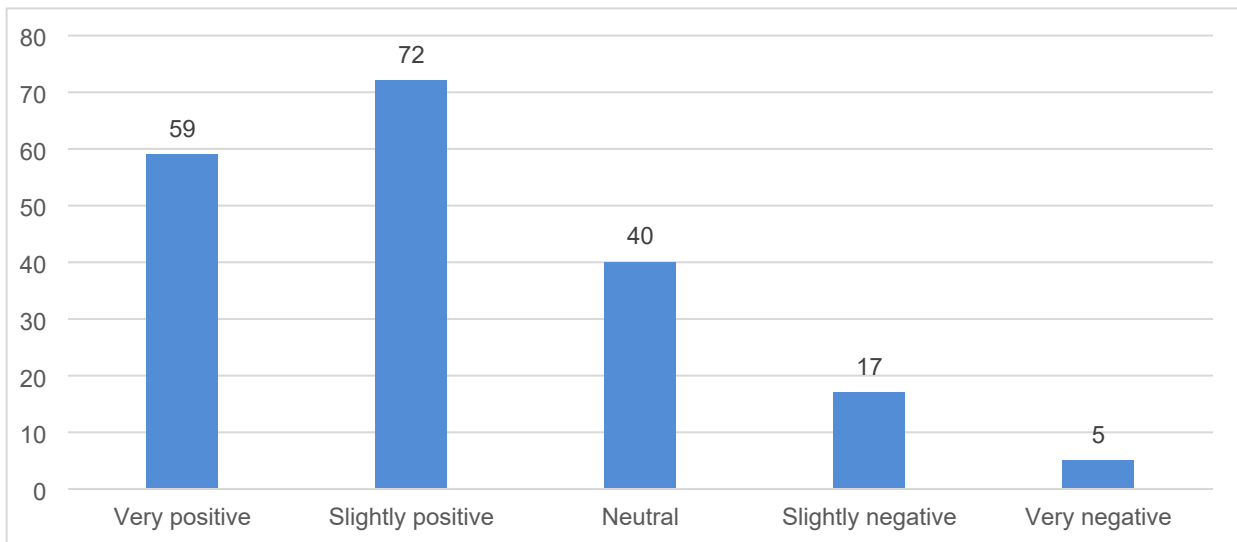


Figure 12: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A1

Respondents from the local authority were more likely to say that A1 would not have a negative impact on inclusion.

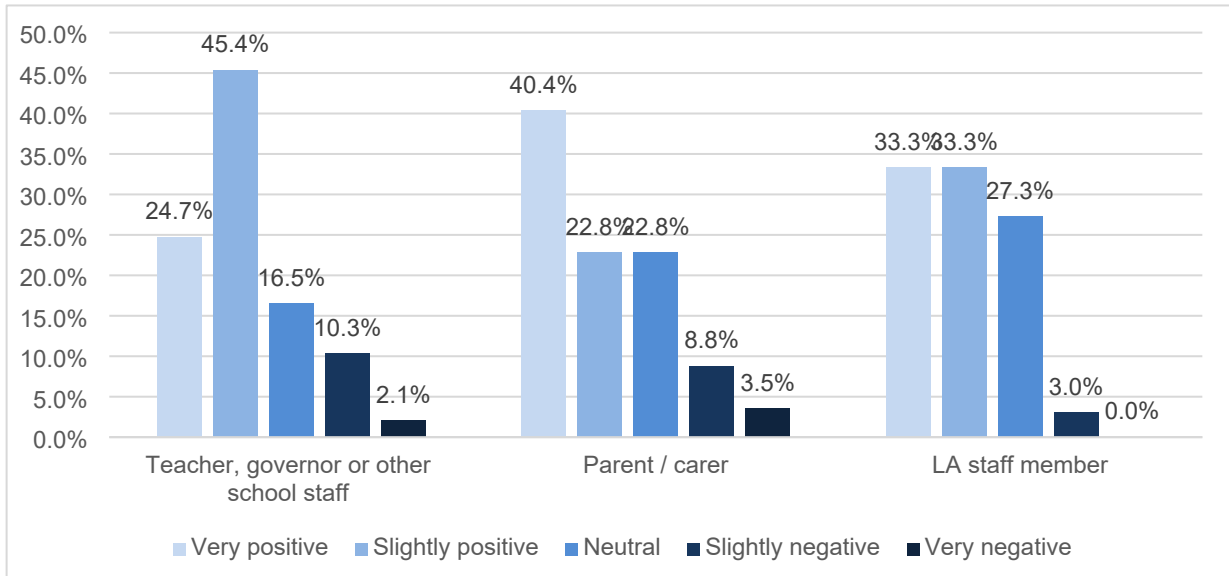


Figure 13: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A1 by stakeholder group

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

The majority of responses on the potential impact of A1 on quality and value for money are positive, largely in line with overall sentiments toward A1.

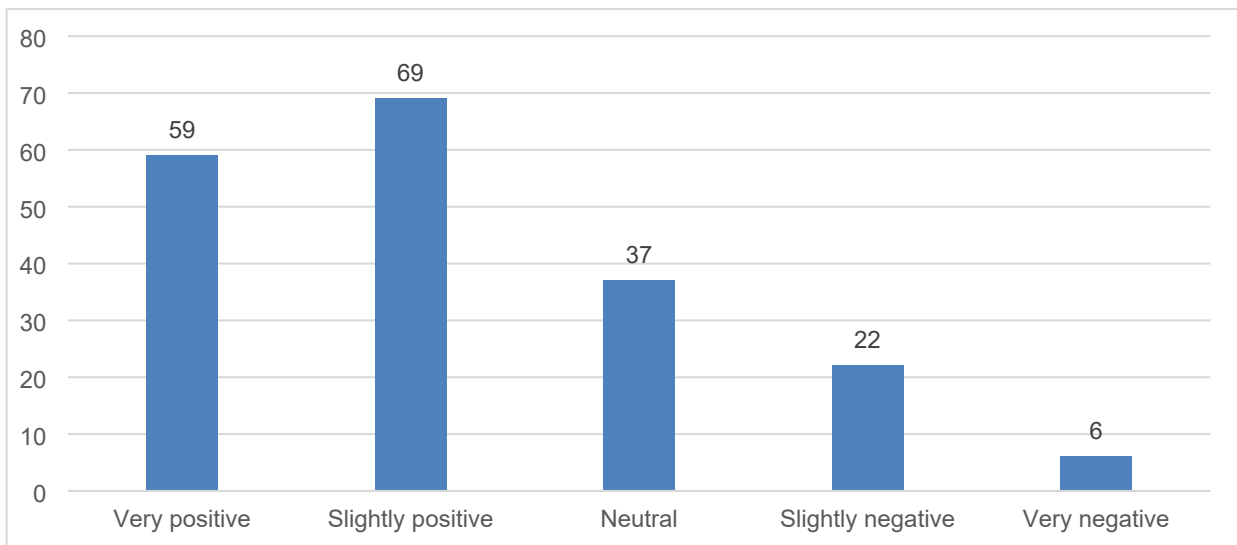


Figure 14: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option A1

This is broadly reflected in the stakeholder group breakdowns, although teachers, governors and other school staff were less likely to feel A1 could have a 'very positive' impact.

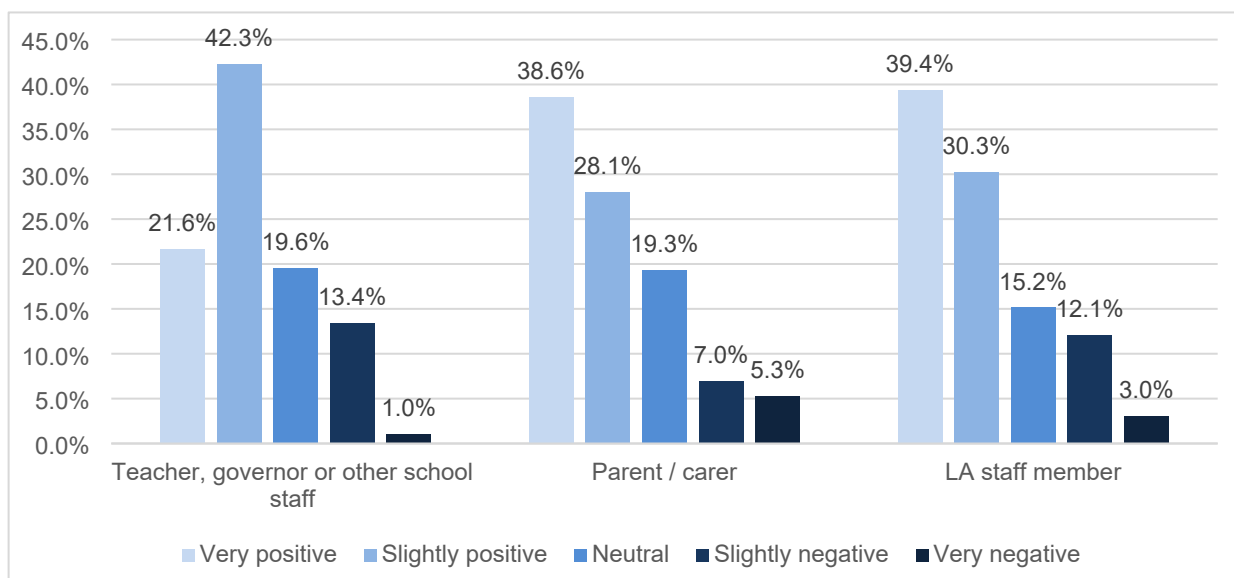


Figure 15: 'What do you anticipate to be the impact of this proposal on the quality and value for money of support available to children and young people?' for option A1 by stakeholder group

5.2.2 Open questions

In line with the overall quantitative feedback, the majority of survey respondents' views on option A1 are positive.

Many respondents, particularly teachers and other school staff, discuss the need for a faster, more streamlined process. They often talk about the need to reduce duplication, whilst several talk about the burden which the current application process places on SENDCOs and other school staff and argue that this needs to be addressed. Some of these responses say that SENDCO and teacher time could be better spent supporting the children in question, whilst a few raise the importance of funding and additional resources to schools supporting SEND pupils.

Several respondents describe the importance of supporting children who do not have an EHC plan, either because they have a lower level of needs or because they are in the process of going through the application process. Indeed, several respondents mention the need to address application times, often arguing that they are too long at present and that there is a need to speed up the process. However, some respondents argue that this shows the importance of top-up funding, as it can act as a bridge for children whose applications are pending, ensuring that they receive the support they need in the meantime. A few also argue that top-up funding provides a mechanism by which children with a lower level of needs can be supported and suggest that otherwise their needs may not be met.

Meanwhile, several respondents feel that option A1 would be the best option from an inclusion perspective. They say that it allows schools to support SEND children in a mainstream education setting as much as possible. A few of these respondents specifically reference children in care (who may live outside of Bristol) as it helps to ensure that these children can access funding and have the support to remain in school. More widely, some respondents say that a lack of funding and support can lead to children being excluded from mainstream education settings.

Of the specific improvements suggested in the survey information, the online portal attracted the most positive feedback. Several respondents said that this could make applications easier and reduce the staff time requirement, as well as help to create a standardised process. When it comes to additional training for SENDCOs and other teachers, some respondents feel that this could help to improve the consistency of the panel decision-making process.

Other positive feedback on option A1 includes:

- some respondents who feel this option would be the best in terms of outcomes for SEND children
- a few respondents who express a general support for this option
- a few respondents who argue that this option would save money, either because it would be more efficient or because it would ensure needs are met quickly and do not escalate
- a few respondents who say this option would result in the fewest EHCP applications
- a small number who say this option would be the safest – where they specify why this is, they say it would ensure sufficient funding to meet children’s needs

However, some respondents voice concerns about some aspects of option A1.

For example, some suggest that this option would be unlikely to realise sufficient savings or argue that it would be financially unsustainable for the council. Meanwhile, some say that the amount of funding being made available is insufficient to meet demand, although no respondents from the local authority express this view.

A few respondents describe challenges with the current system, including parents or carers who outline difficulties they faced accessing funding or ensuring it is used appropriately for their child.

A small number of respondents raise other concerns, which include:

- whether SENDCOs would have capacity to attend training and whether this training would eliminate address subjectivity of top-up panel decisions
- streamlined application processes leading to an increase in EHCP applications and a corresponding increase in workload for the local authority
- whether it is relatively more difficult for secondary settings to receive funding than primary settings

Some respondents also make a range of suggestions about how SEND provision could be improved. These include conducting strengths-based assessments rather than having a deficit focus, prioritising strengthening ordinarily available provision (OAP) in order to benefit more children in the long term and allowing year-round applications with an end to thrice-yearly panels.

One respondent suggests that schools should be able to use element 2 funding across the whole school to support effective OAP rather than evidencing spend on an individual. However, other respondents argue schools should be required to evidence that they have utilised their funding to support the needs outlined in the application, with audits carried out as required.

Other suggestions include:

- clear guidance for SENDCOs
- employing more assessors and administrators
- employing therapists in-house at the council to support education settings
- requiring council staff to complete half day per term of work experience in a school
- automatically funding EHCPs
- separating EHC funding from non-statutory top-up funding
- integrating the Digital SEND Support System into the A1 proposals
- creating an option which combines elements of options A1 and A2
- providing a means of supporting children with short-term health needs

5.2.3 Information and Engagement sessions

Information and Engagement session participants are generally supportive of option A1.

They say that this option would ensure the greatest level of funding for schools and would provide support through top-up to children who might otherwise not receive it, either because they have relatively low levels of need or because their needs assessment for an EHC plan is pending. They argue that these children have needs which need to be met, and therefore that top-up funding is necessary. Similarly, participants also argue that A1 is the best option for inclusivity as children may not have fixed needs so an EHCP may not be the best means of supporting them. Nonetheless, they are supportive of attempts of streamline processes and make them more consistent.

However, participants do raise some concerns about A1. They typically express scepticism that benefits would be realised, suggesting application times may not come down or that A1 would not lead to financial savings. Meanwhile, a participant in the Information and Engagement session for governors says there is a risk that A1 could lead to SENCOs spending less time on applications but more time on evidencing spending.

5.3 Option A2

5.3.1 Closed questions

Do you agree or disagree with this change?

A majority of respondents agree with the proposals for A2, though not as many as agree with A1, and with a smaller proportion who 'strongly agree'. See the 'Overview' section for a comparison between options.

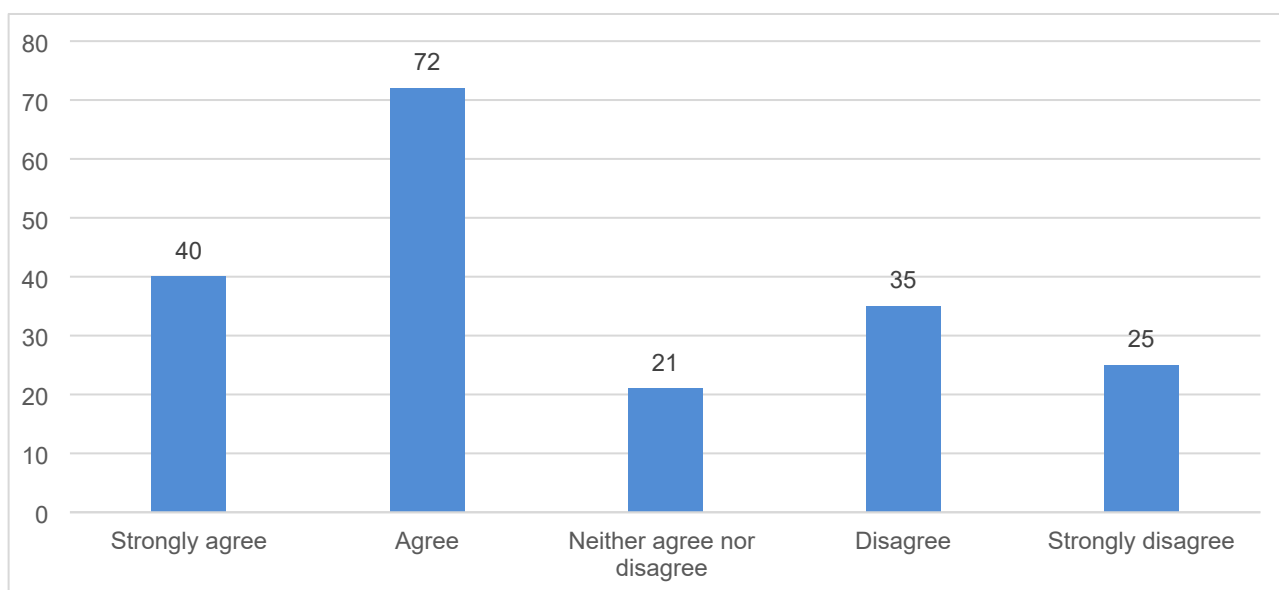


Figure 16: 'Do you agree or disagree with this change?' for option A2

When responses are broken down by stakeholder category, the parent / carer group is more likely to disagree with the A2 proposals (with a higher proportion of those who 'strongly disagree') as well as being less likely to agree.

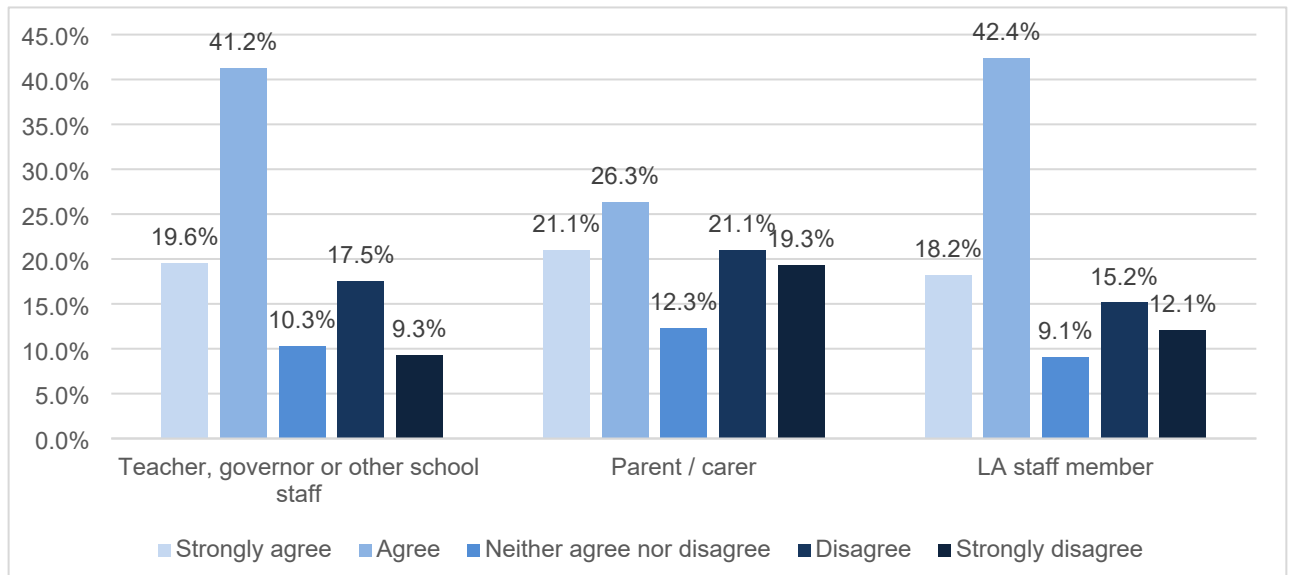


Figure 17: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A2 by stakeholder group

What do you anticipate to be the impact of this proposal on staff capacity?

Responses around any potential impact on staff capacity are broadly aligned to the overall sentiments towards A2, although respondents were slightly less likely to feel they would have a positive impact (instead indicating a 'neutral' sentiment).

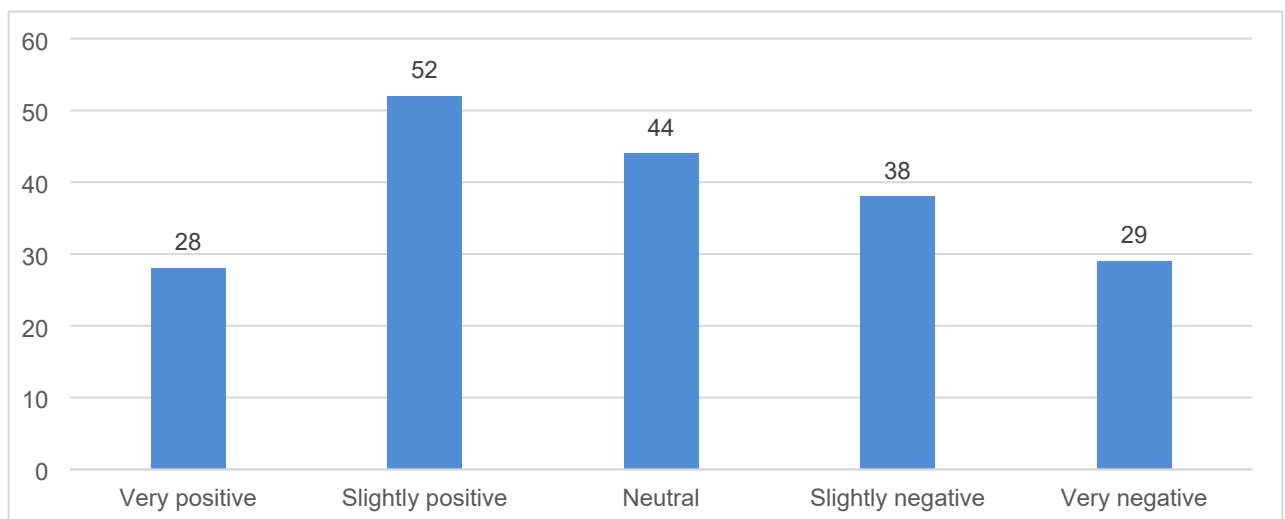


Figure 18: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A2

When broken down by stakeholder group, parents and carers are more likely to say that it would have a neutral impact.

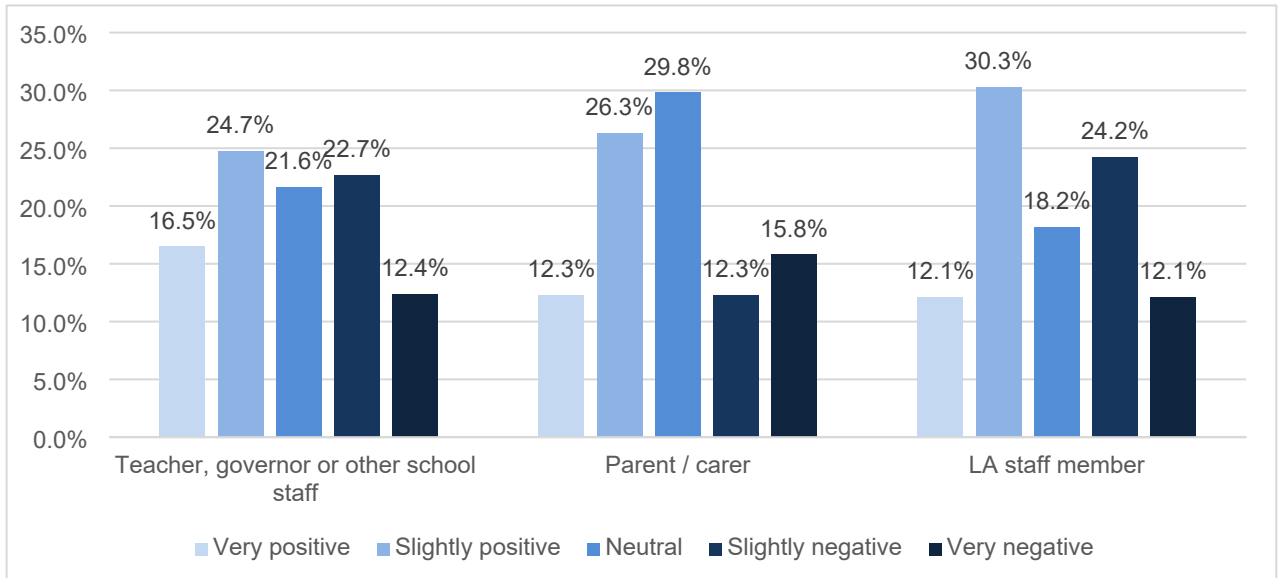


Figure 19: 'What do you anticipate to be the impact of this proposal on staff capacity' for option A2 by stakeholder group

What do you anticipate to be the impact of this proposal on the council's SEND finances?

Most respondents feel that A2 would have a slightly positive or neutral impact on the council's SEND finances.

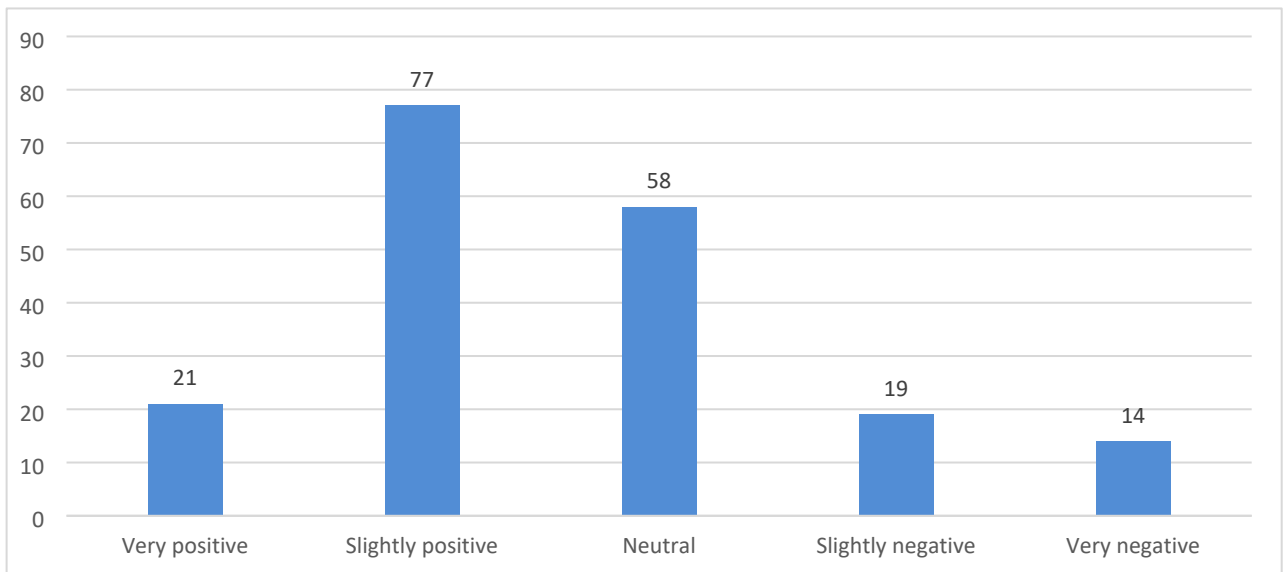


Figure 20: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option A2

School staff were most likely to feel that A2 would have a positive effect on the council's SEND finances (although generally only 'slightly positive') whilst council staff were more likely to say that this proposal would have a negative impact.

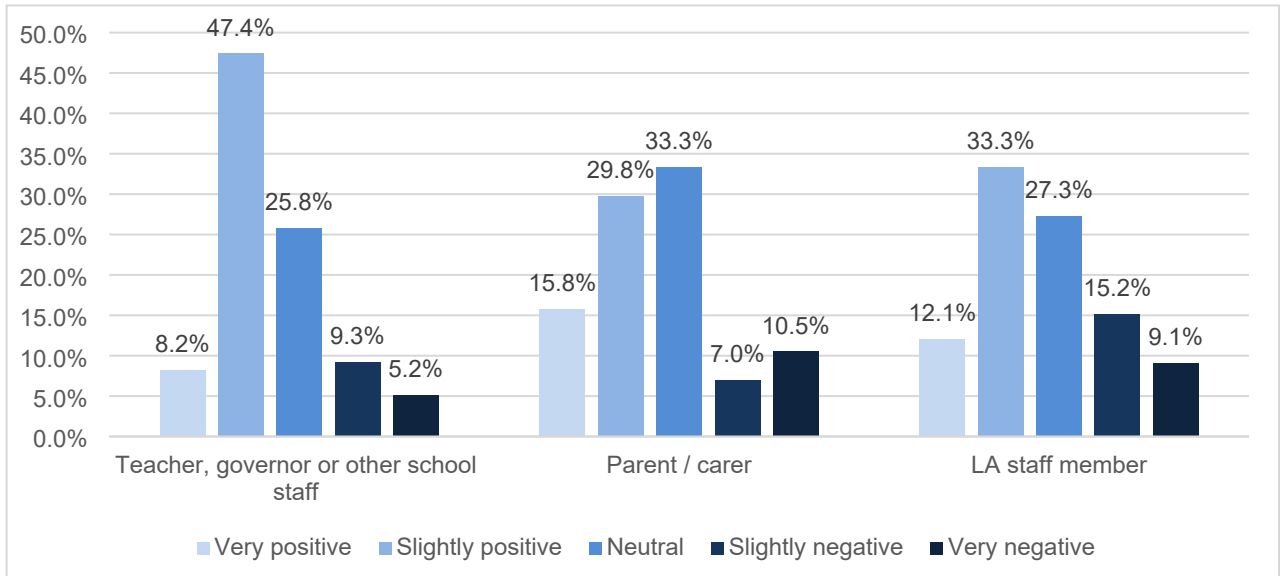


Figure 21: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for A2 by stakeholder group

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

Views on the impact of option A2 on inclusion are varied, with 'slightly positive' the modal response, and around half of respondents viewing the proposal positively.

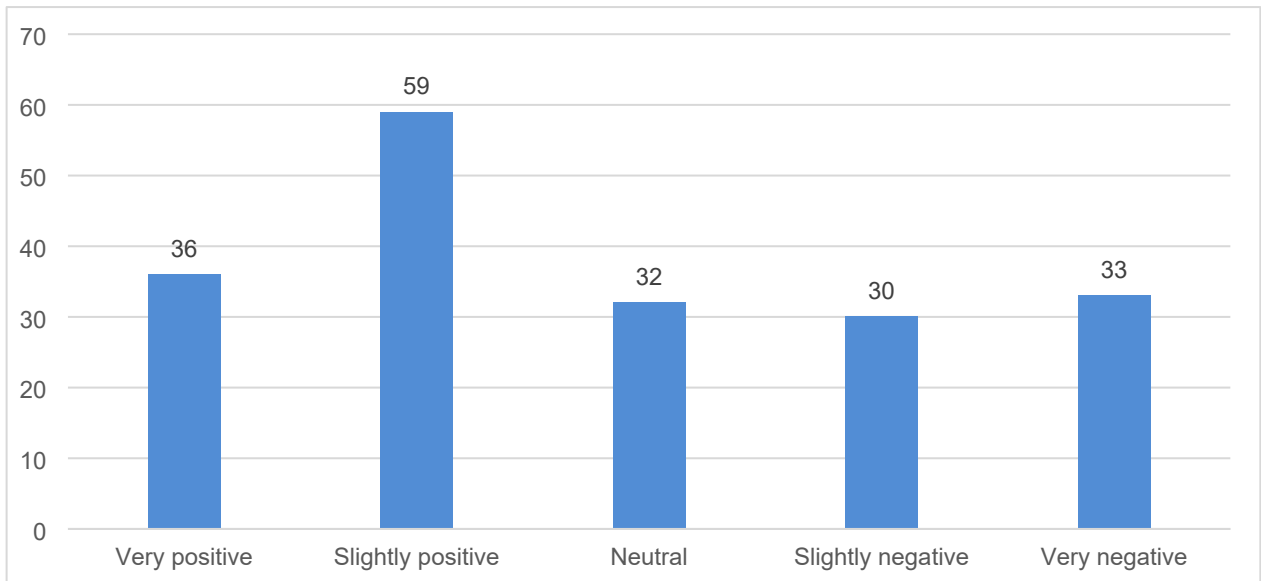


Figure 22: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A2

Similarly, responses when broken down by stakeholder type are mixed.

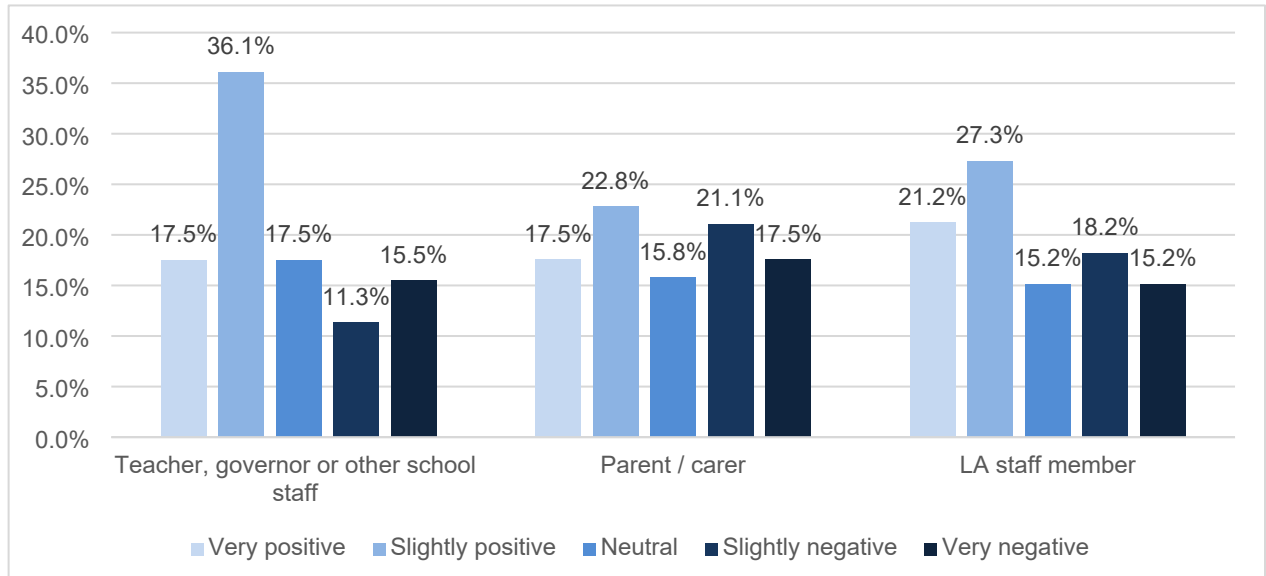


Figure 23: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A2 by stakeholder type

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

As with responses for inclusion, views on the impact of option A2 on quality and value for money are varied, with 'slightly positive' the modal response.

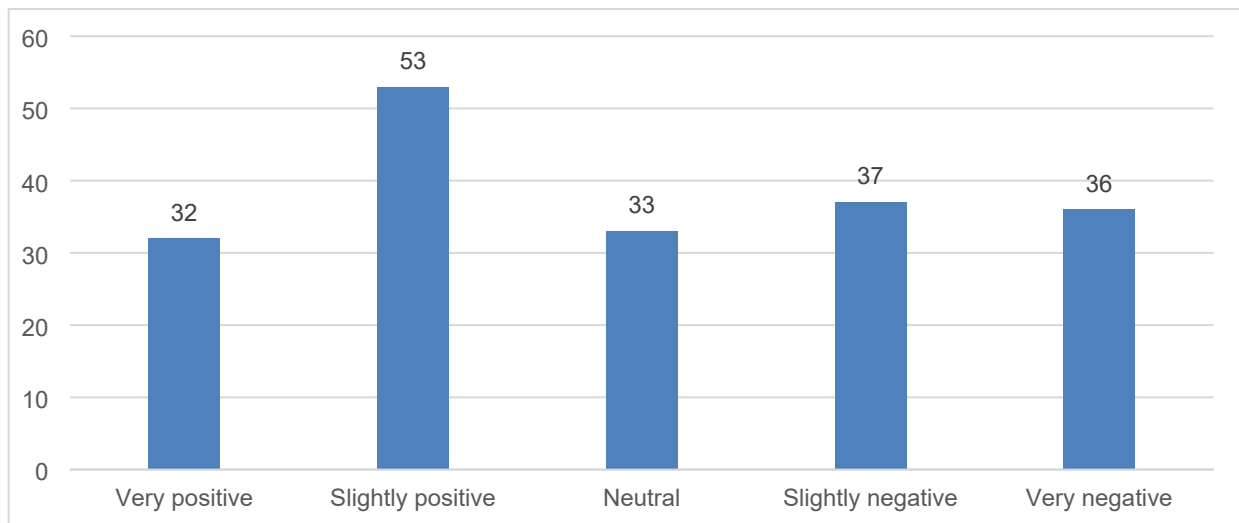


Figure 24: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option A2

When broken down by stakeholder type, parents and carers were most likely to view the proposal negatively in terms of quality and value for money, whilst school staff were most likely view A2 positively.

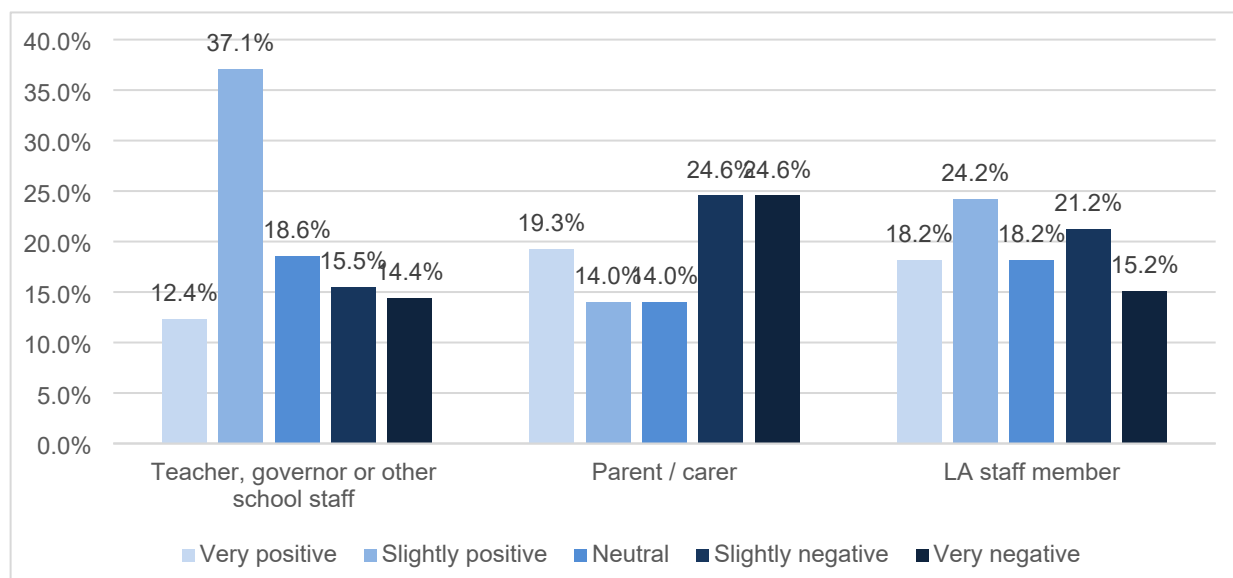


Figure 25: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option A2 by stakeholder type

5.3.2 Open questions

Respondents' views on option A2 expressed in their answers to the open question are mixed.

Several respondents support the principle of early intervention, arguing that it could help to support children who have no diagnosis or who do not yet have funding and ensure that their needs are met, reducing the need for intervention and demand for EHCPs and one-to-one support in the long term. A few of these respondents say that this approach could help children to fulfil their full potential and improve outcomes, whilst a small number suggest specific targeted interventions which could be implemented, including interventions to support with social and emotional wellbeing and speech and language. A small number also name specific groups who they feel could benefit from this proposal, such as children with ADHD or visual impairment (VI).

Meanwhile, some argue that this could reduce the administrative burden on SENDCOs and free up capacity to better support children. A small number go on to suggest that this could enable schools to address specific issues, such as emotionally-based school avoidance (EBSA).

Some respondents say that an early intervention approach may also bring financial benefits, either by addressing needs at an earlier stage and therefore reducing long term support costs, or by allowing schools to access funds to support multiple children, perhaps using group work and pooled support.

However, several respondents raise concerns about the equitability of option A2 and question whether funding will be going to the schools and the children who most needs it. In terms of schools, they say that funding would likely be focused on KS1 pupils and primary schools, with multi-academy trusts also being able to pool their funding, whilst other secondary schools would miss out. For children, they express concern that some groups would be disproportionately impacted by any reduction in top-up funding. These groups include:

- Children in care
- Black and ethnic minority children
- Children who move schools in-year without transferrable provision
- Children with autism spectrum disorder (whose needs may be identified later)
- Children with an EOTAS package, who are home schooled or who attend an ALP

- Children with social, emotional, and mental health needs

A small number express concerns that early intervention approaches could lead to a greater number of exclusions.

Several respondents argue that funding should be spent on a specific child to address a specific need. They argue that some children require dedicated support, personalised provision or a bespoke package which would need to be provided through top-up funding and they express concern that option A2 may affect this provision.

Furthermore, several respondents believe that A2 would reduce schools' ability to access funding or question what would happen if the finite 'pot' was not sufficient to meet demand. They say that schools cannot afford to put individualised support in place without top up funding. Others say that the funding would need to be ringfenced to ensure that schools use it for its intended purpose.

Some respondents express concern about the impact of the proposal on schools, suggesting that monitoring and accounting for spend could place additional burden on SENCOs. One respondent feels it could lead to school leadership teams competing for funds which they believe could damage morale or collaboration.

A small number of respondents feel that if this option does not reduce the number of EHCP applications then it could lead to increased system costs, and indeed a few respondents argue that this proposal could lead to more EHCP requests.

A few respondents request more detail or say that this option is unclear in its present form.

Meanwhile, several respondents make suggestions for how A2 could be designed. A few of these respondents argue that the best solution would be a combination of options A1 and A2, whilst others say that funds should be used to hire shared staff such as Emotional Literacy Support Assistant (ELSA) or Speech and Language Therapists (SALTs).

Other suggestions include:

- automatic funding of EHCPs
- information sharing across schools in the city
- integration of the Digital SEND Support System
- creation of approved suppliers with a standard charge
- providing early intervention before primary school age
- support in place for a minimum of a year
- funds targeted at specific year groups to support transition
- small group classes to support those with ASC or social anxiety
- consideration given to how monitoring could work
- further consultation to inform design of this option

5.3.3 Information and Engagement sessions

In the Information and Engagement sessions, views on option A2 are mixed.

Some participants express support for early intervention, arguing it could provide wide ranging benefits for children and schools. They say it has been proven to work in other local authorities, could empower schoolteachers to hold each other to account, and could fund specialist teams to support both children and teachers.

However, concerns are raised about how school's use of this funding would be monitored and reviewed to ensure that it is being used effectively. They also question whether the money would be sufficient to meet demand, how the funding would be targeted, and how schools could allocate funding if needs changed across or within years. Others suggest that this could result in additional work for SENDCOs. Furthermore, some argue that because early intervention funding would go to younger age groups, those with needs which emerge

later could miss out, while others say that early intervention would not necessarily reduce future needs.

Participants in the Information and Engagement sessions for council and school staff suggest combining options A1 and A2. Other suggestions include an enablement fund to support larger groups and clear guidance around what the early intervention fund could address.

5.4 Option A3

5.4.1 Closed questions

Do you agree or disagree with this change?

Most respondents disagree with option A3, with the majority saying that they ‘strongly disagree’ with this change.

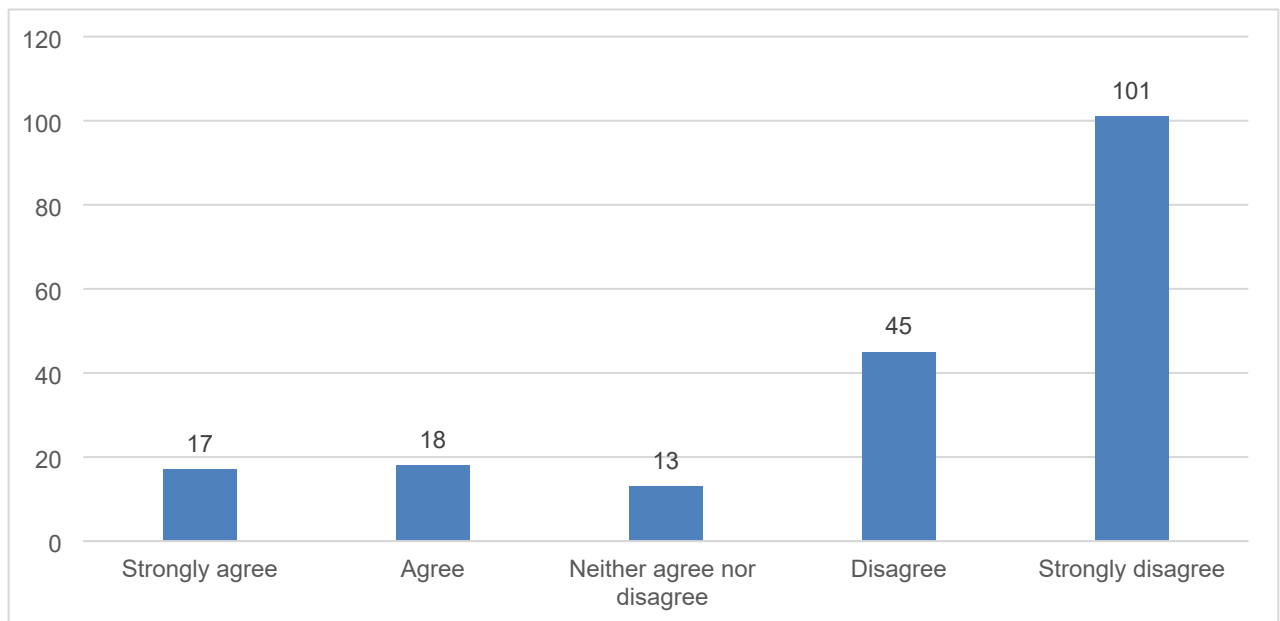


Figure 26: 'Do you agree or disagree with this change?' for option A3

This is broadly reflected across all of the different stakeholder types.

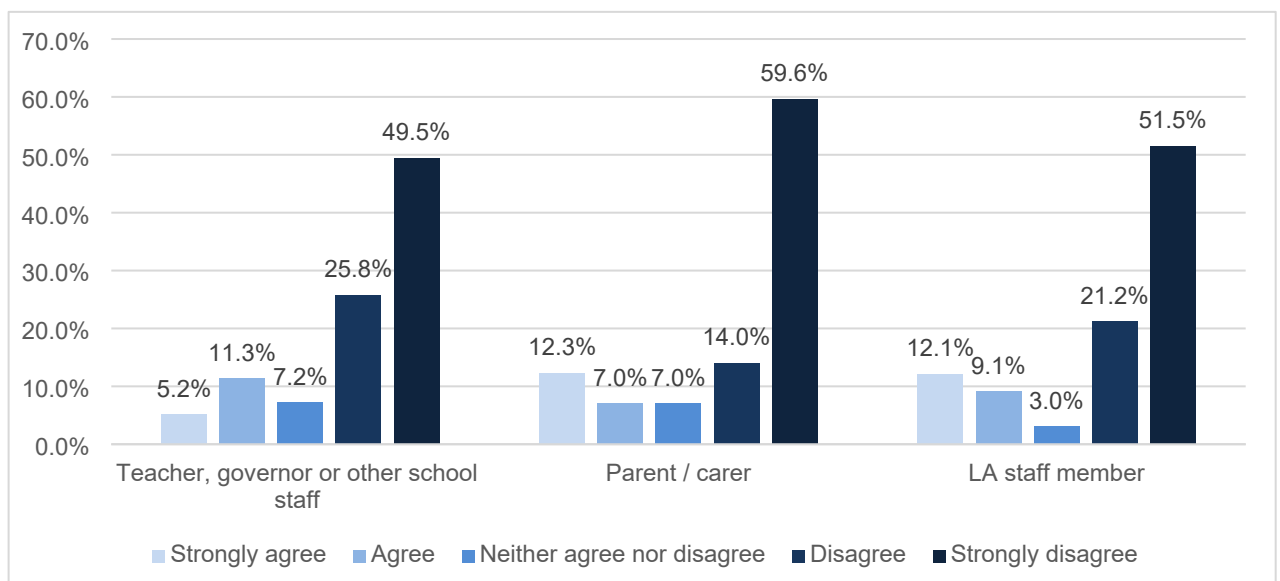


Figure 27: 'Do you agree or disagree with this change?' for option A3 by stakeholder type

What do you anticipate to be the impact of this proposal on staff capacity?

Similarly, most respondents feel that A3 would negatively affect staff capacity, with the majority indicating they believe it could have a 'very negative' effect.

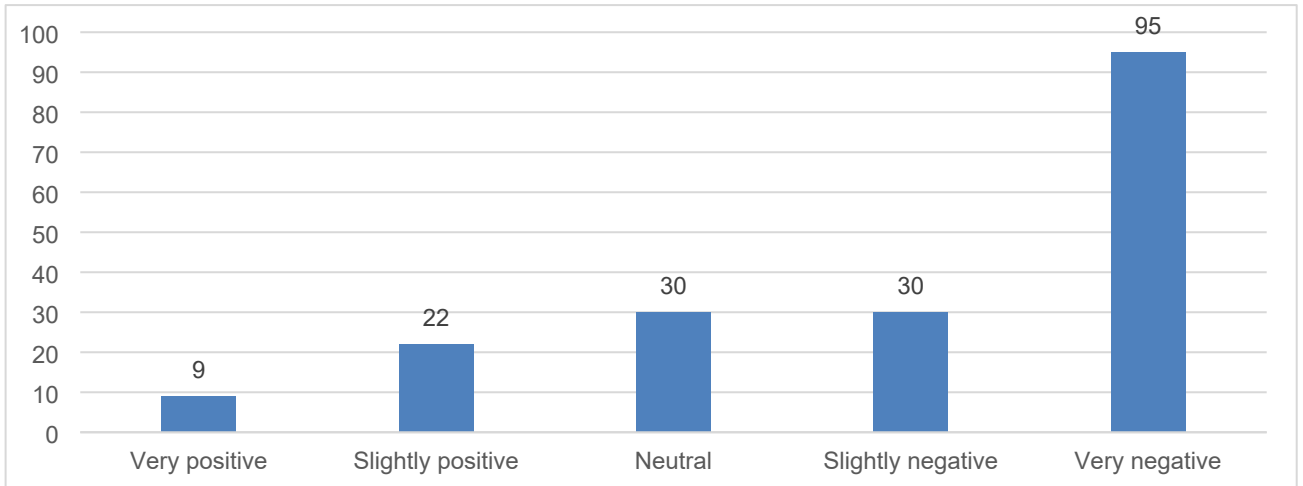


Figure 28: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A3

Parents and carers were more like to feel that A3 could have a positive effect on staff capacity and less likely to feel it could have a negative effect. They were also more likely to feel that it could be a neutral option.

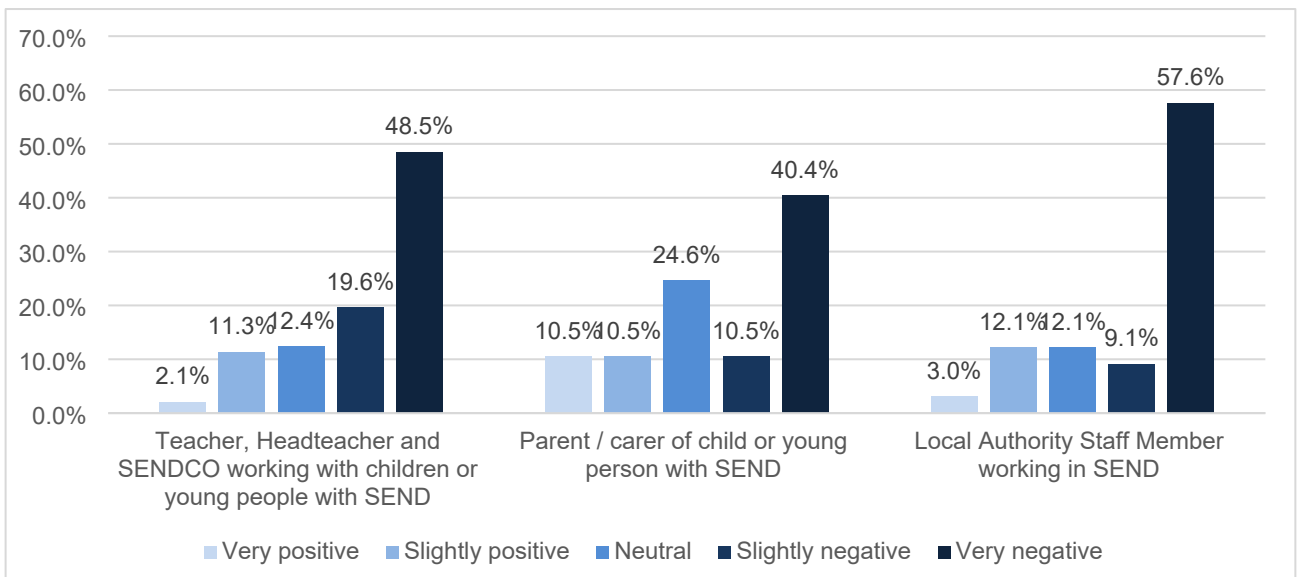


Figure 29: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option A3 by stakeholder group

What do you anticipate to be the impact of this proposal on the council's SEND finances?

Despite more than half of respondents strongly disagreeing with A3 overall, many respondents feel that it could have a positive, or at least neutral, impact on the council's finances.

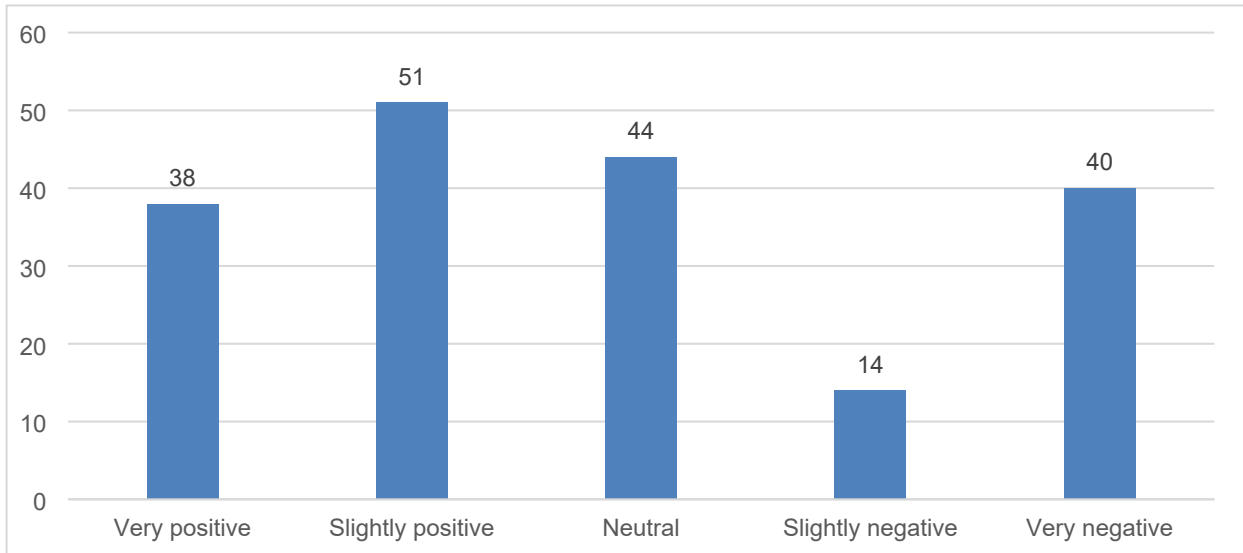


Figure 30: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option A3

However, responses on this issue were highly varied when broken down by stakeholder type. School staff were more likely to believe that A3 would have a positive effect, parents and carers were more likely to feel it would be neutral, and council staff were more likely to say it would have a negative impact.

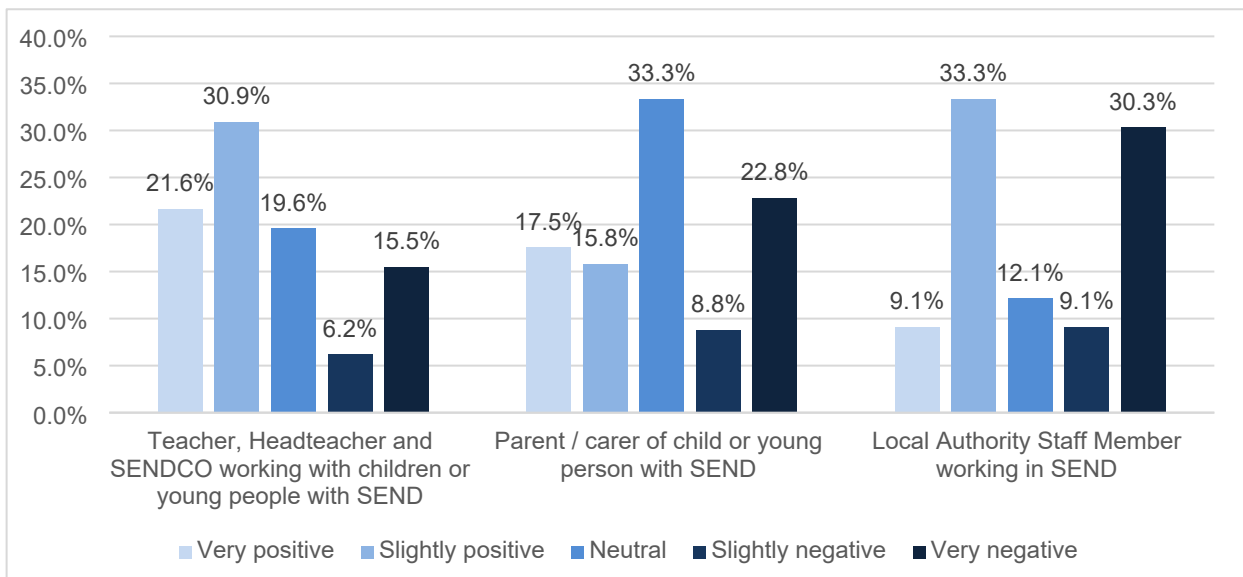


Figure 31: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option A3 by stakeholder group

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

Most respondents say that A3 would have a 'strongly negative' effect on inclusion.

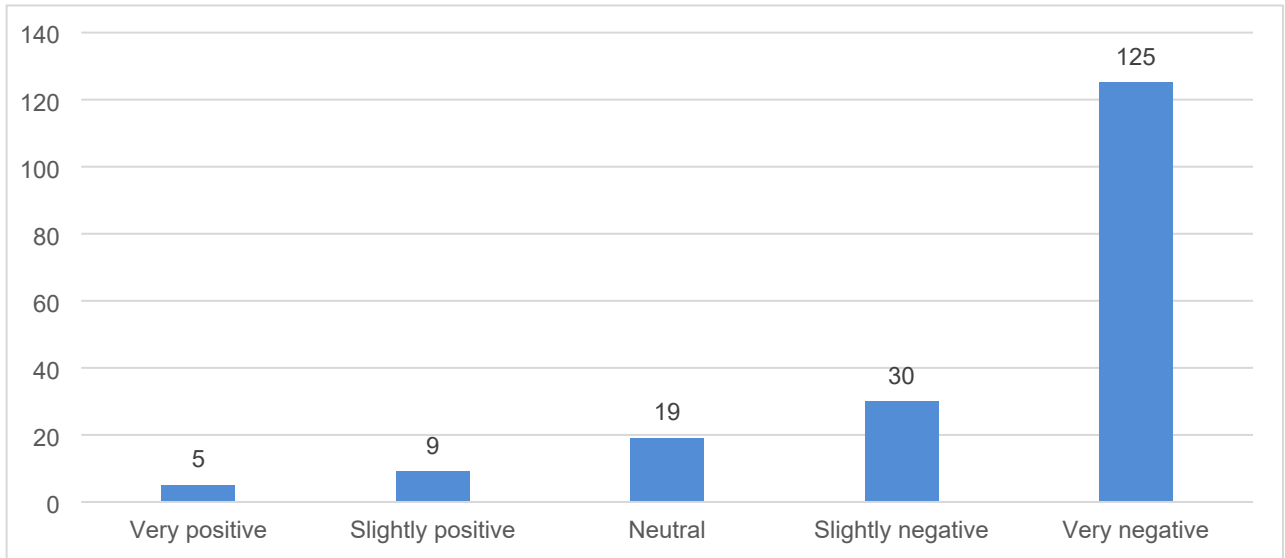


Figure 32: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A3

Council staff are most likely to feel A3 would have a 'strongly negative' impact on inclusion, but this is the majority view across all stakeholder groups.

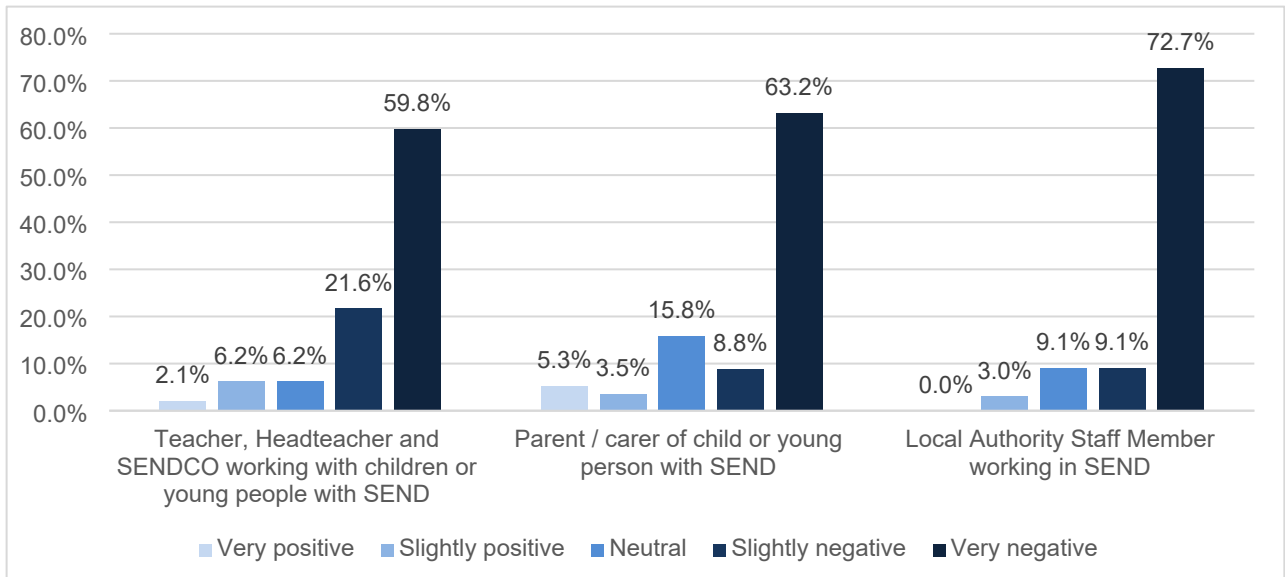


Figure 33: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option A3 by stakeholder type

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

As with responses for inclusion, most respondents say that A3 would have a 'strongly negative' effect on quality and value for money.

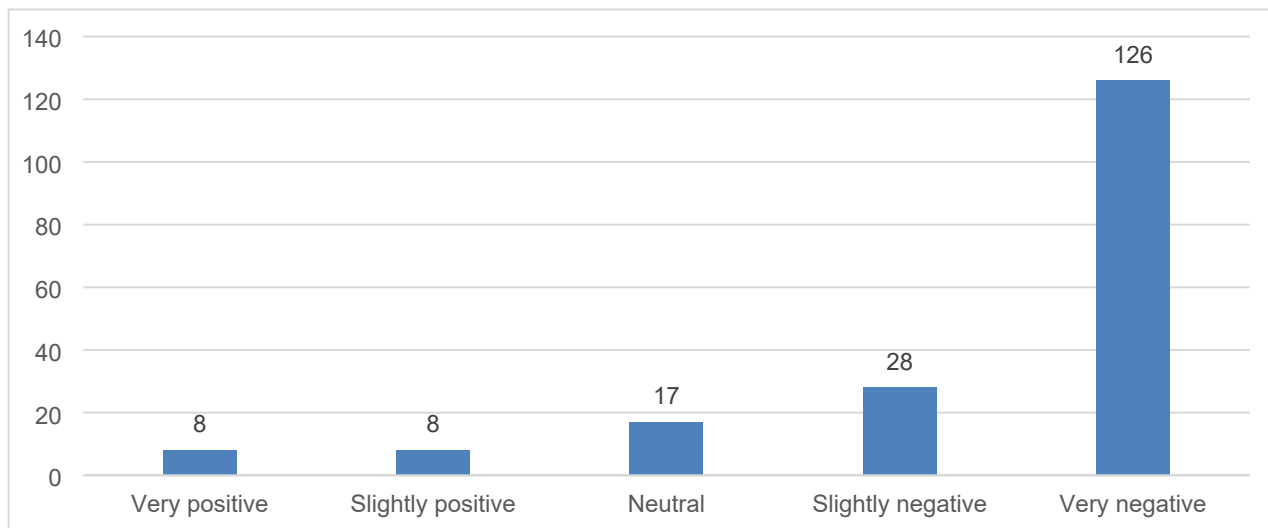


Figure 34: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option A3 by stakeholder type

The response data broken down by stakeholder type largely reflects the overall sentiments outlined above.

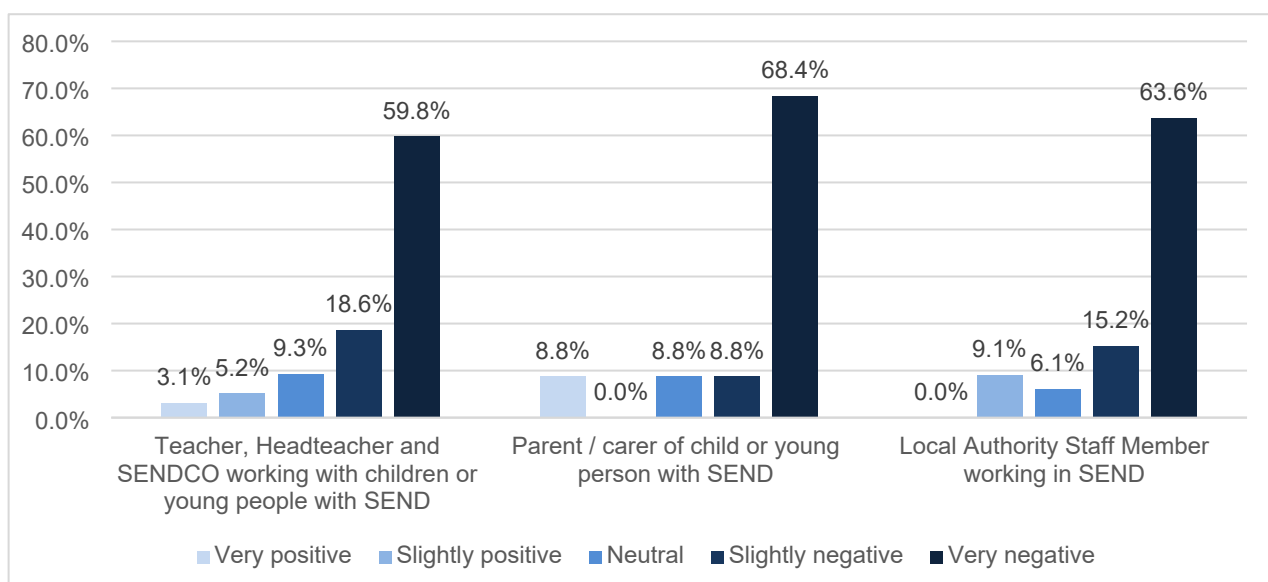


Figure 35: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option A3 by stakeholder type

5.4.2 Open questions

The vast majority of the open text comments on option A3 express concern about the proposal.

Many respondents say that adoption of A3 would lead to an increase in EHC needs assessments application volumes. Some use terms such as 'massive' or 'exponential' to describe any increase. This is because children who do not currently have a plan in place would need to be approved for one in order to continue to receive any funding. They suggest there could be a number of consequences which result from this increase.

For example, several respondents say that there are currently long waits for applications to be considered and approved, with some suggesting that this situation would be exacerbated by an increase in applications. They argue that existing wait times would need to be significantly reduced for this option to be adopted. If this is not the case, then they say this may lead to children who have applied for but not been given an EHCP receiving insufficient support. A few respondents say that this means schools would have to manage these cases without having the funding to do so.

Several respondents also say that an increase in ECH needs assessments, as well as any associated increase in annual reviews, would lead directly to an increase in workload for school staff (particularly SENDCOs) and for council staff (particularly SEND teams and Education Psychologists (EPs)). They feel that these teams are already working at full capacity. A few suggest that more staff, including SALTs and EPs, are needed. A few also say that A3 would negatively impact on the families of children with SEND.

Meanwhile, many respondents say that they feel this option would negatively impact on children and young people with SEND. They suggest that this would lead to an increase in unmet need, particularly for children who have a sudden increase in need and may lead to disengagement with or exclusion from mainstream education. Indeed, a small number of responses suggest that it might no longer be safe for some children to remain in mainstream education without funded plans. There is also a concern that a reliance on formal diagnosis and EHCPs could affect inclusion and might disproportionately disadvantage a number of different groups, including:

- children with relatively low level of need
- minority groups
- children in care
- children with SEMH needs (including undiagnosed needs)
- children with SLCN
- children with English as a second language
- children of parents with English as a second language
- children of parents with a learning disability
- children of parents with a health condition which limits their ability to support an EHC needs assessment
- Some respondents believe that this option would lead to increased costs for the council. This would be as a result of increased applications, a lack of early support leading to greater needs in the long term, and increased need for specialist provisions. A small number say A3 could shift costs to other areas such as Social Care.

Only a few respondents raise points in favour of option A3. They say that:

- only statutory activities should be funded
- an EHCP is the best and most appropriate way of meeting the needs of a child or young person with SEND
- this proposal may deliver financial benefits
- timescales for EHCP applications may improve
- it would be fairer and more consistent if everyone has to apply for an EHCP
- this would be in line with other local authorities

Relatively few respondents make suggestions in relation to A3. Where they do, they propose:

- EHC plans being funded automatically, and funds released immediately
- emergency funded for key stages, such as transition, or for crisis situations
- a phased transition to any new approach
- senior council staff visiting affected schools before implementing proposals
- avoiding tying schools to 1-to-1 provision through EHCPs

5.4.3 Information and Engagement sessions

In line with the survey feedback, the vast majority of the response to option A3 in the Information and Engagement sessions is negative. Several participants express opposition to this proposal in strong terms.

There is widespread agreement that this option would lead to a significant increase in children and young people being put forward for EHC needs assessments. Participants suggest that this, as well as a consequent increase in annual reviews, could lead to further delays and increased workload for school and council staff. Participants in the Information and Engagement sessions for school staff outline the extent of existing delays and say that top-up is currently being used as a means of getting funding which should come with an EHC plan.

Some participants, particularly participants in the sessions for parents and carers, argue that A3 could also result in children with lower levels of need or who may not be eligible for an EHC plan who would be unable to access support.

There is also a view expressed in a session for council staff that A3 may ultimately lead to an increase in costs.

However, one participant in a session for school staff says that they had seen A3-type models work elsewhere, whilst participants in the parent and carer sessions recognise the importance of addressing any funding gap to help protect council taxpayers.

6 Survey results: Post-16

6.1 Overview

The same three options were presented for post-16 learners as for school age children. These options were:

Option A1 – Retain the top-up funding process for children and young people without EHC plans but make improvements to make the system more streamlined and consistent

Option A2 – Re-purpose a proportion of the funding currently being spent on top-up funding for children and young people that do not have an EHC plan to create a targeted early intervention fund for mainstream schools

Option A3 – Gradually phase out the use of top-up funding for children and young people who do not have an EHC plan

For each of these options, survey respondents were asked:

Do you agree or disagree with this change?

This was a closed question with a five-point Likert scale of responses ranging from ‘Strongly agree’ to ‘Strongly disagree’.

Across both the survey and Information and Engagement sessions, B1 is the most popular option. In the survey it receives support (‘Strongly agree’ or ‘agree’) from the majority of respondents. B2 receives support from more than 40 per cent, whilst B3 is strongly opposed, with more than half of respondents indicating that they do not support this option. The number of respondents selecting ‘neither agree nor disagree’ is much larger than in the responses for the school age section of the survey. The qualitative feedback shows that this is because several respondents did not feel they knew enough about post-16 education to be able to comment.

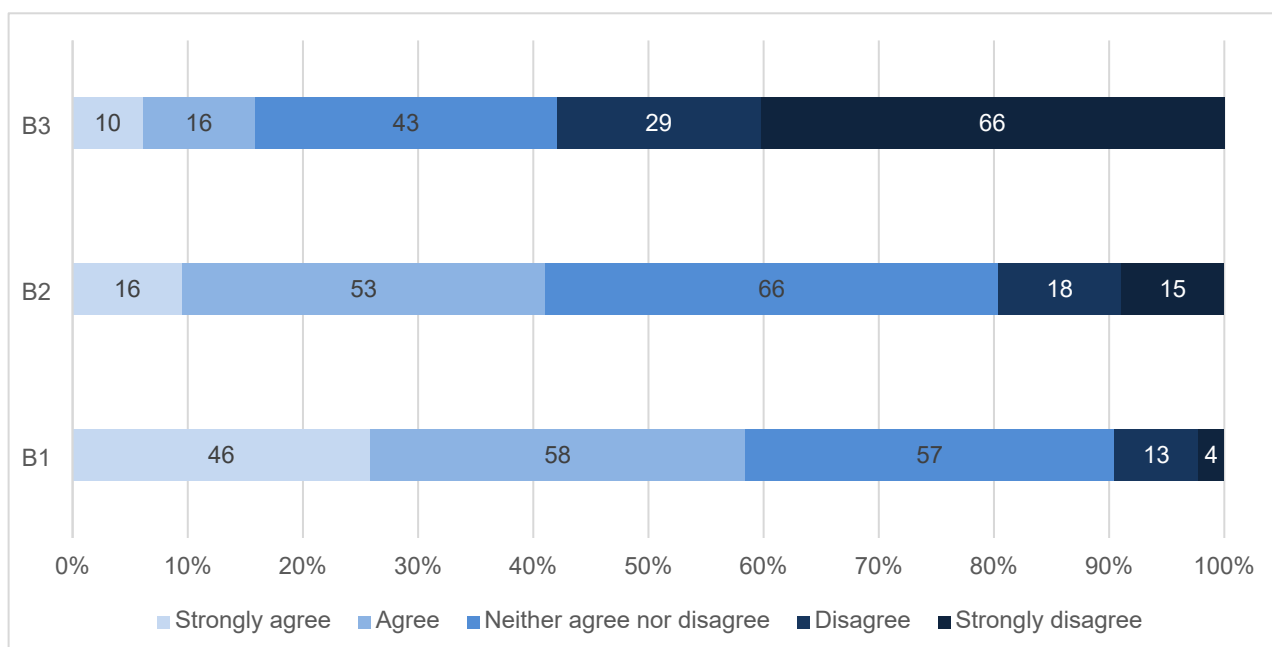


Figure 36: ‘Do you agree or disagree with this change?’ for options B1, B2 and B3

This is broadly reflected across the different stakeholder groups – these details are broken down in the closed question summaries for each option. In addition to those who responded, ‘neither agree nor disagree’, 16.5 per cent of teachers who responded to the survey chose not to answer this question.

When asked about the impact of the various proposals on staff capacity, there is again a high level of ‘neutral’ responses. B1 is the most likely to be viewed positively, whilst more than 25 per cent respondents say B3 would have a ‘very negative’ effect.

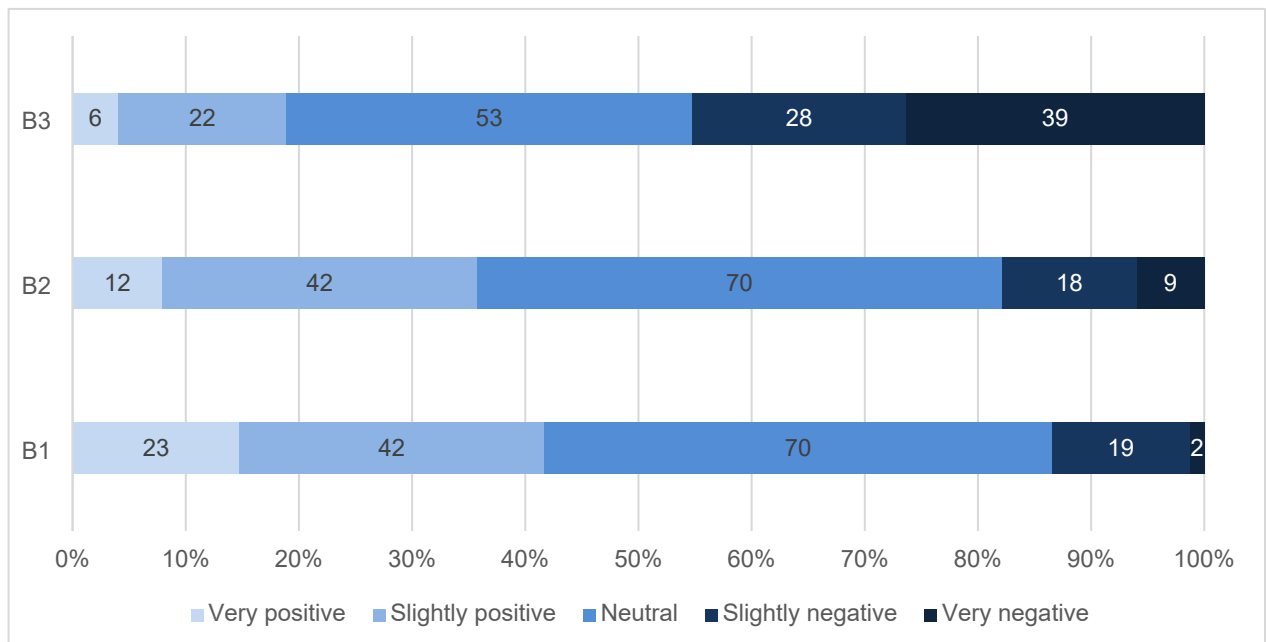


Figure 37: 'What do you anticipate to be the impact of this proposal on staff capacity?' for options B1, B2 and B3

In terms of the possible impact on council finances, B3 is viewed the most positively, but also the most negatively. There is once again a high level of ‘neutral’ responses, though these are slightly lower for B3 than for B1 or B2.

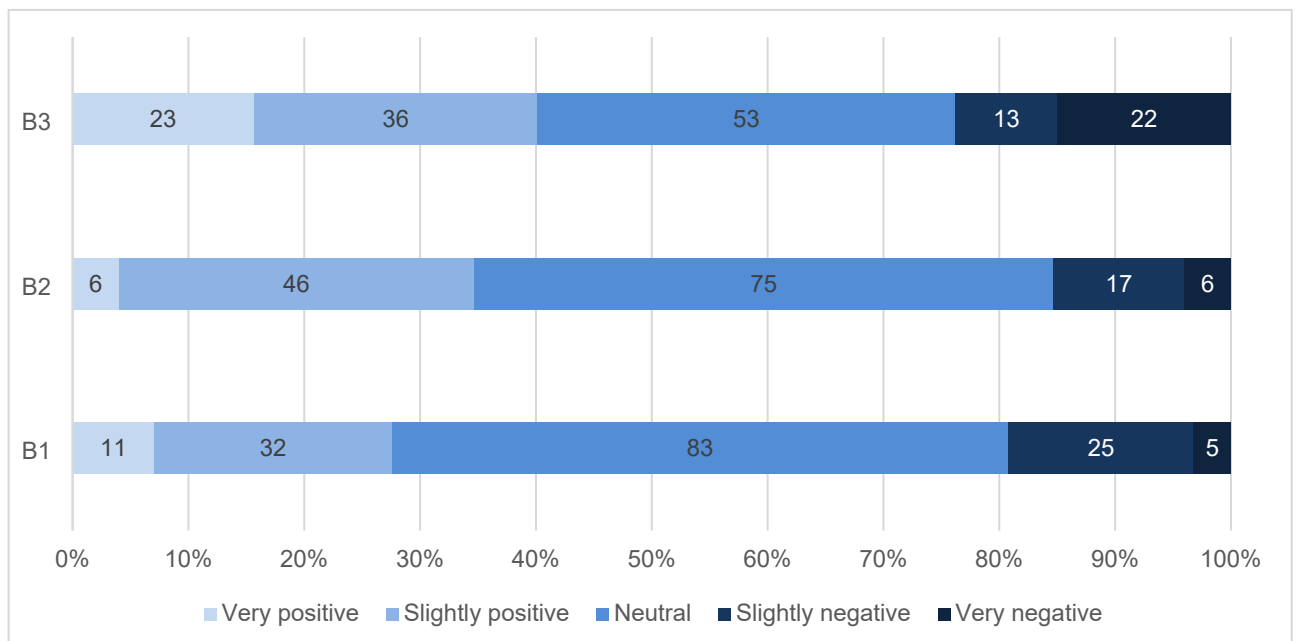


Figure 38: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for options B1, B2 and B3

However, most respondents feel that B3 will have a negative impact on inclusion, with almost half saying that they think it would have a ‘very negative’ effect and less than 10 per cent suggesting it would have a positive effect. Meanwhile, more than half of respondents say that B1 would have a positive impact.

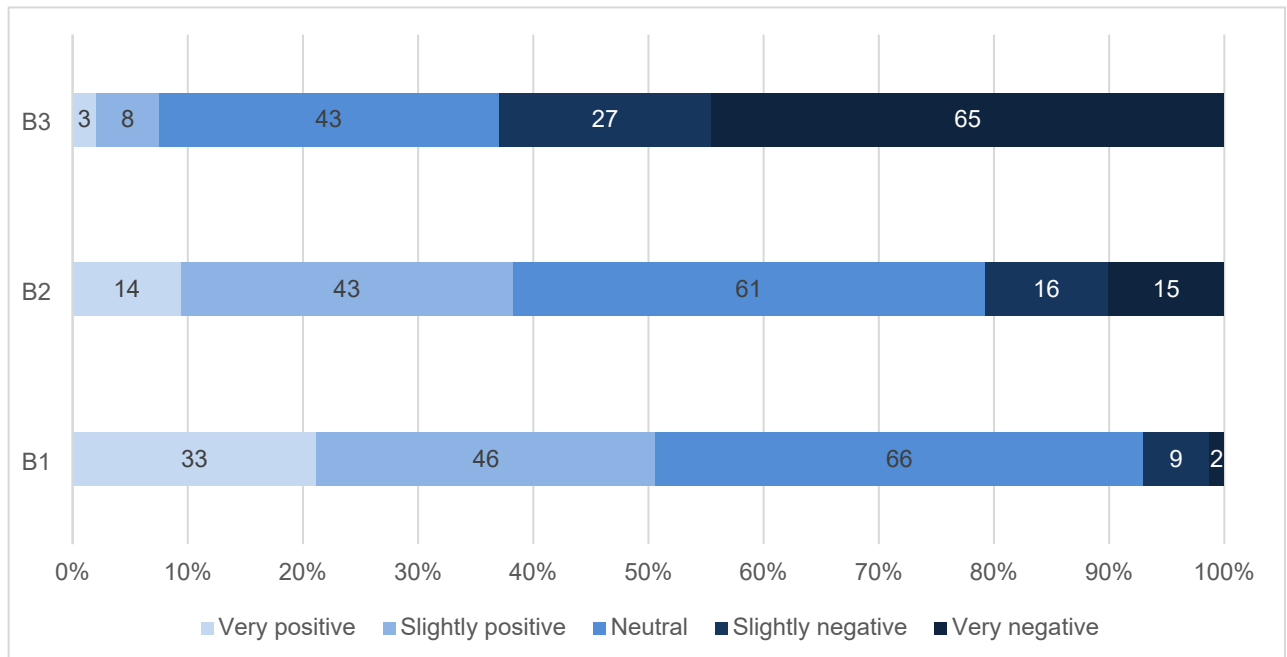


Figure 39: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for options A1, A2 and A3

Finally, responses in relation to the potential impact of the various options on quality and value for money broadly reflect those for inclusion, with a strongly negative response to B3 and a majority positive response to B1.

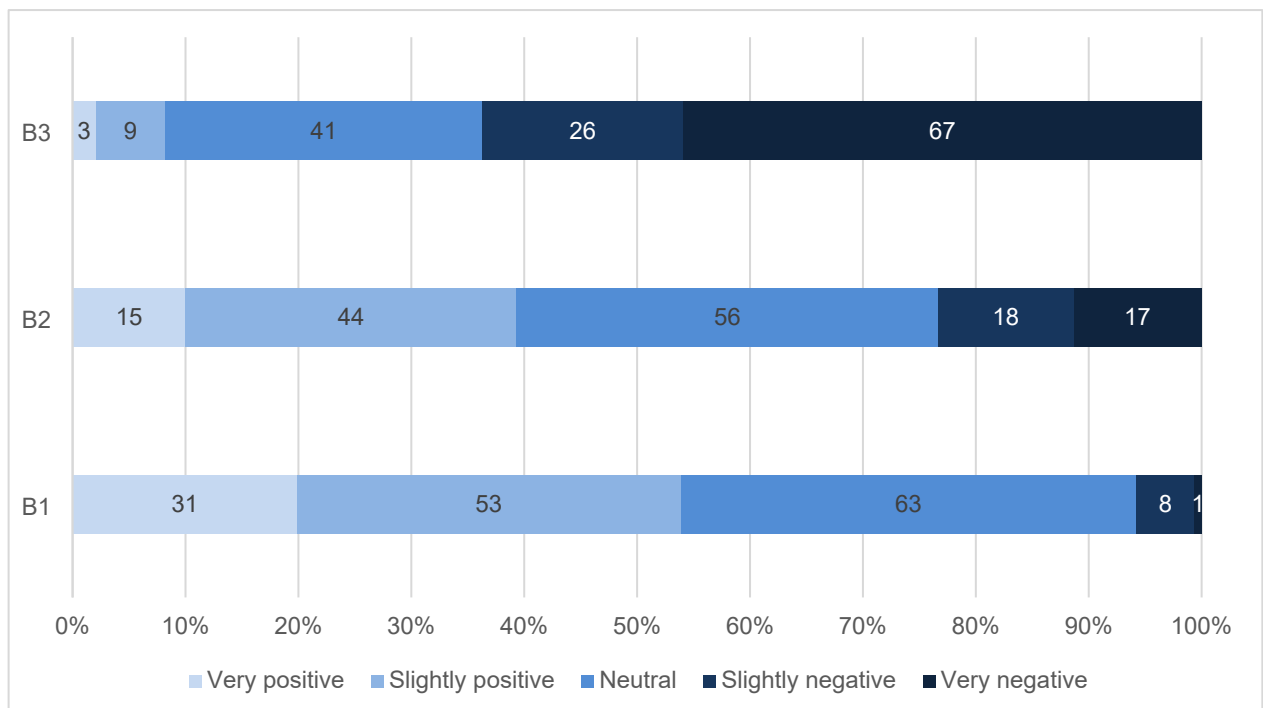


Figure 40: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for options B1, B2 and B3

Far fewer survey respondents provide qualitative feedback for the post-16 options compared to the school age options, but the sentiments they express are broadly similar. B1 is viewed largely positively, with respondents stressing the need to support post-16 learners, whilst views on B2 are mixed, with respondents saying this could be an inclusive option which helps address the needs of post-16 learners, but also expressing concerns about those who require individual support. B3 receives a strongly negative response, with respondents expressing concern that some post-16 learners may not receive sufficient support or arguing that EHCP applications would increase. Information and Engagement

session participants broadly reflected the sentiments of survey respondents, but provided some specific suggestions around implementation.

6.2 Option B1

6.2.1 Closed questions

Do you agree or disagree with this change?

Almost a third of respondents who have answered this question neither agree nor disagree with option B1. Nonetheless, more than six times more people agree with this option than disagree with it.

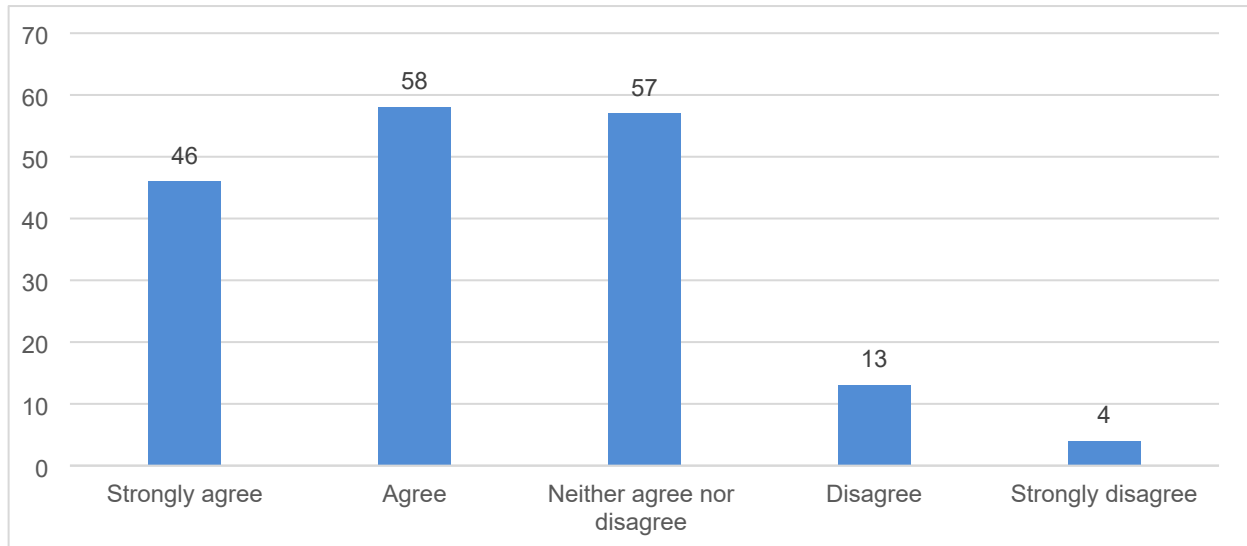


Figure 41: 'Do you agree or disagree with this change?' for option B1

Local authority staff are less likely to select 'neither agree nor disagree' and more likely to agree with option B1.

16.5 per cent of school staff and 3 per cent of local authority staff who responded to the survey opted not to answer this question.

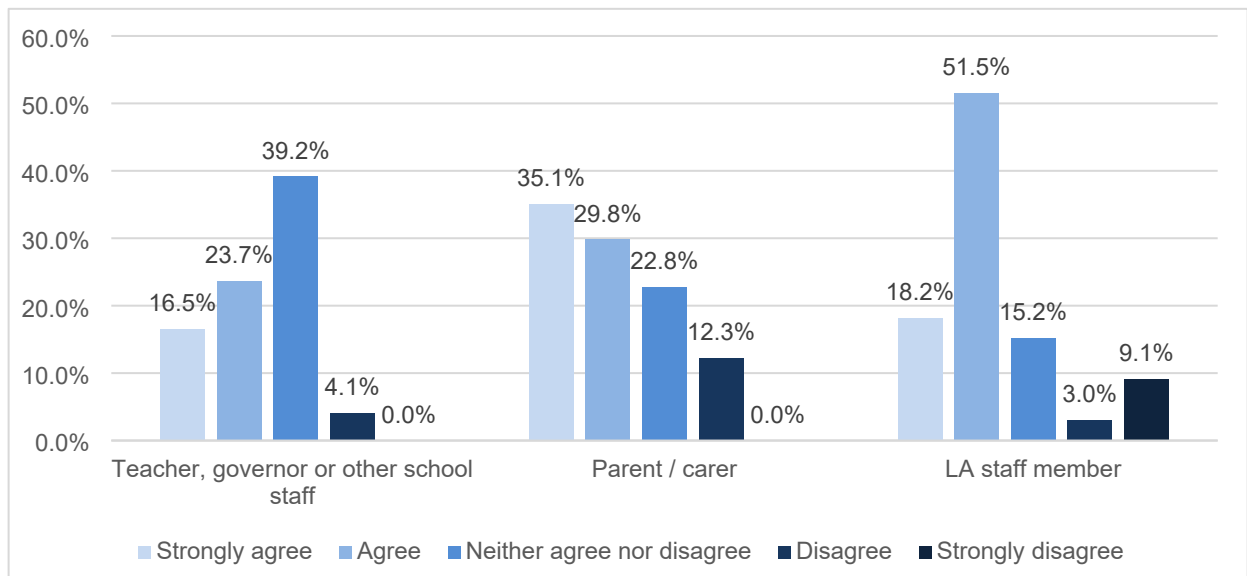


Figure 42: 'Do you agree or disagree with this change?' for option B1 by stakeholder type

What do you anticipate to be the impact of this proposal on staff capacity?

Almost half of respondents who have answered the question suggest B1 would have a neutral effect on staff capacity. Three times more respondents say the impact would be positive than negative.

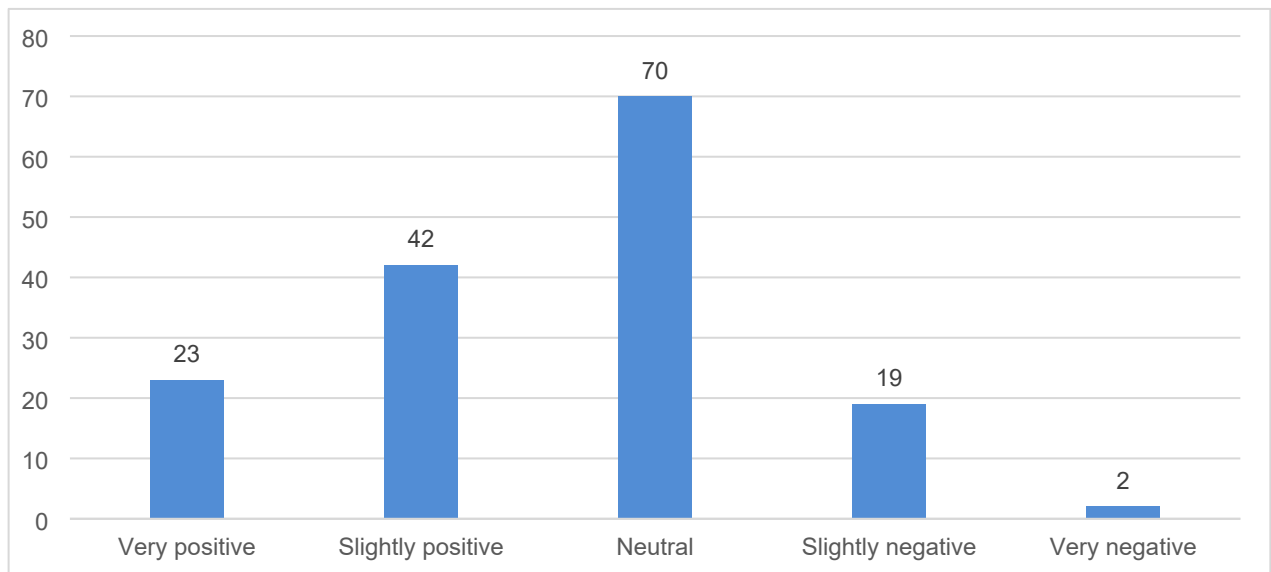


Figure 43: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option B1

Local authority staff members were most likely to feel that B1 would negatively affect staff capacity.

28.9 per cent of school staff, 5.3 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

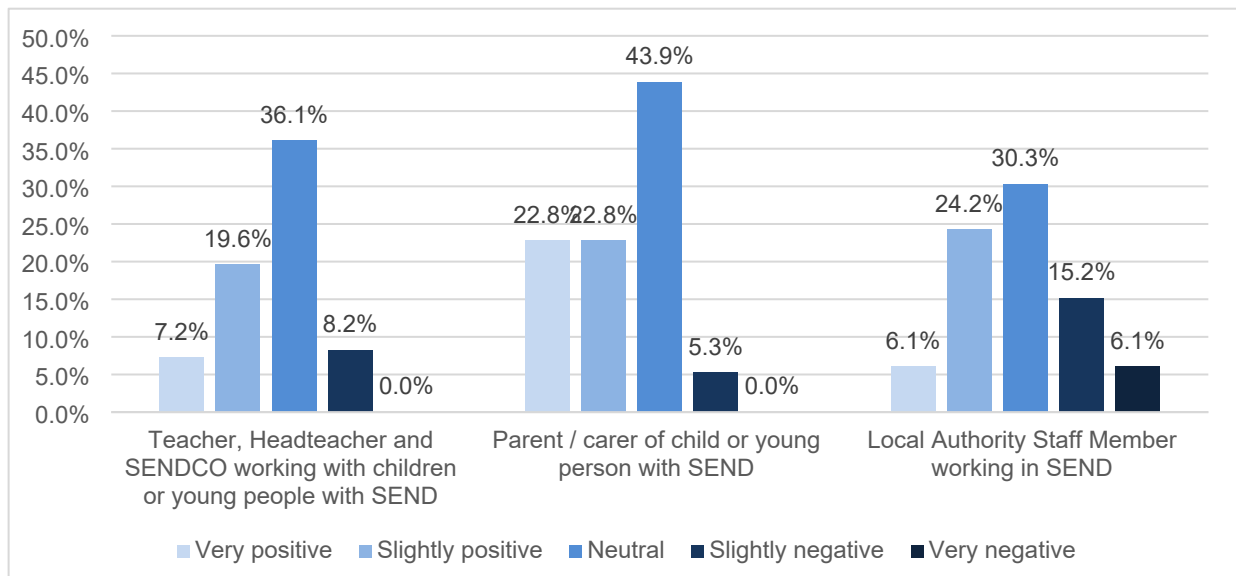


Figure 44: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option B1

What do you anticipate to be the impact of this proposal on the council’s SEND finances?

Most respondents feel that B1 would have a neutral impact on council finances.

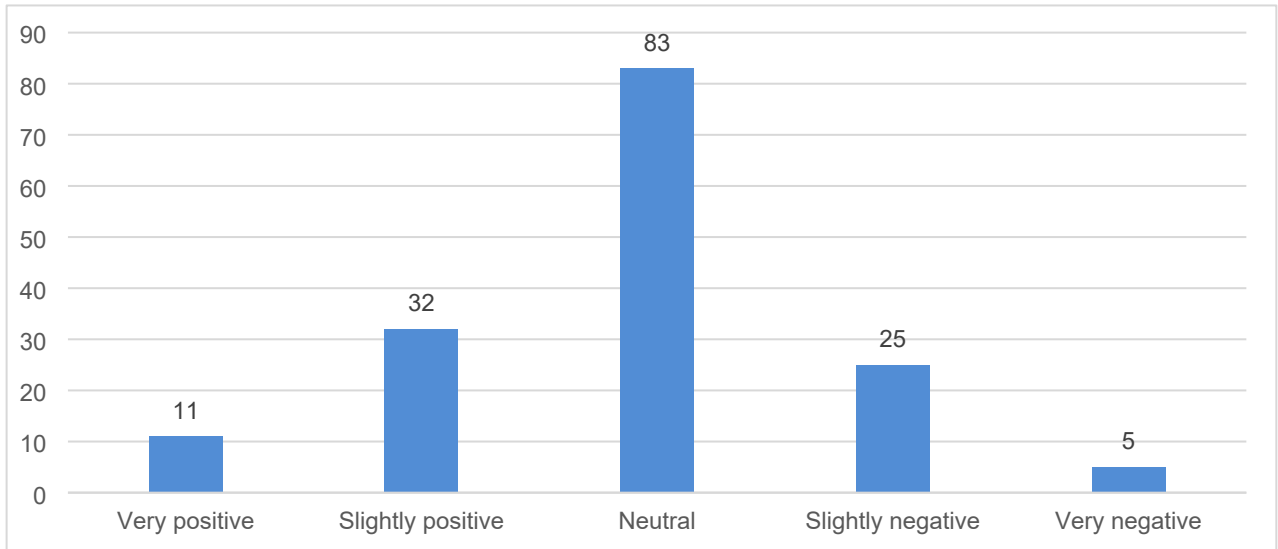


Figure 45: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B1

School staff were least likely to feel that B1 would positively impact the council's finances.

29.9 per cent of school staff, 5.3 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

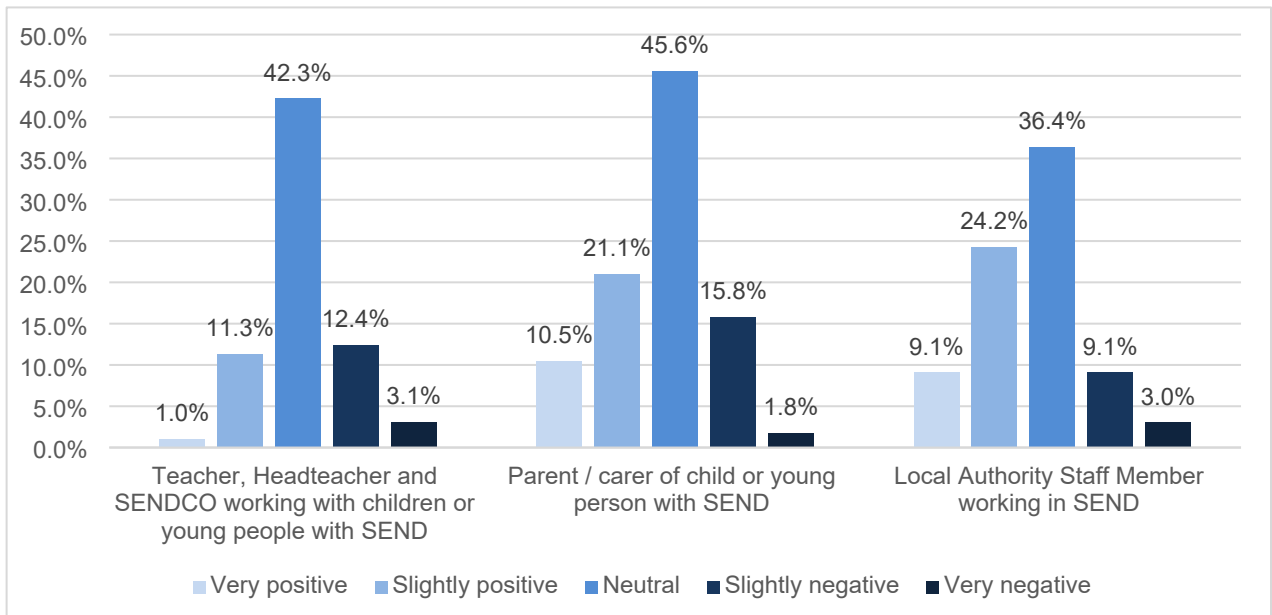


Figure 46: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B1 by stakeholder type

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

Though 'neutral' remains the most popular option, more than seven times more respondents believe it would have a positive impact than negative.

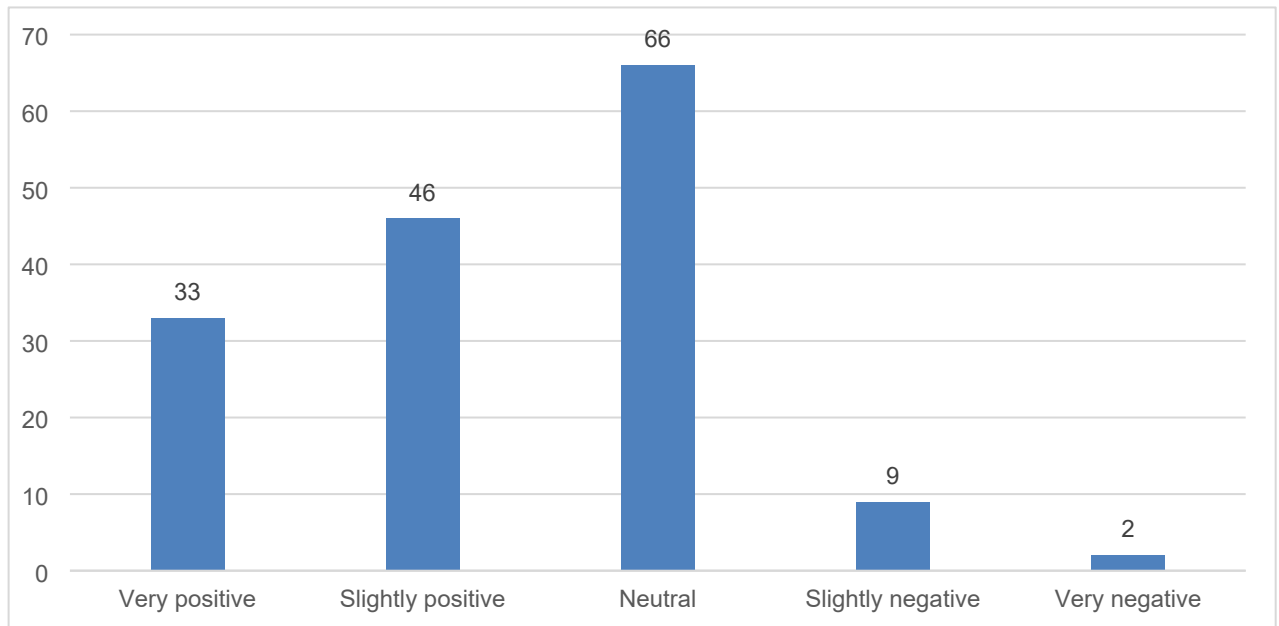


Figure 47: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B1

Parents and carers were most likely to believe B1 would have a 'very positive' impact on inclusion.

29.9 per cent of school staff, 5.3 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

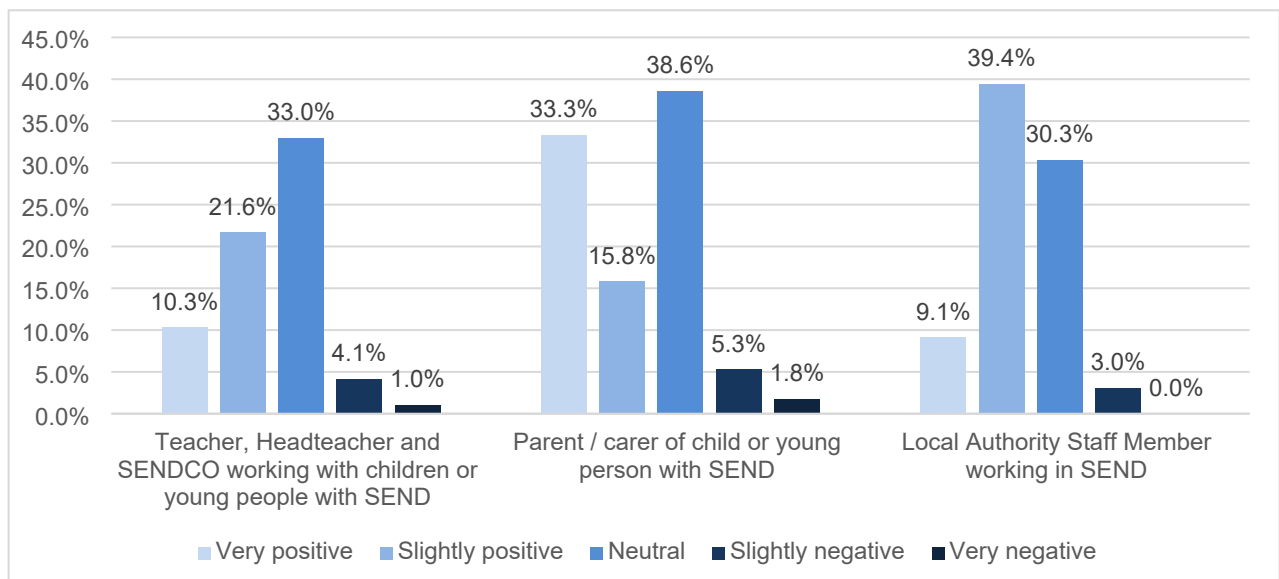


Figure 48: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B1 by stakeholder group

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

Similarly to responses for inclusion, 'neutral' remains the most popular option, but more than nine times more respondents believe it would have a positive impact than negative.

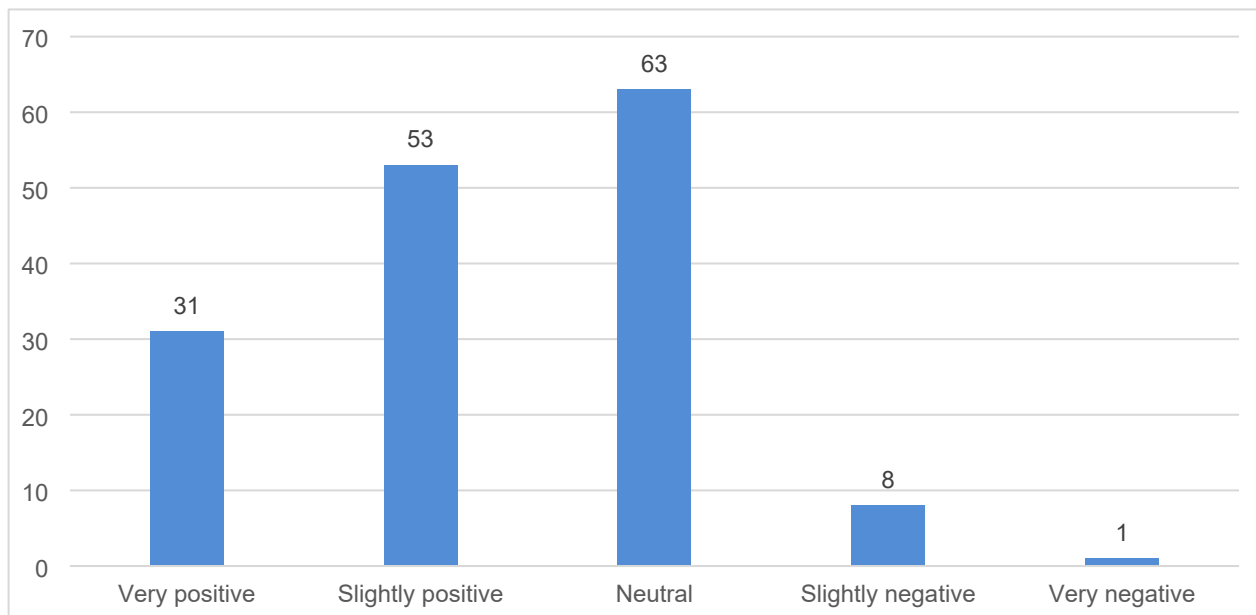


Figure 49: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B1 by stakeholder type

Parents and carers were most likely to feel there would be a 'very positive' impact on quality and value for money.

29.9 per cent of school staff, 5.3 per cent of parents / carers and 15.2 per cent of local authority staff who responded to the survey opted not to answer this question.

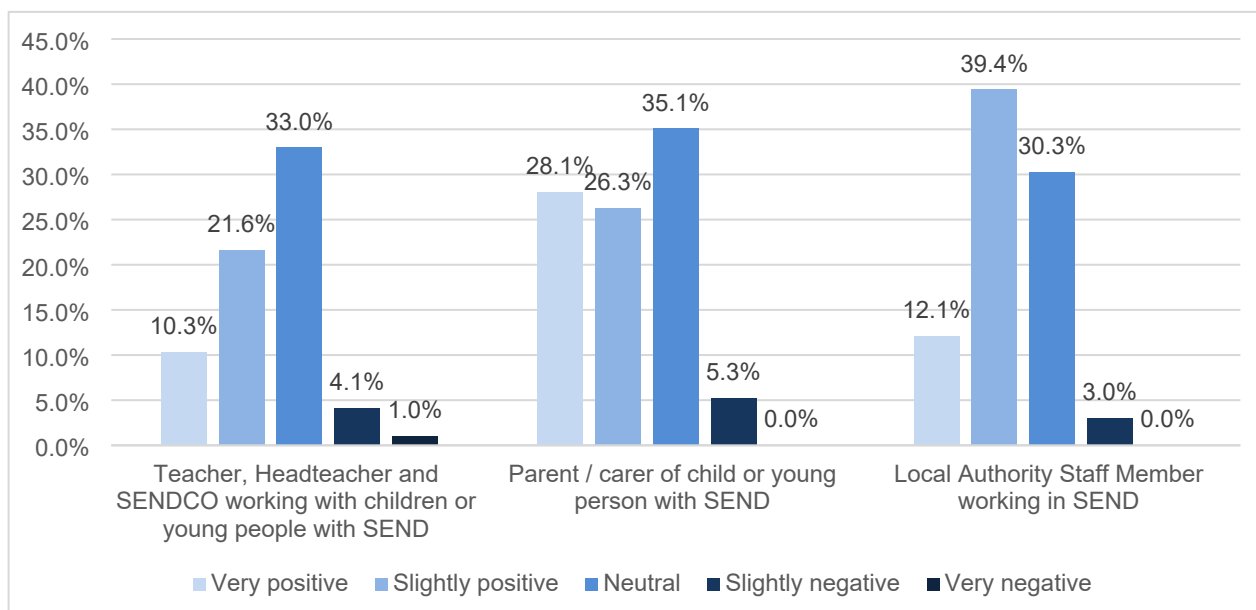


Figure 50: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B1 by stakeholder type

6.2.2 Open questions

This section of the survey received a much smaller response than the equivalent section for school age children. Less than a quarter of respondents to the survey provided a response to the open text question. Of those who did, around a third, most of whom are teachers or other school staff, say that they do not work in post-16 education or do not feel they know enough about it to comment.

Of the remainder, the majority express positive views. Some do so in general terms, suggesting that it is important that provision is made and that post-16 learners are supported so that there is less risk of them being not in education, employment or training

(NEET), particularly children in care. A few respondents say that for some children their needs do not develop until later so funding would be important for ensuring inclusion of these individuals.

A few respondents say they would welcome a streamlined application process.

However, a few respondents raise concerns about whether the available funding would be sufficient or say that the proposal could leave some post-16 learners with insufficient support. A small number believe B1 could negatively impact school staff or would not be financially beneficial.

Suggestions include:

- checks and scrutiny to ensure funding is used effectively and appropriately
- supporting post-16 learners to complete education and gain qualifications which could help with employment
- an incremental approach to improvement based on existing strengths

6.2.3 Information and Engagement sessions

Most of the comments on option B1 come from the Information and Engagement sessions for local authority staff.

One participant says that colleges need solutions which align with what they are already doing, including digital solutions which align with their existing systems. Another says that colleges are well placed to provide specialist support, but some post-16 learners will need additional support as well. Finally, one participant says B1 gives the best continuity.

6.3 Option B2

6.3.1 Closed questions

Do you agree or disagree with this change?

‘Neither agree or disagree’ is the most popular response, but more than twice as many people agree than disagree.

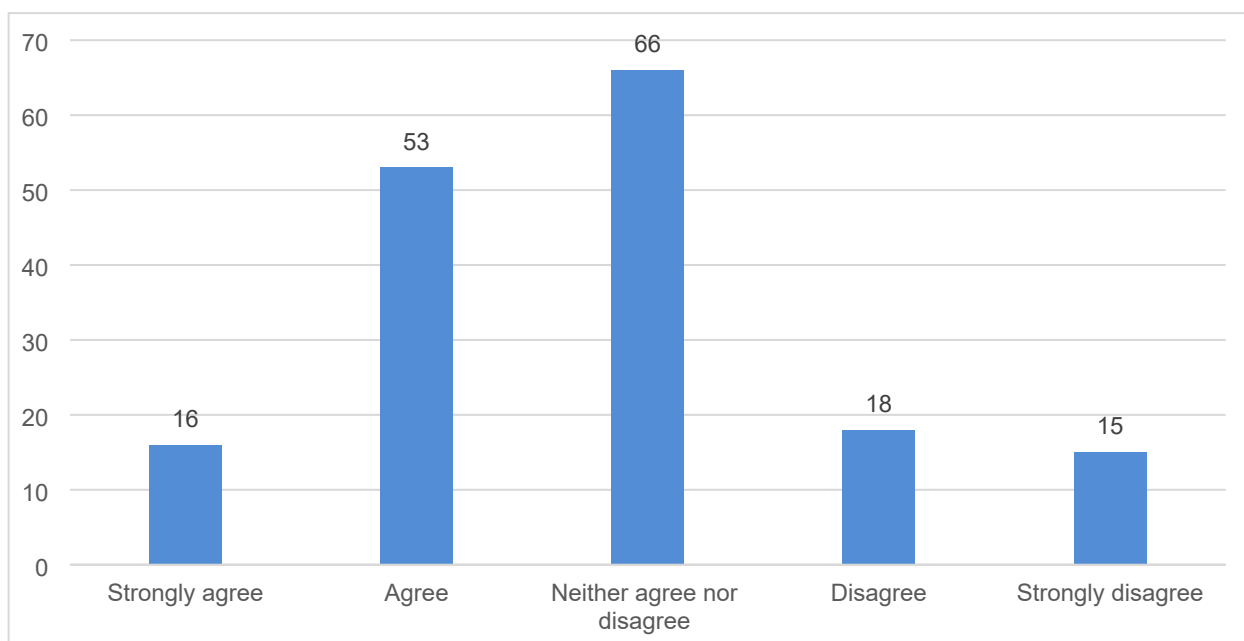


Figure 51: 'Do you agree or disagree with this change?' for option B2

Teachers and school staff are less likely to disagree with this option and more likely to select 'neither agree nor disagree'.

21.6 per cent of school staff, 3.5 per cent of parents / carers and 9.1 per cent of local authority staff who responded to the survey opted not to answer this question.

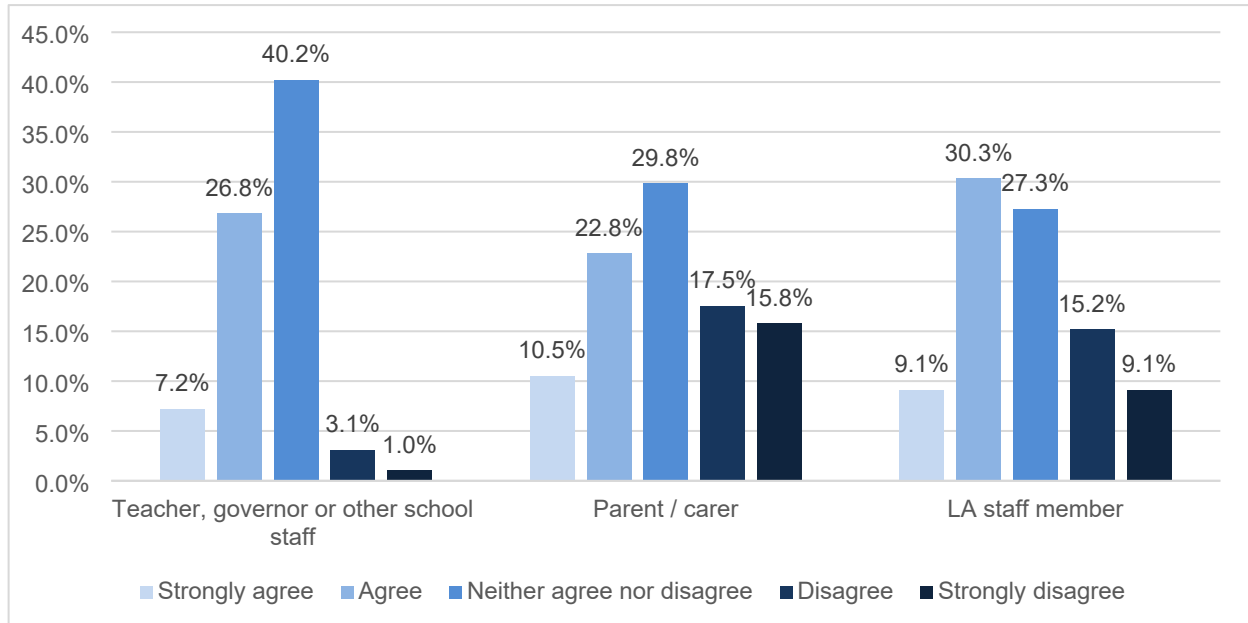


Figure 52: 'Do you agree or disagree with this change?' for option B2 by stakeholder group

What do you anticipate to be the impact of this proposal on staff capacity?

'Neutral' is the most popular response, but twice as many respondents feel B2 would have a positive impact on staff capacity as feel it would be negative.

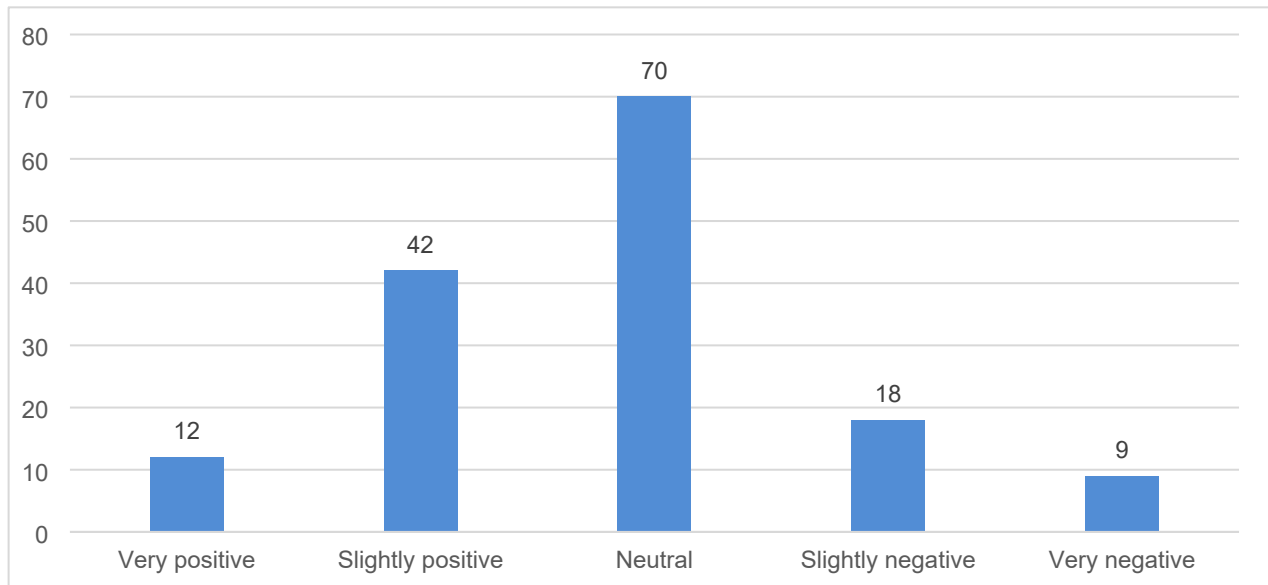


Figure 53: What do you anticipate to be the impact of this proposal on staff capacity?' for option B2

Almost half of all the parents and carers who responded to the survey, and more than half of those who answered this question, say that B2 would have a neutral effect on staff capacity. Local authority staff were less likely to feel it would have a neutral effect and more likely to believe it would have a negative one.

32.0 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

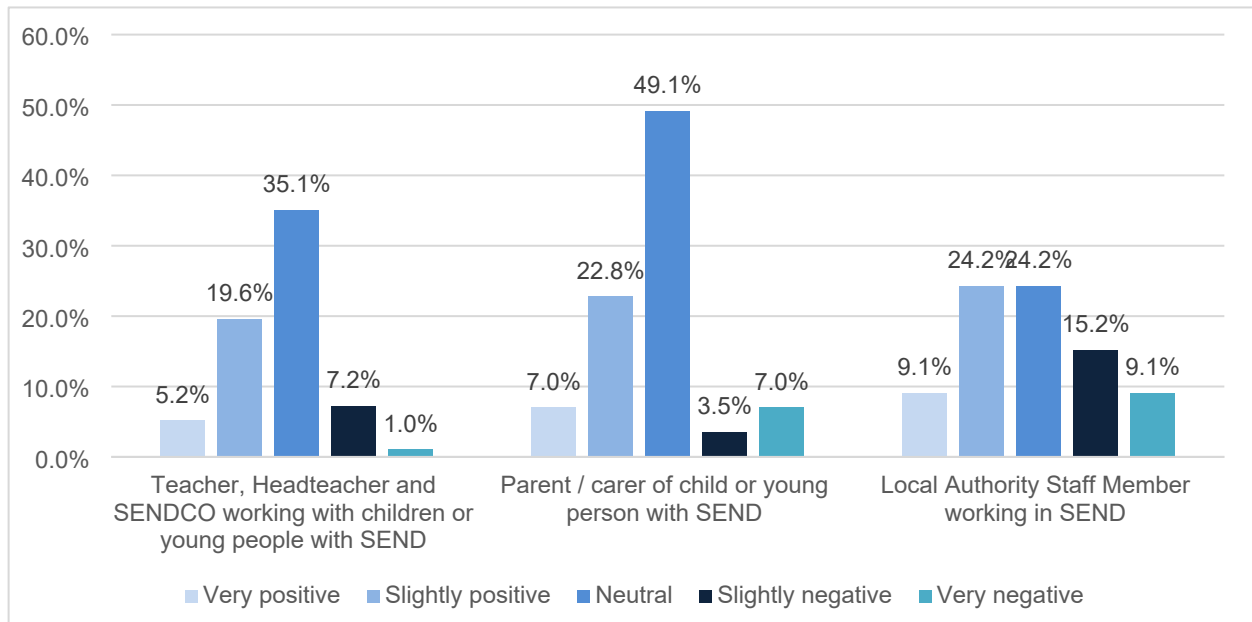


Figure 54: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option B2 by stakeholder group

What do you anticipate to be the impact of this proposal on the council's SEND finances?

Half of those who answered this question say that B2 would have a neutral impact on council finances, with more than twice as many respondents feeling it positive effect than a negative one.

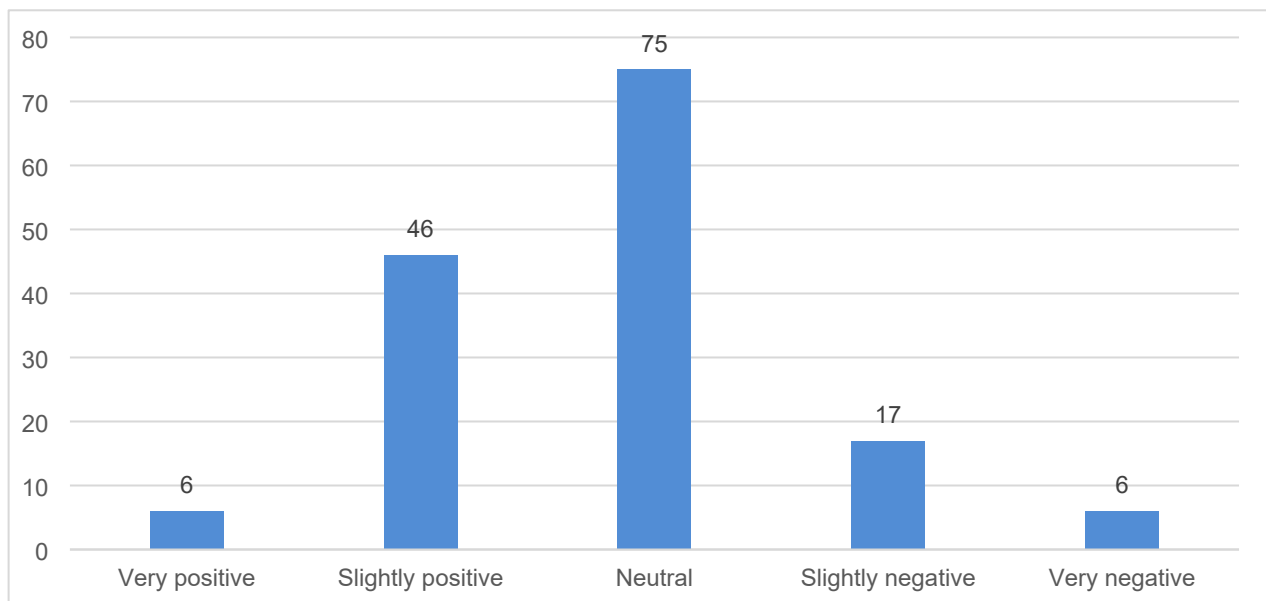


Figure 55: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B2

Local authority staff are less likely to say the impact of B2 on the council's finances would be neutral, and more likely to say it would be negative.

33.0 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

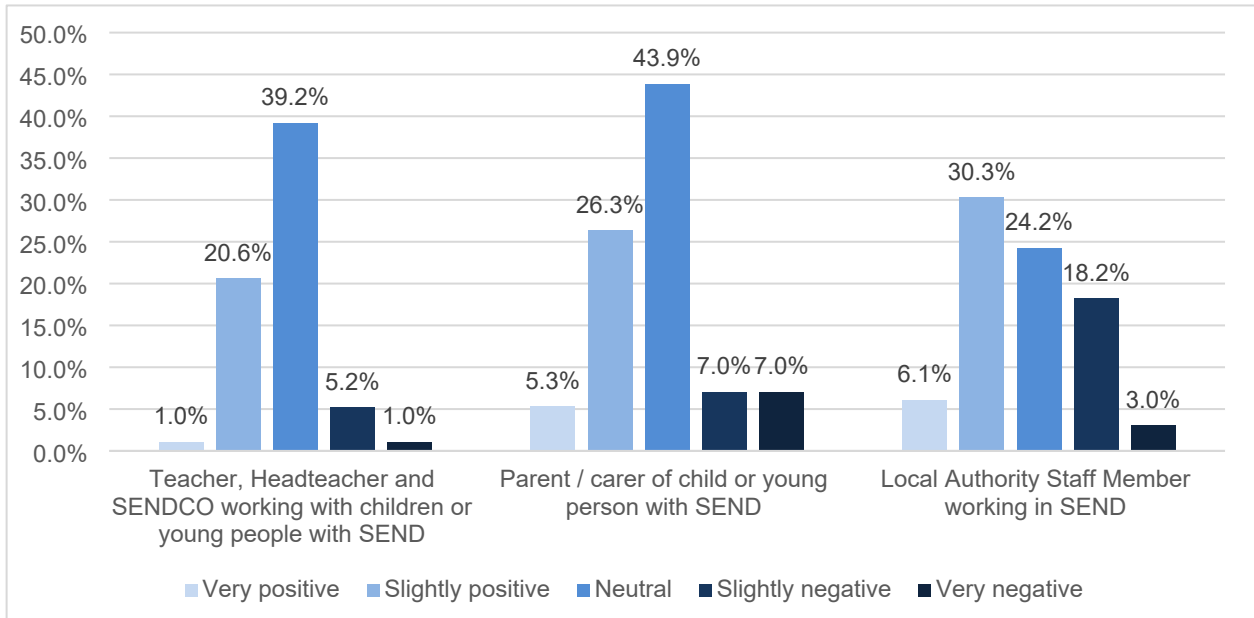


Figure 56: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B2 by stakeholder group

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

In terms of the impact of B2 on inclusion, 'Neutral' is the most popular response but almost twice as many respondents say it would have a positive impact than a negative one.

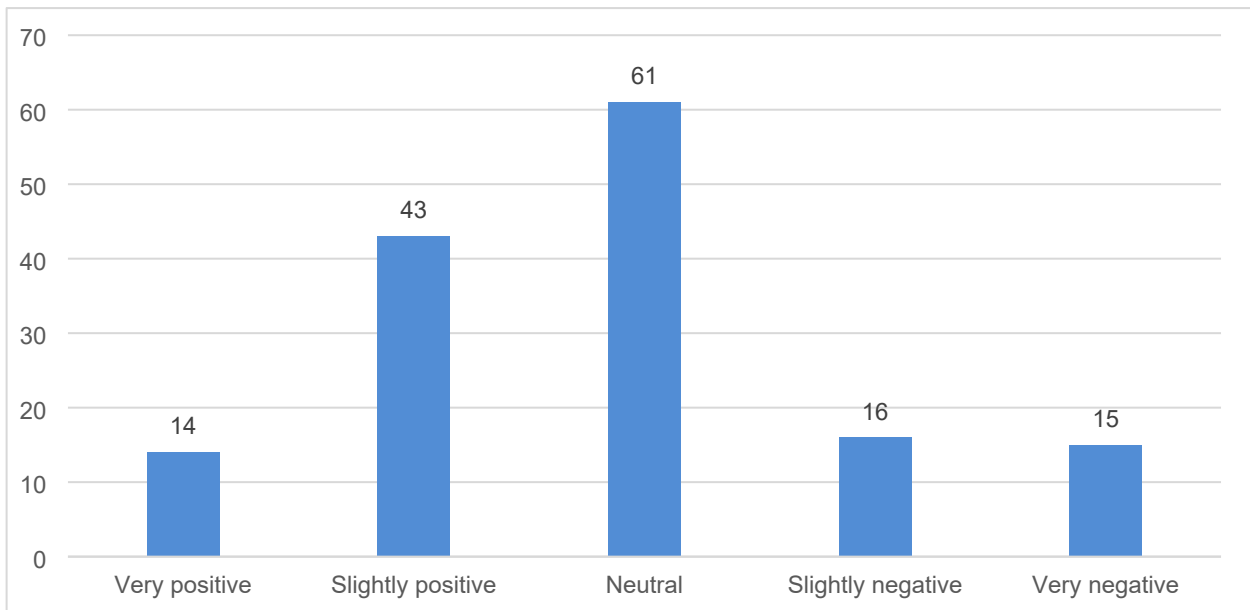


Figure 57: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B2

Local authority staff were more likely to feel that this proposal would have a negative impact on inclusion.

34.0 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

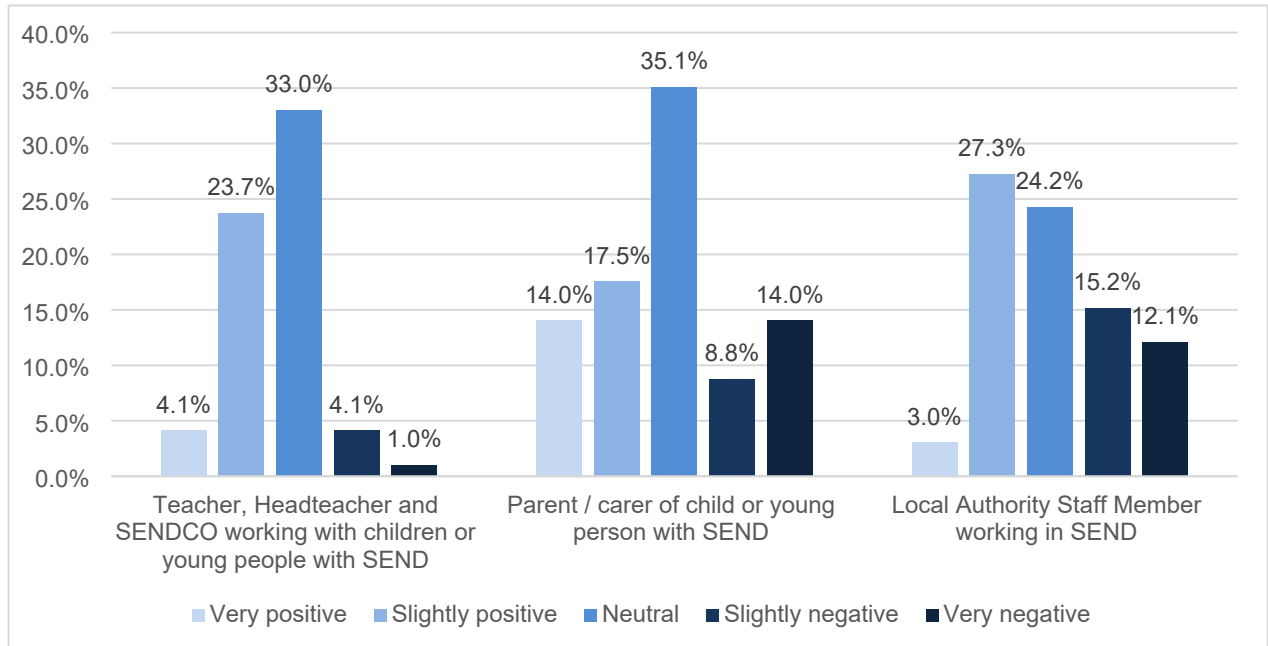


Figure 58: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B2 by stakeholder group

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

'Neutral' is once again the most popular response when it comes to the potential impact of B2 on quality and value for money, and almost twice as many respondents say it would have a positive impact than a negative one.

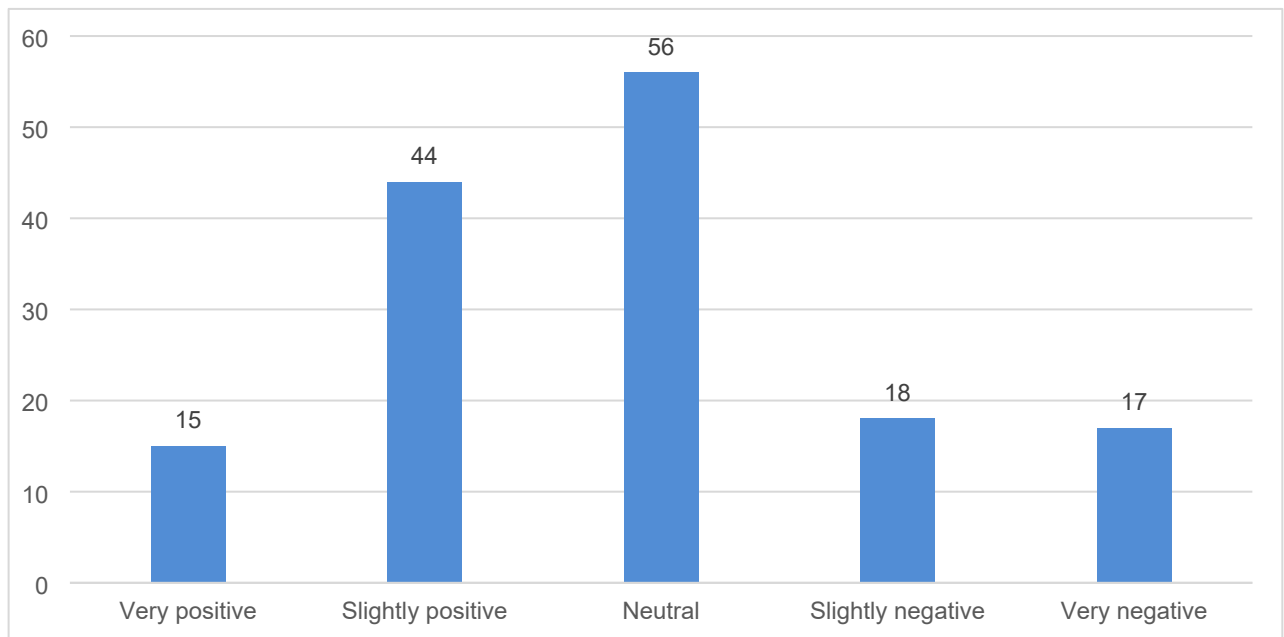


Figure 59: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B2 by stakeholder group

Local authority staff are the least likely to suggest that B2 would have a neutral impact on quality and value for money.

33.0 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

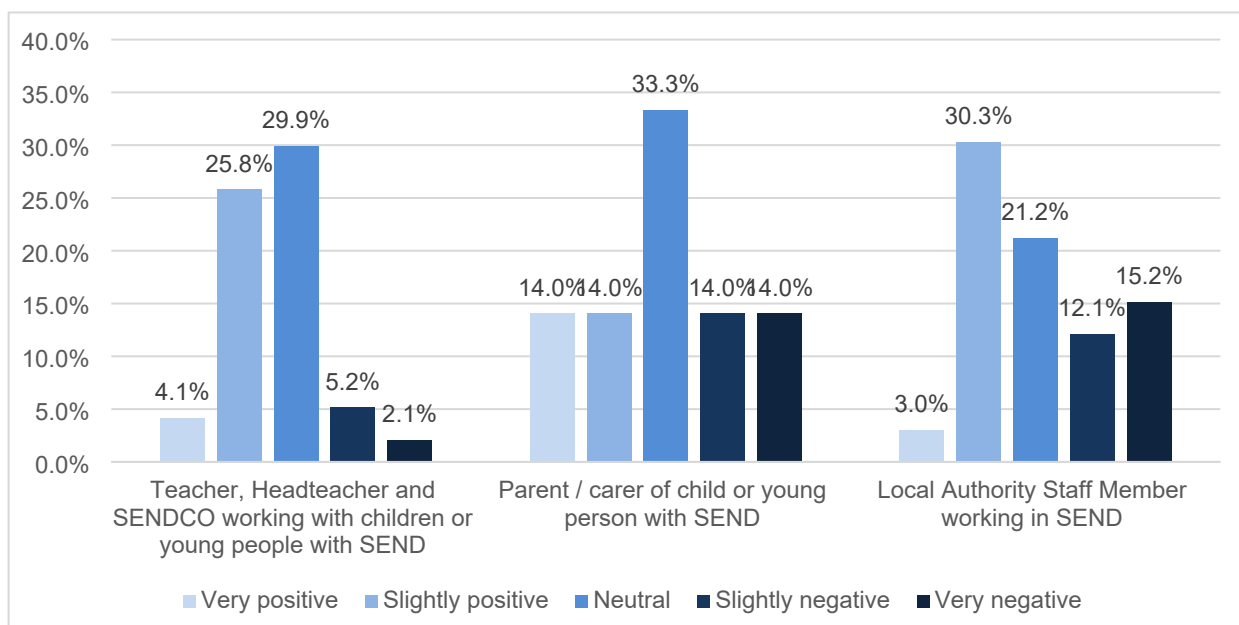


Figure 60: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B2 by stakeholder group?

6.3.2 Open questions

This section of the survey received a much smaller response than the equivalent section for school age children. Less than a quarter of respondents to the survey provided a response to the open text question. Of those who did, a third, most of whom are teachers or other school staff, say that they do not work in post-16 education or do not feel they know enough about it to comment.

Views amongst the remaining respondents are mixed.

A few respondents raise concerns about the potential impact of the proposals on post-16 learners, suggesting that they may need individual support to ensure their needs are met. A few say they believe the funds may be reappropriated by schools for other purposes and that a significant level of monitoring would be needed.

However, a few respondents feel that this proposal could benefit post-16 learners and ensure their needs are met in a more timely and effective manner. One respondent suggests it could make colleges more inclusive as they will have more autonomy and will have to plan to support whole groups.

Suggestions include assessing expected outcomes for young people so that any investment can be evaluated or developing other means of ensuring accountability.

6.3.3 Information and Engagement sessions

Some participants from the sessions for parents and carers and council staff express concerns about any shift away from individual support. One describes a need to avoid 'broad brush solutions'.

School staff suggest that needs should largely have been identified prior to reaching post-16 education but that funding could help with transitions.

6.4 Option B3

6.4.1 Closed questions

Do you agree or disagree with this change?

The majority of those who responded to this question say that they disagree with option B3.

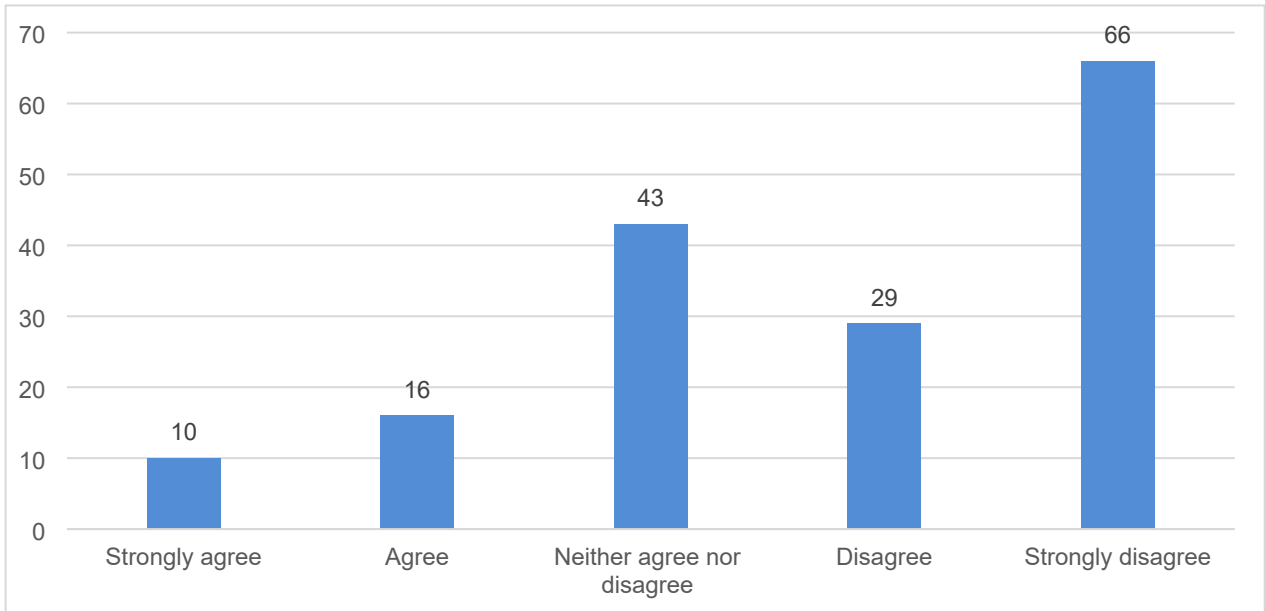


Figure 61: 'Do you agree or disagree with this change?' for option B3

Almost half of all parents or carers who responded to the survey, and the majority of those who answered this question, say that they strongly disagree with option B3.

22.7 per cent of school staff, 7.0 per cent of parents / carers and 12.1 per cent of local authority staff who responded to the survey opted not to answer this question.

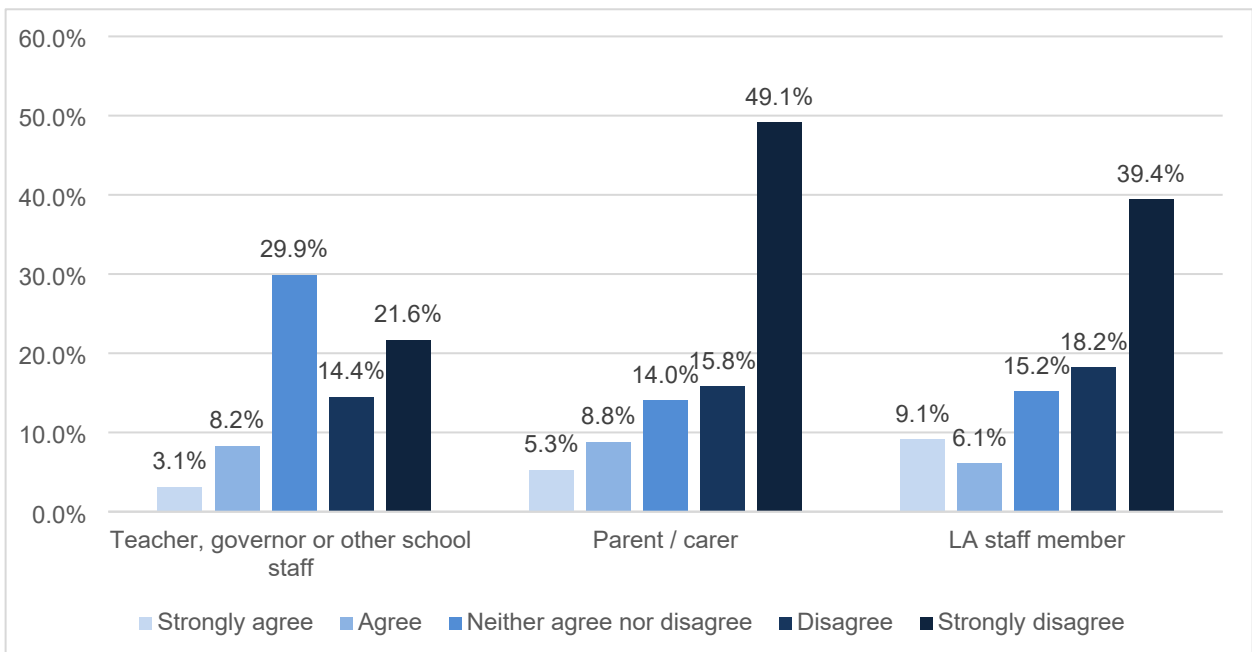


Figure 62: 'Do you agree or disagree with this change?' for option B3 by stakeholder group

What do you anticipate to be the impact of this proposal on staff capacity?

In terms of the potential impact of B3 on staff capacity, 'Neutral' is the most popular response, with more than twice as many respondents say it would have a negative impact than a positive one.

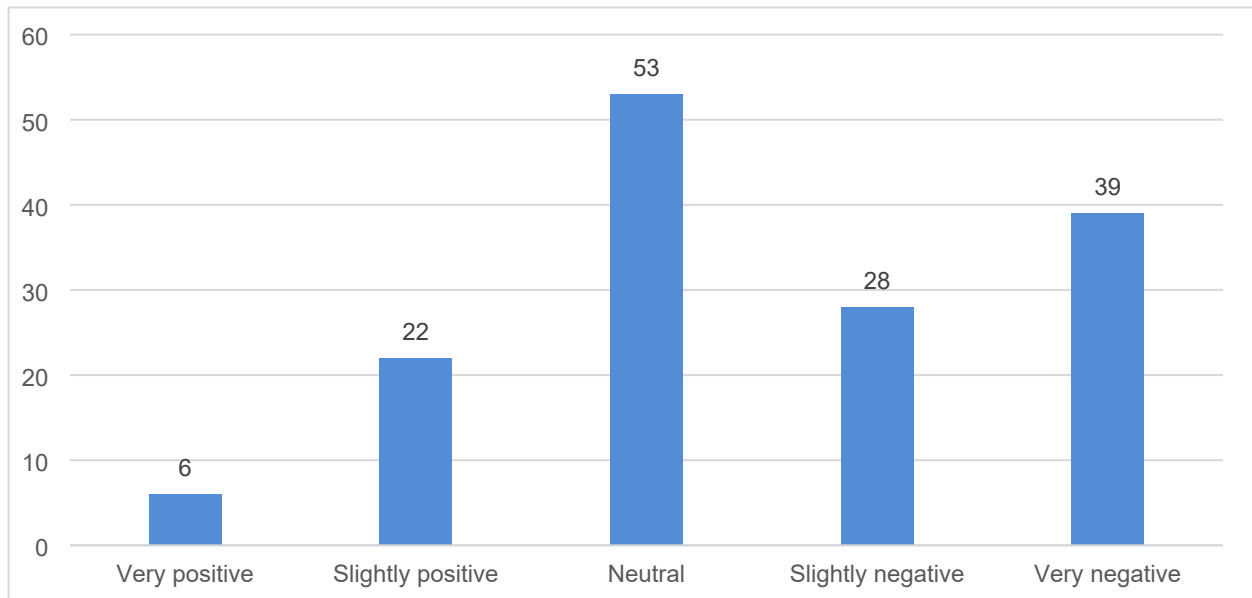


Figure 63: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option B3

Local authority staff are more likely to feel that B3 would have a negative impact on staff capacity and less likely to feel it would be neutral.

35.1 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

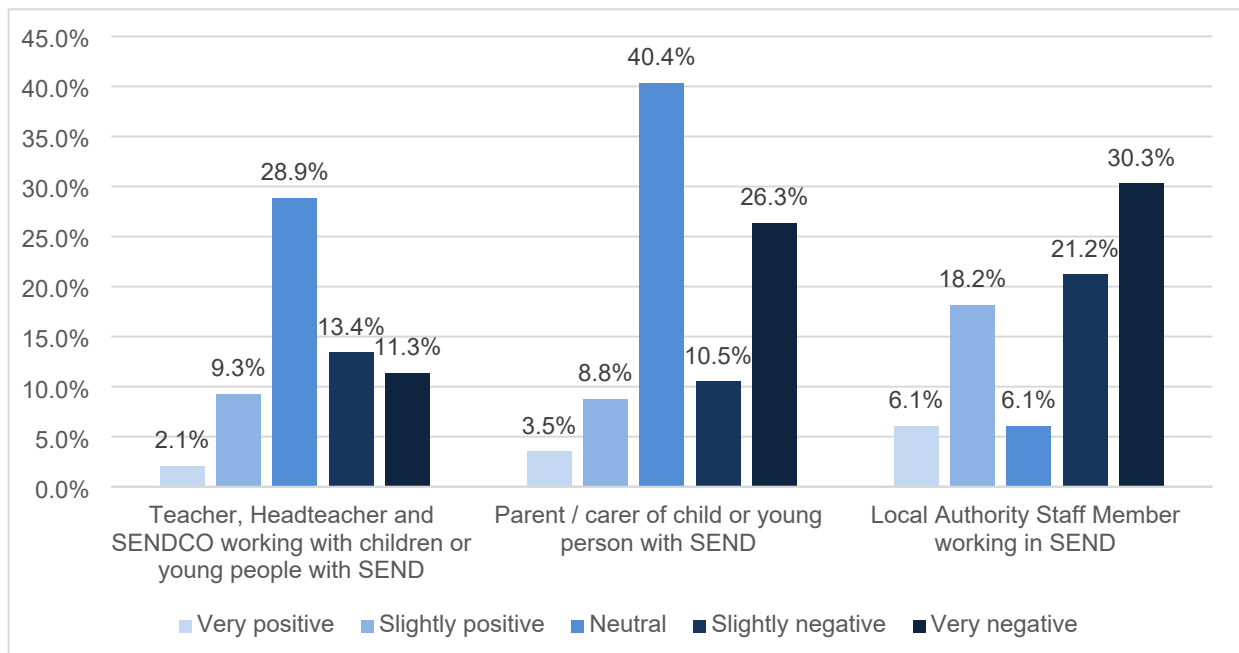


Figure 64: 'What do you anticipate to be the impact of this proposal on staff capacity?' for option B3 by stakeholder group

What do you anticipate to be the impact of this proposal on the council’s SEND finances?

In relation to finances, more than twice as many people see B3 as a positive option rather than a negative one. This is in contrast to overall views on B3.

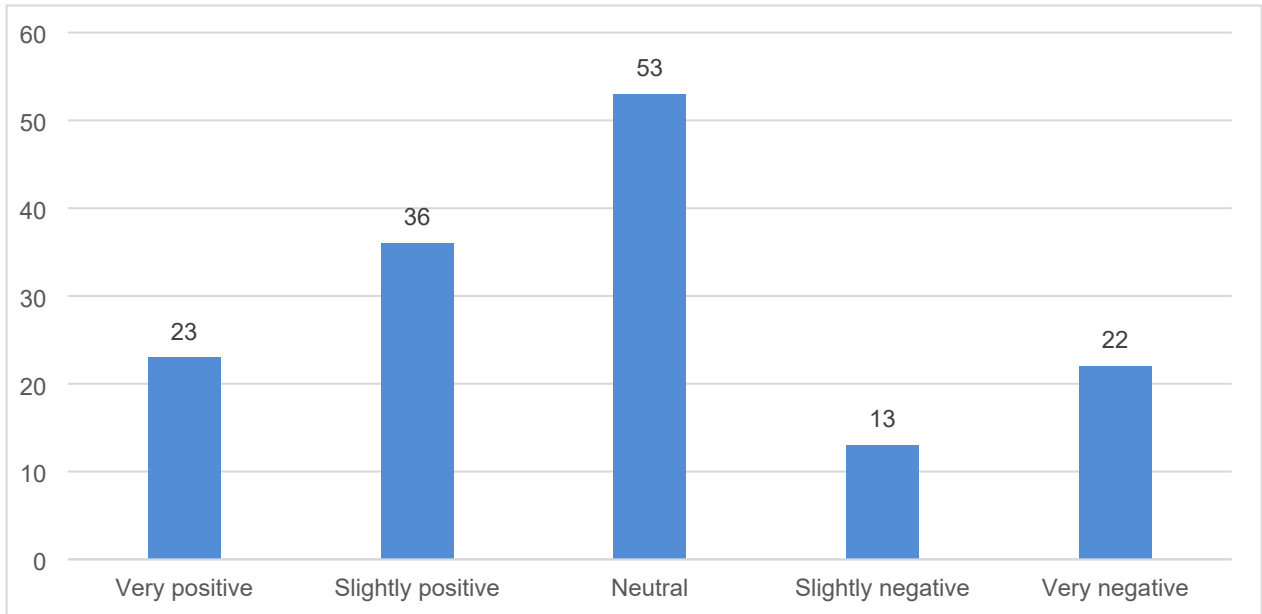


Figure 65: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B3

Local authority staff are more likely to feel that the impact of B3 on council finances would be negative, and less likely to suggest it would be neutral.

36.1 per cent of school staff, 10.5 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

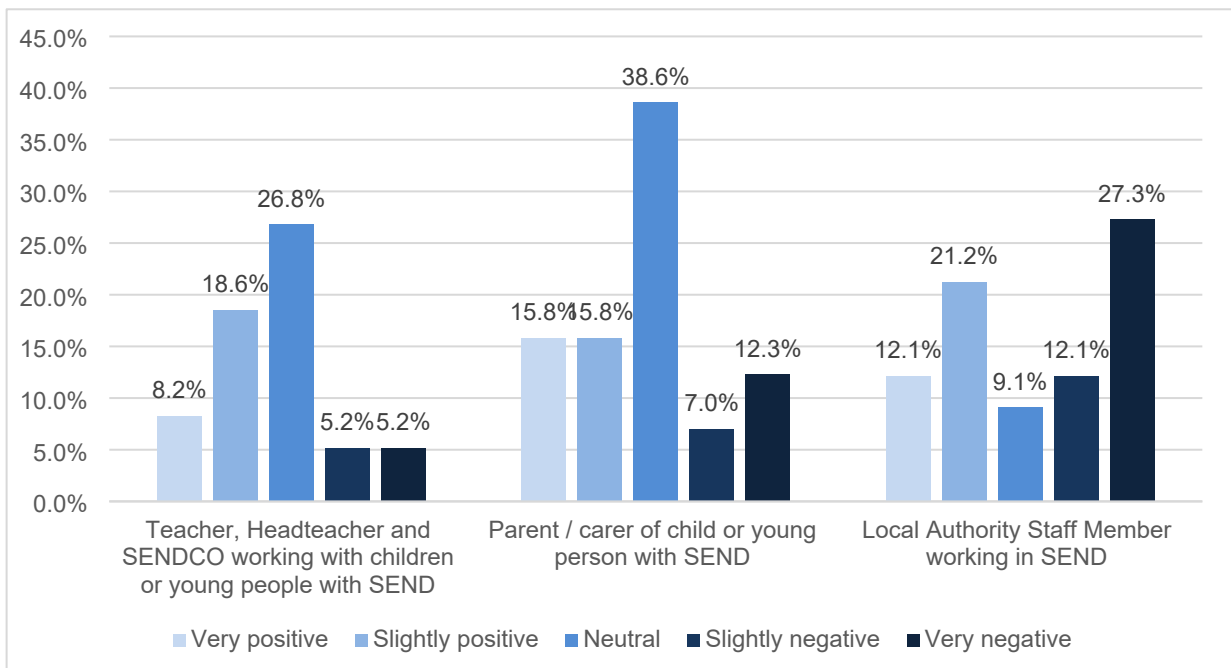


Figure 66: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?' for option B3 by stakeholder group

What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?

Most respondents who answered this question say that they believe B3 would have a negative effect on inclusion.

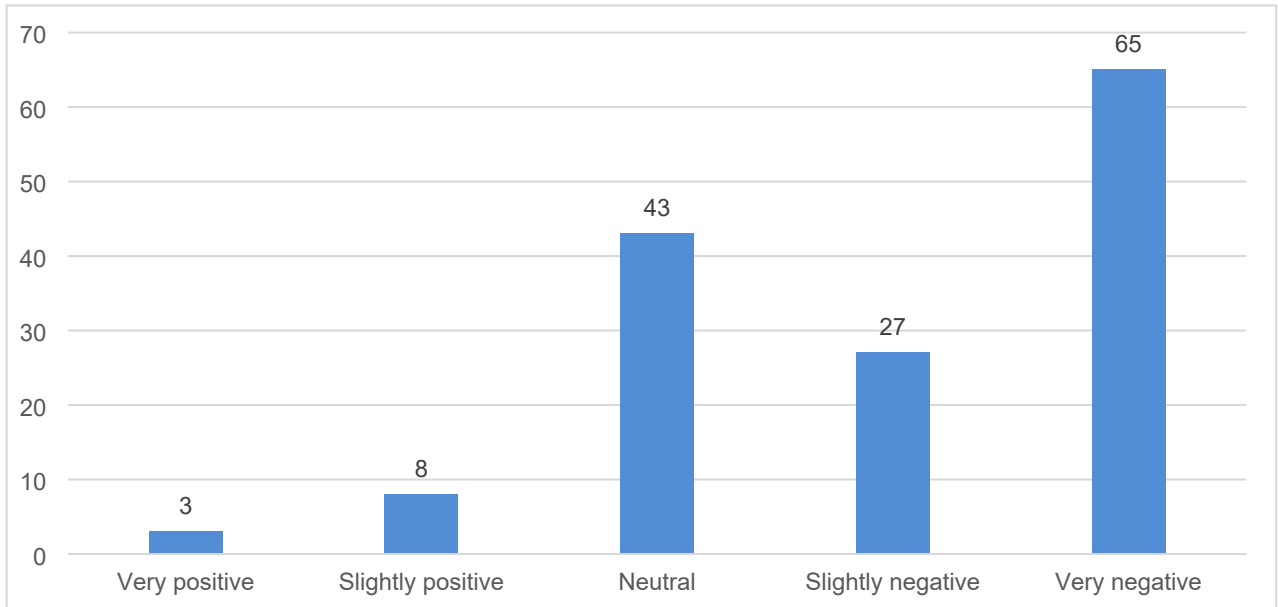


Figure 67: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B3

Almost half of parents or carers, and the majority of those who answered this question, feel that B3 would have a very negative impact on inclusion.

36.1 per cent of school staff, 10.5 per cent of parents / carers and 21.2 per cent of local authority staff who responded to the survey opted not to answer this question.

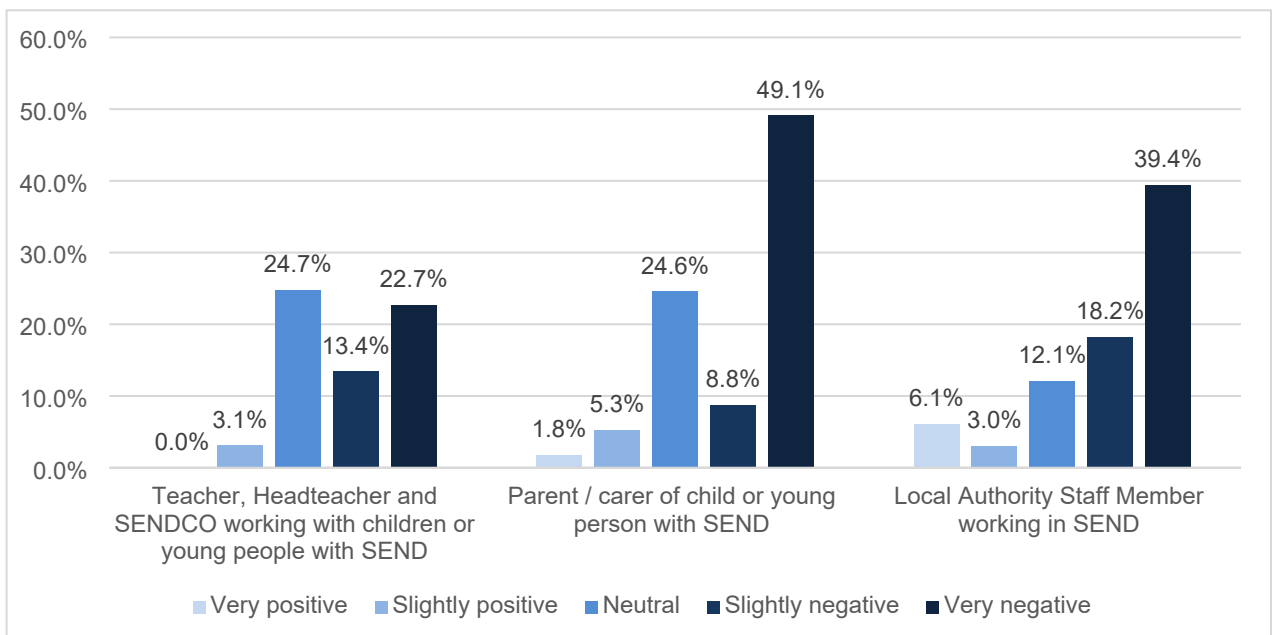


Figure 68: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?' for option B3 by stakeholder group

What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?

As with responses for inclusion, most respondents say that A3 would have a 'very negative' effect on quality and value for money.

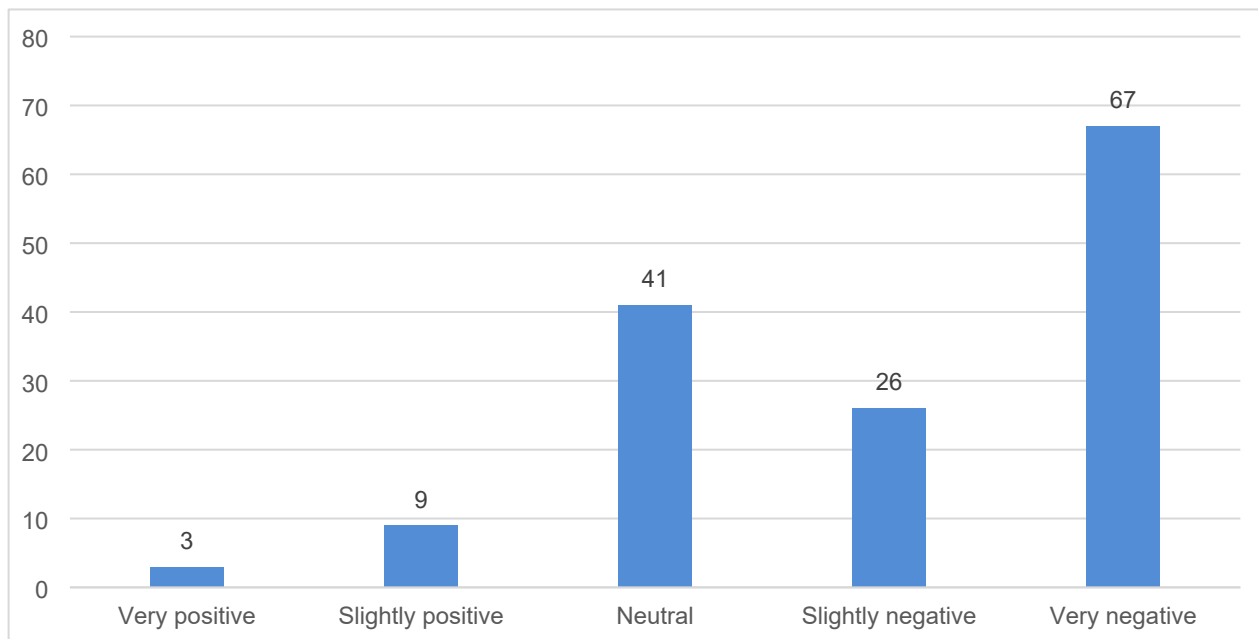


Figure 69: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B3

The majority of parents or carers and council staff who responded to this question say that B3 would have a very negative effect on quality and value for money.

36.1 per cent of school staff, 12.3 per cent of parents / carers and 18.2 per cent of local authority staff who responded to the survey opted not to answer this question.

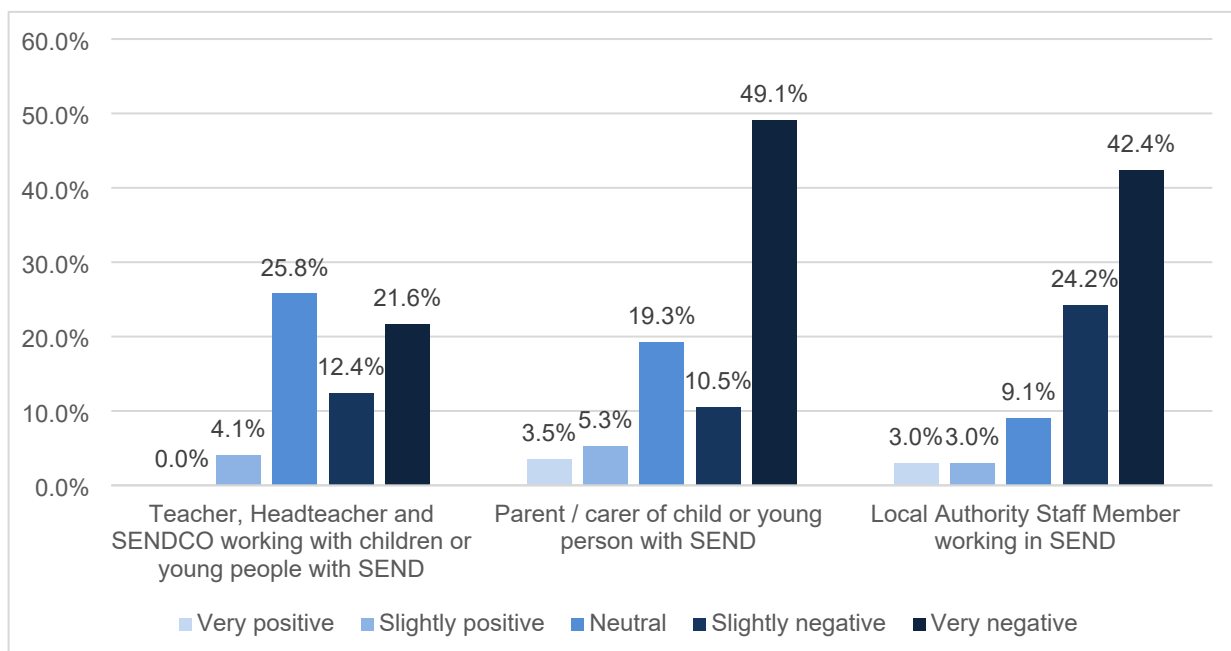


Figure 70: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?' for option B3 by stakeholder group

6.4.2 Open questions

This section of the survey received a much smaller response than the equivalent section for school age children. Fewer than a quarter of respondents to the survey provided a response to the open text question. Of those who did, a quarter, most of whom are teachers or other school staff, say that they do not work in post-16 education or do not feel they know enough about it to comment.

Views amongst the remaining respondents are largely negative.

Some express concern that there will be post-16 learners who may not have received support in the past or who have received support funded through other learners' EHCPs who would need some form of support in a post-16 setting. A small number suggest that students with additional needs, children in care, black and minority ethnic learners, or those with later presenting needs (e.g. girls with Autism Spectrum Disorder (ASD)) may be disadvantaged. A few also argue that this option could lead to an increase in learners who are NEET who to a greater number of children with SEND needs being excluded from further education.

Some respondents suggest that B3 could lead to an increase in ECH needs assessments, which could place additional pressure on school staff. A small number argue that there could be increased waiting times, impacting negatively on applicants whilst they wait for their application to be assessed.

Only a small number of respondents comment positively on option B3, saying that there could be financial benefits, or that it could be consistent with the approach in other local authority areas.

Suggestions include a separate intervention or registration process for post-16 learners, a simplified and streamlined application process, assessments to verify when support is needed or not needed, or any approach which leverages the maximum possible level of funding from central government.

6.4.3 Information and Engagement sessions

The response to option B3 from Information and Engagement session participants is strongly negative.

They argue that there would be a significant increase in EHCP applications and plans in place, which could overwhelm the local authority and slow down the process. One participant suggests this could lead to a raising of the threshold of need for an EHCP to be granted. Others say that it would leave learners unsupported and would not be inclusive, particularly for learners from communities which may associate stigma with diagnosed SEND children.

7 Survey results: BUDs

7.1 Overview

Figure 71 below shows respondents' level of agreement with various statements related to BUDs.

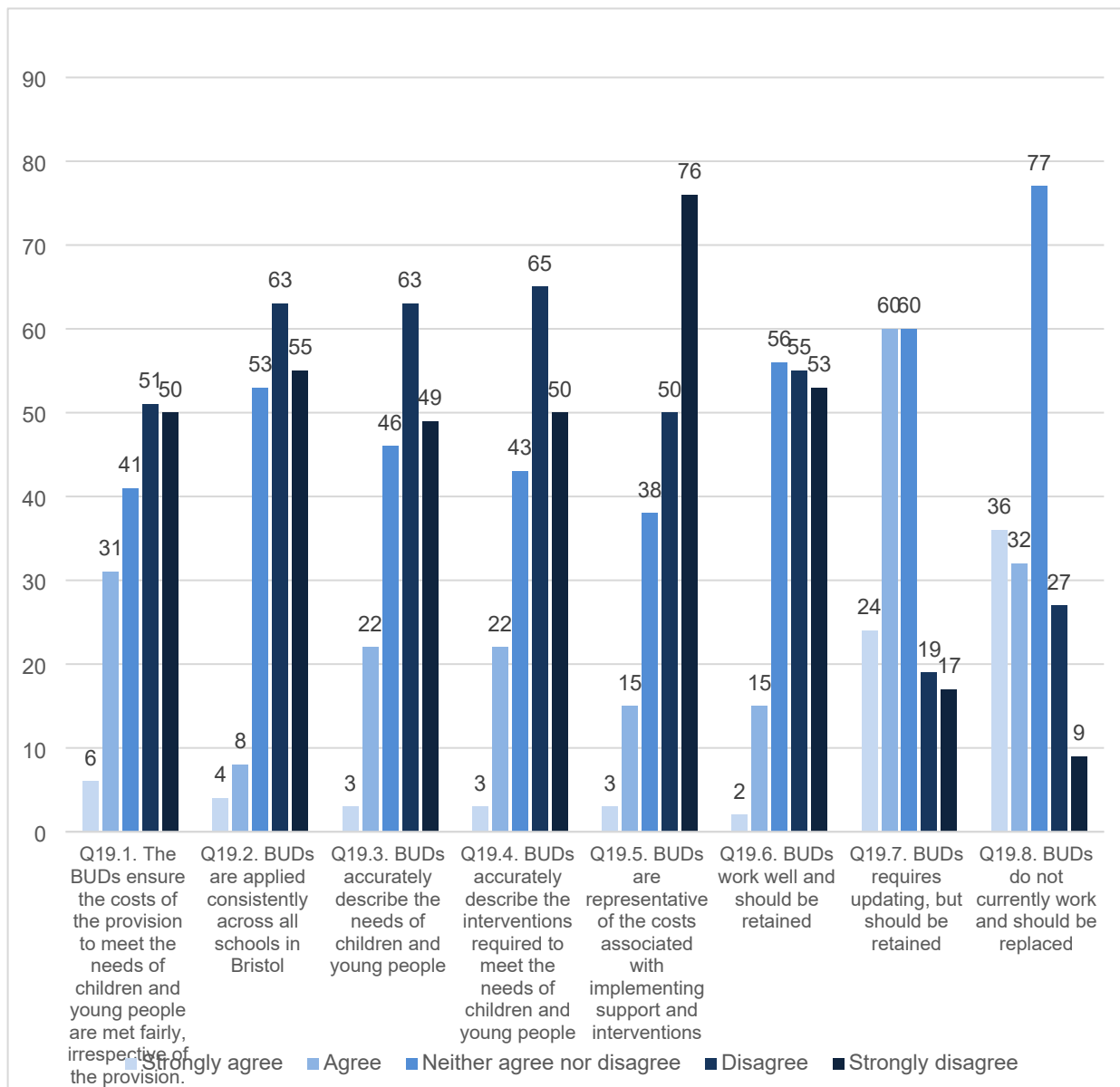


Figure 71: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements?'

The highest level of agreement ('agree' or 'strongly agree') is with the statement 'BUDs require updating but should be retained' and the lowest level of agreement is with the statement 'BUDs are applied consistently across all schools in Bristol'.

The highest level of disagreement ('disagree' or 'strongly disagree') is with the statement 'BUDs are representative of the costs associated with implementing support and interventions' whilst the lowest level of disagreement is with the statements 'BUDs require updating but should be retained' and 'BUDs do not currently work and should be replaced' equally (although more people strongly disagree with the former).

This reflects qualitative feedback which suggests that the statements are outdated, applied inconsistently, and lead to children and young people being 'pigeonholed'.

7.1.1 Closed question responses

‘The BUDs ensure the costs of the provision to meet the needs of children and young people are met fairly, irrespective of the provision’

School staff are most likely to disagree with this statement, whilst local authority staff are more likely to agree with it.

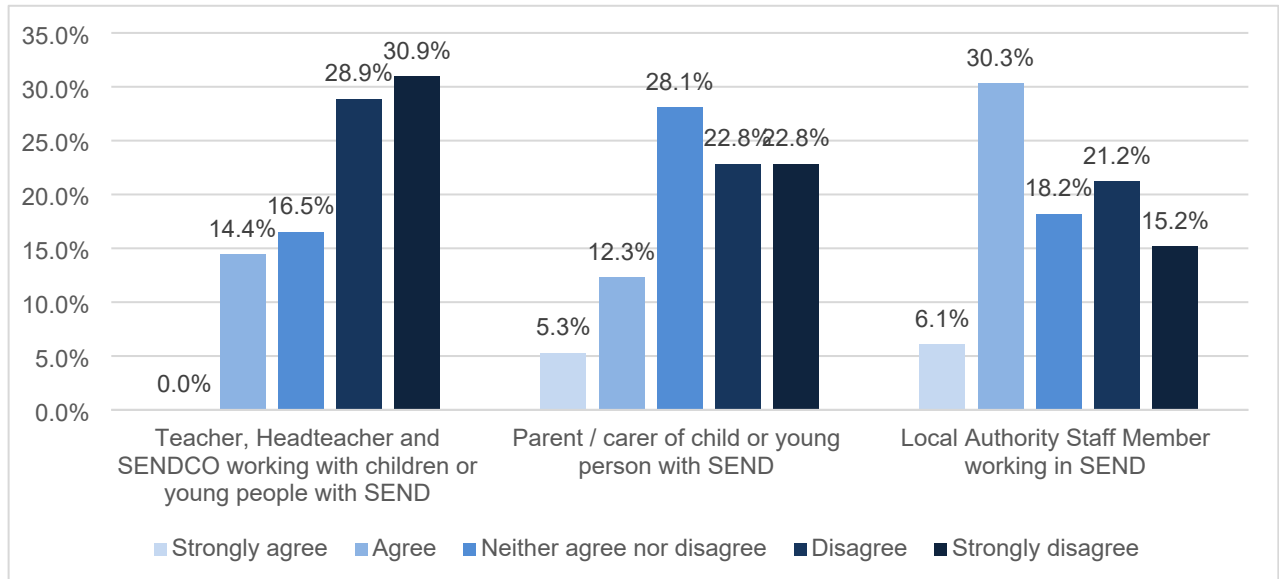


Figure 72: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statement? The BUDs ensure the costs of the provision to meet the needs of children and young people are met fairly, irrespective of the provision' by stakeholder type

‘BUDs are applied consistently across all the schools in Bristol’

School staff are most likely to disagree with this statement, whilst parents and carers are most likely to neither agree nor disagree.

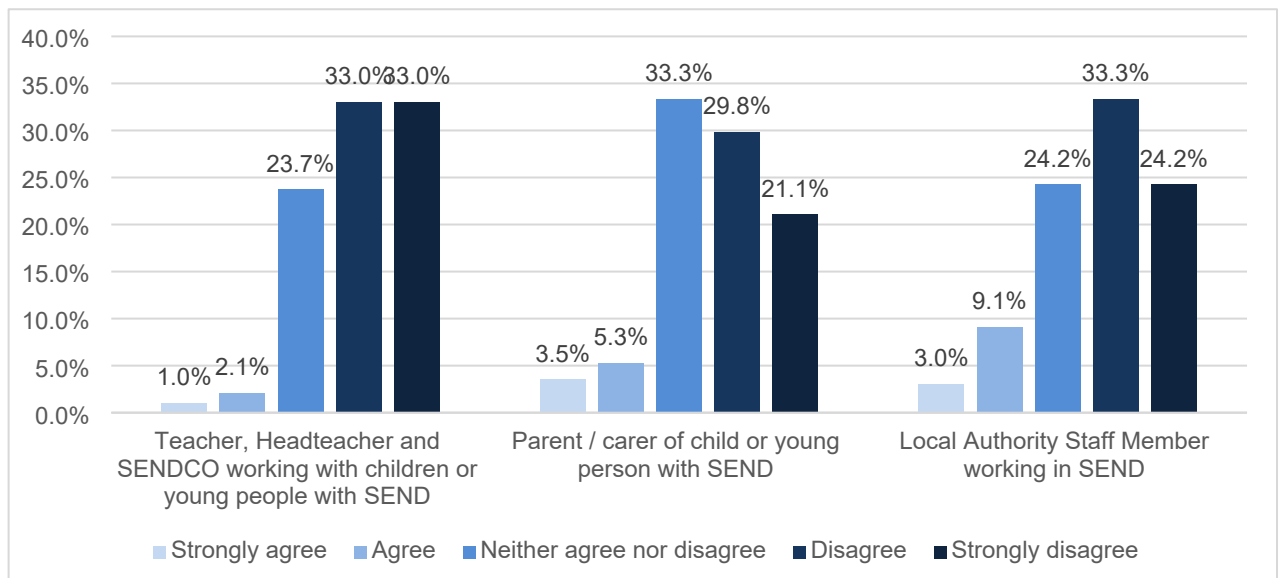


Figure 73: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs are applied consistently across all the schools in Bristol' by stakeholder type

‘BUDs accurately describe the needs of children and young people’

Local authority staff were most likely to neither agree nor disagree with the statement, and the least likely to disagree with it.

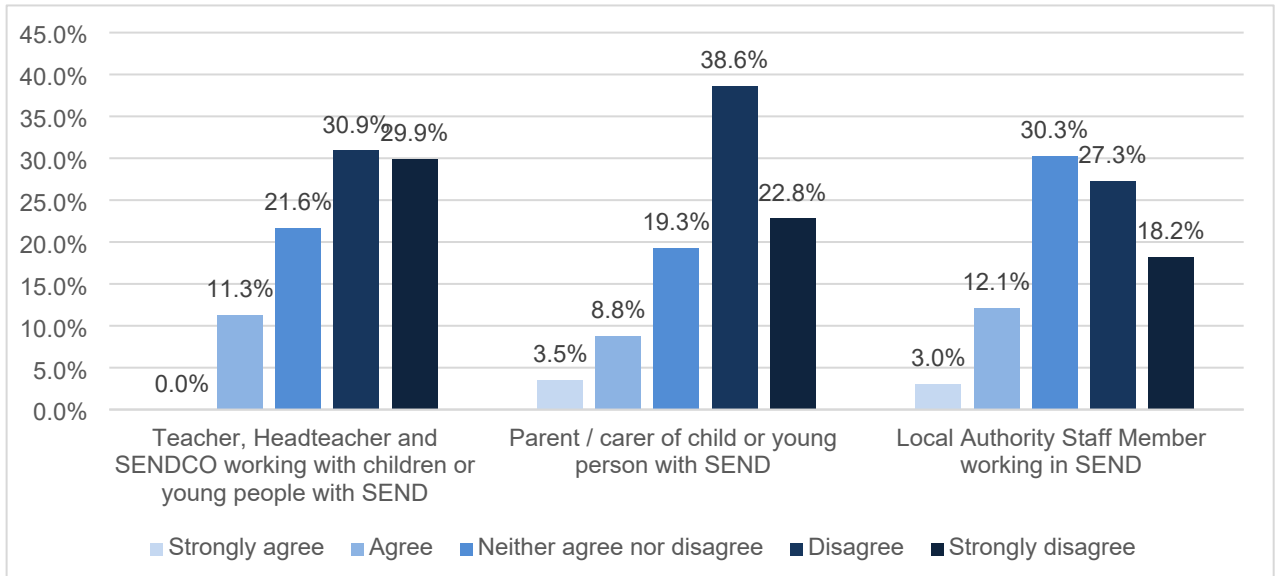


Figure 74: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs accurately describe the needs of children and young people' by stakeholder type

'BUDs accurately describe the interventions required to meet the needs of children and young people'

Responses to this statement are broadly similar across the different stakeholder types.

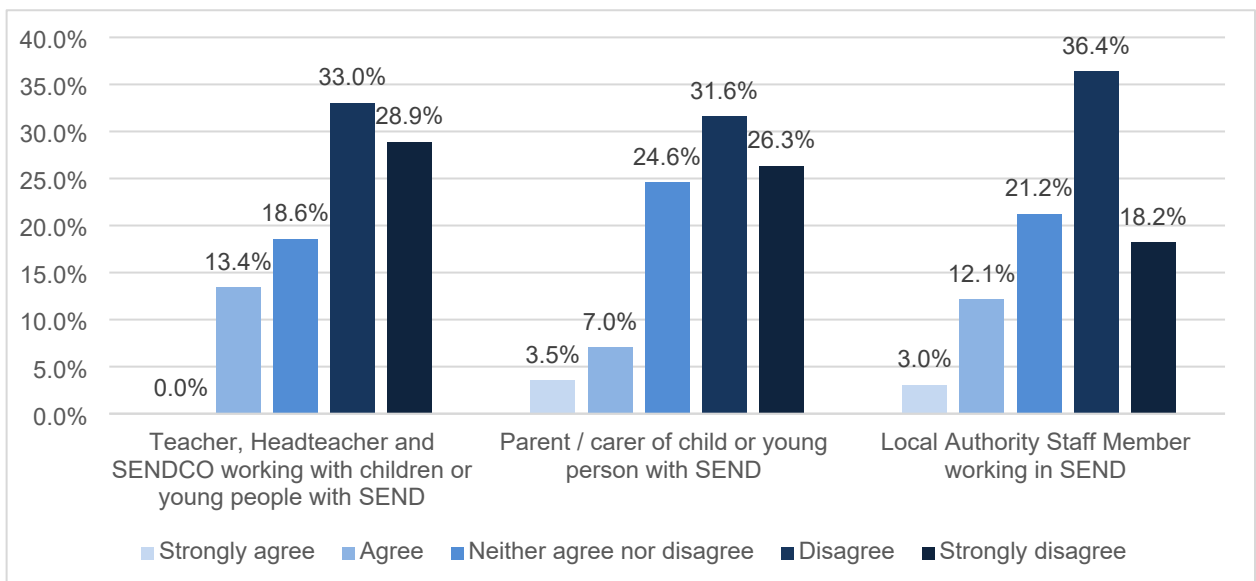


Figure 75: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs accurately describe the interventions required to meet the needs of children and young people' by stakeholder type

'BUDs are representative of the costs associated with implementing support and interventions'

School staff are more likely to strongly disagree with this statement.

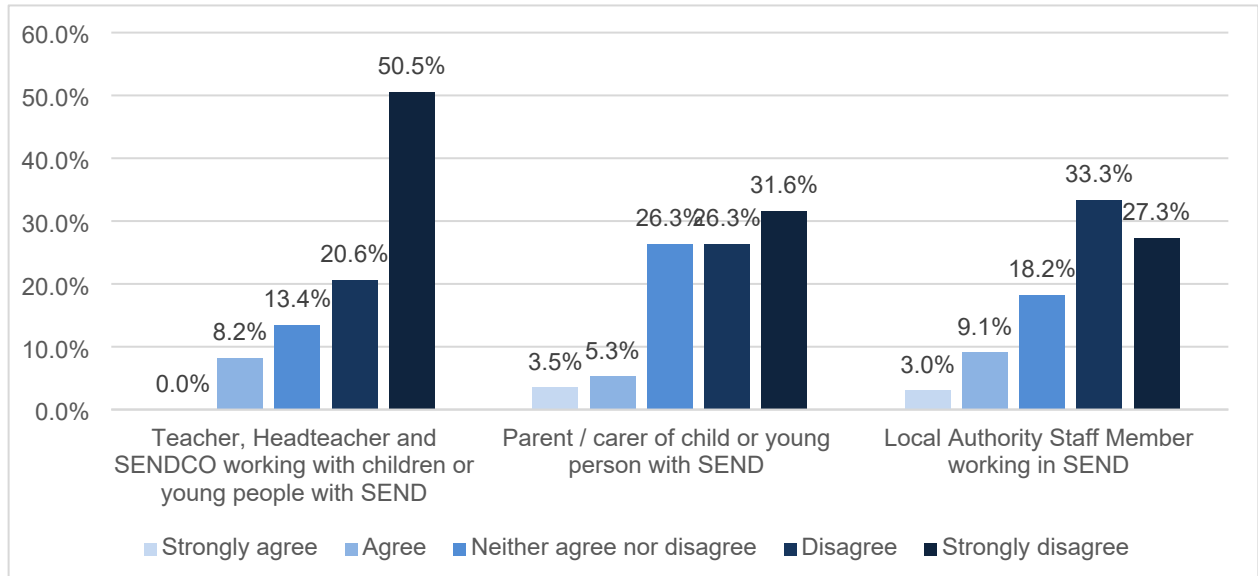


Figure 76: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs are representative of the costs associated with implementing support and interventions' by stakeholder type

'BUDs work well and should be retained'

School staff are more likely to disagree with this statement.

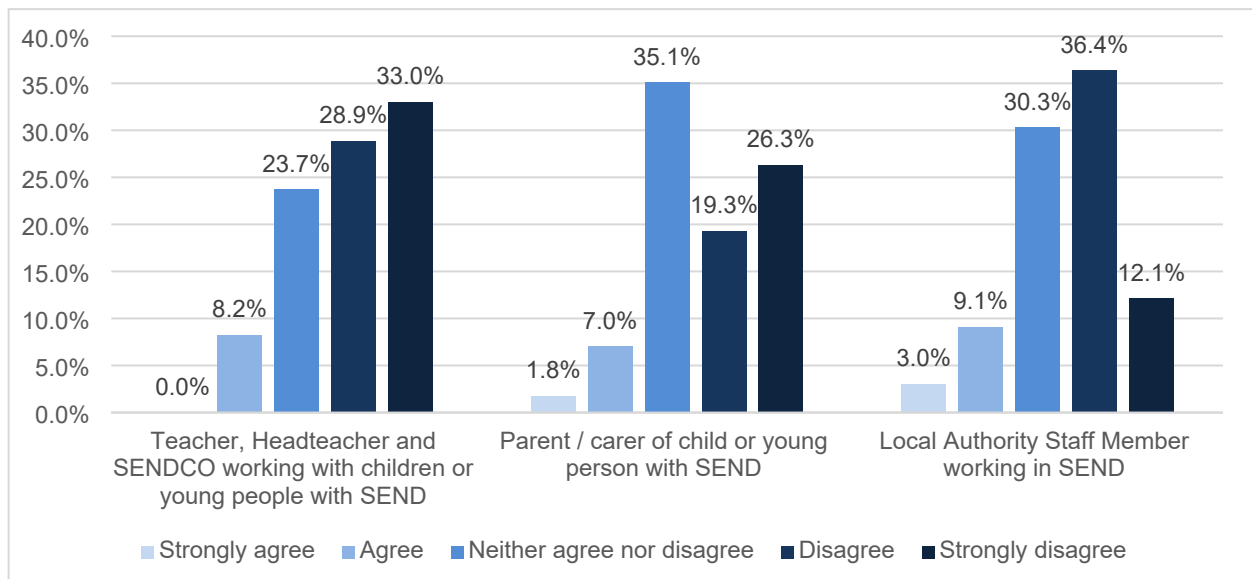


Figure 77: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs work well and should be retained' by stakeholder type

'BUDs require updating, but should be retained'

Parents and carers are more likely to neither agree nor disagree with this statement, whilst local authority staff are more likely to strongly agree with it.

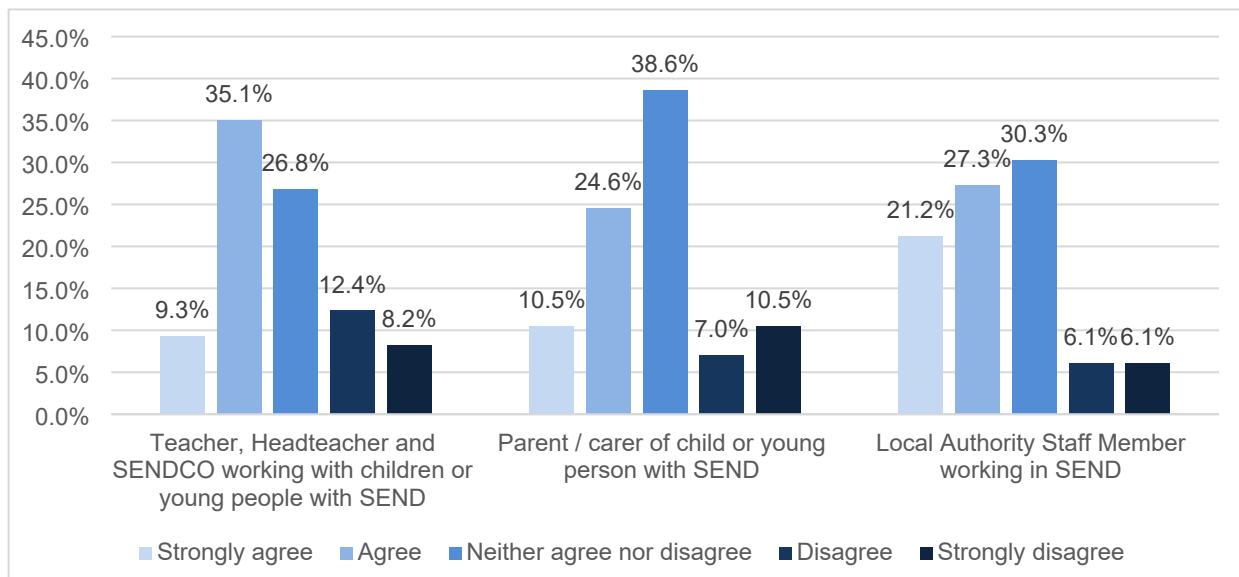


Figure 78: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs require updating but should be retained' by stakeholder group

'BUDs do not currently work and should be replaced'

Local authority staff are less likely to agree and more likely to disagree with this statement.

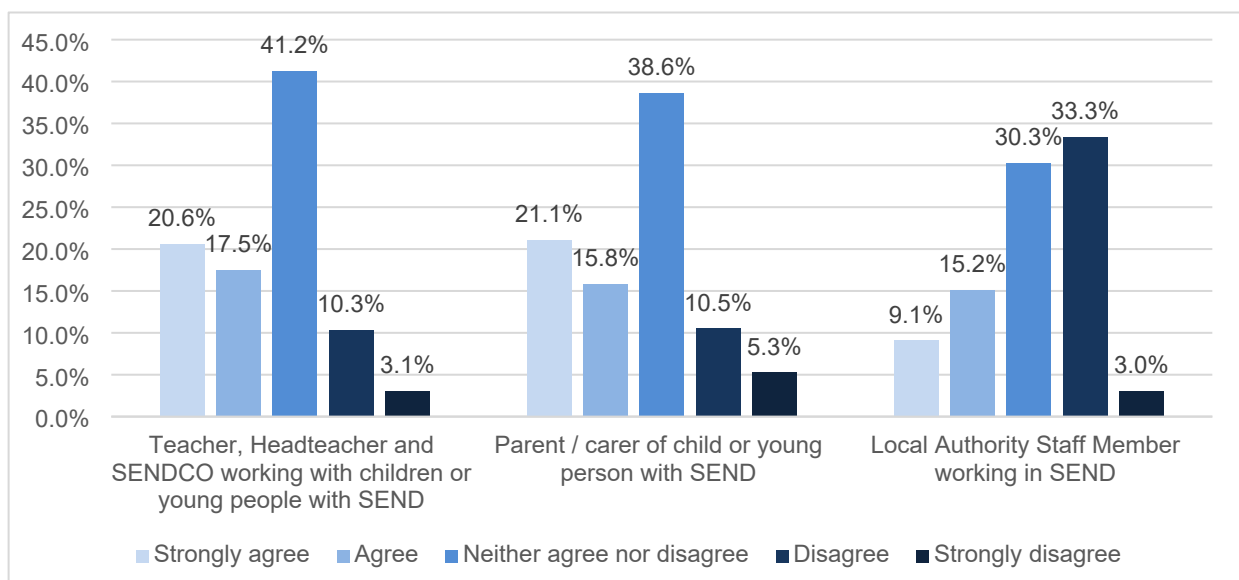


Figure 79: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements? BUDs do not currently work and should be replaced' by stakeholder group

7.1.2 Open question responses

Most survey comments on the BUDs are critical of the current arrangements.

Several respondents say that the BUDs are outdated and that they lead to insufficient funding being granted, often because actual costs do not match those in the bandings. Some add that, at present, there are inconsistencies in how the bands are applied. Furthermore, several respondents say that the BUDs lead to children and young people being 'pigeon holed' and matched to a 'best fit' which may not necessarily align to their individual needs or be the most appropriate means of supporting them. They believe that BUDs in their current form are not illustrative of the needs of children and young people with SEND in Bristol at this time.

A few respondents say that the BUDs are too complicated, confusing or unclear, whilst a small number give specific groups they feel that BUDs are not working for, including

children and young people with an EHCP, those with complex or linked needs, those with Social, Emotional and Mental Health (SEMH) needs, and females with suspected ASD.

However, a small number of respondents comment positively on BUDs, by expressing general support or arguing that they enable consistency.

Suggestions for BUDs include:

- a simplified system
- a consistent and clear outline of costs and provision
- alignment to OAP
- a system which allows for aggregated lower level needs leading to a higher banding
- consultation with practitioners ahead of any update
- alignment with changes to the current SEND COP
- a person-centred rather than deficit-based or risk-based approach to assessing need

Other suggestions made in response to the question on BUDs include:

- training led by high-performing settings
- records of how funding is used

7.1.3 Information and Engagement sessions

As with the survey responses, participants in the Information and Engagement sessions are largely critical of BUDs as they are at present.

Many of the participants believe that the BUDs are outdated and require updating. A few say it has been almost a decade since they were created.

School staff and local authority staff say that there is a mismatch between the costs associated with the descriptions and the actual level of funding required, as well as between the descriptors and the threshold for needs assessment. They add that some children and young people with multiple areas of need may not be adequately served by the descriptors or otherwise that some individuals and their needs may not fall into 'neat boxes'. One school staff member says they have struggled to recruit staff based on the current bands.

Meanwhile, parents and carers say that BUDs are opaque and that they struggle to understand them.

Suggestions include:

- ensuring the buy-in of multi-academy trusts for any new BUDs
- a simplified document which is not overwhelming
- alignment with the annual review documents for EHCPs
- provision mapping across classes and schools or groups of children and young people with similar needs to enable more cost-effective provision
- making available a metric of needs versus bands
- monitoring of how money has been spent

8 How will this report be used?

This report has been published to allow members of the public and stakeholders to view the evidence gathered through the consultation process.

Final recommendations will be developed and put forward based on all consultation and engagement conducted on this topic to date, including the views expressed by respondents and participants which have been summarised in this report, as well as other relevant information generated through the research conducted alongside the consultation. This will likely have taken place before this report has been published.

These recommendations will be shared and tested with council colleagues and iterated as required before they are submitted in Cabinet Papers for consideration. Elected members must approve the adoption of any new approach.

Whatever approach is taken forward, it is likely that there will be a phased implementation process to allow a period of adjustment and to give scope for amendments or iteration of the approach wherever this is required. Detailed documentation and guidance for implementation will be co-designed and the council will work closely with schools, education settings and health care professionals to ensure that the new approach is effective.

A.1 Appendix 1: Survey text

You may answer as many or as few questions as you feel comfortable.

Option A1: retain the top-up funding process for children and young people without EHC plans, but make improvements to make the system more streamlined and consistent.

Do you agree or disagree with this change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive
Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g., on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Option A2: re-purpose a proportion of the funding currently being spent on top-up funding for children and young people that do not have an EHC plan to create a targeted early intervention fund for mainstream schools.

Do you agree or disagree with this change?

- Strongly agree
- Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive
Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g., on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Option A3: gradually phase out the use of top-up funding for children and young people who do not have an EHC plan.

Do you agree or disagree with this change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive

Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g., on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Option B1 – retain the top-up funding process for post-16 learners who did not previously receive funding pre-16, but make improvements to make the system more streamlined and consistent.

Do you agree or disagree with this change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive
Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g., on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Option B2: re-purpose a proportion of the funding currently being spent on top-up funding for post-16 learners that were not previously in receipt of funding to create a targeted fund for post-16 education settings.

Do you agree or disagree with this change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive
Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g. on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Option B3: gradually phase out the use of top-up funding for post-16 learners who have not previously received funding pre-16 plan.

Do you agree or disagree with this change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

What do you anticipate to be the impact of this proposal on the following:

	Very negative	Slightly negative	Neutral	Slightly positive	Very positive
Staff capacity					
The council's SEND finances					
Inclusion within mainstream schools					
Quality and value for money of support available to children and young people					

Please share any other thoughts on this option, for example:

- If this option is implemented, is there any other impact you might expect to see e.g., on a particular group of children or on a protected characteristic etc.
- If this option is implemented, what could the design of this change look like?
- If you have any further comments on this option, please provide them below.

[Free text box]

Banding Questions

We are seeking feedback on the [Bristol Universal Descriptors \(BUDs\)](#) currently used to determine the level of top-up funding schools should be awarded.

Our initial engagement with schools and council staff has suggested that the BUDs are currently out of date and unfit for purpose in determining the level of funding schools should be awarded, and ensuring children and young people can access an appropriate amount of funding based on their needs.

To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
The BUDs ensure the costs of the provision to meet the needs of children and young people are met fairly, irrespective of the provision.					
BUDs are applied consistently across all schools in Bristol					
BUDs accurately describe the needs of children and young people					
BUDs accurately describe the interventions required to meet the needs of children and young people					
BUDs are representative of the costs associated with implementing support and interventions					
BUDs work well and should be retained					
BUDs requires updating, but should be retained					
BUDs do not currently work and should be replaced					

Please share any other thoughts on banding systems and BUDs:

[Free text box]

A.2 Appendix 2: Closed question data tables

A.2.1 School age questions

	A1	A2	A3
Strongly agree	84	40	17
Agree	70	72	18
Neither agree nor disagree	15	21	13
Disagree	23	35	45
Strongly disagree	4	25	101
-	0	3	2
Total	196	196	196

Table 1: 'Do you agree or disagree with this change?'

	A1	A2	A3
Very positive	57	28	9
Slightly positive	71	52	22
Neutral	36	44	30
Slightly negative	20	38	30
Very negative	9	29	95
-	3	5	10
Total	196	196	196

Table 2: 'What do you anticipate to be the impact of this proposal on staff capacity?'

	A1	A2	A3
Very positive	12	21	38
Slightly positive	62	77	51
Neutral	68	58	44
Slightly negative	35	19	14
Very negative	15	14	40
-	4	7	9
Total	196	196	196

Table 3: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?'

	A1	A2	A3
Very positive	59	36	5
Slightly positive	72	59	9
Neutral	40	32	19
Slightly negative	17	30	30
Very negative	5	33	125
-	3	6	8
Total	196	196	196

Table 4: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?'

	A1	A2	A3
Very positive	59	32	8
Slightly positive	69	53	8
Neutral	37	33	17
Slightly negative	22	37	28
Very negative	6	36	126
-	3	5	9
Total	196	196	196

Table 5: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?'

A.2.2 Post-16 questions

	B1	B2	B3
Strongly agree	46	16	10
Agree	58	53	16
Neither agree nor disagree	57	66	43
Disagree	13	18	29
Strongly disagree	4	15	66
-	18	28	32
Total	196	196	196

Table 6: 'Do you agree or disagree with this change?'

	B1	B2	B3
Very positive	23	12	6
Slightly positive	42	42	22
Neutral	70	70	53
Slightly negative	19	18	28
Very negative	2	9	39
-	40	45	48
Total	196	196	196

Table 7: 'What do you anticipate to be the impact of this proposal on staff capacity?'

	B1	B2	B3
Very positive	11	6	23
Slightly positive	32	46	36
Neutral	83	75	53
Slightly negative	25	17	13
Very negative	5	6	22
-	40	46	49
Total	196	196	196

Table 8: 'What do you anticipate to be the impact of this proposal on the council's SEND finances?'

	B1	B2	B3
Very positive	33	14	3
Slightly positive	46	43	8
Neutral	66	61	43
Slightly negative	9	16	27
Very negative	2	15	65
-	40	47	50
Total	196	196	196

Table 9: 'What do you anticipate to be the impact of this proposal on inclusion within mainstream schools?'

	B1	B2	B3
Very positive	31	15	3
Slightly positive	53	44	9
Neutral	63	56	41
Slightly negative	8	18	26
Very negative	1	17	67
-	40	46	50
Total	196	196	196

Table 10: 'What do you anticipate to be the impact of this proposal on quality and value for money of support available to children and young people?'

A.2.3 BUDs

	The BUDs ensure the costs of the provision to meet the needs of children and young people are met fairly, irrespective of the provision.	BUDs are applied consistently across all schools in Bristol	BUDs accurately describe the needs of children and young people	BUDs accurately describe the interventions required to meet the needs of children and young people	BUDs are representative of the costs associated with implementing support and interventions	BUDs work well and should be retained	BUDs requires updating, but should be retained	BUDs do not currently work and should be replaced
Strongly agree	6	4	3	3	3	2	24	36
Agree	31	8	22	22	15	15	60	32
Neither agree nor disagree	41	53	46	43	38	56	60	77
Disagree	51	63	63	65	50	55	19	27
Strongly disagree	50	55	49	50	76	53	17	9
-	17	13	13	13	14	15	16	15
Total	196	196	196	196	196	196	196	196

Table 11: 'To inform our review of the Banding and BUDs system, do you agree or disagree with the following statements?'

A.3 Appendix 3: Equalities monitoring

A.3.1 Age

What is your age?

- 0-10
- 11-15
- 16-17
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85 +
- Prefer not to say

Some categories did not receive any responses.

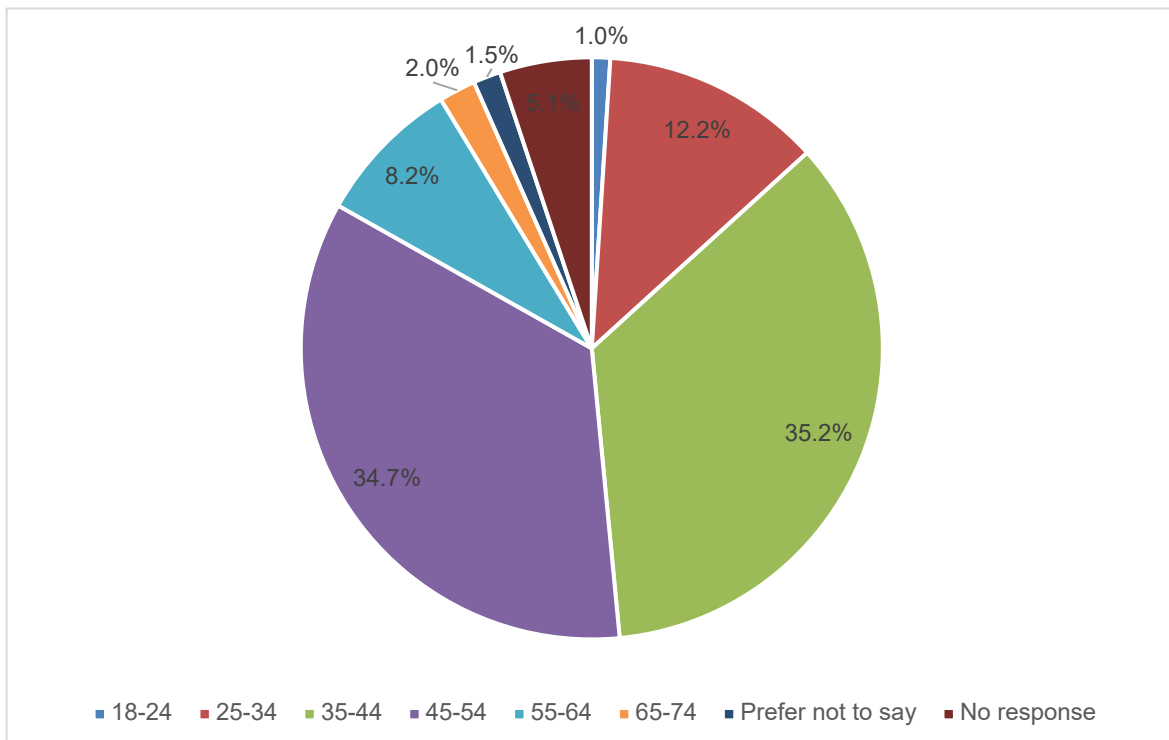


Figure 80: What is your age?

Response data is as follows:

Q22. What is your age?		
18-24	2	1.0 per cent
25-34	24	12.2 per cent
35-44	69	35.2 per cent
45-54	68	34.7 per cent
55-64	16	8.2 per cent
65-74	4	2.0 per cent

Prefer not to say	3	1.5 per cent
No response	10	5.1 per cent
Total	196	100.0 per cent

Table 12: What is your age?

A.3.2 Disability

Do you consider yourself to be a Disabled person?

(Bristol City Council uses the ‘Social Model of Disability’ which recognises the right to self-identify as a Disabled person and that people are Disabled by barriers in society such as lack of physical access and lack of accessible communication, not by their impairment (including mental, physical, sensory, health conditions, learning difficulties etc.)

- Yes
- No
- Prefer not to say

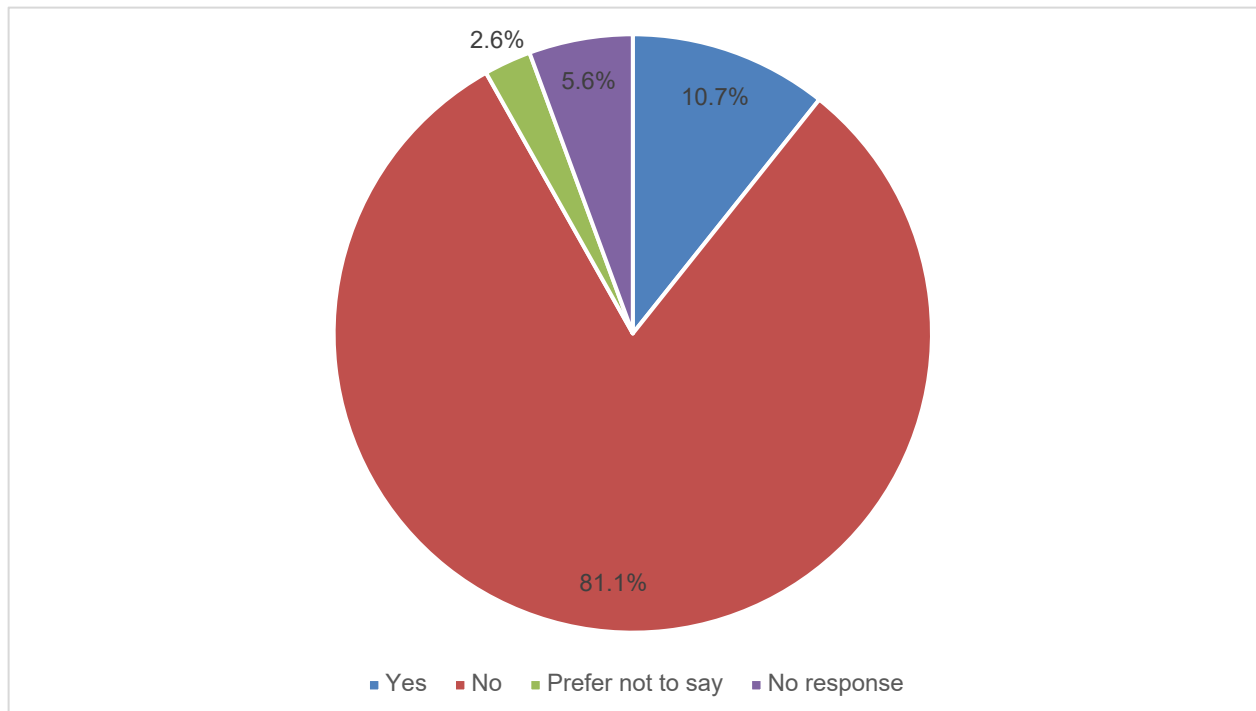


Figure 81: Do you consider yourself to be a disabled person?

Response data is as follows:

Q23. Do you consider yourself to be a Disabled person?		
Yes	21	10.7 per cent
No	159	81.1 per cent
Prefer not to say	5	2.6 per cent
No response	11	5.6 per cent

Total	196	100.0 per cent
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Table 13: Do you consider yourself to be a disabled person?

A.3.3 Ethnicity

What is your ethnic group?

- Asian or Asian British
- Black, Black British, Caribbean, or African
- Mixed or multiple ethnic groups
- White British
- Other White Background
- Gypsy, Roma, or Traveller
- Prefer not to say
- Other ethnic background (please specify)

Some categories did not receive any responses.

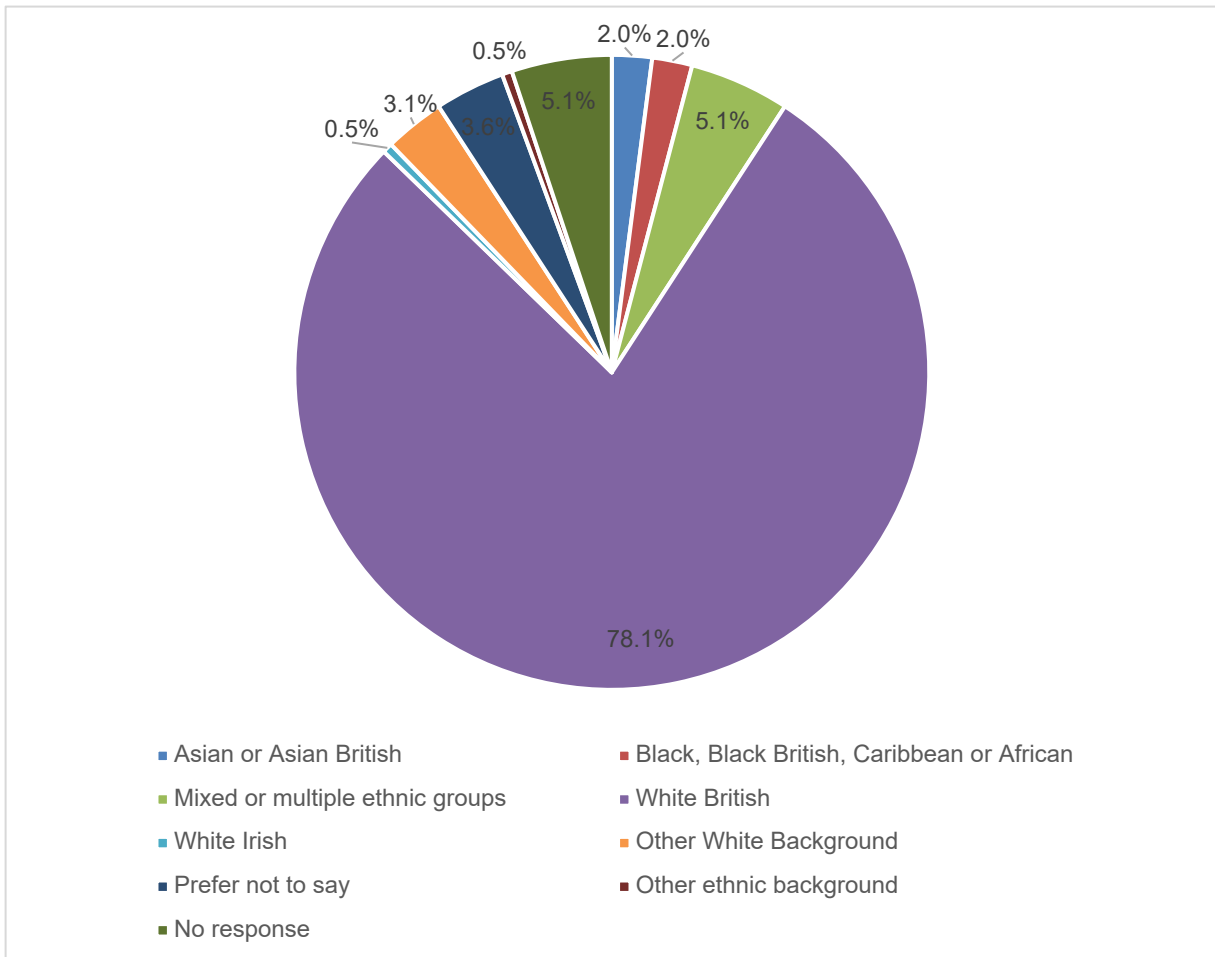


Figure 82: What is your ethnic group?

Response data is as follows:

Q24. What is your ethnic group? (please tick one box only)		
Asian or Asian British	4	2.0%
Black, Black British, Caribbean, or African	4	2.0%

Mixed or multiple ethnic groups	10	5.1%
White British	153	78.1%
White Irish	1	0.5%
Other White Background	6	3.1%
Prefer not to say	7	3.6%
Other ethnic background	1	0.5%
No response	10	5.1%
Total	196	100.0%

Table 14: What is your ethnic group?

A.3.4 Religion

What is your religion/faith?

- No religion
- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Pagan
- Sikh
- Prefer not to say
- Other (please specify): _____

Some categories did not receive any responses.

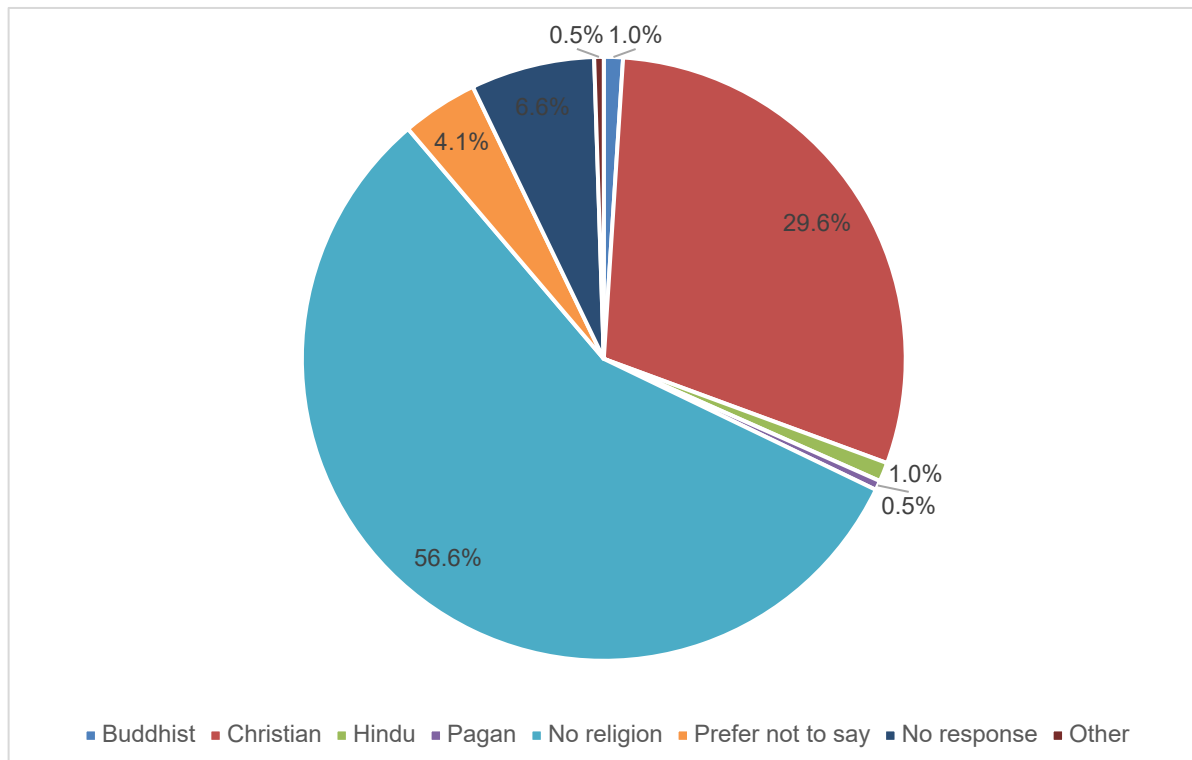


Figure 83: What is your religion/faith?

Response data is as follows:

Q25. What is your religion/faith?

Buddhist	2	1.0%
Christian	58	29.6%
Hindu	2	1.0%
Pagan	1	0.5%
No religion	111	56.6%
Prefer not to say	8	4.1%
No response	13	6.6%
Other	1	0.5%
Total	196	100.0%

Table 15: What is your religion/faith?

A.3.5 Sex

What is your sex?

(If unsure you can use the sex recorded in your official documents.)

- Female
- Male
- Prefer not to say
- Other (please specify):

Some categories did not receive any responses.

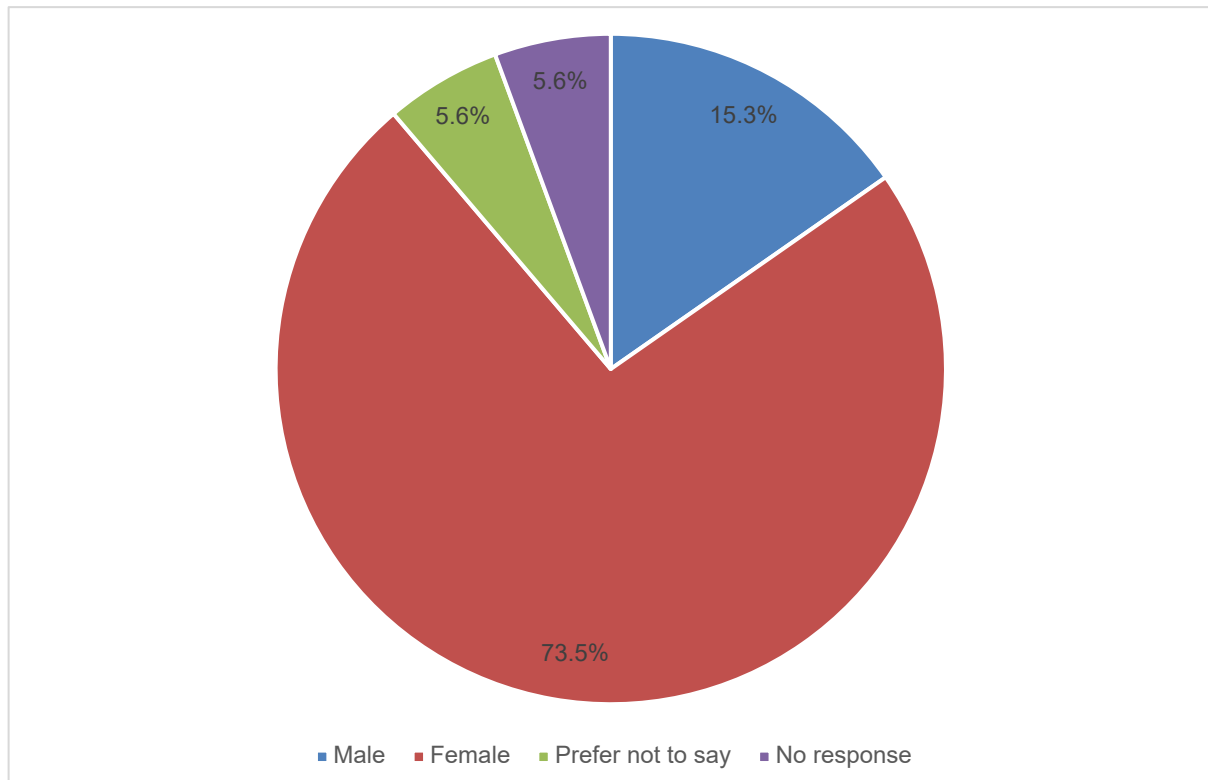


Figure 84: What is your sex?

Response data is as follows:

Q26. What is your sex?		
Male	30	15.3%

Female	144	73.5%
Prefer not to say	11	5.6%
No response	11	5.6%
Total	196	100.0%

Table 16: What is your sex?

A.3.6 Gender identity

Do you consider yourself to have a gender identity different from your sex recorded at birth?

- Yes (e.g., trans, or non-binary)
- No
- Prefer not to say

If 'Yes', please enter the term you use to describe your gender _____

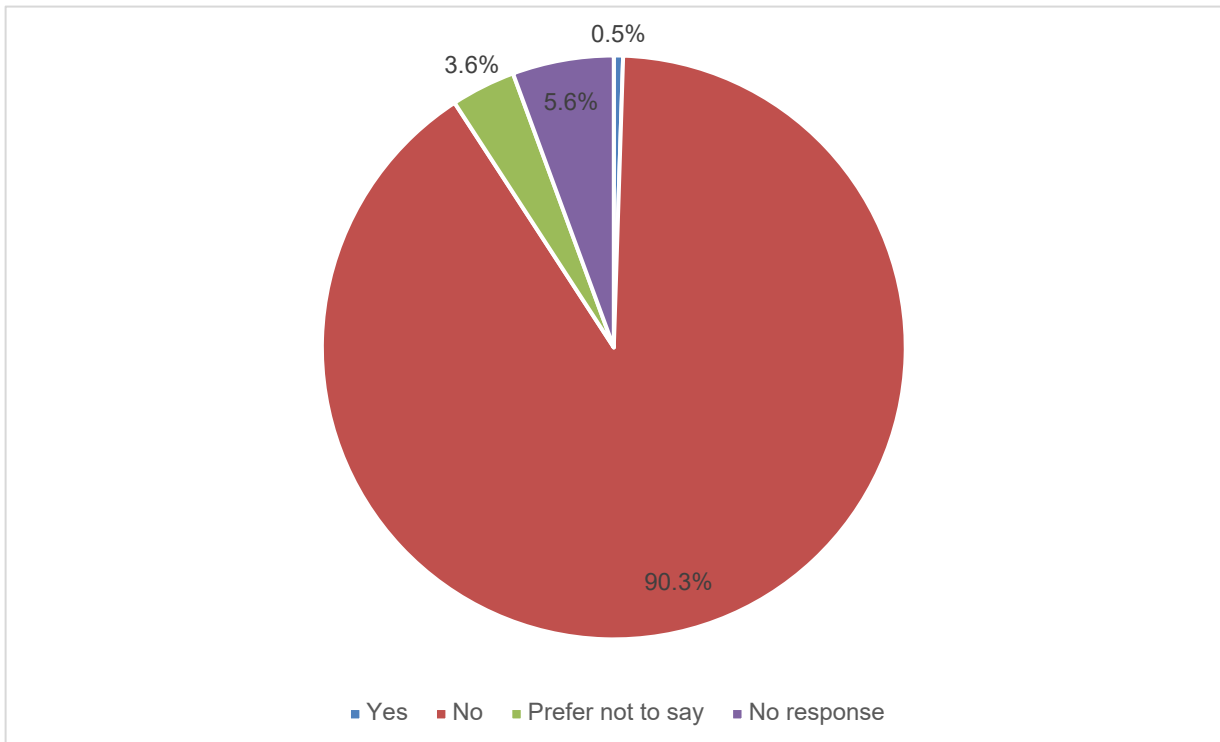


Figure 85: Do you consider yourself to have a gender identity different from your sex recorded at birth?

Response data is as follows:

Q27. Do you consider yourself to have a gender identity different from your sex recorded at birth?		
Yes	1	0.5%
No	177	90.3%
Prefer not to say	7	3.6%
No response	11	5.6%
Total	196	100.0%

Table 17: Do you consider yourself to have a gender identity different from your sex recorded at birth?

A.3.7 Sexual orientation

What is your sexual orientation?

(‘Bi’ is an umbrella term used to describe a romantic and/or sexual orientation towards more than one gender. Bi people may use other terms e.g., bisexual, pan or pansexual.)

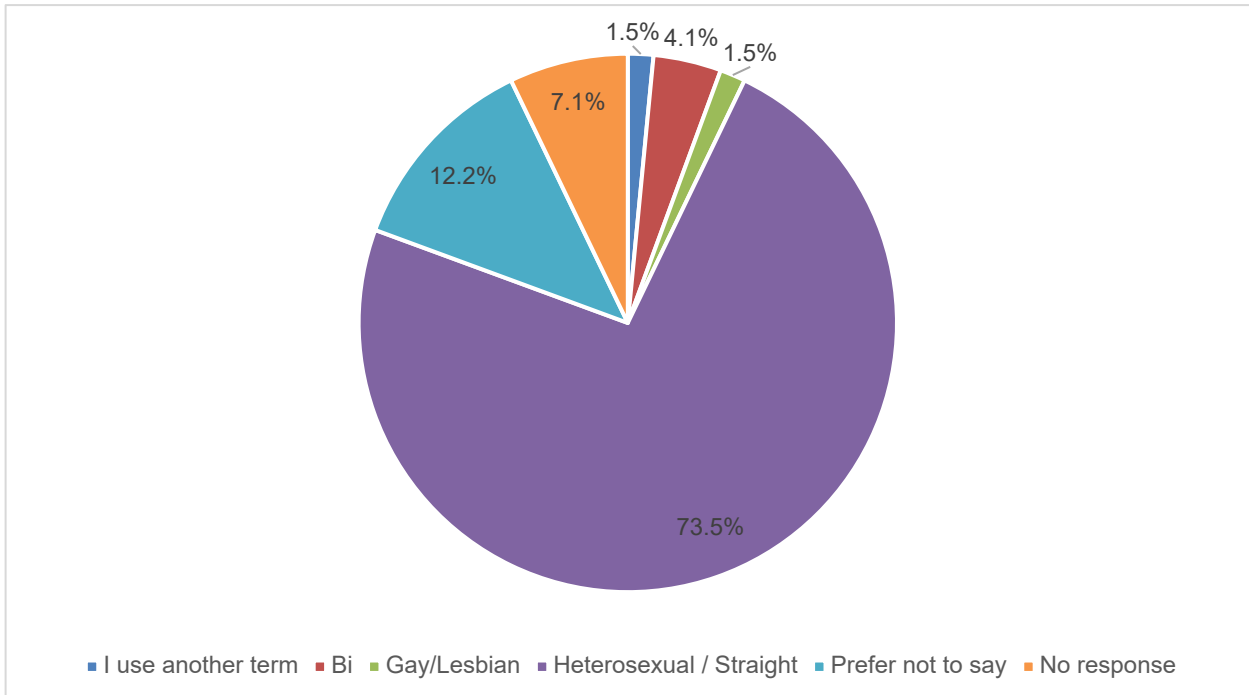


Figure 86: What is your sexual orientation?

Response data is as follows:

Q28. What is your sexual orientation?		
I use another term	3	1.5%
Bi	8	4.1%
Gay/Lesbian	3	1.5%
Heterosexual / Straight	144	73.5%
Prefer not to say	24	12.2%
No response	14	7.1%
Total	196	100.0%

Table 18: What is your sexual orientation?

A.3.8 Maternity

Are you pregnant or have you given birth in the last 26 weeks?

- Yes
- No
- Prefer not to say

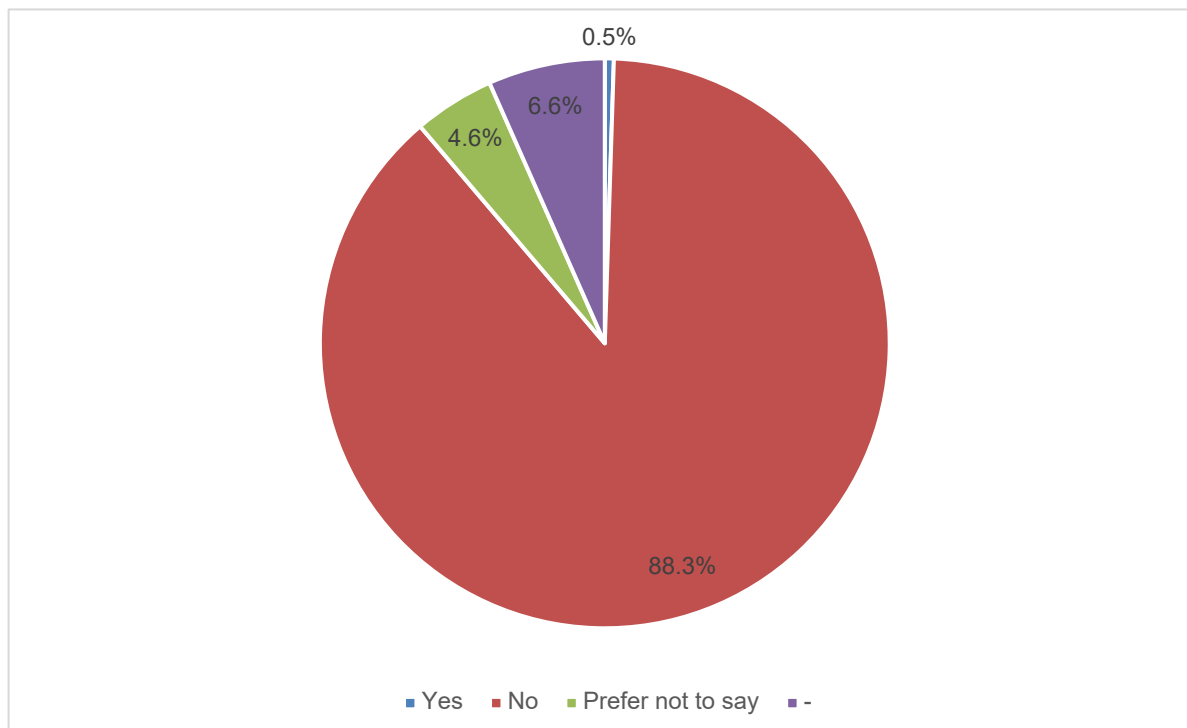


Figure 87: Are you pregnant or have you given birth in the last 26 weeks?

Response data is as follows:

Q29. Are you pregnant or have you given birth in the last 26 weeks?		
Yes	1	0.5%
No	173	88.3%
Prefer not to say	9	4.6%
-	13	6.6%
Total	196	100.0%

Table 19: Are you pregnant or have you given birth in the last 26 weeks?

A.3.9 Carers

Are you a carer?

(A carer is anyone who provides unpaid support for a family member or friend etc. who needs help with their day-to-day life because of illness, disability, or other needs. A young carer might also provide support for other children/siblings.)

- Yes
- No
- Prefer not to say

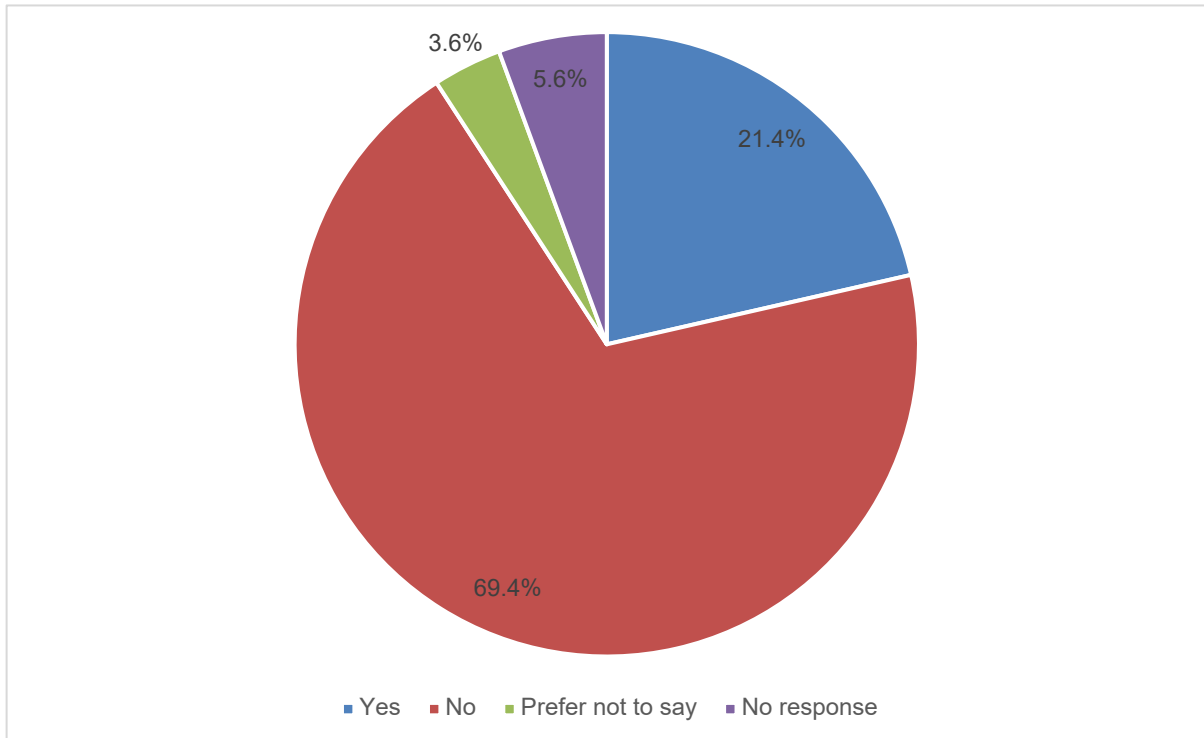


Figure 88: Are you a carer?

Response data is as follows:

Q30. Are you a carer?		
Yes	42	21.4%
No	136	69.4%
Prefer not to say	7	3.6%
No response	11	5.6%
Total	196	100.0%

Table 20: Are you a carer?

A.3.10 Refugees and asylum seekers

Are you a refugee or asylum seeker?

- Yes
- No
- Prefer not to say

Some categories did not receive any responses.

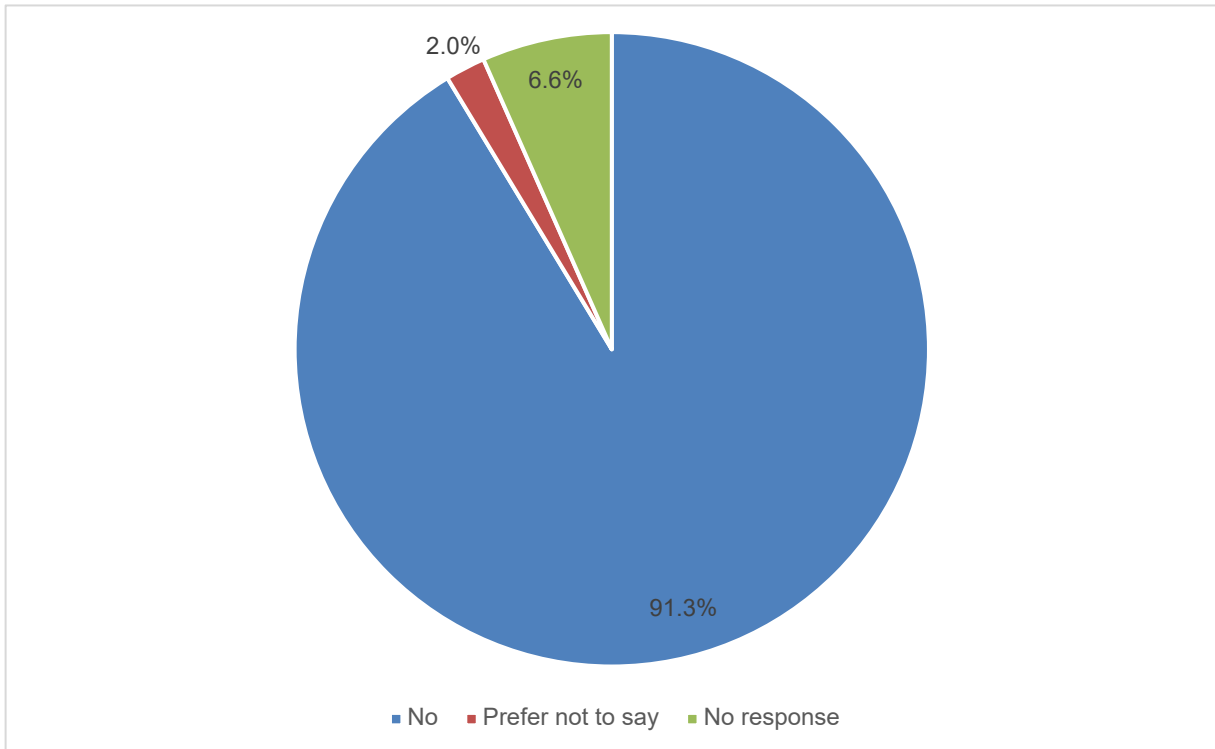


Figure 89: Are you a refugee or asylum seeker?

Response data is as follows:

Q31. Are you a refugee or asylum seeker?		
No	179	91.3%
Prefer not to say	4	2.0%
No response	13	6.6%
Total	196	100.0%

Table 21: Are you a refugee or asylum seeker?

A.3.11 Effect of proposals on protected characteristics

Do you think any of the proposals would have any impact on you or others with a protected characteristic?

The protected characteristics defined in the Equality Act 2010 are:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

The answer options were:

- Very negative effect
- Slightly negative effect
- No effect
- Slightly positive effect

- Very positive effect

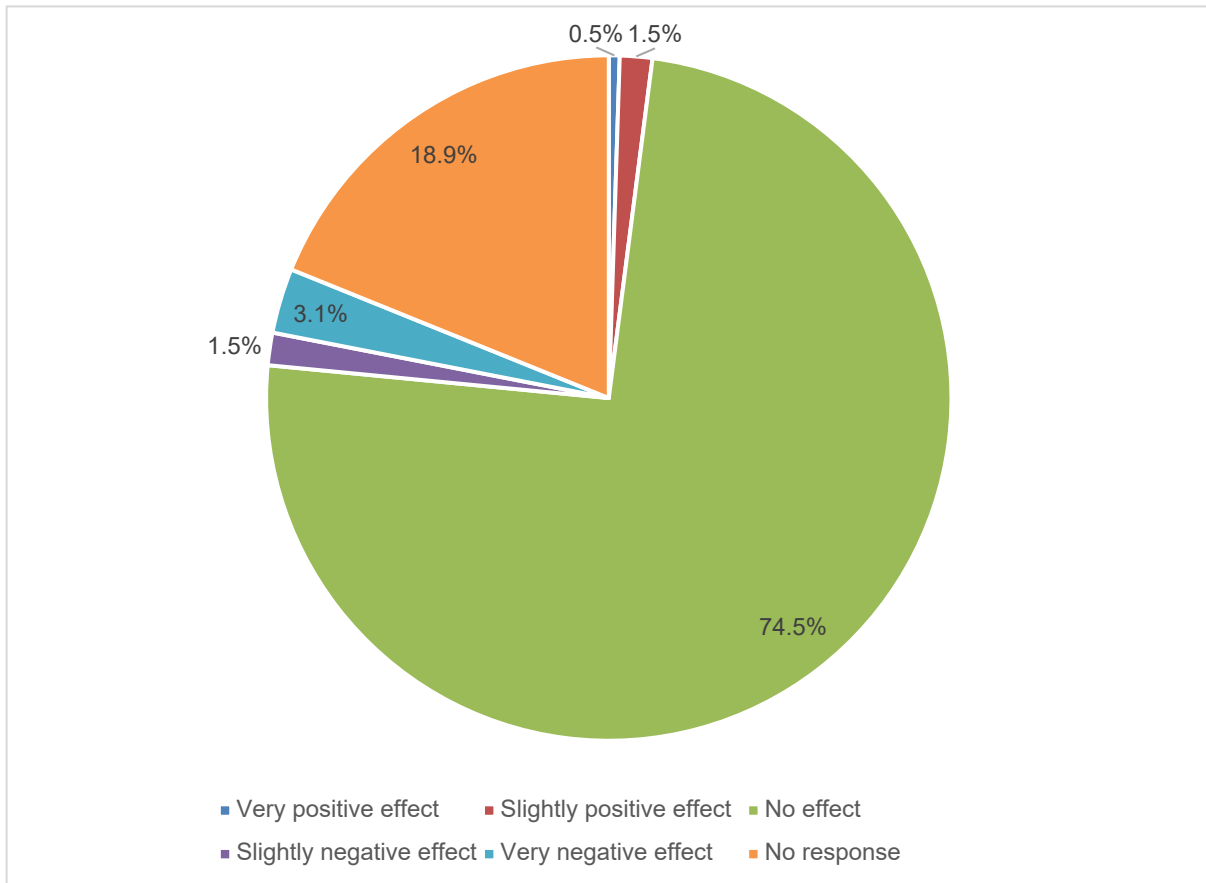


Figure 90: Do you think any of the proposals would have any impact on you or others with a protected characteristic?

Response data is as follows:

Q32. Please tell us what effect, if any, the proposals would have on you because of your protected characteristics.		
Very positive effect	1	0.5%
Slightly positive effect	3	1.5%
No effect	146	74.5%
Slightly negative effect	3	1.5%
Very negative effect	6	3.1%
No response	37	18.9%
Total	196	100.0%

Table 22: Do you think any of the proposals would have any impact on you or others with a protected characteristic?

If you think the proposals would affect you or others because of your protected characteristics, please say how:

7 respondents provided comments. Of these, a small number say the effect would depend on the option which is taken forward and a similar number say the proposals may impact their child. One respondent expresses concerns about the potential impact of any changes on disabled, minority ethnic or LGBT+ children and young people with SEND, whilst one says BUDs need to take into account cultural and gender considerations.

A.4 Consultation process

Respondents were asked to comment on the consultation process by stating the extent to which they agree with a set of statement and their views are set out below.

A.4.1 Information

The survey meets my accessibility needs.

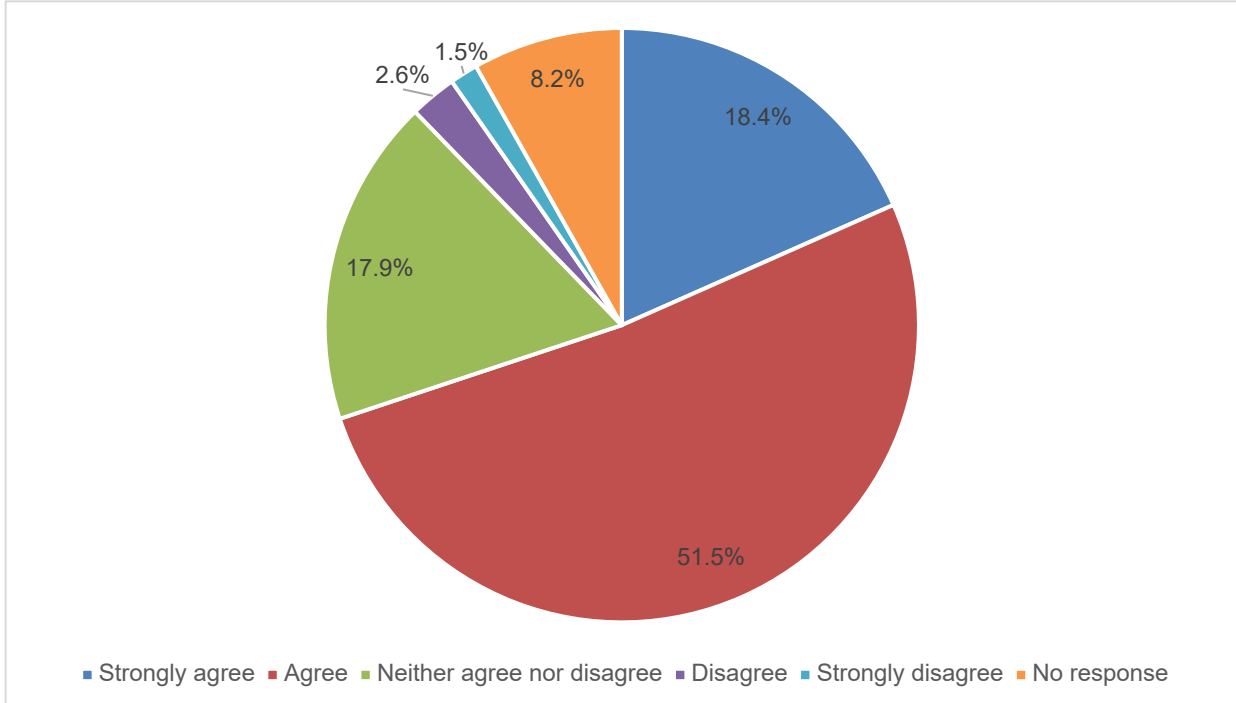


Figure 91: The survey meets my accessibility needs

Response data is as follows:

Q33.3. The survey meets my accessibility needs		
Strongly agree	36	18.4%
Agree	101	51.5%
Neither agree nor disagree	35	17.9%
Disagree	5	2.6%
Strongly disagree	3	1.5%
No response	16	8.2%
Total	196	100.0%

Table 23: The survey meets my accessibility needs

A.4.2 Questions

The questions make it easy for me to give my views.

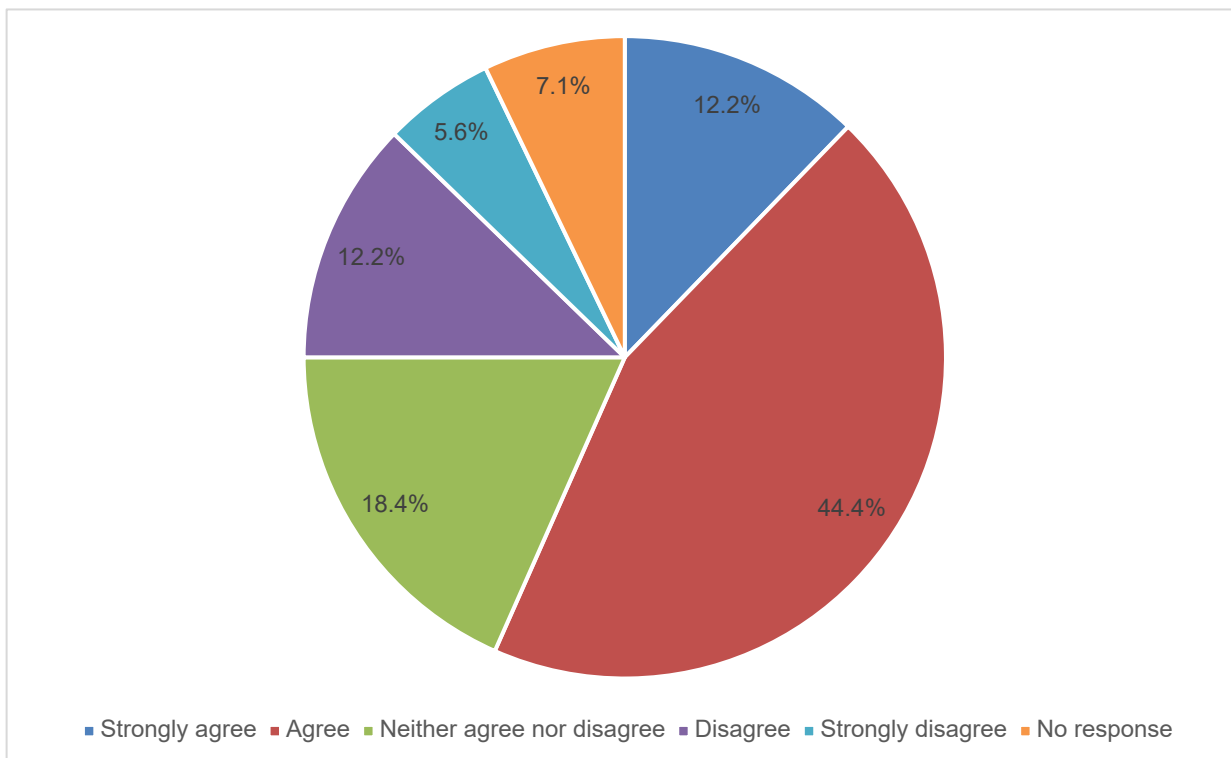


Figure 92: The questions make it easy for me to give my views

Response data is as follows:

Q33.2. The questions make it easy for me to give my views		
Strongly agree	24	12.2%
Agree	87	44.4%
Neither agree nor disagree	36	18.4%
Disagree	24	12.2%
Strongly disagree	11	5.6%
No response	14	7.1%
Total	196	100.0%

Table 24: The questions make it easy for me to give my views

A.4.3 Accessibility

The survey meets my accessibility needs.

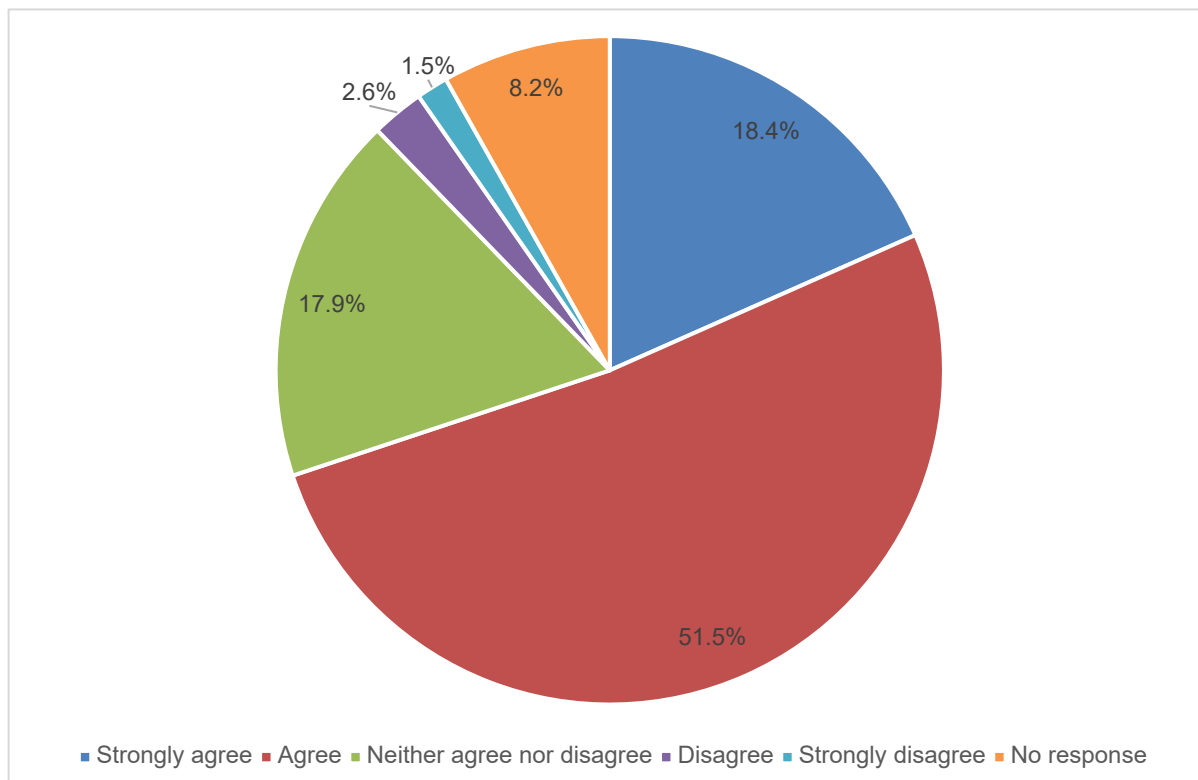


Figure 93: The survey meets my accessibility needs

Response data is as follows:

Q33.3. The survey meets my accessibility needs		
Strongly agree	36	18.4%
Agree	101	51.5%
Neither agree nor disagree	35	17.9%
Disagree	5	2.6%
Strongly disagree	3	1.5%
No response	16	8.2%
Total	196	100.0%

Table 25: The survey meets my accessibility needs

A.4.4 Open text feedback

If you disagree or strongly disagree with any of these statements, please tell us why.

32 respondents provided comments.

Of these, several say that they found it difficult to navigate between the explanation of the options and the questions, as these were in different parts of the form.

Some also say that the questions were difficult to understand without prior knowledge or understanding of the key issues, and some feel the documents were too complicated or 'wordy.'

Some respondents say that the information was insufficient, not specific enough or vague. Areas where these respondents want to see more information include:

- BUDs
- evidence of impact of the changes.
- current provision.

- costs associated with each option.

Meanwhile, some respondents feel that not all areas of the questionnaire were relevant for all respondents, while a small number believe that closed questions are too restrictive, or that key issues were not addressed (e.g., children with EHCP or why top-up applications are rising).

One respondent found one of the information sessions on Teams to be helpful for their understanding of the issues.

Suggestions include:

- presenting information in different formats (e.g., videos).
- giving an option to download the form to complete it offline.
- easy Read options (which were made available).

Equality Impact Assessment [version 2.9]



Review into the effective and sustainable use of statutory and non-statutory high needs block ('Element 3') funding [Delivering Better Value in SEND, Workstream 2]	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Education & Skills	Lead Officer name: Reena Bhogal-Welsh
Service Area: Special educational needs and Disabilities (SEND)	Lead Officer role: Director

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Bristol City Council is reviewing the way it and local partners use high needs funding for Disabled children and young people with Special Educational Needs (SEND); in order to achieve long-term sustainability and improve outcomes. We have sought feedback (via public consultation) from families, schools, and wider stakeholders, to understand the impact of potential changes and make decisions accordingly.

Bristol receives a fixed budget each year (high needs funding) from the Department for Education to spend on Disabled children with SEND, who are considered to require more support than what is ordinarily available in school. Some of the High Needs Block is used for top-up funding (also referred to as Element 3 funding). Top-up funding is one element of the support available for Disabled children and young people with SEND in Bristol.

Like every local authority in England, Bristol has seen rising levels of Disabled Children diagnosed with SEND in schools in recent years. Bristol City Council alongside schools, and other local partners need to change the way high needs funding is allocated to and used in schools to enable greater sustainability of funding and provision for Disabled children and young people with SEND.

As part of the consultation process, options were presented for using top-up funding differently, both the process for allocating it and how it is used in schools. Feedback was sought on the options regarding their potential suitability, impact and how they could help achieve sustainability. The consultation process ran from the 1st November 2023 – 13th December 2023, with an additional week available for those accessing the Easy Read version.

The options and proposals considered as part of the consultation were:

- **Options for changes to funding for children and young people that do not have an EHC plan:**

- a) **Retain the top-up funding process for children and young people without EHC plans but make improvements to make the system more streamlined and consistent.** Such improvements could include introducing an online portal for schools to create and submit funding applications, and greater support and training for SENCOs or any other teachers making top-up applications and sitting on decision-making panel. This might mean school staff spend much less time preparing funding applications and improve the consistency of decision-making and accountability of outcomes.
 - b) **Re-purpose a proportion of the funding currently being spent on top-up funding for children and young people that do not have an EHC plan, to create a targeted early intervention fund for mainstream schools.** A targeted intervention fund could look like a finite budget each year dedicated to early intervention for children and young people with emerging and/or lower levels of need, or funding targeted at specific priority groups. This should mean earlier and better targeted help, and that a proportion of the children and young people who are currently receiving top-up funding (with no EHC plan) may proceed to statutory assessment.
 - c) **Gradually phase out the use of top-up funding for children and young people who do not have an EHC plan.** Under this option, after an initial transition period (e.g. three years), mainstream schools would no longer be able to access additional top-up funding for children and young people who do not have an EHC plan. During this transition period, children and young people who have already been awarded funding would continue to receive it for the period agreed (usually up to three years) and there would be more limited opportunities to apply for additional funding to prepare the system for its eventual removal.
- **Changes to top-up funding for post-16 learners who were not previously in receipt of top-up funding.** The same three options presented for school-age children and young people, were also proposed for post 16 learners.

An initial Equalities Impact Assessment was completed pre-consultation and considered the overall change in its entirety, and potential equality impacts.

Now the consultation is complete, and the feedback analysed and synthesised, the detailed proposal/recommendation is as follows:

Using a proportion of current funding to create a Targeted Support Fund

Bristol takes a proportion of the current annual funding for non-statutory top-up and creates a more targeted fund. The process would look quite similar to now although much more streamlined and improved. The objective is to provide flexible, short-term funding for pupils whose needs are beyond Ordinarily Available Provision (OAP), but who with effective early intervention do not need to proceed to statutory assessment or require long-term or indefinite funding and support.

Funding type: Per-pupil funding based on individual applications from schools.

Process overview: Applications reviewed each term. Single decision-making panel and increased resource to manage and oversee process.

Eligibility: Detailed evidence required that OAP / Element 2 funding exhausted and need for timely, specialist intervention.

Funding amount: Maximum of £1m over one academic year.

Funding criteria: Funding application based on a costed support plan (informed by Bristol Universal Descriptors, BUDs). There is ongoing work to review and update the BUDs, and there was a section on these in the consultation survey. These changes and the funding criteria will be co-produced with schools and families in the coming months.

Governance/ scrutiny: New specialist teacher roles support and challenge schools to use funding effectively.

Supporting rationale:

- Non-statutory funding still provided to schools to support young people, but with much clearer strategic purpose
- Funding used more effectively and in a targeted way to manage emerging needs

- Much more streamlined process reduces time required to manage process for both schools and the council
- Relatively straightforward to implement (i.e. in place from next academic year)
- Potential to target specific priority needs and parts of the system (e.g. emerging speech and language needs in primary, social, emotional and mental health (SEMH) in older primary school children)

The Targeted Support Fund would give non-statutory funding a much a clearer, tighter purpose. It would look to hold needs effectively at SEN Support level where appropriate. Some children would be supported to progress to statutory assessment where appropriate if short-term support is ineffective. We are proposing the same approach for post-16 learners.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: The main impact of this proposal will relate to Disabled children and young people with SEND, their families and their schools; particularly those in receipt of non-statutory top up funding. There will also be changes to practice required by the Education & Skills workforce within the Council.		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
--	------------------------------------	-----------------

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically

active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<p>School census: Data is from the Jan 2023 school census and provides information on the number of pupils in Bristol schools with SEND.</p> <p>Note: This does not include pupils who live in Bristol but attend a school out of area or young people not of school age.</p>	<p>Summary of what the below data tells us: We know from Bristol’s school census data that for school age children – boys are more likely to receive support for non-physical SEND needs than girls, whilst Black African children are more likely to be in receipt of non-statutory top-up funding at mainstream schools; and more likely to be at a special school. Mixed White and Black African/Caribbean children are also overrepresented, whilst White British children are underrepresented compared to the Bristol population average. We also know that Disabled children with SEND are more likely to live in a deprived area and be eligible for free school meals.</p> <p>Pupils with SEND in schools</p> <p>Over 13,500 pupils in Bristol been diagnosed with special educational needs (SEN). This is an increase of 9% in the last year and 43% since 2016.</p> <ul style="list-style-type: none"> • 2,877 school age pupils have an Education, Health and Care plan (EHC plan) • 10,944 pupils have SEND but no EHC plan – SEND support (SEND support means support that is additional to, or different from, the support generally made for other children of the same age in a school.) <p>In Bristol, 4.1% of pupils have an EHC plan. The percentage of pupils with an EHC plan has been increasing since 2018 but is still below the national average (4.3%).</p> <p>The proportion of pupils in Bristol schools with SEND support continues to increase with 15.6% of pupils recorded with SEND support in 2023, higher than the national average of 13%.</p> <p>SEND provision by school type</p> <p>Rates of EHC plans and SEND support are higher in secondary schools than primary schools.</p> <ul style="list-style-type: none"> • In primary schools, 2.1% of pupils have an EHC plan and 14.9% have SEND support • In secondary schools, 2.7% of pupils have an EHC plan and 16.7% have SEND support <p>Pupil characteristics (does not include independent schools)</p> <p>SEND Diagnosis is more prevalent in boys than girls, both locally and nationally.</p>

- 71% of pupils with an EHC plan are boys
- 62% of pupils with SEND Support are boys

In Bristol, EHC plans are most prevalent at age 12 and SEND support rates are highest for 9 and 10 year olds. The proportion of pupils with SEND support increase with age up until age 10. The proportion of pupils with an EHCP also increases with age from 3.5% at age 4 to 11.5% at age 12.

White British children make up a smaller proportion of the population in receipt of top-up funding than they do of the general British population of the same age (2021 Census data) by around 16%. Black African children are 27% more likely to be in receipt of non-statutory top-up at mainstream schools, and 60% more likely to be at a special school than the average child in Bristol. Mixed White and Black African/Caribbean children are also overrepresented. A full analysis of impact by ethnicity has not been possible due to data limitations.

Ethnic group	EHCP		SEN Support	
	Bristol	England	Bristol	England
White British	4.5%	4.5%	16.7%	14.3
Irish	4.2%	4.4%	12.1%	13.6
Traveller Of Irish Heritage	2.0%	6.1%	25.5%	25.5
Any Other White Background	2.7%	2.9%	10.8%	9.5
Gypsy Roma	3.3%	4.8%	27.5%	22.2
White And Black Caribbean	6.8%	5.4%	20.8%	17.0
White And Black African	4.6%	4.5%	15.9%	12.6
White And Asian	2.6%	3.4%	11.0%	10.1
Any Other Mixed Background	4.6%	4.3%	15.5%	11.5
Indian	2.0%	2.4%	7.3%	6.3
Pakistani	3.8%	3.9%	14.1%	11.2
Bangladeshi	5.2%	4.5%	12.4%	10.2
Any Other Asian Background	3.5%	3.7%	8.4%	8.0
Black Caribbean	7.0%	5.8%	26.0%	16.5
Black African	4.7%	4.5%	14.1%	10.4
Any Other Black Background	5.7%	5.6%	15.0%	12.7
Chinese	2.6%	2.1%	5.3%	4.9
Any Other Ethnic Group	4.1%	3.4%	11.4%	10.1
Unclassified	4.8%	4.7%	13.8%	11.6

cc	Mainstream (EHCP)	Mainstream (Non-Stat)	Special Scho
White\nBritish	0.85x	0.75x	0.9
Black\nAfrican	1.06x	1.24x	1.1
Any\nOther\nWhite\nBackground	0.83x	0.99x	0.9
White\nand\nBlack\nCaribbean	1.36x	1.43x	1.1
Any\nOther\nMixed\nBackground	1.69x	1.60x	1.1
Pakistani	0.67x	0.76x	0.9
Black\nCaribbean	1.87x	2.81x	1.1
Any\nOther\nBlack\nBackground	1.39x	1.03x	1.1
White\nand\nBlack\nAfrican	1.22x	1.28x	1.1
Any\nOther\nAsian\nBackground	0.91x	1.51x	2.1
Any\nOther\nEthnic\nGroup	0.92x	0.81x	0.9
White\nand\nAsian	0.46x	0.34x	0.9
Bangladeshi	1.21x	0.64x	1.1
Indian	0.58x	0.41x	0.9
Chinese	0.55x	0.44x	0.9
White\nIrish	0.77x	0.40x	1.1
Traveller\nof\nIrish\nHeritage	1.02x	2.15x	n

Primary type of need (does not include independent schools)

Speech, language and communication needs is the most common primary need type for SEND pupils in Bristol. For pupils with SEND support the most common primary need type is also speech, language and communication needs, but for pupils with an EHC plan it is Autistic Spectrum Disorder.

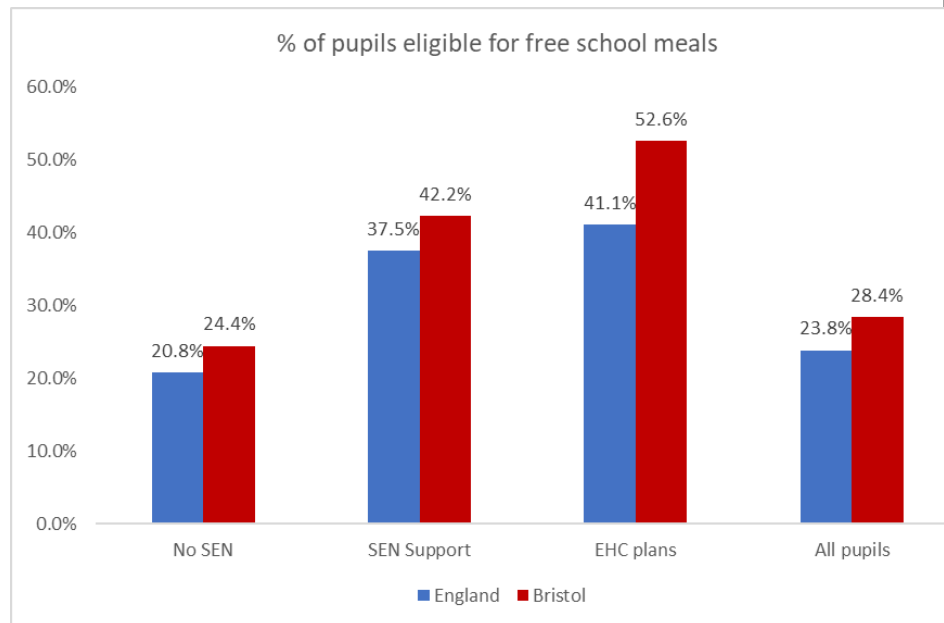
Primary Need	EHCP	SEN Support	Tot
Speech, Language and Communications needs	413	2943	3
Social, Emotional and Mental Health	640	2467	3
Autistic Spectrum Disorder	922	653	3
Specific Learning Difficulty	113	1439	3
Moderate Learning Difficulty	178	1020	3
Other Difficulty/Disability	61	472	3
SEN support but no specialist assessment of need	0	364	3
Physical Disability	107	207	3
Hearing Impairment	82	131	3
Severe Learning Difficulty	129	34	3
Visual Impairment	33	67	3
Profound & Multiple Learning Difficulty	90	4	3
Multi- Sensory Impairment	5	23	3

The most common primary need in primary schools is speech, language and communication needs (2,236 pupils), with a much higher number of pupils with this need type compared to secondary schools (822 pupils).

In secondary schools the most common primary need type is social, emotional and mental health (1,320 pupils).

Free school meal (FSM) eligibility (does not include independent schools)

Pupils with SEND are more likely to be eligible for free school meals.



SEN2: data is from the SEND statutory return, SEN2, and includes information on Disabled children and young people with SEND from 0-25 years who live in a Bristol postcode.

<https://www.explore-education-statistics.service.gov.uk/find-statistics/education-health-and-care-plans>

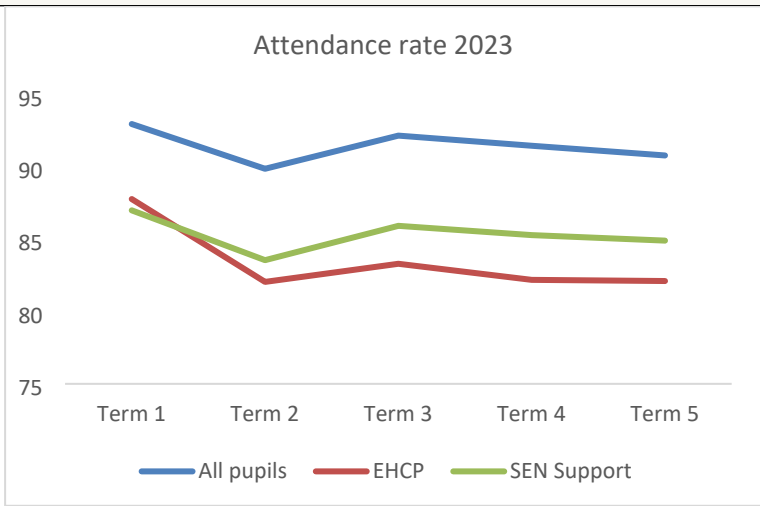
Summary of what the below data tells us: The children and young people for whom Bristol maintains an EHC Plan are distributed across the age ranges, with the vast majority (91%) aged between 5 and 19 years.

Of those 3,709 children and young people for whom Bristol maintains an EHC Plan in January 2023:

- 141 (3.8%) are aged under 5 years
- 1139 (30.7%) are aged 5 to 10 years
- 1413 (38.1%) are aged 11 to 15 years
- 839 (22.6%) are aged 16 to 19 years
- 177 (4.8%) are aged 20 to 25 years

Attendance & Deprivation
(Source: Xvault)

Summary of what the below data tells us: The attendance rate for pupils with an EHCP or SEND support is consistently below the overall attendance rate for Bristol schools. We also know that Disabled children with SEND are more likely to live in a deprived area.

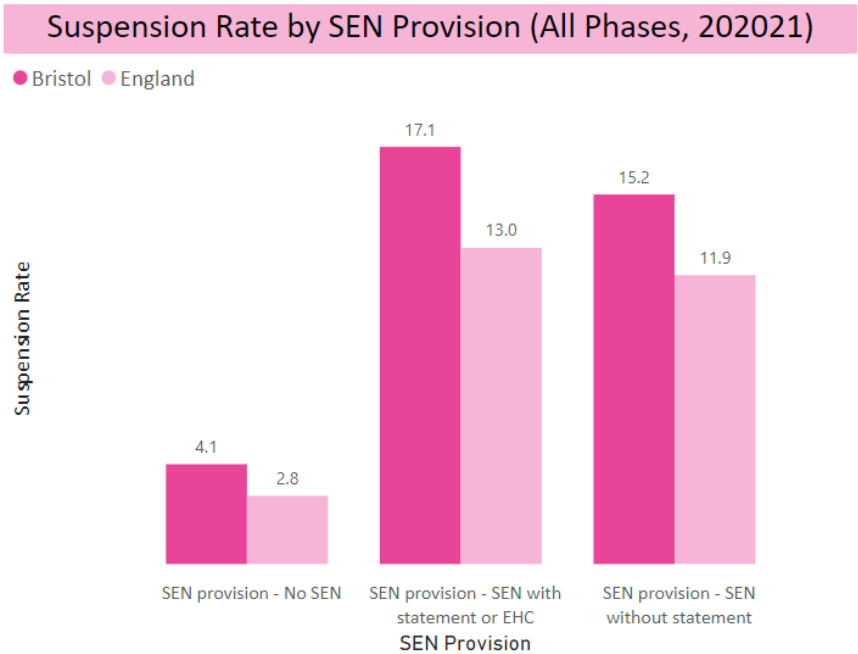


Deprivation

41.6% of pupils with SEND support live in a deprived area and 58.5% of pupils with an EHCP. This compares to 34.9% of all pupils in Bristol. NB: in this analysis a deprived area is an LSOA in the bottom 20% in the IDACI deprivation index. Totals do not include pupils who live outside of Bristol but attend a Bristol school. Excludes pupils who attend an independent school.

Suspension rates (source: Department for Education)
<https://explore-education-statistics.service.gov.uk/find-statistics/permanent-and-fixed-period-exclusions-in-england>

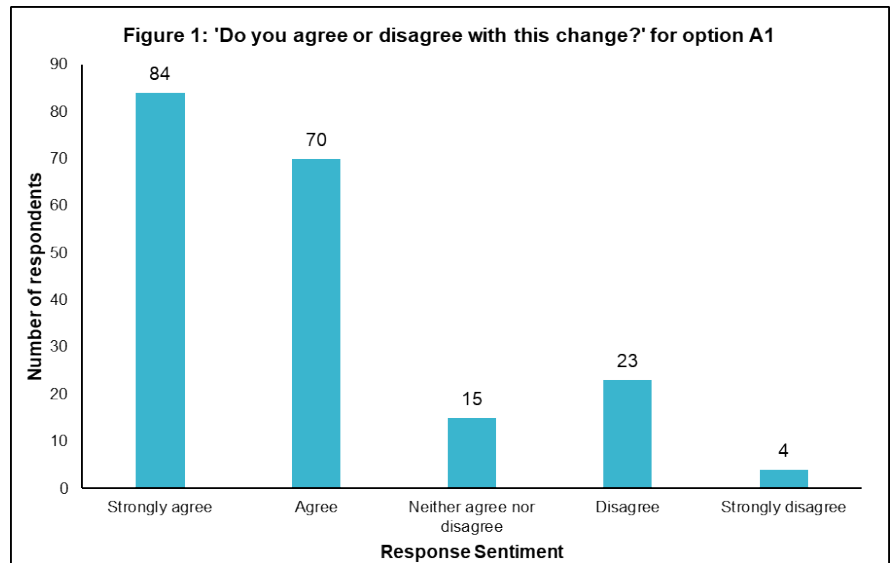
Summary of what the below data tells us: Suspension rates were higher within SEN provision (both with and without EHC) in 2020/21; compared to “no SEN provision” category.



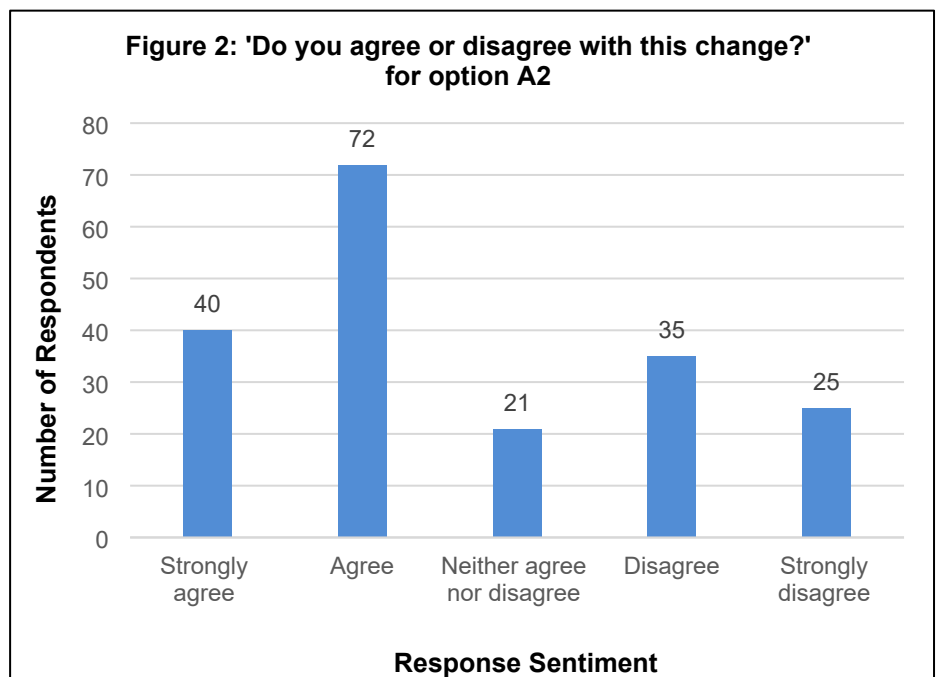
SEND Top-up 2023/24 consultation survey summary report (source: draft not yet published)

Summary of what the below data tells us: Across both the survey and Information and Engagement Sessions, Option A1 (retain process but make improvements) is the most popular option. In the survey it receives support (‘Strongly agree’ or ‘agree’) from more than three quarters of respondents. Option A2 (targeted early intervention fund) also receives support from many respondents. Option A3 (phase out non-statutory top-up funding) is strongly opposed, with more than three quarters of respondents indicating that they do not support this option.

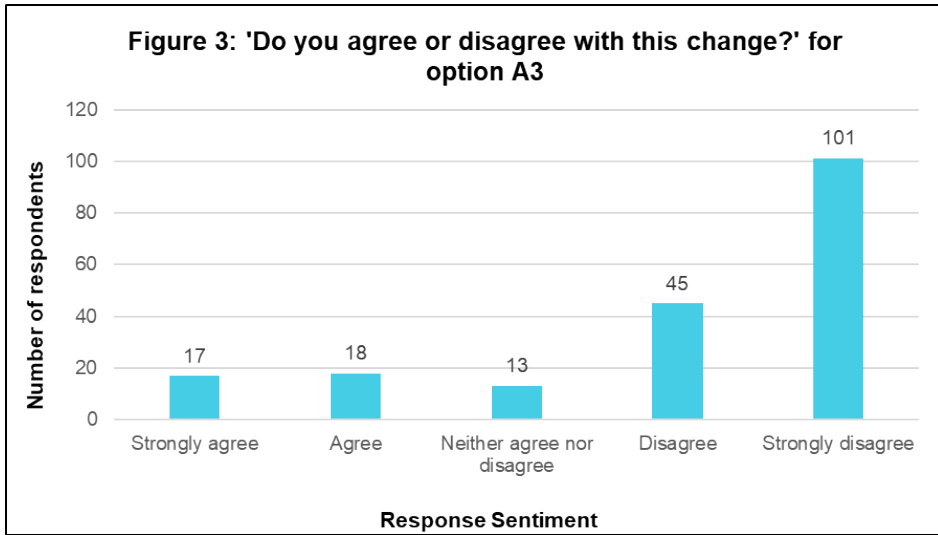
Most respondents agree with the proposals for Option A1, with more than 75% indicating that they agree or strongly agree with the change, compared to less than 15% who disagree or strongly disagree. (See Figure 1)



A majority of respondents agree overall with the proposals for A2, though not as many as those that agree with A1, and there is notably a smaller proportion who 'strongly agree' with A2 than those that strongly agree with A1. (See Figure 2)



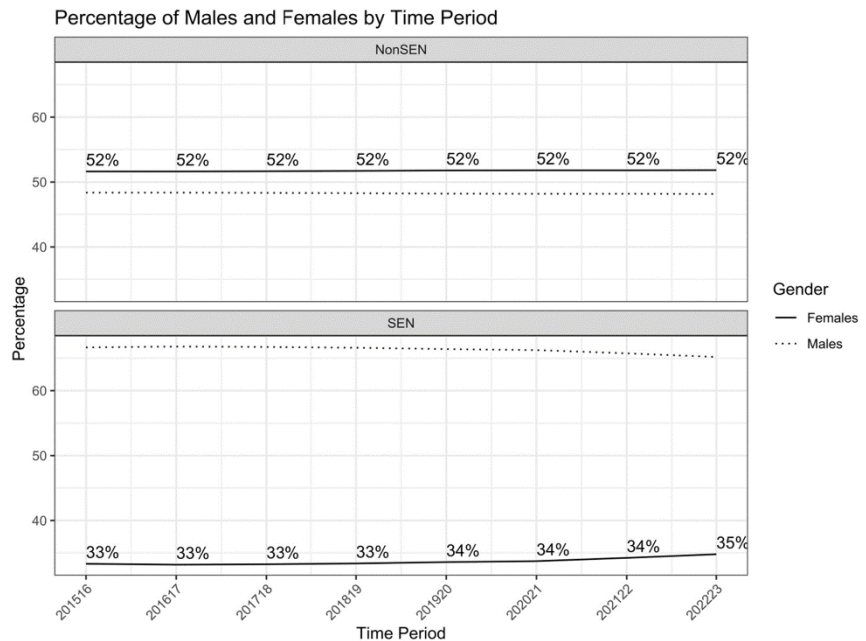
Most respondents disagree with option A3, with the majority saying that they 'strongly disagree' with this change. (See Figure 3).



Gender differences in special educational needs identification, Daniel, J. & Wang, H.

Source:
<https://doi.org/10.1002/rev3.3437>

Summary of what the below data tells us: Of the roughly 1.5 million children in English schools identified for SEN services in 2022-23, only 0.5 million were girls. The same pattern is seen across the country, with girls making up between 34% to 36% of all students accessing SEN support in most regions. In some cases, this may be because certain disabilities are more common in boys. But it is likely to be also down to gender bias in assessment and from those referring children for assessment, as well as girls being better at hiding the challenges they face from some conditions.



Additional comments:

2.2 Do you currently monitor relevant activity by the following protected characteristics?

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Disability | <input type="checkbox"/> Gender Reassignment |
| <input type="checkbox"/> Marriage and Civil Partnership | <input type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race |
| <input type="checkbox"/> Religion or Belief | <input checked="" type="checkbox"/> Sex | <input type="checkbox"/> Sexual Orientation |

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Although our corporate approach is to collect diversity monitoring for all relevant characteristics, there are gaps in the available local diversity data for some characteristics, especially where this has not always historically been included in school census and statutory reporting e.g. for sexual orientation.

We also know there are currently some reporting gaps for age groups outside of the school census age (post-16 and early years). Our "Funding All Pupils" reports currently only report on sex, ethnicity, age and primary need; and do not report on religion or sexual orientation. This means we are unable to assess the equality impact of this proposal for the protected characteristics where data is not currently collected.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

In advance of the public consultation, there has been extensive informal engagement to develop the current proposals and options. This has included:

- 32 interviews with council officers across SEND, Top-Up, Finance, Post-16, and School improvement teams
- 12 interviews with a range of schools incl. head teachers and SENCOs, in mainstream, academies and special schools
- 10 interviews with other local authorities, consultants, voluntary, community and social enterprises (VCSE) orgs, Parent Carer Forum. This included West of England Centre for Inclusive Living (WECIL) and Ups and Downs South West, a Down Syndrome support charity serving children and young people, their parents/carers and all linked professionals dealing with the health and education of children and young people who have Down Syndrome

The formal 6-week consultation included:

- Online survey for all key stakeholders and wider public to provide feedback on options (equality profiling questions were included). The SEND Top-up 2023/24 consultation survey received 196 responses, all of which were completed online
- Briefing Note published on council website alongside survey

- Virtual and in-person engagement with key stakeholder groups running in parallel: Council staff, Headteachers and SENCOs, Parent Carers. Young People
- Easy Read materials available and options to request translation services
- Dedicated sessions with young people via schools/College and charitable partners

Respondents were asked in the survey if they were interested in the top-up funding consultation because they were a:

- Parent/carer of Disabled children or young person with SEND
- Teachers, Headteachers and Special Education Needs Coordinators (SENDCO's) working with Disabled children or young people with SEND
- Local Authority Staff Member working in SEND
- Child or young person with SEND
- Other (please specify)

Respondent type	Responses
Parent/carer of children or young person with SEND	57
Teachers, Headteachers and Special Education Needs Coordinators (SENDCO's) working with children or young people with SEND	97
Local Authority Staff Member working in SEND	33
Child or young person with SEND	1
All other responses	8
Total	196

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

There are already established stakeholder engagement mechanisms and coproduction groups that were used when developing these proposals, and will continue to be used during implementation. Examples include the SENCO (special educational needs co-ordinator) cluster meetings, the Bristol Parent Carers Forum and Schools Forum. Our Community of Groups (meetings with a range of representative groups) continues to ensure diverse voices in terms of SEND, ethnicity and community are heard in the Local Area. We are also looking to establish a Schools Forum specifically for the high needs block ('top up funding').

Alongside this, there will be dedicated communication and engagement activity during the implementation phase (with the bulk of proposals taking effect from the next academic year, September 2024); a continuation of those outlined in 2.4. For example, a letter has already been sent to local SENCOs providing an update on the forthcoming changes. We intend to recruit a dedicated

Communication & Engagement resource into the implementation delivery team, who will lead/ support on the following areas:

- Communicating the new direction for non-statutory top-up funding following the consultation and Cabinet decision
- Sessions to co-design the new process with stakeholders
- Pre-implementation awareness & training sessions during the Summer
- Regular and dedicated stakeholder communications throughout
- Refresher training sessions post-implementation
- Ongoing post-implementation support offer

A detailed stakeholder engagement and communication plan will be developed as one of the first implementation activities following Cabinet decision. This will include any targeted work to seek the views of under-represented groups.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

There continues to be a risk that some groups or individuals from specific backgrounds are over-represented in Bristol's Disabled Children and Young People with SEND population. We know from Bristol's school census data that for school age children – boys are more likely to receive support for non-physical SEND needs than girls, whilst Black African children are more likely to be in receipt of non-statutory top-up funding at mainstream schools; and more likely to be at a special school. Mixed White and Black African/Caribbean children are also overrepresented, whilst White British children are underrepresented compared to the Bristol average. We also know that Disabled children with SEND are more likely to live in a deprived area and be eligible for free school meals.

The primary impact of these proposals will be on the children and young people without EHC Plans who are currently, or potentially in the future, in receipt of non-statutory funding. Local authorities may provide top-up funding to children and young people who do not have an EHC plan and who have emerging or lower levels of support need, however this is not a statutory duty. As part of the [SEND Code of Practice 2014](#), education settings have a statutory requirement to use their core funding to make sure that any pupil with SEND gets the support they need. Any changes will continue to place the child or young person at the centre of the assessment process and ensure we consider their own unique individual characteristics, needs, strengths, resources, and culture.

There are currently 1,066 pupils funded under the current approach i.e. we have a current commitment in the system for non-statutory top-up funding (1 to 3 years in length), which will be paid as relevant

over the next three financial years. Our proposal would apply to new funding applications from September 2024 i.e. the next academic year; which will include brand new pupils and those when their current funding arrangement expires.

Our analysis/ modelling on the potential pupil journey under the new targeted support fund is:

- Circa 22% will likely require long-term support to achieve in school and will not be supported through the targeted support fund, these pupils are likely to proceed to statutory assessment
- Circa 43% will have needs beyond ordinarily available provision (OAP) and are likely to benefit from timely intervention through the targeted support fund. If the intervention is not effective, some will proceed to statutory assessment. If effective, these pupils will receive ongoing support through OAP
- Circa 35% will no longer be eligible for non-statutory funded support and will not be supported through the targeted support fund. They will receive ongoing support through OAP. There are additional recommendations to mitigate the impact on these individuals, including investing in a targeted outreach service to help improve wider mainstream school and staff practice

Note: This analysis is still being finalised and exact numbers subject to change

The current high needs funding model is unsustainable and this approach risks destabilising the whole school system in Bristol. The council, schools, and their local partners therefore need to make vital changes to the way it uses its High Needs Block funds to meet pupils’ needs earlier and more effectively and enable greater inclusion in mainstream schools.

Bristol continues to have a legal duty to provide funding for Children and Young People (CYP) with a statutory ECH plan. Local Authorities are required by law (Section 42 of the Children’s and Families Act 2014) to secure special educational provision and health care provision in accordance with an EHC plan. Where an EHC plan is maintained for the child or young person, the local authority must make sure that the special educational provision set out in it is delivered.

We will continue to monitor outcomes via demographic breakdowns and protected characteristics to see if the way we deliver SEND provision changes significantly. As well as identifying whether funding changes will have a disproportionate impact on particular groups, we need to pay particular attention to the risk of indirect discrimination: when an apparently neutral decision puts members of a given group at a particular disadvantage compared with other people because of their different needs and circumstances.

During the consultation process, the proposed changes were made publicly available for all citizens to review and comment on. An easy read version of the document was made available. This was not available at the start of the consultation period, but was available for an extended period upon request to allow full participation in the process. Consultation documents were also made available in alternative languages upon request.

Although these changes relate to the process for administering and allocating top-up funding locally, this isn’t a blanket approach. Practitioners will always focus on the individual and how their needs can be met in the first instance. We will ensure we are treating each individual on a case by case basis.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Disabled Children and young people with SEND are the focus of this proposal – more EHCPs start during primary school than at secondary ages, and the median age for an ECHP start is just under 10 years old.

Mitigations:	Any decisions around meeting needs of CYP with SEND will need to ensure we consider their wellbeing and clearly evidence how any provision of additional support promotes their wellbeing and doesn't impact on their Human Rights. Any decisions need to be on individual case by case basis. Detailed evidence will be gathered as part of the updated process, with increased resourcing to manage and ensure this. We will also be improving the monitoring and oversight of how the targeted support fund is used and its impact – this will included monitoring of protected characteristics which will enable us to reflect and adjust practice accordingly to tackle these disparities; aided by the targeted approach possible with the new fund.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As outlined in Section 2.1, CYP with SEND experience a range of impairments and are the focus of this proposal. Our research has shown that Autism Spectrum Disorder (ASD), Speech, Language, and Communication Needs (SLCN) and Physical Disability Communication and Interaction (PD) peak during transition periods as children reach the start of primary and secondary school, whilst there have been large increases in Social Emotional and Mental health needs (SEMH) needs across secondary school ages.
Mitigations:	Any decisions around meeting needs of CYP with SEND will need to ensure we consider their wellbeing and clearly evidence how any provision of additional support promotes their wellbeing and doesn't impact on their Human Rights. Any decisions need to be on individual case by case basis. Detailed evidence will be gathered as part of the updated process, with increased resourcing to manage and ensure this. Additional support may be needed around transition periods to ensure this; as this is when ASD, SLCN and PD peak. During the co-design of the new process, we will factor in this additional insight gained through this process. We will also be improving the monitoring and oversight of how the targeted support fund is used and its impact – this will included monitoring of protected characteristics which will enable us to reflect and adjust practice accordingly.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Boys are more likely to be receiving support for SEND needs than girls for all non-physical needs.
Mitigations:	Any decisions around meeting needs of CYP with SEND will need to ensure we consider their wellbeing and clearly evidence how any provision of additional support promotes their wellbeing and doesn't impact on their Human Rights. Any decisions need to be on individual case by case basis. Detailed evidence will be gathered as part of the updated process, with increased resourcing to manage and ensure this. We will also be improving the monitoring and oversight of how the targeted support fund is used and its impact – this will included monitoring of protected characteristics which will enable us to reflect and adjust practice accordingly to tackle these disparities; aided by the targeted approach possible with the new fund.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	

Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	White British children make up a smaller proportion of the population in receipt of top-up funding than they do of the general British population of the same age (2021 Census data) by around 16%. Black African children are 27% more likely to be in receipt of non-statutory top-up at mainstream school, and 60% more likely to be at a special school than the average child in Bristol. Mixed White and Black African/Caribbean children are also overrepresented. A full analysis of impact by ethnicity has not been possible due to data limitations.
Mitigations:	Any decisions around meeting needs of CYP with SEND will need to ensure we consider their wellbeing and clearly evidence how any provision of additional support promotes their wellbeing and doesn't impact on their Human Rights. Any decisions need to be on individual case by case basis. Detailed evidence will be gathered as part of the updated process, with increased resourcing to manage and ensure this. We will also be improving the monitoring and oversight of how the targeted support fund is used and its impact – this will include monitoring of protected characteristics which will enable us to reflect and adjust practice accordingly to tackle these disparities; aided by the targeted approach possible with the new fund.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Disabled children with SEND are more likely to live in a deprived area and be eligible for free school meals. Significant majorities of children classed as SEMH are on free school meals across genders, in both mainstream and special schools, and regardless of ECHP status. In mainstream schools there more children on free school meals classed as ASD, although this effect disappears in special schools.
Mitigations:	Any decisions around meeting needs of CYP with SEND will need to ensure we consider their wellbeing and clearly evidence how any provision of additional support promotes their wellbeing and doesn't impact on their Human Rights. Any decisions need to be on individual case by case basis. Detailed evidence will be gathered as part of the updated process, with increased resourcing to manage and ensure this. We will also be improving the monitoring and oversight of how the targeted support fund is used and its impact – this will included monitoring of socio-economic status which will enable us to reflect and adjust practice accordingly to tackle these disparities; aided by the targeted approach possible with the new fund.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Evidence shows a range of impacts on the carers of Disabled Children and Young People with SEND – including on finances, health and employment

Mitigations:	As outlined in Section 2.5, we will ensure that Parents and Carers are consulted when designing and developing the process for administering the new targeted support fund.
Children in Care	
Potential impacts:	<p>Children in care experience worse academic outcomes compared to the general population. Bristol is currently the corporate parent of nearly 800 children and young people. Circa 45% of these individuals have an identified Special Educational Need (far higher than the general population), with around half of these receiving support via a statutory Education, Health and Care Plan (EHCP); the other half receiving non-statutory top-up funding.</p> <p>Through our engagement we heard that any changes to top-up needs to be considerate of those who may be involved in the children’s social care system. Tightening of the top-up application needs to be considerate of those in receipt of the higher end of the top-up which includes those involved in youth justice support, whilst funding decision makers also need to be mindful of where there is family neglect and parents/carers not identifying needs earlier resulting in higher cost late applications for funding.</p> <p>SEMH is considered common for Children in Care (CIC) due to the trauma they have experienced. There are two contrary outcomes here. On one hand reducing non-statutory funding may result in CIC being less able to access support and funding. On the other hand, some conversations have suggested that EHCPs are leveraged for this cohort as a way to move these young people onto other settings, excluding them from mainstream education. By providing more targeted funding for these needs and this cohort; it may increase schools’ ability to provide inclusive support.</p>
Mitigations:	During the co-design of the new targeted support fund, explore the potential to ringfence a certain amount of money for Children in Care. Ensure The HOPE Virtual School are involved in the co-design of the new process, and that there is a dedicated route (if required) for Children in Care that meets the needs of this cohort.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don’t
- ✓ Foster good relations between people who share a protected characteristic and those who don’t

The overall intention of the proposal is to achieve long-term sustainability within the local SEND system; and thereby improve outcomes for our children and young people. This is an opportunity to re-centre the whole SEND system towards early intervention and inclusion.

Other predicted benefits include:

- Shorter waiting times for schools to receive funding for CYP with EHC plans.
- Education professionals will not have to fill in a separate application form for statutory funding through the top-up process
- Earlier and better targeted help to CYP with SEND
- Much more streamlined and needs-led process for a Targeted Support Fund; reducing the time burden and improving the consistency of decision-making

- A comprehensive, cohesive package of guidance for schools and specialist support
- Increased oversight and scrutiny of spend
- Greater monitoring and oversight of the impact on groups with protected characteristics

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

We know that Disabled children and young people who receive SEND services and support are more likely to be disproportionately impacted on the basis of Disability, race, ethnicity and socio-economic deprivation; as well as other protected characteristics which may be over-represented in the cohort. It is therefore essential that we assess people individually, and ensure that people do not experience any negative impact of any reduction in support that increases inequality.

We will make amendments to our co-design approach as a result of this assessment and analysis. We will introduce more targeted approaches e.g. with grassroots community-led organisations that work closely with the groups we know are at risk of being disproportionately impacted; to ensure that all voices are heard and feed into the process.

In terms of the impact of the proposed changes, the Equality Impact Assessment has identified key areas where we need to fill gaps in our evidence base; and improve oversight and scrutiny moving forward. This will enable us to respond to equality impacts “real time” as we monitor the new targeted support fund. We will also work close with The HOPE Virtual School to minimise the impact of the proposed changes on Children in Care.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

There is an opportunity to ensure that we provide earlier and better targeted help to CYP with SEND, maximising the full range of Ordinarily Available Provision (OAP); and re-centring the whole SEND system towards early intervention and inclusion. The changes proposed will also introduce more guidance, training and partnership support to facilitate this.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Co-production of the new process for the targeted support fund, ensuring all groups and voices are represented	Reena Bhogal-Welsh	Feb – April 2024
Updated fields on the “Funding All Pupils” reports to collect data on the full range of protected characteristics moving forward	Reena Bhogal-Welsh	By September 2024
Establishing the monitoring mechanism and framework for the new targeted support fund which includes equality data	Reena Bhogal-Welsh	By September 2024

Improvement / action required	Responsible Officer	Timescale
Further review on findings from the analysis to understand reasons and impact e.g. why boys are more likely to be receiving support for SEND needs than girls for all non-physical needs	Reena Bhogal-Welsh	By September 2024

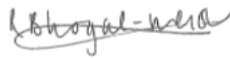
4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

We will continue to monitor equalities data in relation to Disabled Children and Young People with SEND to ensure there is not any adverse impact on any particular group. We will review the impact of the changes periodically with all relevant governance forums; and will share data on any changes to how we provide SEND services, in terms of numbers, type of services and demographic details of individuals who receive support. We will look to seek feedback direct from all stakeholders to see if there has been any discernible change to their experience once proposed changes are introduced. This EqIA will be reviewed and updated regularly during implementation.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: 
Date: 9/1/2024	Date: 24/01/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Proposal title: Review into the effective and sustainable use of statutory and non-statutory high needs block ('Element 3') funding [Delivering Better Value in SEND, Workstream 2]		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service	<input type="checkbox"/> New	<input type="checkbox"/> Changing
<input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> Already exists / review	
Directorate: Education and Skills	Lead Officer name: Tommy Jarvis	
Service Area: Education	Lead Officer role: Senior Project Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council's policies and supports the council's strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

<ul style="list-style-type: none"> • Replace the current non-statutory top-up funding arrangements and create instead a new Targeted Support Fund and Outreach service • The overarching purpose of this revised Fund is to provide schools with flexible, time-bound funding for a more specific group of pupils than now: those with emerging needs that are beyond what mainstream schools would ordinarily be expected to support, but who with effective and timely early intervention can continue to be educated in a mainstream setting without needing to proceed to statutory assessment.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If 'Yes' complete the rest of this assessment.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	[please select]
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The proposal replaces existing systems within Bristol City Council and will not change the environmental impacts outlined in step 2 below.
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1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
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If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
ENV1 Carbon neutral: Emissions of climate changing gases BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030. Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes	Benefits	
	Enhancing actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air,</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

water, or land and what steps will be taken to prevent pollution occurring. Further guidance <input type="checkbox"/> No impact	Adverse impacts	
	Mitigating actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the ‘evidence base’ section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4): None
Summary of significant adverse impacts and how they can be mitigated: None

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.

Environmental Performance Team Reviewer: Giles Liddell, Environmental Performance Co-ordinator	Submitting author: Tommy Jarvis
Date: 24/01/2024	Date: 23/01/24



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Green Recovery Fund – Public Electric Vehicle Infrastructure		
Ward(s)	Citywide		
Author: Helen Reed	Job title: City Leap Client Function and Energy Service Manager		
Cabinet lead: Cllr Kye Dudd - Cabinet Member for Housing Services and Energy	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: To seek approval to accept and spend the grant funding offer from WECA under the Green Recovery Fund to develop and implement electric vehicle (EV) charging infrastructure.			
Evidence Base: Background <ol style="list-style-type: none"> 1. Bristol City Council is working steadily towards realising the Mayor’s vision of a carbon-neutral city by 2030 with improved air quality, in line with the directives outlined in the Mayor’s Climate Emergency Action Plan, Bristol’s One City Climate Strategy and the council’s corporate strategy. Accelerating electric vehicle (EV) uptake should result in improved air quality and will reduce carbon emissions in the city. In order to support accelerated EV uptake, there needs to be a significant increase in the number of EV charging points. The Green Recovery Fund grant from the West of England Combined Authority and delivery of it aims to expand EV charging infrastructure across the city in-line with and in progress of the Council’s 2030 target and its corporate strategy. 2. The council is well placed to help meet the rising demand for EV infrastructure, through expansion of the existing council owned public EV charging network, Revive (further details of the Revive network are set out below). Leveraging the financial resources from the Green Recovery Fund grant will facilitate the construction of additional charging sites strategically located across Bristol, and extending into the neighbouring regions of South Gloucestershire and Bath & Northeast Somerset. This expansion builds on Revive, aiming not only to foster a cleaner, more sustainable urban environment but also to encourage more residents to opt for electric vehicles, confident in the availability of convenient charging solutions. Including proposals to facilitate deployment of EV charge points in residential settings to 'plug gaps' in the existing infrastructure, should help make it more convenient for residents to own and use electric vehicles, thereby fostering a swift transition to greener transportation options. <p>Green Recovery Fund</p> <ol style="list-style-type: none"> 3. The West of England Combined Authority (the CA) has been developing an EV strategy for the region. One objective is for WECA to take a proactive role in EV charging infrastructure provision, as well as to support and promote Revive as the region’s publicly operated EV charging network. The EV charger scheme as part of 			

the Green Recovery Fund is expected to grant fund 300+ EV charging bays to include on-street residential, community hubs and destination chargers in public car parks.

4. Up to £4.9m is being offered by WECA to the council, Bath and North East Somerset (**B&NES**) and South Gloucestershire (**SGC**) under the Green Recovery Fund. Up to £2.46m of this will be allocated to Bristol City Council. The council intends to use Bristol City Leap to support the delivery of the EV charging points, including design and build site construction works, funded by this grant funding money. The council, B&NES and SGC intend to utilise the grant monies in expanding the Revive EV charging network.

Revive electric vehicle charging network

5. Revive is a publicly owned EV charging network backed and owned by the four West of England Local Authorities, which includes fast (7-22kW) and rapid (50kW) charge points for public use. It is expected that (outside of the approvals contained in this cabinet report) c.150kW ultra-rapid charging will be added to the network over the next 12 months.
6. Revive was established through the Go Ultra Low West project, launching in 2019 and now includes over 200 EV charging bays used by over 8000 Revive users. Revive is operated for the WoE Local Authorities by the Council who have sub-contracted the management of this to Bristol City Leap under the council's Bristol City Leap strategic partnership.

Proposed EV Infrastructure Expansion

7. The WECA Green Recovery Fund is fully financing an extended rollout of new EV charge points (EVCPs) in the West of England, including in the city of Bristol, and within the areas of SGC and B&NES. Of the funding allocated to the council, the initiative will introduce or expand the following types of EV charge point installations:
 - **Community charging hubs:** provide chargers for residents who do not have access to off-street parking to charge their vehicles, providing an alternative and complementary approach to on-street charging. Residential hubs typically consist of multiple standard/fast AC chargers (7-22kW) set in an off-street car park in residential or suburban environments, often using a car park which is otherwise underutilised (e.g. overnight). This method continues the approach of the current Revive network, which has already installed fast and rapid chargers in council owned car parks within residential areas.
 - **Destination charging:** this occurs mid-journey when drivers are visiting a location such as a supermarket, railway station, shopping centre, cinema or hotel and take the opportunity to charge the vehicle and 'top-up' the batteries. Destination chargers are in public car parks (either on or off-street) and utilise either a fast or rapid charger. This method continues the approach of the current Revive network, which has already installed fast chargers in central council owned car parks.
 - **On-street residential charging:** provision of convenient and low cost on-street charging in residential areas, for people without off-street charging. For GRF, this is in the form of 150 single-socket charge points fitted to a lighting columns, as part of a trial. Other examples include single or double socket charge points installed on-street (on the pavement where wide enough, otherwise on a build out on the highway).
 - **On-street Residential Chargepoint Scheme (ORCS) grant:** BCC was previously awarded a grant from the DfT for on-street residential charge points. This project required match funding, which was previously to be financed from the council's capital reserves, funded through prudential borrowing. The GRF is now able to provide match in place of prudential borrowing. Permission will be required from the DfT in order to utilise the ORCS grant given the delay to implantation. In the event permission is not forthcoming, there may need to be changes to WECA's required outputs for the delivery plan. Recognising the substantial number of residential areas that currently lack sufficient EV charge points, it is proposed to facilitate the deployment of EV charge points in residential settings to 'plug gaps' in the existing infrastructure. This initiative would make it more convenient for residents to own and use electric vehicles, thereby fostering a swift transition to greener transportation options.

Funding allocation and planned outputs

8. The allocation of the funding for each of the above type of charge point provision is as follows:

Type of installation	Funding allocation	Planned number of chargers	Notes
Bristol City Council			
On-street residential charging	£521,447 + £283,553 'ORCS' grant*	150**	*ORCS grant previously awarded to BCC, but subject to further DfT sign-off to proceed
Community charging hubs	£749,086	11**	7 sites provisionally chosen**
Destination charging	£890,546	26**	4 sites provisionally chosen**
TOTAL:	£2,161,079	187**	
TOTAL (including ORCS grant*):	£2,444,632		
SGC and B&NES			
B&NES allocation	£932,813		
SGC allocation	£1,143,114		Not including match funding (£182k ORCS fund, £226,361 Climate Emergency Fund)
Total CA allocation to BCC, SGC, B&NES minus contingency and WECA PM costs	£4,237,006		
Total WECA funding that could be claimed by BCC as part of GRF project delivery on behalf of BCC, SGC and B&NES	£4,823,806***		Theoretical maximum***
Contingency for programme			
GRF Contingency	£310,450		
GRF Inflation Allowance	£276,350		
GRF Programme Management	£76,194		
WECA GRF total	£4,900,000		Includes staff PM costs

**This will be subject to site selection change controls, as defined by WECA as the programme lead, and as contributed to by the Revive Network Board.

***Theoretical maximum: SGC will claim site delivery works to carry out themselves but procure charge points through BCC (BCL), and B&NES will do the same, although they might wish to also deliver site enabling works through BCC (BCL) – they have yet to decide on this.

Site selection methodology:

9. Details of site selection methodology are set out in Appendix A to this report. In summary:

- a) **Destination Charge Points and Community Hubs:** a long list of sites has been developed using data-led insights to develop a detailed methodology. Sites include key destinations, high priority sites and areas identified as “hotspots” of requests from residents. These sites have then been ranked for suitability for destination and community chargers, resulting in a shortlist of proposed sites.
- b) **On-street residential:** a data led approach highlighting streets with lack of off-street parking has been overlaid with site suggestions have been received by the public through the Travelwest website to help select priority areas. These areas have then been analysed for suitable lighting columns and a final narrower set of priority areas identified.

10. Site selection will be finalised by the project delivery team in conjunction with the Revive Network Board, who will approve based on a forecast overall network income surplus position of the new and existing sites.

Grant offer conditions

11. The funding will be subject to a grant offer letter from WECA, which will set out the terms of the spending

and the return of any unspent grant at the end of the programme. More detail in the funding allocation table above.

- £2,161,079 is allocated to BCC for up to 15 sites for EVI supply, and design& build.
 - £2,075,927 is allocated to SGC and B&NES for 40+ sites, of which approximately £1.3m would be spent through BCC to expand the Revive network. The remainder will be passed to SGC and B&NES.
12. The programme of works will be developed by Bristol City Leap, the council's joint venture company and it is anticipated that the installation of charge points will be carried out by Ameresco Limited, the strategic partner procured by the council to delivery low carbon energy infrastructure through the council's City Leap partnership (or alternatively through another contractor procured via a regulated procurement).
13. It is anticipated that the programme of works would start from summer 2024, with the project ending in March 2026. On commissioning of the newly installed EV charge points, they will be integrated into the existing Revive operations and maintenance systems. Monitoring of utilisation will take place alongside the rest of the Revive network. This will be funded through revenues from the Revive network in the same way current operational and maintenance and monitoring costs are funded. It is anticipated that installation of additional charge points will generate the additional revenues required to meet these costs.

Business case and costs

- An income surplus position is forecast for Revive following the installation of the GRF-funded charge points.
 - GRF includes funding for higher powered ultra-rapid charge points as well as lower powered fast charge points. Higher powered charge points have been shown to generate positive cash flows within the existing Revive network, which has a positive effect on the overall income surplus position.
 - Planned operational costs have been capitalised for the first 3-5 years which reduces the risk of loss-making from underutilised sites.
 - The ORCS grant fund previously had approval for match funding to deliver the capital for the 150 on-street lighting column charge points. GRF provides 100% grant funding, which replaces the need for BCC internal borrowing match funding, which improves the business case for on-street charge point installation.
 - The project outputs are based on achieving the above number of installed charge points, however, the project has also built in the following contingencies:
 - Inflation: 275k
 - Risk: 310k
 - Total 12%: £585k
 - The contingency will minimise the risk of not being able to meet the project output, and there is also the flexibility within the prescribed project change controls to change to difference types of charge point, which could offer up savings as required.
14. As part of the WECA GRF Full Business Case (FBC), estimated costs were included for charge points and site installations. These estimates were based on previous Revive installations. A breakdown of the site costs can be found in section 4.4 of the WECA GRF Full Business Case ([here](#)).

Cabinet Member / Officer Recommendations:

That cabinet:

1. Authorise the Executive Director for Growth and Regeneration, in consultation with the Cabinet Member for Housing Services and Energy, and the Chief Finance Officer to accept up to £2,410,000 Green Recovery Fund grant awarded by WECA to South Gloucestershire Council and Bath and North East Somerset Council and to transfer or spend those monies as directed by South Gloucestershire Council and Bath and North East Somerset Council.
2. Authorise the Executive Director for Growth and Regeneration, in consultation with the Cabinet Member for Housing Services and Energy, and the Chief Finance Officer to enter into a grant agreement to accept and

spend up to £2,500,000 Green Recovery Fund grant awarded by WECA to Bristol City Council to deliver electric vehicle infrastructure as outlined in this report.

3. Authorise the Executive Director for Growth and Regeneration, in consultation with the Cabinet Member for Housing Services and Energy to procure, agree the terms of and enter into any contract(s) (which may be over £500,000) required for the delivery of electric vehicle infrastructure to be funded by the Green Recovery Fund grant award.

Corporate Strategy alignment:

1. Environment and Sustainability: Supporting Carbon Neutrality, encouraging investment, and lead a just transition to a low-carbon future.
2. Climate Resilience – reduce greenhouse gas emissions aiding efforts to adapt to climate change effects
3. Safe and Active Travel – improving air quality by fostering switch to electric vehicles through a wider charging network
4. Mayor’s Climate Emergency Action Plan
5. One City Plan – promoting increased uptake of electric vehicles through improvements to the public charging network

City Benefits:

1. Economic Opportunities: support economic resilience and a green recovery in response to the economic impact of Covid-19, supports local supply chain growth and job creation within the EV sector.
2. Reduced Emissions: promotes the use of electric vehicles contributing to cleaner air.
3. Noise Reduction: EVs operate more quietly compared to conventional vehicles, aiding in noise reduction.
4. Carbon Footprint: Facilitate actions by city partners and citizens to reduce their carbon footprints
5. Quality of Life: Encouraging cleaner transportation options fostering a healthier and more pleasant urban environment.

Consultation Details:

1. Electric Vehicle City Leap Working Group
2. Internal stakeholders – Fleet and Strategic City Transport
3. Chief Finance Officer, Finance Business Partner, Executive Director for Growth & Regeneration, Cabinet Member for Climate, Ecology, Energy and Waste and Designated Deputy Mayor with responsibility for Finance, Governance and Performance.
4. WECA EV Working Group
5. Revive Network Board
6. Public consultation via the [Travelwest EV site suggestion](#) portal.

Background Documents:

1. Mayor’s Climate Emergency Action Plan Update: [CEEP Appendix A1 - Update On Mayors Climate Action Plan Final.pdf \(bristol.gov.uk\)](#)
2. Decision Pathway – Report, Cabinet Approval, Establishing the City Leap Energy Partnership: [2022 12 06 Establishing the City Leap Energy Partnership - Cabinet Report - FINAL.pdf \(bristol.gov.uk\)](#)
3. One City Plan (third iteration): [One City Plan 2021 \(bristolonecity.com\)](#)
4. [WECA Green Recovery Fund](#)

Revenue Cost	£0	Source of Revenue Funding	
Capital Cost	£4.9 million	Source of Capital Funding	WECA – Green Recovery Fund
One off cost <input checked="" type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: This report seeks approval to accept and spend the grant funding offer from WECA under the Green Recovery Fund to develop and implement electric vehicle (EV) charging infrastructure. Using £2.2 million being made available by the West of England Combined Authority (WECA) and a £283,553 grant from the Department for Transport the report proposes building 150 on-street residential charging points, 11 community charging hubs and 26 destination charging hub. An allowance for contingency from WECA brings the total cost up to £2.7 million.

The costs are based on recent estimates completed as part of the LEVI project (a separate EV project running alongside the Green Recovery Fund for which a note is shortly coming to Cabinet). Further work will be done to establish a more accurate forecast of costs based on a precise site by site examination.

A further £2 million is to be allocated to South Gloucestershire and Bath and North East Somerset councils for at least 40 more charging sites. A portion of this £2 million, £1.3 million, will be spent through Bristol City Council to expand the Revive network and will need to be signed off by the Section 151 officer or a delegated officer.

The planned Cabinet Report later in 2024 will include a broader strategy to set out how our varied EV programmes join together.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 13 December 2023.

2. Legal Advice: Whenever the Council procures goods, works and/or services over a certain value, it must comply with its internal procurement rules and the Public Contracts Regulations 2015. The relevant officers when procuring the works and services needed to deliver the EV infrastructure must ensure these rules and regulations are complied with if the value falls within the relevant thresholds.

Whenever the council accepts a grant it must ensure that receipt and spending of such grant is in compliance with the Subsidy Control Act 2022. As above, the relevant officers will need to ensure appropriate legal advice is sought to ensure this is the case.

Legal Team Leader: Sinead Willis – Solicitor, Team Manager Commercial and Governance Team 2 January 2024

3. Implications on IT: I can see no implications on IT in regard to this activity.

IT Team Leader: Alex Simpson – Lead Enterprise Architect 8 December 2023

4. HR Advice: There are no HR implications evident

HR Partner: Celia Williams, HR Business Partner 12 December 2023

EDM Sign-off	Peter Anderson, Director Property Assets and Infrastructure	18 December 2023
Cabinet Member sign-off	Cllr Donald Alexander – Cabinet Member for Transport	4 December 2023
	Cllr Kye Dudd - Cabinet Member for Climate, Ecology, Energy and Waste	19 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES

Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Appendix A

Further Detail on Proposal

Green Recovery Fund – Public Electric Vehicle Infrastructure

Further detail of the site selection methodology to be used to finalise location for the installation of charge points under the Green Recovery Fund are set out below.

Site Selection Methodology: Destination Chargers and Community Hubs

A long list of suitable sites was developed, which included key destination sites (e.g. park & ride, railway stations, hospitals and high streets), hotspots of requests from residents and high priority sites identified by the UAs. A GIS model was then developed to rank the suitability of each site, for both destination and community chargers. A range of datasets were included in the model. The methodology included:

Indicator	Source data or analysis	Destination Chargers	Community Hubs
Demographic/ Social Equity	A number of demographic indicators were used including Index Multiple Deprivation, car ownership by household, current EV uptake and National Travel Survey trip volumes.	10%	37%
Coverage	Number of existing EVCPs within a 5 min drive.	33%	26%
Ward Coverage	Whether or not the ward within which the site sits currently has any existing EVCPs.	4%	3%
Commercial Viability	EV Forecast modelling (see section 2.4). Areas identified as being likely to be attractive to private sector CPOs and will not require public investment.	47%	0%
Public Investment	EV Forecast modelling (see section 2.4). Areas identified as being unlikely to be attractive to private sector CPOs and will require public investment.	0%	29%
Air Quality	Air quality as recorded by air quality monitoring stations.	7%	5%
TOTAL		100%	100%

Officers then carried out a manual sift of highest ranked sites, to produce shortlist of priority and reserve sites:

- **Utilisation:** How well is the parking space currently used, will introducing an EV charging bay result in parking stress.
- **Political Support:** Will there be support for implementing charging at this location internally from officers and members as well as externally from residents and businesses.
- **Parking Spaces:** Is alternative parking available nearby.
- **Local Electrical Infrastructure:** Are there known electricity grid constraints in the area.
- **Awareness:** Is it in prominent public location which will promote the increasing availability of EV chargers. Perceived lack of chargers is a barrier to EV uptake amongst the general public.
- **General commentary:** Does the officer believe the site is suitable overall.

Site selection methodology (on-street residential):

- Demand has been assessed using a data-led approach which highlights streets where there is a lack of off-street parking (a data set analyses each building on a street and depending on the length of the driveway associated with that building assigns them a probability of having off-street parking).
- This data set is overlaid with where site suggestions have been received by the public through the Travelwest

website. At the time of the analysis there were 400+ suggestions (which has increased since).

- Scores and public site suggestions were combined to identify priority Lower Super Output Areas (LSOAs – a geographical area typically with an average population for 1500 people or 650 households)
- Priority LSOAs are then analysed for suitable lighting columns, with priority locations being those that are
 - Kerbside
 - Not directly outside resident's front doors
 - >1.6m pavement width

Further details included in 2.10 of the WECA GRF Full Business Case ([here](#))

The District Network Operator (DNO) National Grid Electricity Distribution have been consulted on these plans, including the chargers that would relate to the lighting columns, which has been given support by the DNO.

Green Recovery Fund Risk Register

Negative Risks that offer a threat to Delivery of Green Recovery Fund and its Aims (Aim - Reduce Level of Risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Direction of travel	Current Risk Level			Monetary Impact of Risk £k	Risk Tolerance			
										Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	Date
GRF001	Approval is not granted within funder timelines.	Delays in getting the approval to spend or delays in getting access to sites and may impact infrastructure lead-in times.	BCC is unable to maximise the potential bid for grant due to approval delays.	Open	Project Management	Contractual	Executive Director, Growth & Regeneration	Approvals process has been started prior to confirmation of funding Preparatory work to identify enabling works and site selection to begin as early as possible.	v	1	1	1	0	1	1	1	13.12.23
GRF002	Registration of subsidy on National Subsidy database is challenged	The Green Recovery fund is a 100% grant and could give rise to a subsidy. WECA have been advised that it should be registered on a National Database.	If a challenge is received WECA will need to consider how best to answer that challenge, one result could be withdrawal of the grant monies	Open	Project Management	Contractual	Executive Director, Growth & Regeneration	Consider timing of delivery - avoid incurring substantive expenditure until notification period has completed.		1	3	3	value of grant	2	2	4	13.12.23
GRF003	Proposed sites not signed-off by Revive Network Board (RNB)	The sites chosen by the GRF Project Board do not meet the requirements of the Revive Network	Site selection revisited, or a change to Revive tariffs to reflect the additional risks	Open	Project Management	Contractual	Programme Assurance Manager, City Leap Client Function	Establish clear coterminus project and RNB new site proposal sign-off procedures so that any problematic sites can be highlighted early.		1	2	2	unable to say at this stage	1	2	2	13.12.23

Equality Impact Assessment [version 2.9]



Title: Green Recovery Fund	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Helen Reed
Service Area: City Leap Client Function	Lead Officer role: City Leap Client Function and Energy Service Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

To approve and accept the grant funding offer from WECA for the Green Recovery Fund grant, totalling up to £2,500,000 to develop and implement electric vehicle charging infrastructure across Bristol City.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: The proposal aims to approve and accept funding which will see the implementation of electric vehicle chargers in key locations across the city.		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes
 No
 [please select]

Inclusive access: expanded EV charging infrastructure promotes equality by ensuring that more citizens, including

those living in residential areas currently underserved, have access to EV charging facilities.

Accessible and usable EV charge points: the new charge point installations will have an increased focus on improved accessibility and usability.

Economic Opportunities: development of new charging sites can offer economic opportunities and jobs evenly across different regions of the city, helping to reduce economic disparities.

Reduced Emissions: initiative promotes the use of electric vehicles, which do not emit tailpipe pollutants, thereby contributing to cleaner air and potentially reducing respiratory and other health issues linked to air pollution.

Quality of Life: The initiative, by encouraging cleaner transportation options, aims to enhance the quality of life for all citizens, fostering a healthier and more pleasant urban environment.

This EqIA is regarding accepting the funding. A further EqIA will be written if the funding is accepted which will make considerations for the works involved with implementing the charging points.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off:  Peter Anderson Director of Property, Assets and Infrastructure
20/9/2023	11/01/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Proposal title: Green Recovery Fund – To approve and accept grant funding		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Property Assets and Infrastructure	Lead Officer name: Helen Reed	
Service Area: City Leap Client Function and Energy Service	Lead Officer role: City Leap Client Function and Energy Service Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

To approve and accept the grant funding offer from WECA for the Green Recovery Fund grant, totalling up to £2,500,000 to develop and implement electric vehicle charging infrastructure across Bristol City, to support the Mayor’s Climate Emergency Action Plan and the Corporate Strategy.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
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If ‘No’ explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)	
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p> <p>By facilitating a greater uptake of electric vehicles (EVs), the initiative aims to decrease the greenhouse gas emissions traditionally associated with the combustion engines found in petrol and diesel cars. This could significantly reduce the city's overall carbon footprint, aligning with broader goals to mitigate climate change through reduced carbon dioxide and other harmful greenhouse gas emissions.</p>
	<p>Enhancing actions</p> <p>Ensure that the electricity supplied to the EV charge points is sourced from renewable energies, minimising the carbon footprint of the electric vehicles.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>
	<p>Adverse impacts</p>
	<p>Mitigating actions</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	

<p>ENV2 Ecological recovery: Wildlife and habitats BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	Supporting wider uptake of electric vehicles (EVs) will facilitate a reduction in the dependence on non-renewable fossil fuels and a significant reduction in parts and materials compared to what is required for maintenance of internal combustion engines.
	Enhancing actions	N/A
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	
	Adverse impacts	The materials necessary for manufacturing EV batteries and components often involve mining of non-renewable resources such as lithium, cobalt, and nickel. These mining processes can have substantial environmental impacts, including habitat destruction and water pollution. Therefore, while the initiative represents a step towards a more sustainable transportation system, it also warrants a comprehensive approach that considers the full lifecycle of EVs, encouraging recycling and the development of technologies to reduce reliance on non-renewable resources.
	Mitigating actions	<p>A nascent industry in recycling lithium-ion batteries is expected to rapidly develop to meet the supply of spent EV batteries.</p> <p>Ongoing developments in battery chemistry mean that cobalt is rapidly being phased out and alternative chemistries using</p>

		combinations such as lithium iron are expected to replace some of the rarer earth elements commonly found in today's batteries.
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Persistence of effects: 1 year or less 1 – 5 years 5+ years

<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	

Persistence of effects: 1 year or less 1 – 5 years 5+ years

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	The proposal directly supports improvements to Bristol's air quality through reduced vehicle emissions making a significant contribution to the city's statutory air quality targets and delivering significant public health benefits.
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	
	Adverse impacts	Expansion of EV manufacturing will lead to increased likelihood of pollution occurring in locations that where rare earth minerals are mined.
	Mitigating actions	None proposed given that the supply chains of car manufacturers is beyond the scope of influence of the council or City Leap partnership and the ongoing developments in battery recycling and alternative chemistry are expected to mitigate the current negative impacts.

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Continue liaising with BCL and BCC colleagues to determine expected carbon savings associated with charging infrastructure delivered.	Sam Rawcliffe	Feb 2024

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the ‘evidence base’ section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
The proposal supports delivery of Bristol’s EV charging network; a fundamental requirement for decarbonising the city’s transport network (ENV1) which in turn provides significant public health benefits associated with improving air quality (ENV4 + Health and Wellbeing Strategy).
Summary of significant adverse impacts and how they can be mitigated:

Environmental Performance Team Reviewer: Daniel Shelton	Submitting author: Samuel Rawcliffe
Date: 22/09/23	Date: 22/09/23

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This does not constitute an endorsement or approval of the proposal.



Decision Pathway

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Highway Contract Procurement		
Ward(s)	Citywide		
Author: Shaun Taylor	Job title: Head of Highways		
Cabinet lead: Cllr Donald Alexander, Cabinet Member for Transport	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: To seek approval for the procurement of new Highway Contracts and to seek approval to extend the value of the Gully Cleansing and Subway Drainage Maintenance, Term Contract and Highways Asset Management and Associated Works Framework and a New Structures Professional Services contract.			
Evidence Base: <ol style="list-style-type: none"> 1. All Bristol City Council (BCC) highway related civil works are issued through the Highways Framework. All response, safety works are issued through the Defect Response and Emergency works term contract. All drainage maintenance and cleansing are issued through the gully cleansing and subway maintenance term contract. 2. The Highways Framework is essential in delivering the capital programme across transport and is made up of multiple lots (see appendix A). Schemes delivered through the framework include the strategic CRSTS schemes, bridge repair and replacement including the new cut structure refurbishment, and road resurfacing programme. Other teams such as Parks also use the framework. 3. The term contracts are essential in delivering BCC statutory duties. This includes maintaining and repairing the drainage network and repairing the roads, fixing potholes and repairing footways. 4. The framework has run for 4 years, the drainage term contract has run for 4 years (to tie in with the expiry of the other contracts) and the Defect response Term contract has run for 8 years. 5. The 2021 estimated values of the Framework is £70m. The defect response term contract was valued at £8m and the drainage contract was valued at £800k. 6. Due to an increase in spend through the 2021-2025 framework because of successful capital funding bids, the value of the framework is nearly spent. To enable continued delivery of the capital transport programme the value of the framework needs to increase by 50% (£35m). 7. Due to the technical nature of structures work the Council also needs to implement a route to access Structures Professional services as the current contract has recently expired. 8. The new contracts are likely to be worth approx. £326m combined (depending on the pipeline of schemes from WECA/BCC). The value is divided in to: <ul style="list-style-type: none"> • £300m for the Highways framework, no guarantee of any work so no funding commitment • £2m annually for the 8year +2+2 Highway Term maintenance contract. Will have a minimum of 500k commitment per year for safety defects 			

- £1m annually for the 8-year +2+2 Drainage Term maintenance contract. Will have a minimum of £250k commitment per year which is to clear drains.
 - £2m over 3 years for a Structures Professional services call off framework, no funding commitment.
9. The £300m estimated value of the framework is made up of allocations from CRSTS1, CRSTS2, ATF, CIL, S106, CAZ and council funding, which could total around £580m. This is expected to be delivered by 2032 so it is prudent to allow for a significant proportion of this in the 2025-2029 framework to allow flexibility in delivery.
 10. The drainage contract has spent more than anticipated and as such requires an increase in the value of the spend by £400k, as well as starting procurement early as this spend will be used up by March 2024.
 11. Maintenance and Installation of Highway Electrical Assets Term Contract can be extended until 2027 and the Traffic Signals Maintenance, Supply and Installation Term Contract expires in 2027 so these are excluded.
 12. All contracts procured will be subject to performance management through the application of Key Performance Indicators.

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Authorises the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Transport to take all steps required to procure and award the contracts necessary for the implementation of a new
 - Gully Cleansing and Subway Drainage Maintenance Term Contract
 - Highways Asset Management and Associated Works Framework
 - Highways Defect Response and Emergency Works Term Contract
 - Structures Professional Services contract
 in-line with the procurement routes and maximum budget envelopes outlined in this report.
2. Authorises the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Transport to invoke any subsequent extensions/variations specifically defined in the contracts being awarded, up to the maximum budget envelope outlined in this report.
3. Authorises the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Transport to take all steps required to increase the value of the Gully Cleansing and Subway Drainage Maintenance Term Contract and Highways Asset Management and Associated Works Framework until March 2025 as outlined in this report.

Corporate Strategy alignment:

- Ensuring BCC has fit for purpose contracts in place promotes sustained, inclusive and sustainable growth as set out in SDG 8
- The contracts support the building of resilient infrastructure and promotes innovations as set out in SD9
- Through use of these contracts the city can be made inclusive safe, resilient and sustainable – SD11
- As per SD13 Procurement of the right contract and KPIS will support us in taking action to combat climate change, specially through decarbonisation – ENV1
- These contracts can promote economic growth through securing social value and community benefits as well as creating local jobs and delivering a living wage - ES3.
- These contracts will help the city deliver infrastructure that will help cool the city and adapt to climate change - ENV4
- The contracts are fundamental in delivering all aspects of Theme 6 – Transport and connectivity.

City Benefits:

Maintaining our highway assets is not only essential to meet our statutory obligations as a local authority but also to achieve our corporate goals. Improving the condition of our roads and footways will ensure we are a well-connected city linking people with jobs and services through well maintained and high-quality transport connections. A better surface quality free from defects will also encourage our residents to walk and cycle more which will improve wellbeing, help us meet our climate change obligations and reduce dangerous levels of air pollution. Our Corporate Strategy explicitly mentions a need for the council to focus on 'planned long-term outcomes not short-term fixes, prioritising early intervention and prevention.' By improving the condition of our highway assets now we will increase the resilience of our transport network, reduce disruption and potential elevated costs in the future through a well-planned programme of early interventions.

Consultation Details:

1. Growth and Regeneration Divisional Management
2. External market testing

Background Documents:

[Joint Local Transport Plan 4 2020-2036](#)
[Corporate Strategy 2022-2027 Corporate Strategy 2022-27](#)

Revenue Cost	£1m Highway Term maintenance for 8 years, 500k Drainage Term maintenance for 8 years.	Source of Revenue Funding	Various highways revenue codes – Drainage, Road marking, pump station maintenance etc.
Capital Cost	£300m for framework over 4 years, £1m Highway term maintenance annually for 8 years, £500k Drainage Term maintenance for 8 years.	Source of Capital Funding	Various highway capital codes and grants as they are awarded.
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: The current Highways contract for three key areas will all expire in 2025, including the Framework for all BCC highways related civil works, defects contract and the drainage contract. A tender is therefore necessary to ensure continuity of service.

The current 2021 Highways Asset Management and Associated Works Framework was approved for procurement of goods and services of up to £70m, defects contract was £8m and drainage was £0.8m. The successful reward of various capital funding streams has resulted in the need to extending the value of the existing Highways Asset Management and Associated Works Framework (2021-2025) by 50% (£35m) taking the total to £105m (£70m + £35m). There is also a request to increase the current drainage contract by £0.4m due to current spent levels being higher than originally anticipated.

Going forward, the combined value of these contracts is expected to be up to £326m, committed in both capital and revenue expenditure. This will be funded from the Highways and Traffic infrastructure capital programme, grant awards, WECA, other government departments, as well as Highways revenue budgets, and does not constitute a new funding pressure for the Council.

The Framework and Term Contracts must enable BCC to respond within a reasonable timeframe to highways and transport demands, provide Value for Money and strong contract management, including forecasting which must continue during the contract period to ensure exposure to both financial and operational risks are minimised.

The increase to the contract value does not constitute a request to increase budgets or approved spending and does not commit BCC to expenditure. Any revenue or capital expenditure against the contracts must continue to follow Council Financial Regulations, delegated approvals, and procurement regulations, against funded budgets and within approved budget envelopes.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 30 January 2024.

2. Legal Advice: The procurement process must be conducted in line with the 2015 Procurement Regulations and the Councils own procurement rules. Legal services will advise and assist officers with regard to the conduct of the procurement process and the resulting contractual arrangements.

Legal Team Leader: Husinara Jones, Team Manager/Solicitor 17 January 2024

3. Implications on IT: No implications on IT in regard to this activity

IT Team Leader: Alex Simpson – Lead Enterprise Architect 14 November 2023

4. HR Advice: There are no HR implications evident

HR Partner: Celia Williams HR Business Partner 21 November 2023

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	22 November 2023
Cabinet Member sign-off	Cllr Donald Alexander, Cabinet Member for Transport	7 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

REF NO.	CONTRACT	DEPARTMENT	SUPPLIER	TYPE	START	END	TOTAL VALUE	ANNUAL VALUE
DN568877	Lot 1 - Machine Laid Surfacing of BSH/HGW/Highways Asset Management and Associated Works Framework 2021-2025	Highways	Eurovia Infrastructure	NEC4 Framework	01/10/2021	30/09/2025	£ 5,000,000.00	£ 1,250,000.00
DN568884	Lot 2 - Surface Dressing and Micro Asphalts of BSH/HGW/Highways Asset Management and Associated Works Framework 2021-2025	Highways	Kier Highways	NEC4 Framework	01/10/2021	30/09/2025	£ 4,000,000.00	£ 1,000,000.00
DN568885	Lot 3 - Slurry Seal and Preventative Treatments of BSH/HGW/Highways Asset Management and Associated Works Framework 2021-2025	Highways	Pronin Limited	NEC4 Framework	01/10/2021	30/09/2025	£ 4,000,000.00	£ 1,000,000.00
DN568886	Lot 4 - Road Markings and High Friction and Coloured Surfacing of BSH/HGW/Highways Asset Management and Associated Works Framework 2021-2025	Highways	Glamorgan White Lining	NEC4 Framework	01/10/2021	30/09/2025	£ 1,000,000.00	£ 250,000.00
DN568887	Lot 5 - Highways and Associated Works up to £150,000 of BSH/HGW/Highways Asset Management and Associated Works Framework 2021-2025	Highways	Various	NEC4 Framework	01/10/2021	30/09/2025	£ 20,000,000.00	£ 5,000,000.00
DN505004	Lot 6 - Highways and Associated Works over £150,000	Highways	Various	NEC4 Framework	01/10/2021	30/09/2025	£ 20,000,000.00	£ 5,000,000.00
DN568906	Lot 7 - Minor Bridge Repairs & Retaining Wall Works to Highway Structures	Highways	Alun Griffiths	NEC4 Framework	01/10/2021	30/09/2025	£ 5,000,000.00	£ 1,250,000.00
DN568926	Lot 8 - Structural Maintenance Repairs and Reconstruction Works to Bridges & Highway Retaining Walls Structures	Highways	Alun Griffiths	NEC4 Framework	01/10/2021	30/09/2025	£ 8,000,000.00	£ 2,000,000.00
DN505004	Lot 9 - Maintenance Painting Works to Bridges and Associated Highway Structures	Highways	N/A	Not Awarded				
DN568927	Lot 10 - Structural Steel Repairs and Replacement Works to Highway Structures	Highways	Centregreat	NEC4 Framework	01/10/2021	30/09/2025	£ 5,000,000.00	£ 1,250,000.00
DN568928	Lot 11 - Geotechnical & Soil Investigation Works	Highways	Structural Soils	NEC4 Framework (Direct	01/10/2021	30/09/2025	£ 1,000,000.00	£ 250,000.00
DN568929	Lot 12 - Traffic Management	Highways	Forest Traffic Services	NEC4 Framework	01/10/2021	30/09/2025	£ 2,000,000.00	£ 500,000.00
DN217278	Highways Defect Response and Emergency Works Term Contract (2017-2025)	Highways	ETM	NEC3 Term	01/10/2017	30/09/2025	£ 8,000,000.00	£ 999,657.65
DN517410	Gully Cleansing and Subway Drainage Maintenance	Highways	Sapphire Utility Solutions	Term Contract	01/10/2021	30/09/2025	£ 800,000.00	£ 200,000.00

Decision Risk Assessment [Version 1.0]

Title of Report	Highway Contracts
Report Author	Nick Pates
Date of Completion	20/12/2023
Purpose of this risk assessment	
<p>Risk Management supports good corporate governance which in turn supports effective decision making and improved performance. Applying risk management processes will help strategic decision makers make informed decisions about of policy decisions and service delivery options.</p> <p>Risk is the chance of something happening that will have an impact on achievement of the council's aims or objectives. Risk can be both Positive Opportunities (for example, pursuing a grant or changing a way of working to increase efficiencies) and Negative Threats (such as the risk of financial loss or reputational damage to the council).</p> <p>Risk management is the identification, evaluation, management and review of these opportunities or threats.</p> <p>This risk assessment is intended to:</p> <ul style="list-style-type: none"> • Demonstrate that all significant risks related to the decision have been considered. • Provides evidence that the decision maker has been provided with sufficient information about risks in terms of probability and impact • Explain how the risks will be managed. 	
Guidance	<p>The assessment requires the report author to record 'significant' risks identified in relation to the decision.</p> <ul style="list-style-type: none"> •Section 1 – Threat Risks - Identify and record the threat risks in relation to taking the proposed recommendation(s) (including the risks of implementation), and the risks of not taking the recommended action. •Section 2 – Opportunity Risks - Identify and record the opportunity risks related to taking the proposed recommendation. <p>When identifying risks consider the type of risk – these can be related to finances, reputation, governance, technology, etc In addition, consider the actions and controls that serve to mitigate the risk or increase the opportunity.</p> <p>Please contact riskmanagement@bristol.gov.uk for further support.</p>
Further risk management guidance can be found on the Source	https://bristolcouncil.sharepoint.com/sites/Corporate/SitePages/risk-management.aspx

Threat Risks											Updates automatically		Updates automatically	
Risk Title	Risk Description	Key Causes	Key Consequences	Status Open / Closed	Risk Category	Key Mitigations	Current Risk Level				Monetary Impact of Risk £k	Council Risk Appetite for the risk type identified	Does the risk exceed the council's risk appetite?	Financial Risk Exposure
							Likelihood	Impact	Risk Rating	Risk Level				
<i>Example - Risk that the decision will lead to a financial loss to the council</i>	<i>EXAMPLE - There is a risk that the council will suffer financial loss if the decision taken is unsuccessful in its aims or objectives</i>	<i>Inflation Workforce capacity Unforeseen cost increases</i>	<i>Financial loss</i>	<i>Open</i>	<i>Financial Loss/Gain</i>	<i>Guidance oTreat – Implementing controls: Contingency plans, Procedures, Monitoring, Detection, Training, Provision of Information, Policies, New Systems. oTolerate – Accept risk without mitigating. Still monitor and consider fall back plans. oTerminate – Avoid the risk by no longer pursuing the objective oTransfer – Share the risk with another party: Insurance, Contractual Transfer, Partnerships, Ventures/Outsourcing Services</i>	<i>4</i>	<i>5</i>	<i>20</i>	<i>High</i>	<i>£100,000</i>	<i>Cautious</i>	<i>Yes</i>	<i>£87,500.00</i>
Approval not given to retender contract	Cabinet decides not to approve the retendering of the contracts	Cabinet	Failure to appoint contracts after the existing contract expires leading to inability to deliver Highway statutory works and the transport work programme	Open	Programme/Project Management	Detailed cabinet report & discussion through decision pathway process.	2	5	10	Medium	£5,000,000	Open	No	£1,500,000.00
Tender prices	Prices tendered exceed budgets	Inflation and unforeseen costs	Ability to deliver full work programme and financial pressures on highway revenue budgets	Open	Financial Loss/Gain	Deliver less in the capital programme Increase budgets review statutory delivery	1	3	3	Minor	1000000	Cautious	No	£100,000.00
Delay to procurement	Delay to procurement	Legal challenges, resources	Delay in procuring the contracts, possibly affecting service delivery	Open	Programme/Project Management	Procurement process starting early	1	3	3	Minor	10000	Open	No	£1,000.00
									0	FALSE		FALSE	#N/A	£0.00
									0	FALSE		FALSE	#N/A	£0.00
									0	FALSE		FALSE	#N/A	£0.00
									0	FALSE		FALSE	#N/A	£0.00
									0	FALSE		FALSE	#N/A	£0.00

#####

Updates Automatically

Updates Automatically

Opportunity Risks												
Opportunity Risk Title	Risk Risk Description	Key Causes	Key Consequence	Status Open / Closed	Risk Category	Key Mitigations	Current Risk Level				Monetary Impact of Risk	Financial Opportunity Exposure
							Likelihood	Impact	Risk Rating	Risk Level	£k	
<i>Example - Opportunity risk that new ways of working causes efficiency cost savings</i>	<i>EXAMPLE - There is an opportunity risk that the successful implementation of the proposed new way of working leads to significant cost savings</i>	<i>Implementation of new way of working</i>	<i>Improved ways of working could lead to efficiencies and cost savings</i>	<i>Open</i>	<i>Financial Loss/Gain</i>	<i>Guidance: Enhance: Seek to increase the likelihood and/or the impact of the opportunity in order to maximise the benefit. Ignore: Minor opportunities can be ignored, by adopting a reactive approach without taking any explicit actions. Share: Find a partner/stakeholder to manage the opportunity, which can maximise the likelihood of it happening and increase the potential benefits Exploit: Find a way to make the opportunity definitely happen. Aggressive measures to ensure the benefits from the opportunity are realized.</i>	4	5	20	High	£100,000	£87,500.00
Carbon	Carbon reduction measures included in contracts	Implementation of new way of working	Improved ways of working could lead to carbon savings	Open	Environmental	seek to increase the likelihood through the inclusion of carbon reduction savings in the quality questions and KPIS	2	1	2	Minor	10000	£3,000.00
Social value	Delivering community benefits through social value	Implementation of new way of working	Social value benefits through the contracts	Open	Communities	Weighted social value in tender submissions to include benefits for the community	2	1	2	Minor	1000	£300.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00

£3,300.00

Threat Risks	
Number of Open Risks	3
CRITICAL	0
HIGH	0
MEDIUM	1
LOW	0
Cost Risk Exposure	£1,601,000.00
Number of risks exceeding risk appetite	0
Number of risks within risk appetite	3

Opportunity Risks	
Number of Open Risks	2
SIGNIFICANT	0
HIGH	0
MEDIUM	0
LOW	0
Cost Opportunity Exposure	£3,300.00

LIKELIHOOD AND IMPACT RISK RATING SCORING CRITERIA

Likelihood Guidance

Likelihood	Likelihood Ratings 1 to 4			
	1	2	3	4
Description	Might happen on rare occasions.	Will possibly happen, possibly on several occasions.	Will probably happen, possibly at regular intervals.	Likely to happen, possibly frequently.
Numerical Likelihood	Less than 10%	Less than 50%	50% or more	75% or more

Severity of Impact Guidance (Risk to be assessed against all of the Categories, and the highest score used in the matrix).

Impact Category	Impact Levels 1 to 7			
	1	3	5	7
Service provision	Very limited effect (positive or negative) on service provision. Impact can be managed within normal working arrangements.	Noticeable and significant effect (positive or negative) on service provision. Effect may require some additional resource, but manageable in a reasonable time frame.	Severe effect on service provision or a Corporate Strategic Plan priority area. Effect may require considerable /additional resource but will not require a major strategy change.	Extremely severe service disruption. Significant customer opposition. Legal action. Effect could not be managed within a reasonable time frame or by a short-term allocation of resources and may require major strategy changes. The Council risks 'special measures'. Officer / Member forced to resign.
Communities	Minimal impact on community.	Noticeable (positive or negative) impact on the community or a more manageable impact on a smaller number of vulnerable groups / individuals which is not likely to last more than six months.	A more severe but manageable impact (positive or negative) on a significant number of vulnerable groups / individuals which is not likely to last more than twelve months.	A lasting and noticeable impact on a significant number of vulnerable groups / individuals.
Environmental	No effect (positive or negative) on the natural and built environment.	Short term effect (positive or negative) on the natural and or built environment.	Serious local discharge of pollutant or source of community annoyance that requires remedial action.	Lasting effect on the natural and or built environment.
Financial Loss / Gain	Under £0.5m	Between £0.5m - £3m	Between £3m - £5m	More than £5m
Fraud & Corruption Loss	Under £50k	Between £50k - £100k	Between £100k - £1m	More than £1m
Legal	No significant legal implications or action is anticipated.	Tribunal / BCC legal team involvement required (potential for claim).	Criminal prosecution anticipated and / or civil litigation.	Criminal prosecution anticipated and or civil litigation (> 1 person).
Personal Safety	Minor injury to citizens or colleagues.	Significant injury or ill health of citizens or colleagues causing short-term disability / absence from work.	Major injury or ill health of citizens or colleagues may result in. long term disability / absence from work.	Death of citizen(s) or colleague(s). Significant long-term disability / absence from work.
Programme / Project Management <i>(Including developing commercial enterprises)</i>	Minor delays and/or budget overspend but can be brought back on schedule with this project stage. No threat to delivery of the project on time and to budget and no threat to identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones, and/or budget overspends. No threat to overall delivery of the project and the identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones; and/or major budget overspends. Major threat to delivery of the project on time and to budget, and achievement of one or more benefits / outcomes.	Significant issues threaten delivery of the entire project. Could lead to project being cancelled or put on hold.
Reputation	Minimal and transient loss of public or partner trust. Contained within the individual service.	Significant public or partner interest although limited potential for enhancement of, or damage to, reputation. Dissatisfaction reported through council complaints procedure but contained within the council. Local MP involvement. Some local media/social media interest.	Serious potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Dissatisfaction regularly reported through council complaints procedure. Higher levels of local or national interest. Higher levels of local media / social media interest.	Highly significant potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Intense local, national and potentially international media attention. Viral social media or online pick-up. Public enquiry or poor external assessor report.

Equality Impact Assessment [version 2.12]



Title: Commence tender of new Bristol Highways Asset Management & Associated Works Framework Contract, Drainage Term Contract and Emergency Defect response Contract	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] <i>Contracts</i>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Management of Place	Lead Officer name: Nick Pates
Service Area: Highways and Traffic	Lead Officer role: Highway Maintenance and Assets Team Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

To seek cabinet approval for the re-procurement of the Highway Contracts which are due to expire in September 2025

The current contracts are the

Highways Asset Management and Associated Works Framework (2021-2025). The new contract will run from 2025 to 2029

Highways Defect Response and Emergency Works Term Contract (2017-2025). The new contract will run from 2025 to 2033 (and will include options for a 2 year + 2 year extension)

Gully Cleansing and Subway Drainage Maintenance Term Contract (2021-2025) . The new contract will run from 2025 to 2033.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.


<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	[please select]
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This work is to procure contracts to enable Bristol City Council to fulfil its statutory duties to maintain the highway and to keep all highway users safe. The contracts also facilitate the delivery of the capital work programme, which seeks to deliver improvements to the highway network. The schemes delivered through these contracts will undertake scheme specific equality impact assessments.

As part of the commissioning process, providers will be required to demonstrate a good understanding of Equality Act 2010 requirements and the public sector equality duty; including that equality of opportunity is central to internal processes / workforce; and services will be regularly tailored and reviewed to meet the diverse needs of Bristol citizens.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: 
Date: 12/1/2024	Date: 16 January 2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Proposal title: Commence tender of new Bristol Highways Asset Management & Associated Works Framework Contract, Drainage Term Contract and Emergency Defect response Contract		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate	<input type="checkbox"/> Outline Business Case	<input type="checkbox"/> Full Business Case
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service	<input type="checkbox"/> New	<input type="checkbox"/> Changing
<input checked="" type="checkbox"/> Other [please state] Contract	<input checked="" type="checkbox"/> Already exists / review	
Directorate: Management of Place	Lead Officer name: Nick Pates	
Service Area: Highways and Traffic	Lead Officer role: Highway Maintenance and Assets Team Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

o seek approval for the procurement of the Highway Contracts which are due to expire in September 2025

Highways Asset Management and Associated Works Framework (2021-2025)

Highways Defect Response and Emergency Works Term Contract (2017-2025)

Gully Cleansing and Subway Drainage Maintenance Term Contract (2021-2025)

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

Yes **No** [please select]

The procurement of these contracts will enable the Authority to undertake essential statutory duties to ensure the maintenance and safety of the highway as well as delivery on the key transport objectives through the delivery of capital transport infrastructure. As such these works will have a negative impact on carbon and air quality, some of which can be mitigated through contract management e.g., low carbon technologies. The

contract will have a positive impact through the delivery of public transport schemes and active travel schemes which will reduce emissions, improve air quality and contribute to healthier lifestyles.

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

Yes No Not applicable [please select]

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

This is a re-procurement of contracts

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future. **Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.**

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)

ENV1 Carbon neutral: Emissions of climate changing gases

BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city

Benefits

The Framework contract will be essential in allowing the authority to deliver its transport objectives, which will help contribute to a carbon neutral environment.

<p>in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>The tender process will evaluate how bidders propose to maximise the delivery of active travel and sustainable transport improvements where these are relevant.</p> <p>Contractors will be expected to provide estimates and reports for greenhouse gas emissions from the delivery of highways contracts.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Works are likely to be delivered by vehicles with diesel emissions.</p> <p>Works are likely to contribute to traffic congestion.</p> <p>Works to maintain existing highways infrastructure will still in part continue to support conventional fossil fuelled transport options (business as usual).</p>
	<p>Mitigating actions</p>	<p>The tender process will evaluate how bidders propose to monitor, measure and minimise the emissions from the use of road going vehicles, non-road mobile equipment, and travel planning for works within the AQMA (Air Quality Management Area).</p> <p>The contractors will comply with requirements to reduce the impact of works on traffic congestion. Tenders should also be marked on innovative responses to improve traffic congestion.</p> <p>The tender process will evaluate how bidders propose to minimise the disruption to bus and cycle lanes and pedestrian walkways, to encourage people to continue using these modes of travel. Contract management will verify this.</p> <p>Contracts will stipulate use of low emission vehicles wherever possible following soft market testing.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider</p>	<p>Benefits</p>	<p>Through the delivery of schemes, additional habitats can be created. The framework is a mechanism for departments to deliver works associated with improving ecological habitats.</p>
	<p>Enhancing actions</p>	<p>The tender process will evaluate how bidders propose to maximise the delivery of improved habitats, wherever possible.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
<p>Adverse impacts</p>	<p>The building of infrastructure can have an adverse effect on habitats, and new infrastructure may reduce habitable spaces.</p>	

<p>how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Mitigating actions</p>	<p>Stipulate in contracts requirements for planting schemes that control runoff reduce the impact of air pollution within the AQMA.</p> <p>The tender process will evaluate how bidders propose to include reinstatement of verges and other land damaged or otherwise affected by equipment storage in their plans and implement this. This will include the potential to add swales and planting to improve habitats.</p> <p>Contract management will monitor the compliance and monitoring of performance in line with current legislation.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>	<p>Non-renewable resources may be used for the completion of works.</p> <p>Works will create wastes, which may include contaminated asphalt.</p>
	<p>Mitigating actions</p>	<p>Contracts and contract management will encourage the use of recycled materials. The tender process will evaluate how bidders propose to reuse aggregates on-site and will be given credit for appropriate proposals.</p> <p>Contractors will be registered as waste carriers, and their understanding of the handling and disposal of hazardous and non-hazardous wastes (including contaminated asphalt) will be evaluated in the tender.</p> <p>The tender process will evaluate how bidders propose to use the latest sustainable road building standards, where appropriate.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will</p>	<p>Benefits</p>	<p>The delivery of transport improvements should lead to a greater uptake of sustainable and active modes of transport.</p> <p>The framework allows for the delivery of flood mitigation schemes and supports the use of SUDS.</p> <p>The drainage term maintenance contract ensure Bristol is resilient to flooding through the ongoing maintenance of the drainage network.</p>

<p>become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>The tender process will evaluate how bidders propose to maximise the delivery of sustainable transport and flood enhancements.</p> <p>The tender process will evaluate how bidders propose to use technology and best working practices to ensure the drainage network is working efficiently.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>The contract will support delivery of SUDS and facilitate the maintenance and cleansing of the drainage network, all of which will reduce the number of contaminants entering watercourses.</p>
	<p>Enhancing actions</p>	<p>The tender process will evaluate how bidders propose to maximise the delivery of improved SUDs and drainage maintenance and cleansing.</p>
	<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Works and any associated traffic congestion may have a short-term impact on air, water, noise, and dust pollution, but have the potential for longer term improvement.</p> <p>Storage and use of fuel and chemicals may lead to pollution</p>
	<p>Mitigating actions</p>	<p>Contracts will stipulate requirements for planting schemes that control runoff reduce the impact of air pollution within the AQMA. Dust should be controlled as far as possible and noise should be controlled by limiting the hours of working and by protecting any sensitive receptors through the use of barriers, etc.</p> <p>Fuels and chemicals should be stored, dispensed and used in accordance with legislation and best practice.</p> <p>Check the quality of methodologies and monitoring as part of the tender process. For example, how will water that was sucked up will be discharged in a way that ensures watercourses will not be polluted.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project's implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
<p>The tender process will evaluate how bidders propose to:</p> <ol style="list-style-type: none"> 1. maximise the delivery of active travel and sustainable transport improvements where these are relevant. 2. monitor, measure and minimise the emissions from the use of road going vehicles, non-road mobile equipment, and travel planning for works within the AQMA (Air Quality Management Area). 3. minimise the disruption to bus and cycle lanes and pedestrian walkways, to encourage people to continue using these modes of travel. 4. innovate responses to improving traffic congestion. 5. maximise the delivery of improved habitats, wherever possible. 6. include reinstatement of verges and other land damaged or otherwise affected by equipment storage in their plans and implement this. This will include the potential to add swales and planting to improve habitats. 7. reuse aggregates on-site and will be given credit for appropriate proposals. 8. 9. use the latest sustainable road building standards, where appropriate. 10. maximise the delivery of sustainable transport and flood enhancements. 11. propose to use technology and best working practices to ensure the drainage network is working efficiently. 12. maximise the delivery of improved SUDs and drainage maintenance and cleansing. 	Nick Pates	Ongoing over five years
<p>The tender process will check:</p> <ol style="list-style-type: none"> 1. the quality of methodologies and monitoring. For example, how will water that was sucked up will be discharged in a way that ensures watercourses will not be polluted. 2. the bidder's understanding of the handling and disposal of hazardous and non-hazardous wastes (including contaminated asphalt) 	Nick Pates	Ongoing over five years
<p>Ensure that contracts stipulate:</p> <ol style="list-style-type: none"> 1. vehicle requirements in the contracts (including the use of low emission vehicles wherever possible following soft market testing). 2. requirements for planting schemes that control runoff and reduce the impact of air pollution within the AQMA. 3. the registration of contractors as waste carriers. 4. requirements for planting schemes that control runoff reduce the impact of air pollution within the AQMA. 5. the control of dust and noise should be controlled by limiting the hours of working and by protecting any sensitive receptors through the use of barriers, etc 	Nick Pates	Ongoing over five years

Enhancing / mitigating action required	Responsible Officer	Timescale
<ul style="list-style-type: none"> 6. the storage, dispensing and use of fuels and chemicals in accordance with legislation and best practice. 7. that contractors will be expected to provide estimates and reports for greenhouse gas emissions from the delivery of highways contracts. 		
The contracts will encourage the use of recycled materials.	Nick Pates	Ongoing over five years
<p>Contract management will monitor contracts to ensure they meet our environmental requirements, including:</p> <ul style="list-style-type: none"> 1. reducing the impact of works on traffic congestion and on existing public transport and active travel routes. 2. monitoring the compliance and monitoring of performance in line with current legislation. 	Nick Pates	Ongoing over five years

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):

The change to a larger framework contract should not significantly enhance or impair the evaluation, stipulation and contract management of environmental enhancements and mitigation of highways contracts. The net benefits should be greater as client and contract understanding of the delivery of enhancements improve, but the use of a larger framework contract should not otherwise alter the scale of the impacts. The net impacts of all the highways contracts will be significant environmentally.

Summary of significant adverse impacts and how they can be mitigated:

The change to a larger framework contract should not significantly enhance or impair the evaluation, stipulation and contract management of environmental enhancements and mitigation of highways contracts. The net adverse impacts may increase during works as more works include additional enhancements, but the use of a larger framework contract should not otherwise alter the scale of the impacts. The net impacts of all the highways contracts will be significant environmentally.

Environmental Performance Team Reviewer: Giles Liddell, Environmental Performance Co-ordinator	Submitting author: Nick Pates, Highway Maintenance and Assets Team Manager
Date: 12/01/2024	Date: 12.01.2024

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This does not constitute an endorsement or approval of the proposal.



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Housing Revenue Account (HRA) Energy Efficiency Strategy		
Ward(s)	Citywide		
Author: Miles Tilling / Sam Robinson	Job title: Head of Business Development / Energy and Renewables Manager		
Cabinet lead: Cllr Kye Dudd, Cabinet Member for Housing Services and Energy	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: To outline the Housing Revenue Account (HRA)'s plan to reach EPC C standard by 2030 across all Bristol City Council (BCC) homes, in line with the corporate commitment made in the One City Plan, and in line with likely regulatory changes to introduce a minimum energy efficiency standard for the social rented sector. Inefficient homes are a major driver of fuel poverty and lead to worse health outcomes for BCC residents. This strategy sets our plan to improve the energy performance of our properties through increased deployment of measures such as wall insulation and solar panels. This approach will combat the cost-of-living crisis by reducing energy bills, while also driving improved health outcomes and lowering carbon emissions associated with domestic gas and electricity consumption.			
Evidence Base: <ol style="list-style-type: none"> Following on from the commitments made in the One City Strategy, a more detailed plan is needed so that BCC and external stakeholders are clear on the steps needed to improve energy efficiency and move towards full decarbonisation of our homes. Through analysis of our stock condition data, we have set out a pathway towards improving the energy efficiency of the approximately 7500 (~28% of total) homes currently below EPC C up to at least that standard. With approximately 24000 homes currently on gas central heating, we have also set out the remaining steps needed to better understand the fastest and lowest cost route to full decarbonisation. The attached paper (Appendix A) is the product of a detailed analysis of BCC's stock condition and energy data, and sets out the programmes needed to achieve EPC C across all BCC homes along with associated costs. The additional costs and complexity associated with the wider decarbonisation of heat will require further in-depth analysis – a separate 'Heat Decarbonisation Strategy' will be brought forward in due course. In particular we have identified the need for a continued programme of wall insulation to improve the thermal performance of around 4000 solid wall and system-built properties. Alongside this we have identified the need for a programme of improvements to address expensive direct electric heating and hot water 			

systems which are present in around 3000 BCC homes and are a driver of higher fuel bills and poor EPC ratings. Finally we have highlighted the low levels of rooftop solar across our social housing estate, and – in line with our commitment to improve EPC scores for our residents - we have committed to installing solar photovoltaic (PV) panels alongside our roof replacement programme wherever technically feasible to do so.

5. The Government relaunched its review of the Decent Homes Standard in June 2023. The review will consider the introduction of a minimum energy efficiency standard in the social rented sector. In the longer term reaching EPC C across all BCC home is therefore likely to become a matter of regulatory compliance.

Cabinet Member / Officer Recommendations:

That cabinet:

1. Authorises the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Housing Services and Energy and the Council’s Section 151 Officer to take all steps required to implement measures which improve the energy efficiency of residential properties owned by the council (including those detailed in the HRA Energy Efficiency Strategy set out in Appendix A to this report) including:
 - a) submit appropriate funding applications (including applications to Homes England) and where such applications are successful, enter into grant agreements (in consultation with the Council’s Legal team) with the appropriate body and accept and spend such funding on such measures.
 - b) use HRA investment plan funds and/or reserves to fund and/or match fund projects implementing such measures to maximise funding.
 - c) procure and enter into all contracts required to deliver such measures including any contracts over the key decision threshold.
2. Notes the recommendations set out in the HRA Energy Efficiency Strategy (Appendix A).

Corporate Strategy alignment:

The recommendations in the HRA report are aligned to the corporate commitments made in the One City Climate Strategy to improve energy efficiency of our homes, maximise generation of renewable electricity and decarbonise heat in our buildings.

The Bristol Fuel Poverty Action Plan makes a commitment that by 2030 nobody in Bristol will suffer from a cold home due to fuel poverty. Improving the energy efficiency of BCC homes is a critical step in our mission to eliminate fuel poverty, mitigate the impacts of the cost-of-living crisis, and drive improved health and wellbeing outcomes for our residents.

City Benefits:

Improved air quality, lower energy bills, enhanced skills and supply chain for domestic retrofit, reduction in fuel poverty, improved health outcomes for residents

Consultation Details:

Internal consultation only:

o Workshops with Cabinet Member for Homes and Housing Delivery on 8th June 2023 and 20th September 2023

o Engagement with tenants and leaseholders at Service User group, Housing Management Board and Summer Housing Forum

o Attended Scrutiny board on 9th March 2023 to hear the views of Councillors

Background Documents:
[One City Plan](#)

Revenue Cost	£ 0	Source of Revenue Funding	
Capital Cost	£ 64m + grant funding	Source of Capital Funding	HRA funding and grant funding
One off cost <input checked="" type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:
 Energy Efficiency of our housing stock is a key factor in both tackling fuel poverty and delivering net carbon zero. As the largest provider of rental accommodation in the city, with over 26,000 homes, BCC has a pivotal role to play in achieving these ambitions.
 However, it should be noted that the costs of delivering energy efficiency works are significant, and in some cases such as air source heat pumps, may in fact be prohibitive in the current market.
 The HRA Business Plan currently has provision of circa £306m over thirty years for a number of energy efficiency initiatives. Despite this level of investment, and taking account of the comments above, it is possible that in order to achieve net zero carbon by 2030, that more may be required. In order to fit within the business plan cost envelope, any additional cost over and above the current provision will require the successful award of grant monies in order to create the necessary capacity.

Finance Business Partner: Martin Johnson – Interim Finance Manager Housing and Landlord Services 3 January 2024

2. Legal Advice: Whenever the council procures goods, works or services where the value is over certain thresholds, it must comply with its own internal procurement rules and currently the Public Contracts Regulations 2015 (due to be replaced shortly by the Procurement Bill). The relevant officers will need to seek legal and procurement advice to ensure these are complied with when procuring the measures detailed in this report.
 When in receipt of grant funding, the Council will need to ensure such funding complies with the Subsidy Control Act 2022. Again, the relevant officers should seek legal advice to ensure any such funding does comply.
 Legal advice should also be sought on the terms and conditions of any grant agreement entered into and any agreements for goods works and services entered into pursuant to this report.
 Consultation and compliance with the Public Sector Equality Act may also be required in relation to tenants affected by these works.

Legal Team Leader: Sinead Willis, Commercial and Governance Team Leader, comments provided on 17 January 2024 having reviewed this report and the HRA EE strategy

3. Implications on IT: I can see no implications on IT in regard to this activity

IT Team Leader: Alex Simpson, Lead Enterprise Architect 25 January 2024

4. HR Advice: There are no HR implications evident

HR Partner: Celia Williams HR Business Partner – 25 January 2024

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	22 November 2023
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Cabinet Member sign-off	Cllr Kye Dudd, Cabinet Member for Housing Services and Energy	4 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – HRA Report – Energy Efficiency Strategy	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Appendix A - Housing and Landlord Services – Energy Efficiency Strategy

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1 – Strategic Context

Set against the backdrop of the climate and ecological emergency, Bristol’s buildings must be ready for a future containing more extreme temperatures *and* more volatile energy prices. As the largest domestic landlord in the city, Bristol City Council (BCC) has a huge role to play in ensuring our homes can meet the challenges ahead.

The One City Climate Strategy sets out a number of priority areas which, taken together, will ensure our homes and buildings are ready for a net zero future:

- 1 – Improving the performance of existing buildings in the city to minimise heat demand.
- 2 – Maximising electricity generation within the city, including at least 350MW of solar PV.
- 3 – Phasing out natural gas by 2030 including the replacement of 160000 gas boilers across the city.

The impacts of the cost-of-living crisis are felt particularly keenly by BCC tenants, many of whom are in lower income groups. The One City Bristol Fuel Poverty Action Plan published in 2020 sets a target that “*by 2030, nobody in Bristol will suffer from a cold home due to fuel poverty*”.

In response to the commitments made in the One City strategies, the BCC Housing and Landlord Services Team has set a target to improve the energy performance of our homes so that every property achieves an EPC rating of C or better by 2030. Around 7400 BCC homes are currently below EPC C, a number which could rise to around 10400 when proposed changes to the EPC framework are introduced at a national level in 2024. The purpose of this document is to set out how we will achieve that goal – taking action to ensure our tenants are healthier and warmer, and that their energy bills are lower.

As well as being impactful in their own right, the steps needed to improve energy efficiency standards form the first part of the journey towards a fully decarbonised housing stock. In this

document we will set out the risks, challenges and opportunities of transitioning away from gas heating and hot water, helping to pave the way for a separate heat decarbonisation plan which we will publish in due course.

2 - Introduction – measuring energy performance

2.1 – Current EPC Performance

As outlined above, BCC has set an ambitious target that all our domestic properties will reach a high standard of energy efficiency by 2030. In order to show progress, we need a consistent way to measure the performance of our homes; Energy Performance Certificates (EPCs), are a cost-based metric used to assess and compare the energy performance of domestic and non-domestic buildings. To generate an EPC for existing buildings, an assessment is carried out using the ‘Reduced Data Standard Assessment Procedure’ (rdSAP) methodology, which gives the building a score from 1-100 (a score of 100 indicates a building with zero energy costs). The ‘SAP score’ is then used to generate an EPC rating from A-G (with A being the highest rating available).

BCC is not required to carry out a physical EPC survey on all our homes. Instead, we use our extensive stock condition data to calculate an assumed EPC rating for each individual property, giving us a clear picture of how our housing stock is performing. Annex One gives in-depth data on the energy performance of BCC homes. Table one (below) provides a high-level overview of BCC homes broken down across different EPC bands.

Table One

EPC Band	Total number of properties	
A (92 – 100)	0	19373 (72.4%)
B (81 - 91)	194	
C (69 – 80)	19179	
D (55 – 68)	7038	7380 (27.6%)
E (39 – 54)	323	
F (21 – 38)	19	
G (1 – 20)	0	
Total	26753	

The data in Table One shows us that almost three quarters of BCC homes are already at EPC C or better, with the significant majority achieving a C rating and a median SAP score of 71. This compares favourably with the Office for National Statistics (ONS) 2021 data for England, whereby the median SAP score across all tenure types was 66.

2.2 EPCs – a change in methodology

In early 2024 the national framework which underpins EPCs is set to change. In practical terms this means the performance of BCC’s housing stock will appear worse than it does at present (with more homes moving to EPC D and below). Despite no physical changes to the properties themselves, the assumed performance of our housing stock will reduce due to changes in the way energy performance is calculated. Table two gives an indicative overview of how our homes will perform under the new methodology:

Table Two

EPC Band	Total number of properties	
A (92 – 100)	0	16,313 (60.9%)
B (81 – 91)	45	
C (69 – 80)	16268	
D (55 – 68)	8928	10,440 (39.1%)
E (39 – 54)	1144	
F (21 – 38)	336	
G (1 – 20)	32	
Total	26753	

The data in Table Two shows a significant increase in the number of homes with poor energy performance. A variety of factors are responsible for this predicted drop in performance, the main one being a change to the assumed cost of electricity, which causes homes with electric heating and hot water systems to drop more than 10 SAP points on average.

The data in tables one and two shows that approximately 28% of BCC homes are currently below EPC C, potentially rising to around 40% from early 2024 under the new SAP methodology. These properties will require improvements if the 2030 target is to be met. We will achieve this through:

- Implementing a major programme of fabric improvements over the remainder of this decade. Targeting uninsulated and poorly insulated homes, improving thermal performance by installing measures such as solid wall insulation and cavity wall insulation, as well as topping up loft insulation and replacing windows and roofs where necessary.
- Increasing the deployment of Solar PV panels on our rooftops. It is our ambition that one day all BCC homes will benefit from rooftop solar where technically feasible - we will start by prioritising homes at the greatest risk of fuel poverty.
- Taking an increasingly data-driven approach to our rolling programme of cyclical maintenance, ensuring that whenever we visit a poor performing property to carry out cyclical maintenance, we also identify and carry out any low-cost energy efficiency works needed to improve the EPC rating.
- Reviewing heating systems in blocks of flats, in particular those with direct electric heating. Many of our flats in blocks have expensive night storage heaters or other, more modern forms of direct electric heating. These heating systems score poorly under SAP framework and often result in lower EPC scores, even when installed in well insulated homes. Over the course of 2024/25 we will review the heating and hot water systems in electrically heated properties, to identify a long-term solution which addresses both our decarbonisation and our fuel poverty goals.
- Introducing a 'Bristol Standard' for our new build properties to increase their energy performance beyond current levels. By adopting aspects of the emerging Local Plan sustainability requirement (due to take force from 2025) a year early, we will ensure low carbon heating is standard in all new homes, and will aim to invest more money to improve the thermal performance and air-tightness of new properties, as well as ensuring the

deployment of solar PV on new rooftops, where appropriate, and the use of other sustainable technologies are utilised to better the energy performance of all new affordable homes delivered by the HRA.

3 - Fabric first

3.1 - Targeting the right properties

Improving energy efficiency of existing buildings through a ‘fabric first’ approach is widely viewed as a no-regrets first step to decarbonisation and, to that end, government grant funding schemes such as the Social Housing Decarbonisation Fund encourage this approach. In practice, meeting our EPC C 2030 target will mean combining BCC funding with external grant funding to deliver a series of projects across the next seven financial years, where possible completing energy efficiency upgrades alongside existing planned improvements such as roof and window replacements to reduce costs and minimise disruption for tenants.

In recent years BCC has invested significantly in installing measures such as cavity wall insulation, loft insulation and double glazing. Most of the remaining uninsulated and poorly insulated properties are ‘harder-to-treat’ homes where these more straightforward, lower-cost measures are not sufficient to achieve the required standard. These homes tend to have solid walls or narrow cavity walls consistent with non-standard methods of construction commonly used in the middle part of the 20th Century. Work to improve these properties is already underway, with a programme of major upgrades scheduled for 2023/24 and 2024/25 (see Annex Two) delivered via the strategic partnership with Bristol City Leap.

The 2030 target encourages a focus on our poorest performing homes, but there will be instances where we need to go further. Preparing our housing stock for the transition to low-carbon heating means minimising heat demand wherever possible, so we will need to improve some homes which – on paper – are already at EPC C, but based on analysis of our data we know perform poorly and would be unable to transition to low carbon, low temperature heating systems without fabric improvements.

Through analysis of our stock condition data, we have identified around 4000 properties which are in need of significant fabric improvements. This cohort, which is made up of flats in blocks with solid walls, non-traditional ‘easiform’ homes and older ‘acquired’ properties, contains a number of homes at EPC D or below, as well as a homes which, despite being at EPC C, are likely to need fabric improvements to minimise heat demand and pave the way for the installation of low carbon heating in the future.

Annex Three gives an overview of how this large programme of work could be delivered and includes indicative costings. BCC will continue to work with our delivery partners at Bristol City Leap (BCL) to finalise the programme of works and submit grant funding bids where applicable. The high cost of addressing these ‘hard to treat’ homes may mean that the funding currently identified in the Housing Investment Plan is not sufficient to complete a full programme of solid wall installation by 2030.

Recommendation one – continue with our fabric first approach, prioritising the remaining uninsulated and poorly insulated homes detailed in Annex Three.

3.2 - PAS 2035 – a ‘whole house’ approach to retrofit

PAS 2035 is an industry standard that aims to drive high quality retrofit in the energy efficiency sector. At the centre of PAS 2035, a ‘whole house’ approach means that all energy efficiency measures must be considered together to mitigate the risks of a piecemeal approach to retrofit. Historically there have been issues where retrofit measures such as cavity wall insulation or solid wall insulation have been installed in isolation of other measures. This can lead to issues such as:

- Increased damp and mould
- Cold bridging
- Poor air tightness

Use of the PAS 2035 framework is mandatory in all grant-funded retrofit projects such as some of those outlined in Annex Two, whereas for projects solely funded by the HRA, PAS 2035 is currently optional. Working to PAS 2035 across all relevant projects would bring a number of benefits:

- Clarity for delivery teams with all retrofit projects designed and specified in line with a national standard.
- Fairness for residents, with all deep retrofit projects delivered to the same standard.
- Improved outcomes for damp and mould bringing associated health benefits for residents, with insulation and ventilation measures considered together as standard under the PAS 2035 framework.
- Consideration of overheating in line with the Keep Bristol Cool Framework, ensuring that the need to keep our homes cool is included in the retrofit design process.

Adopting PAS 2035 as standard is estimated to increase the cost of retrofit projects by 15-20%. However, improved retrofit design is likely to drive longer-term savings to repairs and maintenance budgets, helping to offset these additional up-front costs.

Recommendation two – adopt PAS 2035 as standard in all deep retrofit projects which involve the installation of multiple, high-cost measures.

4 – Lower cost measures – an increased focus on energy efficiency

Many of the homes currently below EPC C do not require a major intervention such as external wall insulation or solar PV to reach the required standard. Around 4000 BCC homes currently at EPC D or below are traditional flats and houses with cavity wall insulation, double glazing and loft insulation – Annex Four gives a breakdown of these properties. Despite these homes being below the required standard, they perform well relative to the types of property outlined in section three (above), with a median SAP score of 67 (just two points below the threshold for reaching EPC C).

For this type of home, a major intervention is unlikely to be needed. Rather than high-cost measures such as external wall insulation, many of these properties are capable of reaching EPC through lower-cost ‘shallow retrofit’ measures such as:

- Draught proofing
- Energy efficient lighting
- Additional loft insulation
- Floor insulation

By taking an increasingly data-led approach to energy efficiency, we can work alongside colleagues at Bristol City Leap to develop a targeted programme, improving energy efficiency standards for our

residents and ensuring these homes receive the improvements they need to reach at least EPC C. Annex four contains more data on properties in this category.

Recommendation three – Use data to inform our energy efficiency programme, targeting low cost measures at homes which are marginally below the EPC C standard.

5 – Solar PV – maximising deployment for retrofit

Maximising electricity generation from solar PV is a key aspect of the One City Strategy, but is an area where BCC homes perform poorly - Currently <1% of BCC homes benefit from rooftop solar panels. Whilst this figure is set to increase somewhat as more new build homes are completed over the course of this decade, there remain around 15000 existing roofs currently without solar panels, of which around half are thought to be technically suitable.

Under the new EPC framework due to take effect from early 2024, approximately 3000 additional homes will move to EPC D or below due to the change in methodology. Many of these properties are fully insulated so, rather than a lack of insulation, the major contributing factor is expensive direct electric heating and hot water. These households are likely to experience the highest heating and hot water bills of all BCC tenants and, adopting the 'Low Income Low Energy Efficiency' (LILEE) definition, are at significant risk of fuel poverty.

By prioritising homes with direct electric heating and hot water, we can maximise near-term deployment of solar PV in a way that is consistent with BCC's wider strategic objectives on energy performance and fuel poverty. This approach also creates opportunities to maximise grant funding by targeting properties with the lowest SAP scores first. The installation of solar PV alongside other related technologies such as battery storage and Solshare units will help reduce energy bills for tenants and improve the EPC rating of these poor performing properties.

Recommendation four - prioritise fuel poor households for solar PV, in particular blocks of flats with expensive direct electric heating and hot water, aligning HRA investment to our dual strategic aims of maximising energy efficiency and minimising fuel poverty.

Beyond the immediate need to prioritise the poorest performing properties, there is a longer term need to continue to maximise solar generation on our rooftops. Maximising deployment of rooftop solar over time will help pave the way for the transition to low carbon heating by minimising tenants' energy bills and reducing the overall demand placed on the electricity grid through the electrification of heat and transport.

On average our Repairs and Maintenance Service replace around 200 roofs per year on houses and house-type flats, of which around 50% are likely to be suitable for rooftop solar. By increasing our roofing budget to include feasibility studies on all roof replacements, and installing solar PV wherever technically feasible, we will ensure that deployment of solar panels increases in the long term and is not limited only to those higher priority homes outlined above.

This approach minimises disruption for our tenants by ensuring roof replacements and solar PV installations are carried out at the same time wherever possible. By aligning these works with our rolling programme of repairs and maintenance, we will also realise cost savings associated with scaffolding and other preparatory work. Annex Five gives an indicative cost for this programme over a 30-year timeline.

Recommendation five – carry out solar PV feasibility assessments alongside all roof replacements and install solar panels wherever technically feasible to do so.

6 – Direct electric heating and homes off the gas grid

As outlined in section five, BCC owns around 2500 homes with older night storage heaters or their more modern ‘high heat retention’ equivalents, in addition to a further 500 homes with electric heat pumps. The majority of these homes use immersion heaters for hot water, and some are fitted with electric showers. In many cases these properties are prevented from being connected to the gas grid by building safety regulations.

Under the current SAP framework around 42% of these properties are EPC D or below, compared to around 26% of all other homes. This means that BCC tenants with electric heating and hot water are over 60% more likely than those with gas heating to live in a home which performs below the required standard. Under the revised SAP framework, we estimate the number of electrically heated homes at EPC D or below will rise to 86%, compared to 34% of all other homes. This means that under the new EPC methodology, BCC tenants with electric heating and hot water will potentially be around over 150% more likely to live in a home which performs below the required standard.

In many cases the energy performance of electrically heated homes can be improved through the use of solar PV and other associated technologies as outlined in section five (above), however in other cases this will not be possible. The structure of high-rise blocks – with limited roof space compared to the large number of dwellings – makes them relatively unsuitable for solar installations. Further work is needed to appraise the options for heating these buildings in the long term.

Recommendation six – work with Bristol City Leap review of the various options for heating and hot water in blocks of flats with direct electric heating. Produce a cost benefit analysis to include the following options:

- *Continuation of the existing programme - upgrading older storage heaters to more modern ‘high heat retention’ equivalents. Maximise deployment of solar PV where possible*
- *Alternative individual electric heating units such as air-to-air heat pumps*
- *Retrofit to a wet central heating system and install a site-specific energy source such as a ground-source heat pump*
- *Retrofit to a wet central heating system and connect to district heating*

The results of this review will help identify the best solution for low-cost low-carbon heating in these homes, and will inform further recommendations in our Heat Decarbonisation Plan.

7 – New build homes – driving quality by introducing a ‘Bristol Standard’

We’re committed to ensuring all new BCC homes are net zero ready, capable of generating zero emissions from the point at which the electricity grid becomes fully decarbonised.

The proposed changes to our Local Plan will help ensure that from 2025 onwards, all new developments in Bristol are built to the highest energy efficiency standards. As the City’s largest residential landlord, we’re adopting these standards early. From 2024 onwards all new BCC homes will be fitted with a low carbon heating solution as standard and the use of solar PV will always be deployed where technically feasible to do so.

8 – Heat decarbonisation

For our existing homes, decarbonisation of heat is by far the biggest challenge we face on the journey to net zero. Currently around 90% of BCC properties have gas heating and hot water systems

(80% individual gas boilers and 10% communal heating systems). Annex Six gives a breakdown of existing heating systems across different property archetypes and areas of the city.

Due to a range of factors including wider market conditions, the commitment to fully decarbonise Bristol by 2030 appears extremely challenging in the context of heat decarbonisation, with several significant barriers to near term deployment of low carbon heating systems:

- **Capital costs of air source heat pumps (ASHPs).** The majority of our homes have individual gas boilers which provide heat and hot water. The most obvious low carbon solution for these homes are ASHPs, but based on current costs, the estimated total cost of replacing these heating systems would be £290 million - £330 million. It is unlikely that this level of investment will be achievable over the remainder of this decade. With additional investment needed to decarbonise communal gas heating systems in blocks of flats, the estimated overall cost of decarbonising our housing stock is in excess of £400 million. Heat pumps are likely to reduce in cost over time, as the low carbon heating market matures in line with the country's wider decarbonisation agenda.
- **Running costs of low carbon heating systems.** While it is possible for low carbon heating systems to achieve lower running costs than fossil fuel alternatives, much of this depends on the way the system is installed and used in practice. The unit cost of electricity is around 3-4 times that of gas so – despite the higher efficiencies they can achieve - there remains a high risk that those switching to heat pumps and low carbon heat networks will experience higher heating bills in the near term, increasing the risk of fuel poverty for some households.
- **Technical suitability of our homes.** Detailed work is needed to understand the most suitable low carbon heating solution for each of our homes. Many BCC tenants do not have smart meters in their homes and use prepayment cards to pay for electricity – these residents are thought to be at significant risk of increased running costs due to the likelihood of voluntary disconnection and an inability to make use of cheaper 'time of use' electricity tariffs. Furthermore, ASHPs differ from gas boilers in that they require a hot water cylinder to be installed; in many of our smaller homes this is likely to result in a loss of space to one of the existing rooms.
- **Resident engagement.** ASHPs are low temperature heating systems which work best when set to run constantly and maintain a stable room temperature. This is in contrast to gas boilers which run at higher temperatures and are often used intermittently to warm up a room in a short space of time. Among the 70,000 people living in BCC homes are a large number of people with long term health problems and other complex needs. A separate resident engagement strategy needs to be in place before we can begin deploying low temperature heating systems at scale.
- **Skills and supply chain.** Replacing around 21,000 gas boilers over a six-year period would require us to install around 70 heat pumps each week. Our work to date has demonstrated that heat pump installations take time, sometimes requiring planning permission as well as intensive work with our residents to ensure they understand their new heating system. Irrespective of the wider economic conditions, we will be unable to deploy heat pumps at a sufficient rate to meet a 2030 decarbonisation goal.

The barriers outlined above do not mean that BCC homes cannot decarbonise over time. It is our ambition that in the future all BCC homes will be fully decarbonised, but to achieve this we will need to overcome the challenges set out above, including a review of the level of capital funding allocated to our heating replacement programme. The multiple barriers to heat decarbonisation are

illustrative of the need for a separate Heat Decarbonisation Plan which is both affordable *and* grounded in real world delivery.

Recommendation seven – develop a Heat Decarbonisation Plan over the course of the next 12 months which sets out the most suitable low carbon heating solution for all BCC homes. The plan should identify opportunities for potential early no-regrets actions, for example early opportunities for district heating connections.

Recommendation eight – Develop a Resident Engagement Strategy in conjunction with colleague at Bristol City Leap, to ensure we minimise instances of tenants missing out on energy efficiency and renewable heat measures through a failure to engage. The strategy should set out how we will increase awareness across all residents, as well as how we plan to engage at a project-specific level.

While we develop a longer-term plan for heating, we have to ensure that our tenants with existing gas boilers have continuous access to heating and hot water. In practice this means we will have to continue our policy of replacing gas boilers where existing systems have broken and are beyond economic repair.

Accelerating delivery and maximising grant funding

The targets set out in the One City strategies are challenging both in the scale and pace of delivery required, and the associated capital costs. By continuing to maximise grant income from sources such as the Social Housing Decarbonisation Fund, we can ensure the HRA budget goes further, helping to meet the cost of expensive measures such as solid wall insulation.

Recommendation nine – maximise all grant funding opportunities including further waves of the SHDF.

Grant funding can bring in significant levels of additional income, but the delivery windows are short and meeting the conditions of grant agreements is resource intensive. By changing the way we work to complete design and development work in advance of delivery windows, we can reduce the burden on delivery teams and ensure we complete grant-funded projects on time.

Recommendation ten – separate project budgets into ‘development’ and ‘delivery’, with development budgets running one year ahead of delivery budgets in the Housing Investment Plan.

10 – Summary of recommendations

- 1 – Continue with our major programme of solid wall insulation for uninsulated and poorly-insulated homes
- 2 – Adopt PAS 2035 as standard for all deep retrofit projects
- 3 – Initiate a ‘shallow retrofit’ programme targeting lower-cost measures at homes marginally below the required standard
- 4 – Introduce Solar PV programme targeted at those most at risk of fuel poverty, in particular flats in blocks with expensive direct electric heating and hot water
- 5 – Install Solar PV on all new roofs where technically feasible to do so.
- 6 – Review of use of electric storage heaters in high rise blocks of flats to identify an affordable long term heating solution.

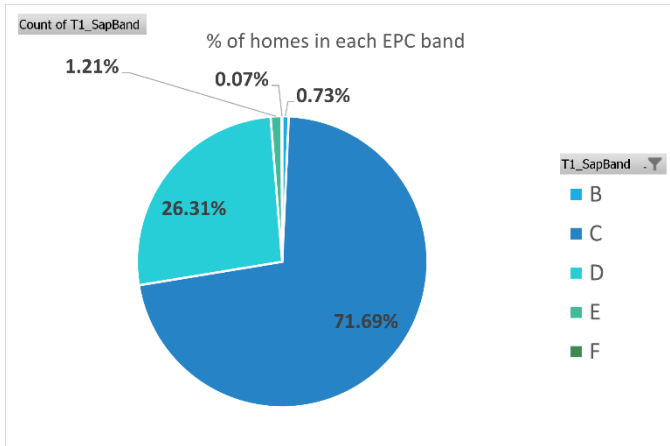
7 – Develop a heat decarbonisation plan which sets out the risks and opportunities of transitioning away from gas over time

8 – Develop a Resident Engagement Strategy together with Bristol City Leap to maximise take up of retrofit measures

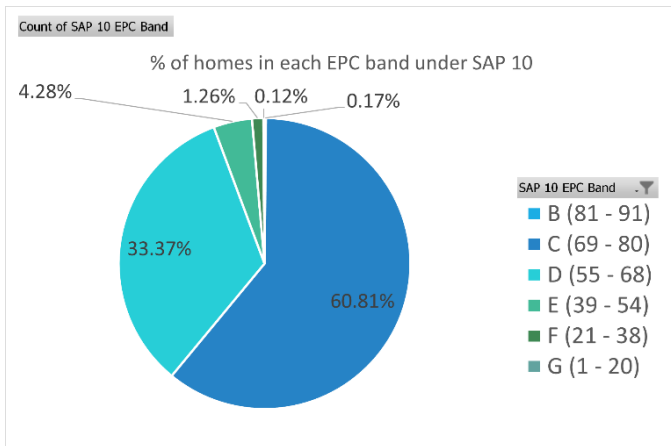
9 – Continue to maximise grant funding by bidding for future rounds of SHDF funding, actively seeking to identify other grant funding opportunities, and being open to other innovative funding models where the financial interests of the HRA and our residents are safeguarded.

10 – Introduce development budgets for energy efficiency works to generate a steady pipeline of work and ensure deliverability within grant funding windows.

Annex One – Analytical overview of EE data



This chart shows an overview of the current energy performance of BCC homes. Around 28% of our residential properties are currently below EPC C



This chart shows an indicative overview of the energy performance of BCC homes under the new SAP 10 methodology. Around 39% of our residential properties are likely to be below EPC C

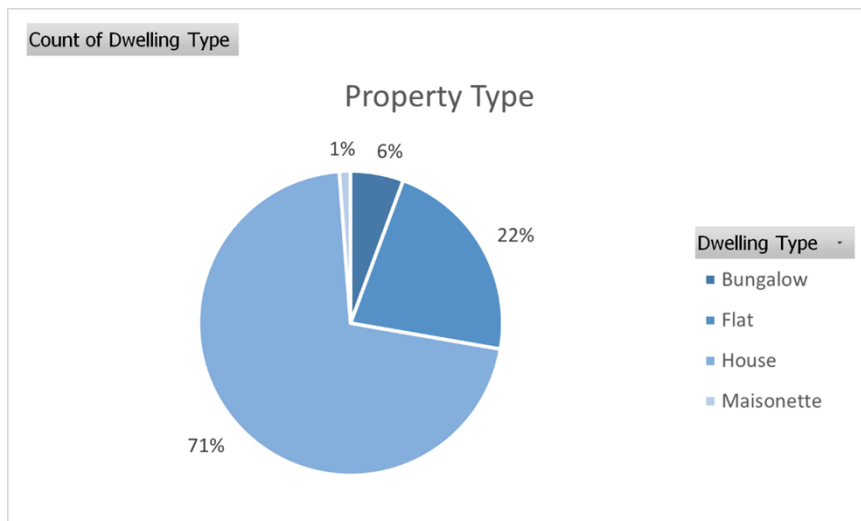
Annex Two – current energy efficiency projects

	Total cost	Grant funding	No. of homes (EPC D and below)	No of homes (EPC C and above)
Francome, Waring and Underdown	£14,500,000	£0	43	117
Littlecross House	£8,000,000	£2,000,000	112	13
Ledbury Road	£7,018,776	£1,000,000	34	46
London Road	£420,560	£48,000	1	3
St Judes blocks (Charleton, Langton, Tyndall, Haviland, JCH)	£17,000,000	£4,000,000	101	63
112 easiform flats	£3,861,215	£1,344,000	16	96
Easiform pilot	£323,000	£500k	4	21
Total	<u>£51,123,551</u>	<u>8,892,000</u>	<u>311</u>	<u>359</u>

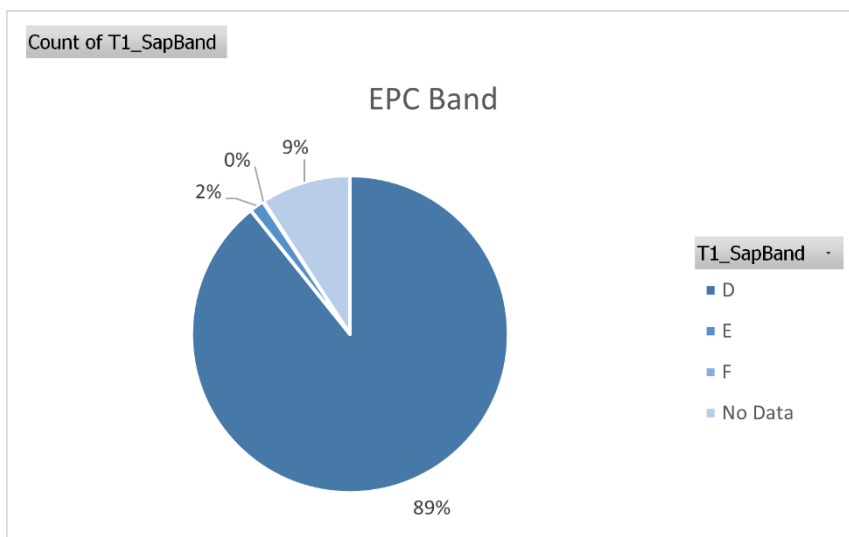
Annex Three – estimated total cost of fabric improvements (solid wall and hard to treat properties)

	Total cost April 2025 - March 2031	Maximum income from grant funding	No. of homes (EPC D and below)	No of homes (EPC C and above)	Total number of homes
Deep retrofit – acquired properties	£38m	£7m	602	226	828
Deep retrofit – high rise blocks	£12m	£2m - £4m	176	231	407
Deep retrofit – low rise blocks	£23m	£4.5m - £7.5m	215	390	605
Deep retrofit – house type flats	£30m	£7m	300	761	1061
Deep retrofit – houses	£56m	£14m	430	942	1372
	£159m	£39.5m	1723	2550	4273

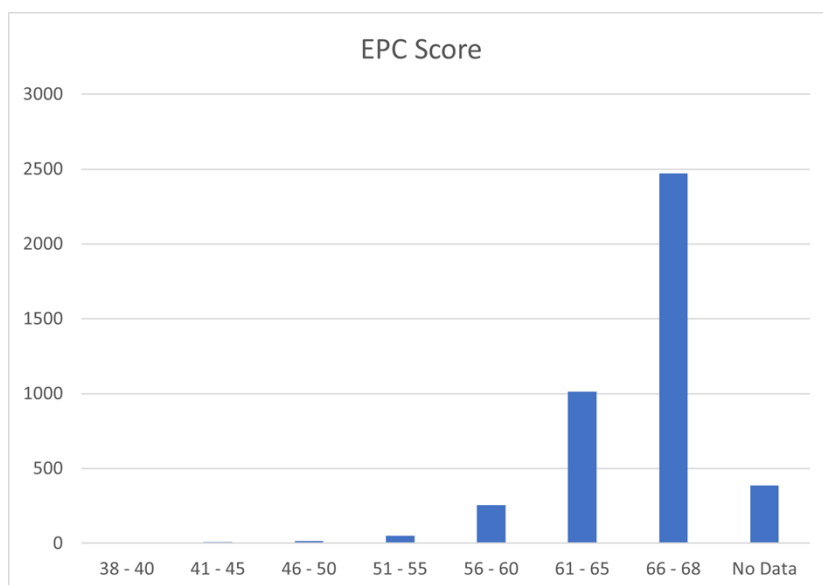
Annex Four – overview of homes requiring lower-cost interventions



Of the 4000 homes requiring low cost measures, nearly three quarters are houses



Almost 90% of these homes are currently EPC D – just below the required standard

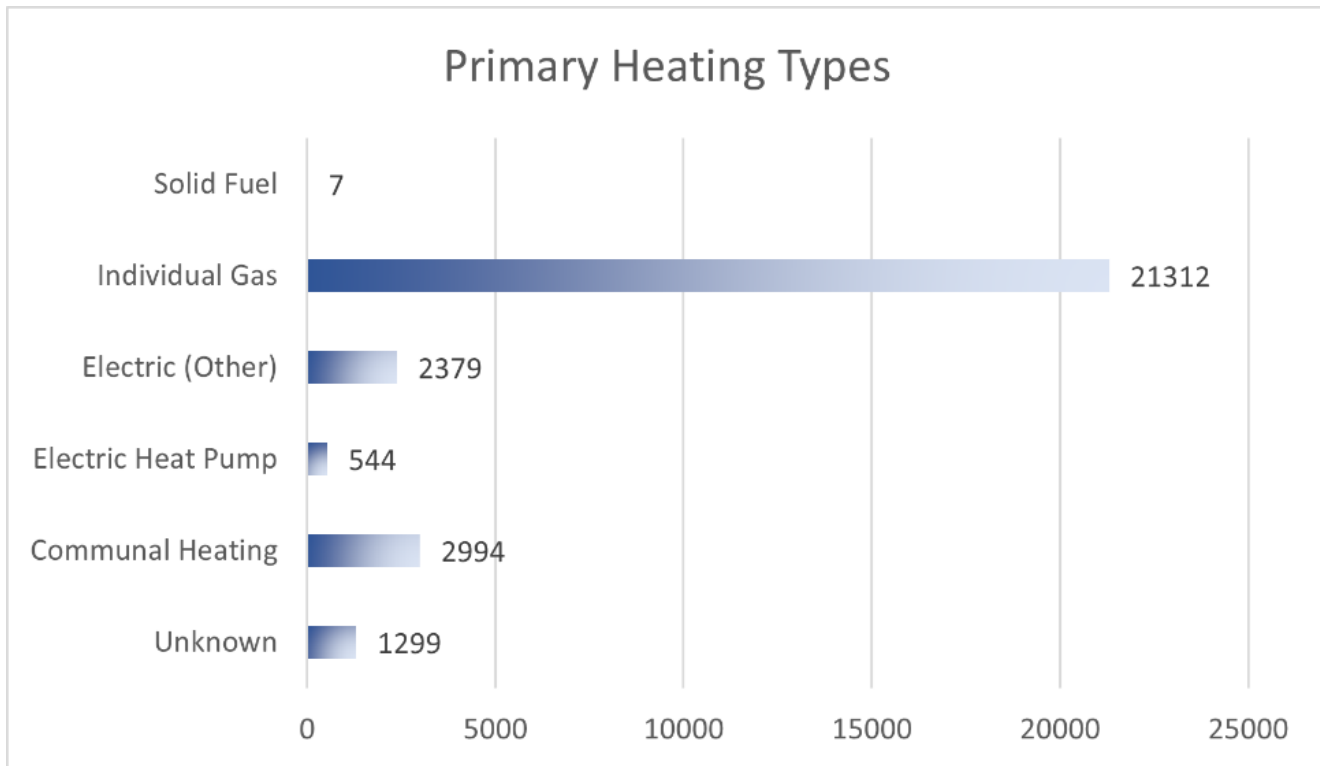


2500 of these homes (62%) are within 3 SAP points of achieving an EPC C rating

Annex five – indicative costings for rooftop solar programme

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Notes
Solar PV programme – block roofs	£16000 (development costs only)	£220,000	£330,000	£550k	£550k	£550k	Targeting PV and associated storage and power sharing tech at low rise blocks with electric heating
Solar PV programme – house roof replacement	£600,000	£600,000	£1.2m	£1.4m	£500,000	£1.6m	All roof replacements to include PV where feasible. Programme to run beyond 2030 at a cost of ~£28m over 30 years

Annex Six – overview of heating by type



The majority of BCC homes (85% in total) have gas heating, made up of individual gas boilers (75%) and communal gas heating (11%). These homes tend to perform relatively well in EPC terms with around 73% at EPC C or above.

Around 3000 of our homes have electric heating, a combination of storage heaters and air source heat pumps. These properties tend to do less well in EPC terms, with around 50% at EPC C or above.

Updates automatically

Updates automatically

Threat Risks														
Risk Title	Risk Description	Key Causes	Key Consequences	Status Open / Closed	Risk Category	Key Mitigations	Current Risk Level				Monetary Impact of Risk £k	Council Risk Appetite for the risk type identified	Does the risk exceed the council's risk appetite?	Financial Risk Exposure
							Likelihood	Impact	Risk Rating	Risk Level				
<i>Example - Risk that the decision will lead to a financial loss to the council</i>	<i>EXAMPLE - There is a risk that the council will suffer financial loss if the decision taken is unsuccessful in its aims or objectives</i>	<i>Inflation Workforce capacity Unforeseen cost increases</i>	<i>Financial loss</i>	<i>Open</i>	<i>Financial Loss/Gain</i>	<i>Guidance oTreat – Implementing controls: Contingency plans, Procedures, Monitoring, Detection, Training, Provision of Information, Policies, New Systems. oTolerate – Accept risk without mitigating. Still monitor and consider fall back plans. oTerminate – Avoid the risk by no longer pursuing the objective oTransfer – Share the risk with another party: Insurance, Contractual Transfer, Partnerships, Ventures/Outsourcing Services</i>	<i>4</i>	<i>5</i>	<i>20</i>	<i>High</i>	<i>£100,000</i>	<i>Cautious</i>	<i>Yes</i>	<i>£87,500.00</i>
Lack of certainty leading to under delivery against HRA energy efficiency targets	Failing to agree a strategy and associated delegated authority will mean officers and delivery partners don't have the certainty needed to deliver an ambitious programme of improvements	failue to agree the HRA EE strategy and associated delegated authority	Fuel poverty, inefficient homes, higher carbon emissions, increased damp and mould	Open	Environmental	Agree the approach outlined in the HRA EE strategy			<i>0</i>	<i>FALSE</i>		<i>Cautious</i>	<i>No</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>
									<i>0</i>	<i>FALSE</i>		<i>FALSE</i>	<i>#N/A</i>	<i>£0.00</i>

Updates Automatically

Updates Automatically

Opportunity Risks												
Opportunity Risk Title	Risk Risk Description	Key Causes	Key Consequence	Status Open / Closed	Risk Category	Key Mitigations	Current Risk Level				Monetary Impact of Risk	Financial Opportunity Exposure
							Likelihood	Impact	Risk Rating	Risk Level	£k	
<i>Example - Opportunity that new ways of working causes efficiency cost savings</i>	<i>EXAMPLE - There is an opportunity risk that the successful implementation of the proposed new way of working leads to significant cost savings</i>	<i>Implementation of new way of working</i>	<i>Improved ways of working could lead to efficiencies and cost savings</i>	<i>Open</i>	<i>Financial Loss/Gain</i>	<i>Guidance: Enhance: Seek to increase the likelihood and/or the impact of the opportunity in order to maximise the benefit. Ignore: Minor opportunities can be ignored, by adopting a reactive approach without taking any explicit actions. Share: Find a partner/stakeholder to manage the opportunity, which can maximise the likelihood of it happening and increase the potential benefits Exploit: Find a way to make the opportunity definitely happen. Aggressive measures to ensure the benefits from the opportunity are realised.</i>	<i>4</i>	<i>5</i>	<i>20</i>	<i>High</i>	<i>£100,000</i>	<i>£87,500.00</i>
Opportunity that agreeing an ambitious programme of energy efficiency works will reduce fuel poverty and improve health and wellbeing outcomes for BCC residents	By improving the energy performance of our homes we will improve the health and wellbeing of our residents	Agreeing the programme of works in the EE strategy	See column C	Open	Communities	n/a			0	FALSE		£0.00
Reduced carbon emissions	By endorsing an ambitious approach to energy efficiency we can reduce the carbon emissions associated with heating and powering bCC homes	Agreeing the programme of works in the EE strategy	Cleaner air, more progress towards city-wide emissions targets	Open	Environmental	n/a			0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00
									0	FALSE		£0.00

Threat Risks	
Number of Open Risks	1
CRITICAL	0
HIGH	0
MEDIUM	0
LOW	0
Cost Risk Exposure	£0.00
Number of risks exceeding risk appetite	0
Number of risks within risk appetite	1

Opportunity Risks	
Number of Open Risks	2
SIGNIFICANT	0
HIGH	0
MEDIUM	0
LOW	0
Cost Opportunity Exposure	£0.00

LIKELIHOOD AND IMPACT RISK RATING SCORING CRITERIA

Likelihood Guidance

Likelihood	Likelihood Ratings 1 to 4			
	1	2	3	4
Description	Might happen on rare occasions.	Will possibly happen, possibly on several occasions.	Will probably happen, possibly at regular intervals.	Likely to happen, possibly frequently.
Numerical Likelihood	Less than 10%	Less than 50%	50% or more	75% or more

Severity of Impact Guidance (Risk to be assessed against all of the Categories, and the highest score used in the matrix).

Impact Category	Impact Levels 1 to 7			
	1	3	5	7
Service provision	Very limited effect (positive or negative) on service provision. Impact can be managed within normal working arrangements.	Noticeable and significant effect (positive or negative) on service provision. Effect may require some additional resource, but manageable in a reasonable time frame.	Severe effect on service provision or a Corporate Strategic Plan priority area. Effect may require considerable /additional resource but will not require a major strategy change.	Extremely severe service disruption. Significant customer opposition. Legal action. Effect could not be managed within a reasonable time frame or by a short-term allocation of resources and may require major strategy changes. The Council risks 'special measures'. Officer / Member forced to resign.
Communities	Minimal impact on community.	Noticeable (positive or negative) impact on the community or a more manageable impact on a smaller number of vulnerable groups / individuals which is not likely to last more than six months.	A more severe but manageable impact (positive or negative) on a significant number of vulnerable groups / individuals which is not likely to last more than twelve months.	A lasting and noticeable impact on a significant number of vulnerable groups / individuals.
Environmental	No effect (positive or negative) on the natural and built environment.	Short term effect (positive or negative) on the natural and or built environment.	Serious local discharge of pollutant or source of community annoyance that requires remedial action.	Lasting effect on the natural and or built environment.
Financial Loss / Gain	Under £0.5m	Between £0.5m - £3m	Between £3m - £5m	More than £5m
Fraud & Corruption Loss	Under £50k	Between £50k - £100k	Between £100k - £1m	More than £1m
Legal	No significant legal implications or action is anticipated.	Tribunal / BCC legal team involvement required (potential for claim).	Criminal prosecution anticipated and / or civil litigation.	Criminal prosecution anticipated and or civil litigation (> 1 person).
Personal Safety	Minor injury to citizens or colleagues.	Significant injury or ill health of citizens or colleagues causing short-term disability / absence from work.	Major injury or ill health of citizens or colleagues may result in. long term disability / absence from work.	Death of citizen(s) or colleague(s). Significant long-term disability / absence from work.
Programme / Project Management <i>(Including developing commercial enterprises)</i>	Minor delays and/or budget overspend but can be brought back on schedule with this project stage. No threat to delivery of the project on time and to budget and no threat to identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones, and/or budget overspends. No threat to overall delivery of the project and the identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones; and/or major budget overspends. Major threat to delivery of the project on time and to budget, and achievement of one or more benefits / outcomes.	Significant issues threaten delivery of the entire project. Could lead to project being cancelled or put on hold.
Reputation	Minimal and transient loss of public or partner trust. Contained within the individual service.	Significant public or partner interest although limited potential for enhancement of, or damage to, reputation. Dissatisfaction reported through council complaints procedure but contained within the council. Local MP involvement. Some local media/social media interest.	Serious potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Dissatisfaction regularly reported through council complaints procedure. Higher levels of local or national interest. Higher levels of local media / social media interest.	Highly significant potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Intense local, national and potentially international media attention. Viral social media or online pick-up. Public enquiry or poor external assessor report.

Equality Impact Assessment [version 2.12]



Title: Housing and Landlord Services – Energy Efficiency Strategy	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Housing and Landlord Services	Lead Officer name: Sam Robinson
Service Area: Business Development	Lead Officer role: Energy and Renewables Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://www.sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Equality and Inclusion Team early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

This strategy sets out the ways in which Bristol City Council will improve the energy performance of our social housing stock in line with commitments made in the One City Strategies. Improving all BCC homes to a minimum of EPC C is likely to become a legal requirement in the future, and will play a crucial role in the wider decarbonisation of Bristol.

The strategy will inform how we allocate capital to bring our worst performing homes up to a higher standard, by installing things like insulation and solar panels, and will also set out which types of property we plan to prioritise.

The Energy Efficiency Strategy is needed so we can develop a clearer understanding of how our homes currently perform, analyse the costs and other challenges of making improvements, and set out a clear pathway to improved energy performance for all.

By clearly setting out the steps we need to take, we will give certainty to our residents, internal delivery teams and strategic delivery partners. Around 72% of our homes are already at EPC C or better – this strategy is about how we bring the remaining 28% of homes up to the required standard, achieving fairness for all our residents.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes No [please select]

The impacts of the projects and programmes which flow from this strategy are expected to be positive, with BCC residents benefitting from warmer homes, lower energy bills and better health outcomes. The varying energy performance across our housing stock will mean we prioritise some types of home for improvements, while other, better-performing properties may be subject to lower levels of investment because they are already at or above the required standard of energy efficiency.

The evidence base for prioritising properties will be our extensive stock condition and energy datasets which are agnostic as to whether residents living in our homes have protected characteristics. On this basis there appears to be no risk of direct discrimination since no personal data of any type will form part of the overall decision-making process.

The end point for this work is that all our homes have been improved up to at least EPC C. The aim is to achieve a high standard of energy performance across all our homes, benefiting all our residents. Since our strategy is to achieve a high standard for everyone, there appears to be no risk of indirectly discriminating against certain groups.

Making major improvements to people's homes can be disruptive and have the potential to be discriminatory at an individual project level for residents and neighbours impacted e.g. by building works. This strategy does not set out any individual projects to be delivered – separate EQIAs will be carried out for all major energy efficiency projects prior to delivery. These separate EQIAs will assess the likelihood of discrimination arising from the way specific projects are delivered on a case-by-case basis.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](https://www.bristol.gov.uk/equality-diversity)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically

active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Stock condition data	
Equalities data	
Demographic of tenants:	
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Potential impacts:	

Mitigations:	
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3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale

4.3 How will the impact of your proposal and actions be measured?

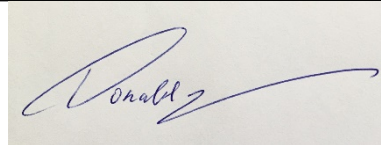
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services
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¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

A handwritten signature in blue ink, appearing to read "Ronald", is centered within a rectangular box. The signature is fluid and cursive.

Date: 17/11/2023

Date: 24/01/2024



Environmental Impact Assessment [version 1.0]

Proposal title: Housing and Landlord Services – Energy Efficiency Strategy		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: HRA	Lead Officer name: Sam Robinson	
Service Area: Housing and Landlord Services	Lead Officer role: Energy & Renewables Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

The proposal sets out an energy efficiency strategy which outlines how the HRA will meet our corporate objective of EPC C or better across all BCC homes (covering approximately 30% of our stock). This includes a recommendation to develop a HRA specific heat decarbonisation plan to support the one city target of achieving of carbon neutrality by 2030.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
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If ‘No’ explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
The draft strategy contains seven recommendations which, if approved, would enable a route to ensuring that all of BCC's social housing stock is EPC C or better by 2030. Doing so would significantly reduce instances of residents experiencing fuel poverty with multiple co-benefits for health and wellbeing.		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact,</p>	Benefits	<p>The strategy details the enabling conditions that would allow a costed delivery plan for achieving EPC C+ for all BCC homes, this would also make a significant reduction in carbon.</p> <p>Some of the proposed measures are essential steps required to enable net zero homes in the medium term, particularly by enabling the later stage adoption of low carbon heating sources by reducing overall heat losses.</p>
	Enhancing actions	Estimated carbon savings to be achieved through the proposal will be quantified in partnership working with Bristol City Leap.
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
Adverse impacts		

<p>particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	<p>Benefits</p>	
<p>Enhancing actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Adverse impacts</p>		
<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p>	<p>Benefits</p>	
<p>Enhancing actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Adverse impacts</p>	<p>Retrofit works will result in waste generation.</p>	

<p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Mitigating actions</p>	<p>All works will be handled following standard BCC procedures adhering to the waste hierarchy.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Around 3000 homes are estimated to need deep retrofit. If the recommendation to embed PAS 2035 into the programme is adopted, then these homes will receive high quality insulation works. Improving the thermal envelope of housing stock will make dwellings less prone to overheating, benefitting residents’ wellbeing and supporting the Keep Bristol Cool Framework.</p>
<p>Enhancing actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>Adverse impacts</p>		
<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	<p>Benefits</p>	
<p>Enhancing actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Adverse impacts</p>		
<p>Mitigating actions</p>		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Work with BCL colleagues to model the estimated carbon savings that will be achieved through adoption of the proposal.	Sam Robinson	By 15 th December if possible

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the ‘evidence base’ section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
<i>The environmental impact assessment has identified the following positive impacts:</i> This proposal represents an essential component of supporting delivery of the One City Climate Strategy. Without the proposed energy efficiency strategy and heat decarbonisation plan, it is very unlikely that we will be able to achieve corporate and one city targets on carbon.
Summary of significant adverse impacts and how they can be mitigated:

Environmental Performance Team Reviewer: Daniel Shelton	Submitting author: Sam Robinson
Date: 16.11.2023	Date: 16.11.2023

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This does not constitute an endorsement or approval of the proposal.

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Proposals to introduce new property licensing schemes		
Ward(s)	Citywide additional licensing scheme and a targeted selective licensing scheme in Bishopston & Ashley Down, Cotham and Easton wards		
Author: Tom Gilchrist	Job title: Private Housing Services Manager		
Cabinet lead: Councillor Kye Dudd, Cabinet Member for Housing Services and Energy	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: Councillor			
Decision maker: Cabinet Member			
Decision forum: Cabinet			
Purpose of Report:			
<ol style="list-style-type: none"> 1. To seek approval to introduce a citywide additional licensing scheme. 2. To seek approval to introduce a targeted selective licensing scheme in three wards. 3. To seek approval of the proposed associated licensing fee structure. 			
Evidence Base:			
<ol style="list-style-type: none"> 1. In Bristol, privately rented housing accounts for 27.4% (55,670) of the city’s housing stock (Building Research Establishment (BRE) Bristol Housing Stock Report, August 2023) – more than 10% above the national average of 19%. 2. Although most private landlords provide a good standard of accommodation and service to their tenants, many do not. Some houses are in poor condition and poorly managed, with a significant number let to vulnerable tenants who are unaware of their rights or of the minimum standards of accommodation their landlord should provide. 3. Using powers under Part 2 and 3 Housing Act 2004, it is proposed to declare <ol style="list-style-type: none"> a. a citywide Additional Licensing scheme to tackle the substandard conditions and poor management of the Houses in Multiple Occupation (HMO’s) not currently covered by mandatory licensing and b. A targeted selective licensing scheme in Bishopston & Ashley Down, Cotham and Easton wards. 4. Licensing gives the local authority resources and the power to proactively inspect the accommodation that meets the designation criteria to ensure property standards and good management practices are being met and to deal with issues that would not otherwise come to our attention. 5. The evidence used to declare these Additional and Selective licensing areas is based on the findings from the BRE report August 2023 using a range of data sources and the council’s own information relating to housing management and property conditions in the rented sector. This information was also backed up with the findings of the National statistics, English Housing Survey 2021 to 2022: private rented sector report 6. For Selective licensing, the first criteria to meet is: <ul style="list-style-type: none"> - that there is a high proportion of Privately Rented Properties (PRS) in the area. The government definition of a high proportion is currently 19% of all housing (source: English Housing Survey 2021-2022). All three of the targeted wards exceed this figure - Bishopston and Ashley Down ward the private rented sector is 33%, Cotham 55% and Easton 23%. - The second criteria to be met is that that the proposal must meet one of six conditions should be met – The ‘Poor property conditions’ criteria was met as a significant number of properties in the PRS are in poor condition and are adversely affecting the health and safety of the occupants. 			

In all three wards, poor conditions were found to notably higher with levels of disrepair and properties with actionable hazards under the Housing Act 2004.

- Licensing will enable officers to inspect rented properties proactively to determine the incidence of category 1 or 2 hazards and ensure these defects are remedied so that a general improvement of property conditions in the designated area will be improved over the lifetime of the designation. See also Appendix A2: The Licensing Proposal document.
- 7. The BRE modelling also found that HMOs account for an estimated 24% (13,349) of the private rented sector and had a higher level of serious hazards present and lower energy efficiency levels compared to the citywide average as well as notably higher levels of fuel poverty. 19% of all complaints received by the Private Housing team in the last five years relate to poor housing conditions and poor management in HMOs.
- 8. Bristol City Council has already introduced four previous property licensing schemes in the Stapleton Road area, Eastville and St George West wards (additional and selective), an additional licensing scheme in the 12 central wards in Bristol and most recently an additional licensing scheme in Bedminster, Brislington West and Horfield wards and a selective licensing scheme in Bedminster and Brislington West. High levels of improvements have been made in these areas and over 6,600 properties had been licensed up to June 2023 and a further 4,000 being processed. Given the outcomes from the previous schemes, we expect the licensing programme under these proposals to have similar outcomes. See section 6 of the proposal document Appendix A1 for a more comprehensive list of outcomes for each scheme to date).
- 9. The proposed new licensing schemes will include an estimated 8,041 additional licensable HMOs and 4,307 selective licensable properties. There are already 3,087 mandatory licensable HMOs in Bristol and these will not be included in these proposed new schemes. HMOs licensed under previous declared additional licensing schemes will need to re-license under this new additional licensing scheme proposal.
- 10. If both proposals are approved by Cabinet, additional resources will be recruited to deliver the licensing schemes.
- 11. A fee will be required to be paid when a property licence application is made. The total income generated from fees charged will not exceed the total expected cost of the scheme. The fee covers the cost of the licensing function and no more. The proposed fee has been calculated on this basis. Without the licensing fee income, the council would not be able to operate the scheme. See Appendix A2.
- 12. The result from the consultation shows that 52.57% of respondents agreed with the proposal to introduce a new additional licensing scheme and 39.19% disagreed. However, when this broken down by respondent group 28.60% of landlords and agents agreed or strongly agreed; 63.8% of private tenants; 76.15% of owner occupiers and 40.4% of "Other "respondents agreed or strongly agreed with the additional licensing proposal.
- 13. The result from the consultation shows that 38.96% of respondents agreed with the proposal to introduce a new selective licensing scheme and 51.22% disagreed. However, when this broken down by respondent group 13.86% of landlords and agents agreed or strongly agreed; 53.9% of private tenants; 60.71% of owner occupiers and 29.47% of "Other "respondents agreed or strongly agreed with the selective licensing proposal.
- 14. As private tenants are most affected by poor housing conditions or poor management their support for the scheme to improve their living conditions should be noted.
- 15. The Housing Act 2004 allows councils to set a fee for property licences and the council may consider all costs incurred by the authority in carrying out the licensing function and allows the council to recover the full cost of running the scheme. The fee calculator has been closely checked by council finance officers

Cabinet Member / Officer Recommendations:

That cabinet:

1. Approves the introduction of a citywide additional licensing scheme.
2. Approves the introduction of a targeted selective licensing scheme in three wards.
3. Approves the proposed associated licensing fee structure outlined in Appendix A2.
4. To note the outcome of the consultation.

Corporate Strategy alignment:

1. This scheme would continue efforts to improve housing standards in the PRS – a key issue in the council’s Corporate Strategy.

City Benefits:

1. We must take necessary steps to ensure that the private rented stock provides decent housing conditions for

the residents of Bristol, many of whom are the most vulnerable.

Consultation Details:

1. A comprehensive ten-week consultation took place from 29 August to 7 November 2023 and was posted on the Ask Bristol and Property Licensing web pages. The consultation was started with the mayor's blog.
2. 12,636 letters were sent to known private landlords, letting agents and 7,483 to private tenants.
3. An article appeared in two Landlord Newsletters and to Tenant Organisation Newsletters during the consultation period. These went to 7,632 landlords and agents and to 35 tenant organisations.
4. Direct emails were sent to 31,947 private tenants and to 30,066 owner occupiers.
5. 90 emails to stakeholder organisations.
6. Posters were put up in 27 libraries and in 100 community centres across Bristol and shared through the Community Exchange Network.
7. 22 consultation packs were sent out to those who requested paper copies.
8. 248 direct emails were received, and responded to, from consultees.
9. A Landlord Forum and Tenant organisation's meeting was held during the consultation period.
10. All 70 councillors were emailed with details of the consultation and given relevant publicity materials.
11. Social media posts were made throughout the ten-week consultation period both the council and from other organisations such as Shelter and Acorn.
12. The consultation was raised at the Living Rent Commission tasking group and its members also asked to share details on the consultation.
13. We have received four submissions from organisations, which are included in the Consultation Report with responses.
14. The consultation attracted 1562 responses: 36.49% from private landlords or managing agents affected by the proposals; 24.58% from private tenants affected by the proposals; 29.00% from owner occupiers living near to affected properties; 19.33% from other interested parties.
15. The key results were:
 - a. 52.57% of respondents agreed with the proposal to introduce a new additional licensing scheme and 39.19% disagreed. However, when this broken down by respondent group 28.60% of landlords and agents agreed or strongly agreed; 63.8% of private tenants; 76.15% of owner occupiers and 40.4% of "Other" respondents agreed or strongly agreed with the additional licensing proposal.
 - b. 38.96% of respondents agreed with the proposal to introduce a new selective licensing scheme and 51.22% disagreed. However, when this broken down by respondent group 13.86% of landlords and agents agreed or strongly agreed; 53.9% of private tenants; 60.71% of owner occupiers and 29.47% of "Other" respondents agreed or strongly agreed with the selective licensing proposal.
 - c. 55.49% of the respondents found the additional licensing fees too high and 54.49% thought that the selective licensing fees were too high.
16. Other statistics from the Consultation report include:
 - a. 32.74% of landlords who responded to the survey own only one HMO but 1% own more than 100.
 - b. 24.07% of landlords who responded to the survey let an HMO, 59.26% let non-HMOs and 19.44% let both HMO and non-HMO
 - c. 36.79% of landlords who responded to the survey say they visit their properties every quarter but only 17.71% of private tenants who responded said their landlord visits quarterly. 12% of them said the landlord never visits.
 - d. 99% of landlords who responded to the survey say they comply with safety standards.
 - e. 31.08% of landlords who responded to the survey have experienced damage to their properties (more than wear and tear)
 - f. 44% of tenants who responded to the survey said they lived in an HMO.
 - g. 41% of tenants who responded to the survey live in Cotham.
 - h. 69.62% of tenants who responded to the survey said their landlords provided them with emergency contact details.
 - i. 29.67% of tenants who responded to the survey said their landlords didn't deal with ASB from other tenants or their visitors.

- j. 36.71% of tenants who responded to the survey said their landlord ignored requests for repairs.
- k. 38.51% of owner occupier respondents had made a complaint about noise from a privately rented property.
- l. 28.8% of owner occupier respondents had made a complaint about ASB from a privately rented property.
- m. 36.22% of owner occupier respondents have made a complaint about rubbish/waste at a privately rented property.

Background Documents: [The Building Research Establishment \(BRE\)](#) undertook a stock dwelling modelling analysis with emphasis on the private rented stock in Bristol. Further information on the state of the PRS was taken from [National statistics- English Housing Survey 2021 to 2022: private rented sector](#), published 13 July 2023

Revenue Cost	£12.5m and £3.5m	Source of Revenue Funding	Licensing fee income
Capital Cost	n/a	Source of Capital Funding	n/a
One off cost <input checked="" type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input checked="" type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: The projected cost for two new rented property licensing schemes in three wards of the city is £16m and expected to issue over 12,000 licenses over 5 years. Any additional costs associated with the scheme will be recovered from additional income generated.

It is estimated that additional Licensing for HMO will cost £12.5m and Selective Licensing for dwellings will cost £3.5m over 5 years. The cost includes staff, set up cost and overheads to run the scheme.

It is anticipated that 8,041 licenses (4,345 new & 3,696 renewal) and 4,307 Selective licenses (new only) will be issued over 5 years with fees (before any discounts like Regulatory memberships or Satisfactory certificates) of £1,861 and £912 per application respectively. Please see fee schedule.

The total income generated by the scheme is required by legislation not to exceed cost (over its 5-year duration) the cost of processing applications and operating the scheme.

The greater part of scheme income will be received in the early years, so it is appropriate a reserve is operated to smooth out the income and achieve a better match with the costs entailed.

Finance Business Partner: Martin Johnson – Interim Finance Manager Housing & Landlord Services, 17 January 2024

2. Legal Advice: The proposal document sets out the statutory ability and tests that must be satisfied to introduce schemes such as these. In order for either scheme to be introduced lawfully, the Council must ensure the legislation is complied with at every stage and that evidence for each the scheme is present and outlined as required.

Consultation has taken place in relation to the proposals. The responses to the consultation must be considered when taking the decision. It is noted that the consultation in relation to selective licensing was not supportive of the scheme's introduction.

Effective and proper consultation is imperative, and the decision maker should be satisfied that:

- (1) The proposals were consulted on are at a formative stage.
- (2) Sufficient reasons have been given for the proposals; and
- (3) That adequate time has been allowed for consideration and response.

This report sets out the key findings from the consultation. At the time of drafting these legal comments the full

consultation report is not available.

The Public Sector Equality duty requires the decision maker to consider the need to promote equality for persons with “protected characteristics” and to have due regard to the need to:

- i) Eliminate discrimination, harassment, and victimisation.
- ii) Advance equality of opportunity; and
- iii) Foster good relations between persons who share a relevant protected characteristic and those who do not share it.

The Equalities Impact Check/Assessment (Appendix E) is designed to assess whether there are any barriers in place that may prevent people with a protected characteristic using a service or benefiting from a policy. The decision maker must take into consideration the information in the check/assessment before taking the decision.

A decision can be made where there is a negative impact if it is clear that it is necessary, it is not possible to reduce or remove the negative impact by looking at alternatives and the means by which the aim of the decision is being implemented is both necessary and appropriate.

The decision maker should have regard to the regulators code insofar as the decisions being made would set standards that private landlords would have to comply with. The code can be found at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

The decision maker is asked to set fees at certain levels and Appendix A2. It is imperative, in order for the scheme to be lawful, that the fees do not exceed the amount that is permitted under legislative provisions.

If the decision maker wanted to consider another level of fee, then further detailed financial information would be needed and further consultation should be undertaken with those likely to be affected.

It is lawful to introduce such a scheme as long as the correct statutory procedure is followed, the evidential basis for the scheme’s introduction is present and the outcome of the consultation is taken into consideration by the decision maker.

Legal Team Leader: Anne Nugent, Team Manager - Litigation, Regulatory and Community Team (in consultation with specialist regulatory lawyer Kate Burnham-Davies) 29 January 2024.

3. Implications on IT: IT are supportive and available to aid in progressing relevant work and can be engaged through the existing work request process.

IT Team Leader: Alex Simpson - Lead Enterprise Architect - 23 November 2023

4. HR Advice: The report states that additional staffing resource will be required, should both schemes be implemented. The service estimates an additional 28-30 FTE technical and support equivalent roles will be necessary to resource both schemes. The additional staff will be funded by generated income.

HR Partner: Celia Williams - HR Business Partner – Growth and Regeneration - 6 December 2023

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	29 November 2023
Cabinet Member sign-off	Councillor Kye Dudd, Cabinet Member for Housing Services and Energy	4 December 2023
For Key Decisions - Mayor’s Office sign-off	Mayor’s Office	8 January 2024

Appendix A – Further essential background / detail on the proposal	YES
A1: Proposal to introduce new property licensing schemes in Bristol – full consultation document	

A2: Proposed fee structure	
Appendix B – Details of consultation carried out - internal and external Appendix B1 - Consultation Report Appendix B2 - NRLA submission #2 Appendix B3 - Black South West Network Research paper Appendix B4 - Safeagent submission Appendix B5 - Grainger plc submission	YES
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	No
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Proposals to introduce new property licensing schemes in Bristol

Information Booklet

[www.ask.bristol.gov.uk/
property-licensing-2023](http://www.ask.bristol.gov.uk/property-licensing-2023)

Consultation closes
Tuesday 7 November 2023



Consultation - Proposals to introduce new property licensing schemes in Bristol

1. Background information

- 1.1. We are consulting on proposals to introduce two new property licensing schemes for private rented sector (PRS) housing. The consultation will close on Tuesday 7 November.
- 1.2. The Housing Act 2004 allows local authorities to require landlords of some privately rented accommodation to license their properties. Licensing can be applied to specific areas of the city where evidence suggests there is poor quality private rented housing.
- 1.3. We already operate the national mandatory licensing of larger Houses in Multiple Occupation (HMOs), which targets privately rented properties with five or more unrelated people, living together, and sharing some facilities including kitchens and bathrooms.
- 1.4. Under the Housing Act the local authority also has the powers to introduce two other types of property licensing – **additional licensing** for smaller HMOs where only three or four people are sharing, or **selective licensing** for other types of privately rented accommodation including properties rented to individuals, couples, or families.
- 1.5. The recently published report [National statistics: English Housing Survey 2021 to 2022: private rented sector](#) found:
 - 14% of private rented sector homes, or 615,000 occupied dwellings, are estimated to contain a [Category 1 hazard](#) (for example severe damp and mould) This is higher than for social rented (4%) or owner occupied (10%) dwellings.

- Private rented homes were more likely to be non-decent than owner-occupied homes.
- Private rented homes were more likely to have damp than all other tenures. Almost 11% (465,000 dwellings) of private rented homes had dampness compared with 4% (177,000 dwellings) of social rented homes and 2% (262,000 dwellings) of owner-occupied homes.

2. The proposal

- 2.1. Scheme 1: To introduce a citywide additional licensing scheme under Section 56 of the Housing Act 2004, where most HMOs not already subject to mandatory licensing will need a licence.
- 2.2. Scheme 2: To introduce a selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards under Section 80 of the Act, where most other types of privately rented accommodation in these areas will need a licence.
- 2.3. Some types of properties are exempt from licensing and are excluded from these proposals. See Appendix 1 for the full list of excluded properties.

3. Scheme 1: Additional licensing

- 3.1. The Housing Act gives powers to the local authority to designate areas, or the whole city, as subject to additional licensing in respect to HMOs that are not already subject to mandatory licensing.
- 3.2. Under section 56(2) of the Act, before introducing additional licensing, the local authority must be confident that a significant number of HMOs, that would come under the scheme, are not being managed effectively, resulting in one or more problems either for tenants or for members of the public.

In Bristol we have evidence that this is the case, and the council believe that introducing additional licensing, will significantly help to deal with the problems that result from the poor management of HMOs in the area.

- 3.3. Some types of property are excluded from the proposals. We have added poorly converted blocks of flats, and any properties approved under section 233¹ of the Act and student accommodation registered with ANUK (Accreditation Network UK) to the mandatory exclusions.
- 3.4. By introducing a citywide additional licensing scheme, the council would aim to improve poor management, and its associated problems, for the occupants of the HMO. Poor management practices in HMOs will be improved by inspecting every property during the licensing period to identify serious hazards. The council can then use its enforcement powers to correct these issues and to ensure compliance with licensing conditions and other legal requirements (see Appendix 3).

4. Evidence for an additional licensing scheme

- 4.1. In Bristol, although many landlords provide a good standard of accommodation and service to their tenants, there are a large number who do not. Given the demand for housing in the city, some landlords are taking advantage of those who have the least choice in the market, due to their personal circumstances. Substandard and poorly managed accommodation can have a detrimental effect on the health, safety, and welfare of the occupiers.
- 4.2. The Building Research Establishment (BRE), who are the leading experts in stock modelling, were asked to provide a report on the conditions of the private housing stock in Bristol with a focus on the private rented sector stock. The report has identified potentially significant issues in the areas we wish to apply additional or selective licensing in.
- 4.3. The local authority also receives complaints about the conditions and management practices in properties in the private rented sector which adds to the evidence base.
- 4.4. HMOs account for an estimated 24% (13,349) of the private rented sector stock in Bristol. Some of these properties are already licensable under the national mandatory licensing scheme, but the majority are smaller HMOs that would meet additional licensing criteria under this proposal.
- 4.5. HMOs that already have additional licences will be required to re-license once their existing licence has expired.
- 4.6. Some of the worst evidence of poor management of a property are poor conditions, poor amenities and overcrowding, which negatively impact the health, safety, and welfare of the occupants.

¹ which includes larger developments of student accommodation not managed and controlled by educational establishments such as universities

- 4.7. The BRE has identified that HMOs are more likely to have higher levels of disrepair, excess cold, fall hazards and fuel poverty compared to non-HMOs. It shows that HMOs have lower energy efficiency levels compared to non-HMOs.
- 4.8. A property that is not maintained to a satisfactory standard, or properly insulated, can be harder to heat as costs are higher. In turn this can lead to ill health and damp and mould issues.
- 4.9. In the last five years 19% (3,195) of all complaints received by the Private Housing Service relate to HMOs, with issues including; poor management and property conditions, illegal evictions, harassment, and nuisance.
- 4.10. Sometimes tenants making complaints about their accommodation can be at risk of retaliatory eviction. Licensing will enable us to be proactive and to inspect all the HMOs during the licensing period, to deal with the issues that we encounter, without the tenant having to make a complaint and put themselves at risk of retaliatory eviction. When a property requires a licence and there isn't one, tenants are protected from section 21 notices / no fault notice seeking possession.
- 4.11. We will work with our partners in the planning, noise, and waste teams to address issues which, if left unchecked, can impact on the local community especially where there are high concentrations of HMOs.
- 4.12. Many smaller HMOs have not come under any previous licensing scheme. Considering our experiences of mandatory and previous additional licensing schemes, together with the data supplied by the BRE report, we would expect to find a significant number of HMOs that do not meet licensing or minimum housing standards. The council is unaware of the location of some unlicensed HMOs unless a tenant or resident complains about the condition or poor management practices from the building.

5. Scheme 2: Selective licensing in three wards

- 5.1. Section 80 of the Housing Act gives powers to the local authority to apply selective licensing to areas, or the whole city, provided certain conditions are met. See Appendix 5.
- 5.2. Under this proposal most privately rented properties, not included under mandatory or additional licensing schemes operating in Bristol, would be required to be licensed in the wards of Bishopston and Ashley Down, Cotham and Easton.
- 5.3. The **Act** sets a maximum threshold for selective licensing of either 20% of the geographic area or 20% of privately rented homes. If the 20% threshold is exceeded, an application to the Secretary of State is required. Under both definitions, our proposal meets the general approval and does not require Secretary of State approval to proceed.
- 5.4. The three wards proposed in scheme 2, together with the current selective licensing schemes in Bedminster and Brislington West wards, account for less than 20% of the geographical area of Bristol with a combined area of 10,451 square kilometers. The total area of Bristol is 111,598 square kilometers. The 20% geographical threshold of 22,320 square kilometers has therefore not been exceeded.
- 5.5. The three wards in scheme 2, together with the current selective licensing schemes in Bedminster and Brislington West wards, cover a total of 8,511 private rented properties based on Census 2021 figures. The Census shows there are 50,219 private rented properties in Bristol. The 20% threshold of 10,044 has therefore not been exceeded.

5.6. There are certain conditions that must be met to designate a selective licensing area. One or more of the following conditions must be met:

- Low housing demand.
- A significant and persistent problem caused by anti-social behaviour.
- Poor housing conditions.
- High levels of migration.
- High levels of deprivation.
- High levels of crime.

5.7. Under this proposal we are considering implementing the new scheme on the ground of poor housing conditions.

5.8. Evidence from the BRE report indicates that in the three wards of Bishopston and Ashley Down, Cotham and Easton, a significant number of private rented accommodation is in poor condition, affecting the health and safety of the occupants with higher-than-average levels of category 1 and 2 hazards and disrepair.

5.9. It is therefore considered appropriate for properties in these areas to be subject to selective licensing, and be inspected to assess their condition, with appropriate action taken where serious hazards (category 1 or 2) exist.

5.10. Finally, a local authority can only make a designation if the area has a high proportion of housing in the private rented sector. Nationally the private rented sector currently makes up 19% of the total housing stock in England. Based on Census 2021 figures the private rented sector levels in each of the wards is in excess of 19% - Bishopston and Ashley Down 31%, Cotham 50.1%, and Easton 32.7%.

5.11. The introduction of selective licensing would improve property conditions that could impact on the health and safety of the occupants. Properties will be inspected during the licensing period, prioritising those with the likelihood of worst conditions and presence of serious hazards. Where poor conditions are found, action will be taken to identify and rectify

issues, and where appropriate using relevant enforcement powers to bring these properties up to the licensing standards.

6. Outcomes from previously declared licensing schemes:

6.1. Stapleton Road Selective and Additional Licensing Scheme

The first discretionary licensing scheme (selective and additional licensing) ran from 15 April 2013 to 14 April 2018. The scheme was set up to help tackle anti-social behaviour (ASB) and a proactive and collaborative approach was taken, working with several stakeholders to achieve the scheme objectives. In summary, the outcomes of the scheme were:

- 1,207 properties were licensed.
- 396 (33%) properties had at least one serious hazard resolved.
- 845 (70%) required improvements to meet licensing conditions.
- 665 formal and informal notices were served.
- 10 landlords were prosecuted for 37 offences.
- 204 referrals were made to other agencies and departments. Working with other agencies there was a property closure due to prostitution, drug use and dealing, fire damage and disrepair. The licensing team assisted with evidence for a conviction for human trafficking offences.

6.2. Eastville and St George Selective and Additional Licensing Scheme

The Eastville and St George (wards), selective and additional licensing scheme ran from 1 July 2016 to 30 June 2021. The scheme objectives were to improve housing standards and management of private rented properties in the two wards. The scheme delivered

significant improvements to private-rented housing standards including:

- 3,316 licences were issued.
- 3,409 inspections were conducted.
- 3,019 (88%) properties were improved to meet licensing standards.
- Four prosecutions were undertaken, and 10 civil penalty notices issued, totalling more than £62,000.
- 752 informal and formal notices were issued to resolve serious hazards.
- 675 properties had fire safety improvements made.

6.3. Central Additional Licensing (CAL) Scheme

The Central Additional Licensing Scheme covers smaller HMOs in the twelve central wards of the city. The scheme started on 8 July 2019 and will run until July 2024. Despite the impact of Covid-19, which started around eight months into the scheme, things are progressing, although slightly behind target for inspections. As of 31 March 2023, the outcomes have been:

- 2,157 inspections completed of the 3,441 properties where licence applications have been made.
- And from those inspections we found that:
 - ◊ 2,020 (94%) properties failed to meet licence conditions during the inspection.
 - ◊ 1,644 (76%) properties were found to be breaching HMO management regulations.
 - ◊ Fire safety has been improved in 1,115 (52%) of properties.
 - ◊ Five Civil Penalty Notices were served for failure to licence a property, meet the conditions, or manage it in accordance with the regulations.
 - ◊ Where remedial works have been required, the licensing team is working with landlords to ensure these works are completed on time.

6.4. Bedminster, Brislington West and Horfield Licensing Scheme

This scheme was approved by Cabinet on 14 December 2021 and came into force in April 2022. An additional licensing scheme was approved for all three wards and a selective licensing scheme in Bedminster and Brislington West wards. The scheme is still very much in its infancy and is not yet possible to measure its effectiveness.

- 6.5. Given the outcomes from the three previously declared schemes, we expect the schemes under this proposal to have similar outcomes.

7. Bristol Living Rent Commission report

- 7.1. The [Bristol Living Rent Commission report](#), written by the University of Bristol, endorses the council's firm stance against poor property and management standards in private renting, and recommends that licensing could be part of a firm stance towards improving standards in the private rented sector.
- 7.2. Research for the Bristol Living Rent Commission report shows that poor living conditions and disrepair are frequent issues raised by tenants. Poor living conditions affect quality of life, health, and wellbeing. Mould, damp, and plumbing were the most common property issues faced by tenants renting privately in Bristol.
- 7.3. The introduction of these licensing schemes would result in an improvement in property conditions and management of the private rented properties through the powers of enforcement under section 3(1) of the Housing Act and compliance with license conditions.
- 7.4. Licensing enables tenants to become more aware of the standards that they should expect in their accommodation, and allows them to raise issues with the council without fear of any retaliatory action by the landlord.

8. Alternative options considered

8.1. The Housing Act 2004 legislation and guidance says the council must consider whether there are any alternative courses of action available that could provide an effective method of dealing with the problem, or problems, in the private rented sector in the proposed areas. As part of research we have considered the following options:

8.2. Responding to complaints: The council responded to 4,028 complaints from private tenants about problems in their homes across the city in the last five years. However this type of approach alone has its limitations, because:

- Not all tenants are aware of the Private Housing service.
- Some tenants do not report problems because they are afraid it will jeopardise their tenancy and their home.
- Complaints can only be used to enforce minimum legal standards (as opposed to licensing, where more than just the legal minimum can be required through the licence conditions).
- The cost of providing a comprehensive response service for managing and responding to private tenant complaints is significant given the size of the private rented sector in Bristol. With the reductions in central government funding to government departments from 2025, it is likely that there will also be reductions to local authorities funding allocations. This is likely to impact on the council's ability to deliver a comprehensive complaint response service.
- Just dealing with reactive complaints alone will not be enough to tackle the issues in these areas and will not significantly improve the standards and management of private rented sector properties.
- Individual complaints outside of licensing schemes will continue to be dealt with through the complaints approach.

8.3. Mandatory licensing: A city-wide mandatory licensing scheme has been in operation since 2006. This accounts for approximately 3,500 larger HMOs where there are five or more unrelated occupants, sharing some facilities. Mandatory licensing alone is not considered the most satisfactory course of action as it will not improve the standards and management of smaller HMOs or the other privately rented properties, or tackle the issues facing the private rented sector in the proposed areas.

8.4. Self-Regulation – Rent with Confidence Scheme: This is a voluntary scheme for landlords and agents to join and agree to meet at least minimum housing standards and good management practice in their properties. These types of initiatives are important and form part of the wider plan to improve standards and conditions in the private rented sector. However, as this is a voluntary scheme it does not attract those landlords and agents who continue to mismanage their properties or fail to meet their legal obligations. The council does not believe it will be as effective as the proposed licensing schemes.

8.5. Co-regulation: Co-regulation is a relatively new concept with a limited number of schemes in operation, which has raised issues of effectiveness and affordability. It is a voluntary scheme where the local authority works in partnership with an accreditation scheme, or another organisation, to establish a framework under which responsibilities for the management of properties are shared. There are risks associated with this type of scheme. It is not compulsory and is dependent on landlords volunteering to join the scheme and complying with its conditions.

- These schemes have very limited sanctions if a landlord chooses not to comply with the rules. When this occurs, the local council will then be required to inspect the property(s) and take action, where appropriate. This will introduce a further tier of administration, potential

delays in responding and result in the council incurring additional costs. Co-regulation has only been used to enforce minimum legal standards (compared to licensing, where licence conditions also need to be met).

- These schemes need to be funded to pay for the necessary resources to run, and the funding mechanism is unclear.
- A co-regulation approach to tackle the issues in the proposed areas is not considered the most satisfactory course of action as it will not significantly improve the standards of management and condition of the properties within the proposed area.

9. Why selective and additional licensing is the preferred option

- 9.1.** Selective and additional licensing will have a positive impact on the management and condition of privately rented properties for the following reasons.
- Licensing provides confidence and assurance to existing, or prospective, tenants that licensed properties are well managed and safe to occupy.
 - All properties with a licence will be inspected. If a landlord doesn't have a licence when they should, we will undertake an investigation and if they still don't apply, we will take action against them.
 - Using the additional licensing powers under the Housing Act 2004 will ensure that there are satisfactory management practices in place and that the landlord/manager is a fit and proper person (Appendix 6) to be granted a licence. It will also reduce a tenant's fear of retaliatory eviction or harassment.
 - Licensing conditions will also enable the council to deal with issues where there are no other minimum legal powers available to tackle the issue.
 - The council will require that licensable properties meet certain standards and landlords will need to ensure that their properties are well managed and safe. If they don't meet the licensing conditions, they may be breaking the law and could be prosecuted or be subject to a Civil Penalty Notice (CPN).
 - Through property licensing conditions the council will be able to work with landlords/agents/owners to deal with other issues in the area such as empty properties, overcrowding, and anti-social behaviour.

- The council will work with landlords, agents, and private tenants, offering support and guidance.
- The council believes that licensing properties in the proposed areas will have a positive impact on private tenants living in these properties as it will raise standards of management and conditions of their homes through inspection and increased regulation. This will also benefit landlords who are already compliant and put at a competitive disadvantage by non-compliant landlords in the same area.

9.2. Having considered the issues and problems identified in the proposed areas and the resource restraints, the council believe a licensing scheme (funded through licence fees), will provide the council with the necessary resources to ensure privately rented properties in the proposed area meet the licensing standards.

10. Licence fees

- 10.1.** The Housing Act 2004 allows councils to set a fee for property licences and says that the council may consider all costs incurred by the authority in carrying out the licensing function. The council cannot make a profit from licence fees. The table in Appendix 7 sets out the proposed fees for additional and selective licensing.
- 10.2.** The fees proposed are for a licence which will normally last for five years and the fee is fixed for the five-year period. There are no other costs or fees to pay.

11. Responsibilities: A duty to apply for a licence and comply with licensing conditions

- 11.1.** Once a scheme has been declared, owners/managers of properties that meet the licensing criteria must apply for a licence when the scheme goes live. Those who fail to apply for a licence face enforcement action and possible financial penalties for renting an unlicensed property.
- 11.2.** It is particularly important that landlords are made aware that it is a criminal offence to operate a licensable property without a licence. This could result in unlimited fines or a civil penalty of up to £30,000, together with other restrictions such as not being able to serve section 21 notices while unlicensed, and tenants being able to claim back rent paid whilst the property was unlicensed.
- 11.3.** Once a property is licensed, landlords and managers must comply with the conditions of the licence. These conditions are slightly different for additional and selective licences and can be found in full at Appendix 3 and Appendix 4.
- 11.4. Legal obligations** - The Housing Act 2004, together with other relevant legislation and regulation, sets out the legal requirements for landlords in relation to renting private properties and licensing. These can be found at Appendix 8.

12. Other actions being taken to improve the private rented sector in Bristol

12.1. Reduction in empty private homes:

Bristol has a very successful programme of reducing empty homes and bringing them back into use. Most properties bought back into use have gone into the private rented sector, so it is important that they meet current property and management standards. We work with the Empty Property team to make sure that the landlords of these properties are made aware of their duties as landlords and that the properties meet minimum standards when brought back onto the market.

12.2. Homelessness prevention: The Bristol City Council Homelessness and Rough Sleeping Strategy 2019 - 2024 aims to use early intervention and prevention as a method to tackle problems before they become a crisis. It also aims to provide more move-on accommodation, including the use of the private rented sector, and bringing empty properties back into use, to provide more affordable accommodation.

- Shelter has carried out research into homelessness in relation to Bristol's private rented sector. The research identified that some private tenants who have previous experience of being homeless feel that they have no choice but to put up with poor conditions and harassment from their landlords. This is because they have nowhere else to go and their housing options are very limited, given their financial or personal circumstances.

- Many tenants find it difficult to find somewhere to live in Bristol and were willing to go to great lengths to remain in their private rented accommodation despite the property having serious problems. People with children or those who were receiving housing benefit found it particularly difficult to rent.

- The Private Renting Team provide accommodation to help prevent homelessness in Bristol. If a landlord agrees to work with them by providing the whole property to let, the landlord will be entitled to a licence fee refund from them.

12.3. The Bristol Corporate Strategy 2022-

2027: The strategy recognises that a warm, secure affordable home provides a springboard to achieving a high-quality life. It acknowledges that the private rented sector continues to grow, bringing issues such as the insecurity of short-term tenancies and for some poor conditions or tenancy management. The strategy brings together representatives of different housing sectors at the Bristol Homes Board to provide leadership across a range of housing issues, including making improvements to the private rented sector.

12.4. Bristol's One City Plan: Under the theme of Housing and Communities in the One City Plan is the aim to raise standards in the private rented sector through the introduction of discretionary licensing schemes.

12.5. Bristol City Council Business Plan 2023-2024: Under this plan, the council has a stated action to: "Work to improve conditions in the private rented sector through the expansion of property licensing and robust enforcement of minimum standards."

13. Consultation

- 13.1.** The consultation period will run for 10 weeks from Tuesday 29 August to Tuesday 7 November 2023. We welcome feedback from anyone who may be directly affected, and members of the public. Please visit www.ask.bristol.gov.uk/property-licensing-2023 for more information and to complete the online survey.
- 13.2.** All consultation responses will be considered and analysed, and information regarding the findings will be made available in due course. These findings will be taken into consideration before deciding which option to take to the council's Cabinet to declare a new scheme(s).
- 13.3.** Any report to Cabinet, and its decision will be published, and if a scheme is approved, it cannot come into force for a minimum of three months following the Cabinet decision.

14. Appendix 1: Types of properties that are exempt from licensing

Exemptions from additional licensing

Certain types of buildings, or parts of buildings, are by law **not** subject to HMO licensing. ([Schedule 14 of the Housing Act 2004](#)).

This includes:

- buildings managed or owned by public sector bodies. (i.e., local authority housing, and properties managed or owned by registered providers previously known as registered social landlords, police authorities, fire and rescue authorities and the NHS).
- where the residential accommodation supports the principal use of the building i.e., caretaker accommodation.
- buildings occupied by religious communities for religious purposes.
- student accommodation managed and controlled by educational establishments such as universities.
- care homes.
- bail hostels.
- hostels - the description of which are specified by law.
- buildings entirely occupied by freeholders or long leaseholders.
- buildings occupied by owners.
- buildings occupied by no more than two, unrelated people.
- buildings occupied by a resident landlord with no more than two lodgers.
- buildings which are Housing Co-operatives.

NB There are currently draft regulations which will remove some accommodation for asylum seekers provided by the Home Office from being included within the legal definition of an HMO, if implemented this may affect a small number of properties in Bristol. The same properties may still require a selective licence if they are in a relevant ward.

Exemptions from selective licensing

Certain types of accommodation would not be subject to selective licensing (Selective licensing of Houses (Specified Exemptions) (England) Order 2006 SI 2006/370).

This includes:

- properties occupied by owners.
- accommodation where the tenant is a family member.
- property managed or owned by public sector bodies i.e., social housing.
- business premises.
- student accommodation owned by a university.
- holiday lets.
- empty properties.
- any property where the landlord already holds an HMO licence.

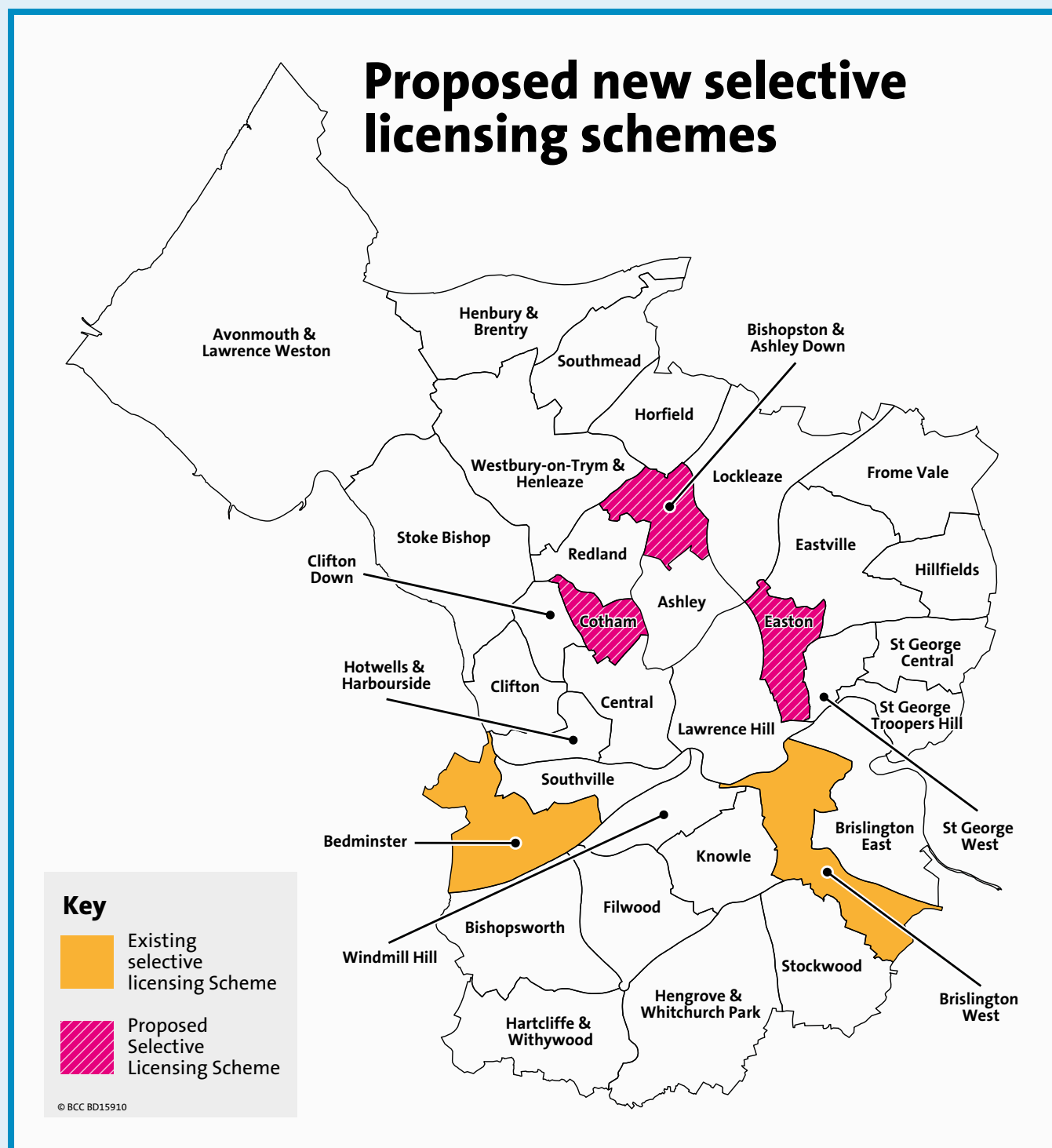
We will also exempt from this scheme any poorly converted blocks of flats, as defined under section 257 of the Housing Act 2004, as well as any properties approved under section 233 of the Act, which includes larger developments of student accommodation not managed and controlled by educational establishments such as universities.

Purpose build student accommodation registered with the national accrediting body ANUK is already closely regulated regarding standards so is excluded from this proposal.

All other private rented units occupied by students will require a license.

15. Appendix 2 – Wards

[Find my ward](#)



16. Appendix 3 licence conditions – additional licensing

The following licence scheme conditions apply both to the licence holder and to any manager who has accepted responsibility under the licence.

1	Professionalism and standard of conduct
1.1	<p>Reasonable and equitable standard of conduct Conduct business with regard to the property and the tenancy in a reasonable and equitable manner and in accordance with applicable standards of due diligence.</p>
1.2	<p>‘Fit and Proper Person’ declarations Any person involved in or becoming involved in the management of the property after the licence date must be a fit and proper person¹ and must supply the Council on demand² with a completed ‘declaration in respect of a fit and proper person’ form for each individual involved.</p>
1.3	<p>All agents to be members of statutory schemes Where the licence holder or manager is a letting or property managing agent, they must be a member of statutory schemes such as the Lettings and Management Agent Redress Scheme and the Client Money Protection Scheme.</p>
1.4	<p>Licence holder and manager agreements Provide to the Council, on demand² a copy of any written agreement between the licence holder(s) and property managers, which sets out responsibilities for the management of the property. These might include arranging tenancies, managing complaints and repairs, setting up tenancy deposits, taking the inventory, visiting the property.</p>
1.5	<p>Anti-discrimination Landlords and Agents must not discriminate either directly or indirectly against tenants or prospective tenants on the basis of a protected characteristic¹¹. This includes discrimination against people because they are in receipt of welfare benefits i.e. Universal Credit.</p>

2	Keeping the Council informed of changes
2.1	<p>Any changes in licence holder Notify the Council in writing³ of any change to the name, address, or any other contact details (including email address) of the licence holder, manager or any other person involved in the management of the property, within 14 days of that change or on demand².</p>
2.2	<p>Any changes in property layout or room numbering Do not make alterations to any aspect of the layout of the property, or the numbering of rooms, without first gaining written consent from the Council. Requests should be made in writing to the Council³ and include a full description of the proposed changes.</p>
2.3	<p>Any changes to the way the property is occupied Any proposed changes to the way the property is occupied should first be submitted to the Council³ to determine any consequent need for alterations to the required levels of amenity provision or the permitted number for the property.</p>
2.4	<p>If occupation rises above the permitted numbers If the occupation of the property rises beyond the maximum permitted number, inform the Council³ in writing within 28 days of the over occupation occurring.</p>

3	Repair and maintenance
3.1	<p>Property repair timescales</p> <p>As far as is reasonably practicable keep within the following timescales in responding to information about disrepair and maintenance issues at the property:</p> <ul style="list-style-type: none"> • Emergency repairs: 24 hours (affecting health or safety e.g., dangerous electrical fault, blocked W C, no hot water, etc.). • Urgent repairs: five working days (affecting material comfort e.g., no heating or fridge failure, serious roof leak, etc.) • Other non-urgent repairs: within a reasonable period taking into account the extent and cost of the works required and any disruption for the occupiers.
3.2	<p>Facilities and equipment</p> <p>Facilities and equipment must be kept in a safe condition and good working order.</p>
3.3	<p>Asbestos and Legionella</p> <p>Comply with current statutory requirements relating to the safe management of the following:</p> <ul style="list-style-type: none"> • any asbestos containing materials⁴, and • Legionella species risks⁵.
3.4	<p>Pest control</p> <p>Employ a competent pest control contractor to carry out appropriate treatments to any pest infestation.</p>

4	Gas and electrical safety
4.1	<p>Gas safety certificate</p> <p>If gas is supplied to the house, supply to the Council³ annually for their inspection, a satisfactory and genuine gas safety record obtained in respect of the house within the last 12 months.</p>
4.2	<p>Carbon monoxide alarm</p> <p>Install a carbon monoxide alarm in any room (includes a hall or landing) in the property which is used wholly or partly as living accommodation (includes bathroom or lavatory) and contains a fixed combustion appliance other than a gas cooker⁶, and keep any such alarm in proper working order. Check the alarms on the day the tenancy begins if it is a new tenancy and supply to the Council on demand² a declaration of the condition and positioning of any such alarms.</p>
4.3	<p>Electrical safety</p> <p>Meet current statutory requirements in relation to electrical installations in The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 and ensure that every electrical installation² in the property is in proper working order and safe for continued use. Supply to the Council on demand² a declaration as to the safety of such installations within in 7 days of a request.</p>
4.4	<p>Electrical safety certificates</p> <p>Supply to the Council on demand² a current (less than 5 years old) genuine electrical installation condition report within seven days in cases where the property would otherwise be exempt from the requirements of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020. Any code 1 or 2 defects in a report must be rectified and any FI (further investigation) codes followed up. On the expiry of a report, a new report must be obtained and supplied to the Council³ within two months of the previous report's expiry date.</p>

4.5	<p>Electrical appliance and furniture safety</p> <p>Keep electrical appliances and furniture made available in the house in a safe condition and supply to the Council on demand² a written declaration verifying the safety of the appliances and furniture.</p>
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5	Fire safety
5.1	<p>Smoke alarms installation</p> <p>Install a smoke alarm on each storey of the house on which there is a room used wholly or partly as living accommodation and keep any such alarm in proper working order.</p>
5.2	<p>Smoke alarms</p> <p>Check smoke alarms whenever there is a new tenancy on the day the tenancy begins and supply to the Council on demand² a declaration of the condition and positioning of any such alarms.</p>
5.3	<p>Fire safety precautions and reviews</p> <p>Fire precautionary measures must be provided in accordance with either:</p> <p>The Bristol City Council document “Fire Safety Standards for Licensable HMOs⁹</p> <p>or</p> <p>An independent Fire Risk Assessment (FRA) produced by a competent person that adheres to current regulations and legal requirements relating to fire safety and licensing. Such a Fire Risk Assessment must be approved by the Council and reviewed annually, on a change of tenancy, and whenever there are alterations to the property or its contents. Supply to the Council on demand written evidence of the Fire Risk Assessment together with any revisions.</p>
5.4	<p>Fire alarm periodic test certificate</p> <p>Where there is a Grade A fire alarm system installed, supply to the Council on demand² a satisfactory and genuine certificate of servicing by a competent person carried out in the previous 6 months, as required under BS 5839-6: 2019. Where there is a Grade C or Grade D system installed, supply to the Council on demand² a satisfactory and genuine certificate of servicing by a competent person carried out in the previous 12 months, following the servicing procedure contained in Annex I of BS 5839-6: 2019.</p>
5.5	<p>Lighting and emergency lighting</p> <p>Supply to the Council, on demand² a declaration that the lighting system is in proper working order. Emergency lighting to be maintained in accordance with the relevant British Standard (BS 5266-1:2016).</p>

6	Energy performance
6.1	<p>Energy Performance Certificate</p> <p>Where applicable supply to the Council on demand², a current and genuine Energy Performance Certificate (EPC) in accordance with the Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2012.</p>
6.2	<p>Minimum levels of energy efficiency</p> <p>Ensure that the property reaches at least an Energy Performance Certificate (EPC) rating of E, subject to any exemptions, in compliance with the minimum level of energy efficiency for privately rented property required under The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015.</p>

7	Amenity standards
7.1	Access to facilities Provide all tenants with 24 hour direct access to all toilet, personal washing and cooking facilities and equipment.
7.2	Sharing of bedrooms Ensure that there is no obligate sharing of bedrooms.
7.3	Names of all occupants Supply to the Council on demand ² the names of all occupants
7.4	Room size and amenity standards Comply with the Bristol City Council document 'Room Size & Amenity Standard for Licensable HMOs ¹⁰ . This document includes conditions required by law and may be updated during the term of the licence, and it is the responsibility of the licence holder and the manager to ensure that they are aware of and are complying with the latest versions.
7.5	Small rooms Notify the Council ³ of any room in the HMO with a floor area of less than 4.64 square metres.
7.6	Permitted numbers Ensure that the property is occupied in accordance with, and by no more than, the number of persons and households specified in the licence.
7.7	Refuse and recycling Provide suitable facilities for the storage and disposal of refuse and recycling in accordance with the Council's waste and recycling collection requirements.
7.8	Food safety training Where food is provided, ensure that all food handlers have appropriate food safety training.

8	Tenancy agreements
8.1	Written tenancy statement Supply to the occupiers of the house a written statement of the terms on which they occupy it. Supply a copy of the statement to the Council on demand ² .
8.2	Clear tenancy conditions Do not mislead prospective or existing tenants regarding the use, occupation, condition or the contents of the property which forms part of tenancy or agreement to occupy the property.
8.3	Make tenants aware of their rights and obligations Make tenants aware of their rights and obligations and of the licence holder or manager's legal obligations when a tenancy is brought to an end or where the licence holder or manager seeks possession of the dwelling-house.
8.4	Avoid unfair terms in tenancy agreement The tenancy agreement should be free from both unfair terms and prohibited fees.
8.5	Tenancy clause on anti-social behaviour Issue new tenants with a tenancy or written agreement that include clauses that will allow the licence holder to take reasonable steps to tackle anti-social behaviour.

9	Setting up and ending tenancies
9.1	<p>Inventories</p> <p>Arrange for an inventory of contents and condition to be signed by both parties at the beginning of the tenancy (or as soon as practicable afterwards) and give tenants the opportunity both to carry out a joint inventory inspection at the outset and to discuss the inventory at the end of the tenancy.</p>
9.2	<p>Deposit protection schemes</p> <p>Comply with all statutory obligations regarding tenancy deposit protection if a deposit is taken.</p>
9.3	<p>New tenant references</p> <p>Require a reference for each new person wishing to occupy the property. The reference request should include questions about anti-social behaviour⁸, acting in a way that may cause a nuisance to neighbours, and any problems in respect of non-payment of rent. References should be retained for a minimum of 6 months from the issuing of the licence and supplied to the Council on demand².</p>
9.4	<p>Past tenant references</p> <p>Provide, on request from other landlords, an honest, factual and accurate written reference relating to existing or past occupiers.</p>
9.5	<p>Contact details</p> <p>Make available to tenants the licence holder or manager's name, address, any telephone contact number or email address to each household and ensure that such details are clearly displayed in a prominent position in the property.</p>
9.6	<p>Fire precaution information for tenants</p> <p>Provide written details of fire evacuation procedures to tenants and other occupiers. Ensure that all tenants and occupiers are aware of fire and fault indications of any fire alarm system, are adequately familiar with controls (e.g., resetting) and of measures to avoid false alarms. Supply these details to the Council on demand².</p>

10	Tenants' entitlement to peaceful enjoyment of their home
10.1	<p>Obligation to allow tenant peaceful enjoyment</p> <p>Do not, and do not cause anyone else to:</p> <ul style="list-style-type: none"> • Unlawfully deprive any residential occupier(s) of their occupation of the property or any part of the property, or attempt to do so, • Carry out acts likely to interfere with the peace or comfort of the residential occupier(s) or members of his household, or • Persistently withdraw or withhold services reasonably required for the occupation of the property in question as a residence.
10.2	<p>Access to property</p> <p>Make prior arrangement with the tenant and give at least 24 hours' notice (except in emergencies) of access to the property by the landlord or their representative for inspection, repairs, monitoring or any other reason.</p>

11	Relations with neighbours and dealing with anti-social behaviour⁸
11.1	Anti-social behaviour⁸ by tenants and visitors Take all reasonable and practicable steps to prevent or reduce anti-social behaviour ⁸ by persons occupying or visiting the house
11.2	Illegal activity Take all reasonable steps to ensure that the property is not used for illegal or immoral purposes.
11.3	Property appearance Take all reasonable steps to keep the external appearance of the property in a reasonable condition considering its age of the property, character and locality and keep the exterior of the property free from graffiti and fly posters.
11.4	Monitor for anti-social behaviour Arrange inspections of the property on a regular basis to assess if there is evidence of anti-social behaviour ⁸ ; this should be at least quarterly, but more frequently if anti-social behaviour has been established.
11.5	Contact details for neighbours Provide the occupants of adjoining properties direct contact details such as a telephone number to enable them to inform the licence holder of problems such as complaints about the behaviour of the tenants or their visitors.

Notes

- ¹ Fit and Proper person definition: see Housing Act 2004 s66, this can be found at <https://www.legislation.gov.uk/ukpga/2004/34/section/66>
- ² Any reference to 'on demand' means the Council requires that the document(s) or information be supplied to the Council within 28 days unless stated otherwise.
- ³ Postal addresses: (Private Housing Team) (100TS) or (Licensing Team) (100TS), Bristol City Council, PO Box 3399, Bristol, BS1 9NE. E-mail address: private.housing@bristol.gov.uk
- ⁴ [Managing asbestos in buildings](#): A brief guide Health and Safety Executive.
- ⁵ Legionnaires' disease [A brief guide for duty holders](#) Health and Safety Executive.
- ⁶ This means a fixed apparatus where fuel of any type is burned to generate heat. Typically, these appliances are powered by gas, oil, coal, wood, etc., for example, gas or oil boilers, or log-burning stoves. A non-functioning purely decorative fireplace would not constitute a fixed combustion appliance.
- ⁷ Regulation 2(1) of the Building Regulations: "electrical installation" means fixed electrical cables or fixed electrical equipment located on the consumer's side of the electricity supply meter.
- ⁸ Anti-social behaviour: Behaviour that causes or is likely to cause harassment, alarm or distress to one or more persons not of the same household (this includes noise nuisance).
- ⁹ Bristol City Council Fire Safety Standards for Licensable HMOs. The latest versions can be found at [Licence standards and conditions](#)
- ¹⁰ Bristol City Council room size and amenity standard for licensable HMOs. The latest versions can be found at [Licence standards and conditions](#)
- ¹¹ Protected characteristics are defined under the Equality Act 2010 and include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

17. Appendix 4 licence conditions – Selective Licensing

The following licence scheme conditions apply both to the licence holder and to any manager who has accepted responsibility under the licence.

1	Professionalism and standard of conduct
1.1	<p>Reasonable and equitable standard of conduct Conduct business with regard to the property and the tenancy in a reasonable and equitable manner and in accordance with applicable standards of due diligence.</p>
1.2	<p>‘Fit and Proper Person’ declarations Any person involved in, or becoming involved in the management of the property after the licence date must be a fit and proper person¹ and must supply the Council on demand² with a completed ‘declaration in respect of a fit and proper person’ form for each individual involved.</p>
1.3	<p>All agents to be members of statutory schemes Where the licence holder or manager is a letting or property managing agent they must be a member of a statutory scheme such as the Lettings and Management Agent Redress Scheme and the Client Money Protection Scheme.</p>
1.4	<p>Licence holder and manager agreements Provide to the Council, on demand² a copy of any written agreement between the licence holder(s) and property managers, which sets out responsibilities for the management of the property. These might include arranging tenancies, managing complaints and repairs, setting up tenancy deposits, taking the inventory, visiting the property.</p>
1.5	<p>Anti-discrimination Landlords and Agents must not discriminate either directly or indirectly against tenants or prospective tenants on the basis of a protected characteristic². This includes discrimination against people because they are in receipt of welfare benefits i.e. Universal Credit.</p>
2	Keeping the Council informed of changes
2.1	<p>Any changes in licence holder Notify the Council in writing³ of any change to the name, address, or any other contact details (including email address) of the licence holder, manager or any other person involved in the management of the property, within 14 days of that change or on demand².</p>
3	Repair and maintenance
3.1	<p>Property repair timescale As far as is reasonably practicable keep within the following timescales in responding to information about disrepair and maintenance issues at the property:</p> <ul style="list-style-type: none"> • Emergency repairs: 24 hours (affecting health or safety e.g., dangerous electrical fault, blocked W C, no hot water, etc.). • Urgent repairs: five working days (affecting material comfort e.g., no heating or fridge failure, serious roof leak, etc.) • Other non-urgent repairs: within a reasonable period taking into account the extent and cost of the works required and any disruption for the occupiers.

3.2	Facilities and equipment Facilities and equipment must be kept in a safe condition and good working order.
3.3	Asbestos and Legionella - comply with legal requirements Comply with current statutory requirements relating to the safe management of the following: <ul style="list-style-type: none"> • any asbestos containing materials⁴, and • Legionella species risks⁵.
3.4	Pest control Employ a competent pest control contractor to carry out appropriate treatments to any pest infestation

4	Gas and electrical safety
4.1	Gas safety certificate If gas is supplied to the house, supply to the Council ³ annually for their inspection, a satisfactory and genuine gas safety record obtained in respect of the house within the last 12 months.
4.2	Carbon monoxide alarm Install a carbon monoxide alarm in any room (includes a hall or landing) in the property which is used wholly or partly as living accommodation (includes bathroom or lavatory) and contains a fixed combustion appliance other than a gas cooker ⁶ , and keep any such alarm in proper working order. Check the alarms on the day the tenancy begins if it is a new tenancy and supply to the Council on demand ² a declaration of the condition and positioning of any such alarms
4.3	Electrical safety Meet current statutory requirements in relation to electrical installations in The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 and ensure that every electrical installation ⁷ in the property is in proper working order and safe for continued use. Supply to the Council on demand ² a declaration as to the safety of such installations within in 7 days of a request.
4.4	Electrical safety certificates Supply to the Council on demand ² a current (less than 5 years old) genuine electrical installation condition report within seven days in cases where the property would otherwise be exempt from the requirements of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.
4.5	Electrical appliance and furniture safety Keep electrical appliances and furniture made available in the house in a safe condition and supply to the Council on demand ² a written declaration verifying the safety of the appliances and furniture..

5	Fire safety
5.1	Smoke alarms installation Install a smoke alarm on each storey of the house on which there is a room used wholly or partly as living accommodation and keep any such alarm in proper working order.
5.2	Smoke alarms - check smoke alarms at start of tenancy, supply a declaration on their condition and position if asked. Check smoke alarms whenever there is a new tenancy on the day the tenancy begins and supply to the Council on demand ² a declaration of the condition and positioning of any such alarms.

6	Energy performance
6.1	Energy Performance Certificate Where applicable supply to the Council on demand ² , a current and genuine Energy Performance Certificate (EPC) in accordance with the Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2012.

7	Amenity standards
7.1	Access to facilities Provide all tenants with 24hour direct access to all toilet, personal washing and cooking facilities and equipment.
7.2	Sharing of bedrooms Ensure that there is no obligate sharing of bedrooms.
7.3	Names of all occupants Supply to the Council on demand ² a list of all occupants.

8	Tenancy agreements
8.1	Written tenancy statement Supply to the occupiers of the house a written statement of the terms on which they occupy it. Supply a copy of the statement to the Council on demand ² .
8.2	Clear tenancy conditions Do not mislead prospective or existing tenants regarding the use, occupation, condition or the contents of the property which forms part of tenancy or agreement to occupy the property.
8.3	Make tenants aware of their rights and obligations Make tenants aware of their rights and obligations and of the licence holder or manager's legal obligations when a tenancy is brought to an end or where the licence holder or manager seeks possession of the dwelling-house.
8.4	Avoid unfair terms in tenancy agreement The tenancy agreement should be free from both unfair terms and prohibited fees.
8.5	Tenancy clause on anti-social behaviour Issue new tenants with a tenancy or written agreement that include clauses that will allow the licence holder to take reasonable steps to tackle anti-social behaviour.

9	Setting up and ending tenancies
9.1	Inventories Arrange for an inventory of contents and condition to be signed by both parties at the beginning of the tenancy (or as soon as practicable afterwards) and give tenants the opportunity both to carry out a joint inventory inspection at the outset and to discuss the inventory at the end of the tenancy.
9.2	Deposit protection schemes Comply with all statutory obligations regarding tenancy deposit protection if a deposit is taken.
9.3	New tenant references Require a reference for each new person wishing to occupy the property. The reference request should include questions about anti-social behaviour ⁸ , acting in a way that may cause a nuisance to neighbours, and any problems in respect of non-payment of rent. References should be retained for a maximum of 6 months from the issuing of the licence and supplied to the Council on demand ² .

9.4	Past tenant references Provide, on request from other landlords, an honest, factual and accurate written reference relating to existing or past occupiers.
9.5	Contact details Make available to tenants the licence holder or manager's name, address, any telephone contact number or email address.
9.6	Fire precaution information for tenants Provide written details of fire evacuation procedures to tenants and other occupiers. Ensure that all tenants and occupiers are aware of fire and fault indications of any fire alarm system, are adequately familiar with controls (e.g., resetting) and of measures to avoid false alarms. Supply these details to the Council on demand ² .

10	Tenants' entitlement to peaceful enjoyment of their home
10.1	Obligation to allow tenant peaceful enjoyment Do not, and do not cause anyone else to: <ul style="list-style-type: none"> • Unlawfully deprive any residential occupier(s) of their occupation of the property or any part of the property, or attempt to do so, • Carry out acts likely to interfere with the peace or comfort of the residential occupier(s) or members of his household, or • Persistently withdraw or withhold services reasonably required for the occupation of the property in question as a residence.
10.2	Access to property Make prior arrangement with the tenant and give at least 24 hours' notice (except in emergencies) of access to the property by the landlord or their representative for inspection, repairs, monitoring or any other reason.

11	Relations with neighbours and dealing with anti-social behaviour⁸
11.1	Anti-social behaviour⁸ by tenants and visitors Take all reasonable and practicable steps to prevent or reduce anti-social behaviour ⁸ by persons occupying or visiting the house.
11.2	Illegal activity Take all reasonable steps to ensure that the property is not used for illegal or immoral purposes.
11.3	Property appearance Take all reasonable steps to keep the external appearance of the property in a reasonable condition considering its age of the property, character and locality and keep the exterior of the property free from graffiti and fly posters.
11.4	Monitor for anti-social behaviour Arrange inspections of the property on a regular basis to assess if there is evidence of anti-social behaviour ⁸ ; this should be at least quarterly, but more frequently if anti-social behaviour has been established.
11.5	Contact details for neighbours Provide the occupants of adjoining properties direct contact details such as a telephone number to enable them to inform the licence holder of problems such as complaints about the behaviour of the tenants or their visitors.

Notes

- 1 Fit and Proper person definition: see Housing Act 2004 s66, this can be found at <https://www.legislation.gov.uk/ukpga/2004/34/section/66>
- 2 Any reference to 'on demand' means the Council requires that the document(s) or information be supplied to the Council within 28 days unless stated otherwise.
- 3 Postal addresses: (Private Housing Team) (100TS) or (Licensing Team) (100TS), Bristol City Council, PO Box 3399, Bristol, BS1 9NE. E-mail address: private.housing@bristol.gov.uk
- 4 [Managing asbestos in buildings](#): A brief guide Health and Safety Executive.
- 5 Legionnaires' disease [A brief guide for duty holders](#) Health and Safety Executive.
- 6 This means a fixed apparatus where fuel of any type is burned to generate heat. Typically, these appliances are powered by gas, oil, coal, wood, etc., for example, gas or oil boilers, or log-burning stoves. A non-functioning purely decorative fireplace would not constitute a fixed combustion appliance.
- 7 Regulation 2(1) of the Building Regulations: "electrical installation" means fixed electrical cables or fixed electrical equipment located on the consumer's side of the electricity supply meter.
- 8 Anti-social behaviour: Behaviour that causes or is likely to cause harassment, alarm or distress to one or more persons not of the same household (this includes noise nuisance).
- 9 Protected characteristics are defined under the Equality Act 2010 and include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

18. Appendix 5: Designation conditions applying to selective licensing

The Selective Licensing of Houses (Additional Conditions) (England) Order 2015

A selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions. The area is experiencing:

- low housing demand (or is likely to become such an area).
- a significant and persistent problem caused by anti-social behavior.
- poor property conditions.
- high levels of migration.
- high level of deprivation.
- high levels of crime.

Article 3: Conditions specified for the purposes of section 80(2)(b) of the Housing Act 2004

3.—(1) The following conditions are specified as additional conditions for the purposes of section 80(2)(b) of the 2004 Act, which a local housing authority must consider are satisfied in relation to the area before making a selective licensing designation under this provision

(a) that the area contains a high proportion of properties in the private rented sector, in relation to the total number of properties in the area.

(b) that the properties referred to in subparagraph (a) are occupied either under assured tenancies or licences to occupy; and

(c) that one or more of the sets of conditions in articles 4 to 7 is satisfied.

(2) For the purposes of this article, a property shall not be regarded as being in the private rented sector where the landlord is a private registered provider of social housing, as defined by section 80 of the Housing and Regeneration Act 2008⁽¹⁾.

The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of other residential accommodation (England) General Approval 2015 (the general approval)

set conditions which need to be satisfied when considering scheme declarations including the mandatory consultation with those affected by it for not less than 10 weeks.

It also set the 20% thresholds on the size of a selective scheme covers either more than 20% of the geographical area or would affect more than 20% privately rented homes in the area. If the threshold is exceeded, the local authority would need to seek confirmation from the Secretary of State.

Article 4: Conditions in relation to housing conditions

4. The first set of conditions is—

(a) that having carried out a review of housing conditions under section 3(1) of the 2004 Act, the local housing authority considers it would be appropriate for a significant number of the properties referred to in article 3(1)(a) to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises⁽¹⁾;

(b) that the local housing authority intends to carry out such inspections as referred to in paragraph (a), with a view to carrying out any necessary enforcement action; and

(c) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

19. Appendix 6 – Fit and proper person checks

Under the Housing Act 2004, if the council is to issue any property licence it must be satisfied that the proposed licence holder is a fit and proper person, and the most appropriate person to hold the licence. It must also be satisfied that the proposed manager of the house is a fit and proper person to be the manager of the house. If not, the licence must be refused unless other arrangements can be agreed.

The licence may be revoked if the council no longer considers that the licence holder is a fit and proper person to be the licence holder and if the council no longer considers that the management of the house is being carried out by people who are not fit and proper persons to be involved in its management.

These requirements are to ensure that those responsible for managing the property are of sufficient integrity and good character to be involved in the management of a residential property, and as such they do not pose a risk to the welfare or safety of people occupying the property.

However, where a property is not licensed, there is no control over who is managing the property.

Each person involved in the management of a licensed property needs to complete the fit and proper person declaration form below

(www.bristol.gov.uk/files/documents/198-fit-and-proper-person-declaration-form)

which is to be kept for their own records.

Declaration in Respect of a Fit and Proper Person Housing Act 2004 (Part 2 / Part 3)

Name

In connection with the application dated

for a property licence in respect of:

(Property Address)

I hereby declare that I am:

- (i) The proposed licence holder
 - (ii) The manager of the property to whom rent is paid (if different from (i) above)
 - (iii) Someone who is otherwise engaged in the management of the property
- (Delete as appropriate)

and that I am a fit and proper person to be engaged in that capacity.

In support of the above declaration I confirm that I:

- do not have any unspent convictions particularly in respect of any offence involving fraud or other dishonesty, or violence or drugs, or any offence listed in Schedule 3, of Sexual Offences Act 2003;
- have not been found guilty by any court or tribunal of practicing unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in, or in connection with, the carrying on of any business;
- have not had any judgements (whether civil or criminal) made against me under housing, public health, environmental health or landlord and tenant law.

Please provide information about any HMO or house the proposed licence holder or manager owns or manages or has owned or managed which has been the subject of:

- any appropriate enforcement action described in section 5(2) of the Act;
- refusal to grant a licence under Part 2 or 3 of the Act, or has had a licence revoked as a consequence of breaching the conditions of his licence;
- an interim or final management order under the Act

Details of above

Read our policy statement and our property licensing and enforcement privacy notice to see what we do with your personal information.

Please note that it is a criminal offence to knowingly supply information which is false or misleading for the purpose of obtaining a licence. Evidence of any statements made in this application regarding the property concerned may be required later. If we subsequently discover something which is relevant which you should have disclosed, or which has been incorrectly stated or described, your licence may be revoked, or other action taken.

Signed:

Date:

Name:

20. Appendix 7 – Licence fees

The Housing Act 2004 allows councils to set a fee for property licences and says that the council may consider all costs incurred by the authority in carrying out the licensing function. The council cannot make a profit from licence fees.

The predicted cost for a citywide additional licensing scheme is £12,516,316.

The predicted cost for a targeted selective licensing scheme is £3,532,288

The fees proposed are for a licence which will normally last for five years and the fee is fixed for the five-year scheme period. There are no other costs or fees to pay after the correct fee has been paid.

The fee structure proposed is designed to allow the council to recover the costs of the licensing function. There are two parts to the process of setting out the proposed fee structure:

Part 1 covers the average cost of granting or refusing an application. This part of the fee is payable at the time of submitting the application. Applications cannot be accepted without payment.

Part 2 covers the enforcement of the licence scheme requirements and general scheme administration costs. It is payable only for licences which are proposed to be granted and is not payable if the licence application is refused.

Refunds of fees paid will only be given when the property licensed didn't require a licence at the time of application.

Payments are only acceptable online via credit or debit card, except where an applicant can show that they have an impairment that makes using this payment method unreasonable.

Part 2 payments must be paid within 28 days of request for payment, otherwise the property will be considered unlicensed.

Scheme 1: Additional licensing fees

The proposed fee structure for additional licensing is illustrated in the following table.

Table 1: Table of fees payable for a citywide additional licensing - Scheme 1

Additional licensing						
Type of Licence	New			Renewal		
	Part 1	Part 2	Total	Part 1	Part 2	Total
Fee	£1023	£838	£1861	£808	£662	£1470
Discount for satisfactory certificates ¹	n/a	£150	£1711	n/a	£150	£1320
Discount for membership of Rent with Confidence (RWC) ²	n/a	£150	£1711	n/a	£150	£1320
Discounts for both certificates and RWC	n/a	£300	£1561	n/a	£300	£1170
Found unlicensed fee ³	n/a	£140	£2001	n/a	£140	£1610

Scheme 2 Fees – Selective Licensing fees

The proposed fee structure for selective licensing is illustrated in the following table.

Table 2: Table of fees payable for a selective licensing scheme - Scheme 2

Selective licensing				
Type of Licence	New			Renewal
	Part 1	Part 2	Total	
Fee	£467	£445	£912	n/a
Discount for satisfactory certificates ¹	n/a	£150	£762	n/a
Discount for membership of Rent with Confidence (RWC) ²	n/a	£150	£762	n/a
Discounts for both certificates and RWC	n/a	£300	£612	n/a
Found unlicensed fee ³	n/a	£140	£1052	n/a

Notes

¹ Discounts will be awarded where satisfactory* electrical, gas, (if applicable) safety and energy performance certificates are submitted before the licence is issued.

² Discounts will be awarded where the landlord or agent is a member of an accreditation scheme provided by an approved provider under the West of England Rent with Confidence scheme at the time of the application.

³ An unlicensed fee of £140 will be added where the application is not made on time. No discounts are available if this fee is due.

* Satisfactory Certificates:

Gas safety record (no longer called a certificate) – a record of an inspection carried out by a Gas Safe registered contractor competent for the appliance(s) inspected and tested and dated within the previous 12 months prior to submission that confirms that all appliances and pipework are in a safe condition.

Electrical Installation Condition Report (EICR) – the inspection record should be dated within the previous 5 years and indicate that the installation is in a safe condition and is free from any code 1 (C1), 2 (C2) or FI matters. The inspection report should be carried out by a contractor competent and approved to carry out inspections and tests (rather than solely competent and authorised to carry out work) and who meets the definition of a qualified person under regulation 2 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020. The inspection report will be required to show that the installation complies with the electrical safety standards as detailed in regulation 2 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

Energy Performance Certificate (EPC) – a satisfactory EPC is one dated within the previous 10 years (and thus still valid), and which indicates a minimum EPC band of band E. Any band F or G certificate will not be regarded as satisfactory.

21. Appendix 8 – Glossary of legislation and regulation relating to licensing

- **Housing Act 2004**
www.legislation.gov.uk/ukpga/2004/34/contents
- **Housing Act 2004 Part 1 Housing Health and Safety Rating System**
www.legislation.gov.uk/ukpga/2004/34/part/1
- **SI 2006/ 373 - The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006**
www.legislation.gov.uk/uksi/2006/373/contents/made
- **The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018**
www.legislation.gov.uk/ukdsi/2018/9780111167359/contents
- **SI 2015/ 977 The Selective Licensing of Houses (Additional Conditions) (England) Order 2015**
www.legislation.gov.uk/uksi/2015/977/contents/made
- **SI 2006/ 370 – Selective Licensing of Houses (Specified Exemptions) (England) Order 2006**
www.legislation.gov.uk/uksi/2006/370/made
- **SI 2015/ 962 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015**
www.legislation.gov.uk/uksi/2015/962/contents/made
- **SI 2012/ 3118 Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2012**
www.legislation.gov.uk/uksi/2012/3118/contents/made
- **BS 5266-1 2016 Emergency Lighting Code of practice for emergency lighting of premises**
www.firesafe.org.uk/emergency-lighting
- **Landlord and Tenant Act 1985**
www.legislation.gov.uk/ukpga/1985/70
- **Landlord and Tenant Act 1987**
www.legislation.gov.uk/ukpga/1987/31/contents
- **Protection from Eviction Act 1977**
www.legislation.gov.uk/ukpga/1977/43
- **Housing Act 1988**
www.legislation.gov.uk/ukpga/1988/50/contents
- **Housing and Planning Act 2016**
www.legislation.gov.uk/ukpga/2016/22/contents/enacted
- **Deregulation Act 2015**
www.legislation.gov.uk/ukpga/2015/20/contents/enacted
- **SI 2015/ 1646 The Assured Short Hold Tenancy Notices and Prescribed Requirements (England) Regulations 2015**
www.legislation.gov.uk/uksi/2015/1646/contents/made
- **SI 2007/ 797 Housing Tenancy (Deposits) (Prescribed Information) Order 2007**
www.legislation.gov.uk/uksi/2007/797/article/2/made
- **Tenant Fees Act 2019**
www.legislation.gov.uk/ukpga/2019/4/contents/enacted

If you would like this information in another language, Braille, audio tape, large print, easy read, BSL video or CD-ROM or plain text please contact us by emailing private.housing@bristol.gov.uk or calling **0117 922 4947** (answerphone).Page 309

Appendix A2: Licensing fee structure proposal

1. Additional Licensing fees proposal:

Type of Licence	New			Renewal		
	Part 1	Part 2	Total	Part 1	Part 2	Total
Fee	£1023	£838	£1861	£808	£662	£1470
Discount for satisfactory certificates	n/a	£150	£1711	n/a	£150	£1320
Discount for membership of Rent with Confidence (RWC)	n/a	£150	£1711	n/a	£150	£1320
Discounts for both certificates and RWC	n/a	£150	£1561	n/a	£300	£1170
Found unlicensed fee	n/a	£140	£2001	n/a	£140	£1610

2. Selective Licensing fees proposal:

Type of Licence	New			Renewal
	Part 1	Part 2	Total	
Fee	£467	£445	£912	n/a
Discount for satisfactory certificates	n/a	£150	£762	n/a
Discount for membership of Rent with Confidence (RWC)	n/a	£150	£762	n/a
Discounts for both certificates and RWC	n/a	£150	£612	n/a
Found unlicensed fee	n/a	£140	£1052	n/a

Private Housing Service



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1 Executive Summary

1.1 Proposal to introduce new property licensing schemes in Bristol

Bristol City Council is proposing to introduce a citywide Additional licensing scheme for HMOs (Houses in Multiple Occupation) and a Selective Licensing in Bishopston and Ashley Down, Cotham and Easton wards.

1.2 The consultation

The consultation was open between 29th August 2023 and 7th November 2023 and sought views from the public (including private landlords and private tenants, managing agents and residents, local universities, businesses, and organisations which represent private landlords and tenants) about the proposal.

The consultation sought feedback on:

- the level of support for the proposal
- the licensing fees and proposed rewards
- respondents' experience of any poor management and poor conditions in the scheme area.

The consultation comprised an online consultation survey. Paper copies of the survey and alternative accessible formats were available on request.

The consultation was widely publicised through media, social media and direct communications with the known private landlords and agents and their tenants and other stakeholders, such as residents, landlord and tenant organisations and councillors.

Posters were put up in all libraries and in community centres across Bristol.

Comments, requests, and suggestions received in letters and emails during the consultation were reviewed and considered alongside the survey results.

2 Scope of this report

This report describes the methodology and presents the findings of the consultation. It includes:

- Quantitative data and analysis of free text comments from the xx completed surveys which were received by 7th November 2023.
- Other relevant correspondence by email and petition received between 29th August and 7th November 2023.

This report does not contain the council officers' assessment of the feasibility of any of the suggestions received nor officers' proposals for the delivery of future services, having considered the consultation feedback.

3 How the report will be used

This report will be considered as final proposals are developed by officers. The result of this consultation will be taken into consideration in developing the final proposal that will be considered by the Mayor and Cabinet when they make those decisions. Cabinet decisions will be published through normal procedures for Full Council and Cabinet decisions at democracy.bristol.gov.uk.

4 Consultation - Key findings

4.1 Response rate

1,562 completed surveys were received. 1,559 respondents self-completed it online and 3 completed the survey on paper. 247 emails and 5 organisational submissions were also received.

Of the 1,562 responses about respondent category 570 (36.49%) were private landlords or agents with property in the area, 384 (24.58%) private tenants living in the area, 453 (29%) owner-occupiers and other residents living in the area, and 302 (19.33%) from other interested parties (including councillors, landlords and tenants living outside of the area and landlord organisations).

Figure 1: Respondent category






18. Which of the following best describes your situation? (Please tick all that apply)				
Answer Choices			Response Percent	Response Total
1	A private landlord or managing agent who lets property affected by this proposal (This option includes landlords who live in the property they let)		36.49%	570
2	A private tenant who is living, or has lived, in property affected by this proposal, or someone responding on behalf of a tenant		24.58%	384
3	An owner-occupier or other resident currently living near properties affected by this proposal		29.00%	453
4	Other interested party (e.g. landlord with property outside the proposed areas, landlord organisation, councillor, etc.)		19.33%	302
			answered	1562
			skipped	0

4.2 Views on the proposal to introduce an additional licensing scheme

Of the 1,554 respondents who expressed a view on the proposal to introduce a citywide additional licensing scheme, 817 (52.57%) strongly agreed or agreed, 609 (39.19%) disagreed and 128 (8.24%) neither agreed nor disagreed.

Breaking that down by respondent type – 28.6% of respondents who identified as landlords or agents, 63.8% private tenants, 76.15% owner occupiers and 40.4% Other category agreed or strongly agreed with the additional licensing proposal.

Figure 2: Views on the proposal to introduce an additional licensing scheme






Do you agree or disagree with the proposal for scheme 1 – a citywide additional licensing scheme covering all smaller HMOs?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		34.36%	534
2	Agree		18.21%	283
3	Neither agree nor disagree		8.24%	128
4	Disagree		8.88%	138
5	Strongly disagree		30.31%	471
			answered	1554
			skipped	8

4.3 Views on the proposal to introduce a selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards.

Of the 1550 respondents who expressed a view on the proposal to introduce a selective licensing scheme, 604 (38.96%) agreed, 794 (51.22%) disagreed and 152 (9.81%) neither agreed nor disagreed.

Breaking that down by respondent type – 13.86% of respondents who identified as landlords or agents, 53.9% private tenants, 60.71% owner occupiers and 29.47% Other category agreed or strongly agreed with the selective licensing proposal.






Figure 3: Views on the proposal to introduce a selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards.

Do you agree or disagree with the proposal for scheme 2 – targeted selective licensing in three wards (Bishopston and Ashley Down, Cotham, and Easton)?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		24.19%	375
2	Agree		14.77%	229
3	Neither agree nor disagree		9.81%	152
4	Disagree		13.74%	213
5	Strongly disagree		37.48%	581
			answered	1550
			skipped	12

4.4 Views on whether introducing an additional licensing scheme would help to resolve the poor management and poor conditions of the private rented properties in the city.

Of the 1550 respondents who expressed a view on whether the proposal to introduce an additional licensing scheme would improve poor management and poor conditions in private rented properties in the city, 749 (48.33%) agreed or strongly agreed, 591 (38.13%) disagreed or strongly disagreed and 210 (13.55%) neither agreed nor disagreed.






Figure 4: Views on whether introducing an additional licensing would help to resolve the poor management and poor conditions of private rented properties in the city.

Do you agree or disagree that scheme 1 would help to resolve the poor management and poor conditions of private rented properties in the city?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		21.68%	336
2	Agree		26.65%	413
3	Neither agree nor disagree		13.55%	210
4	Disagree		14.58%	226
5	Strongly disagree		23.55%	365
			answered	1550
			skipped	12

4.5 Views on whether introducing a selective licensing scheme would help to resolve the poor management and poor conditions of private rented properties in the city.

Of the 1553 respondents who expressed a view on whether the proposal to introduce a selective licensing scheme would improve poor management and poor conditions in private rented properties in the city, 592 (38.12%) agreed, 752 (48.42%) disagreed and 209 (13.46%) neither agreed nor disagreed.

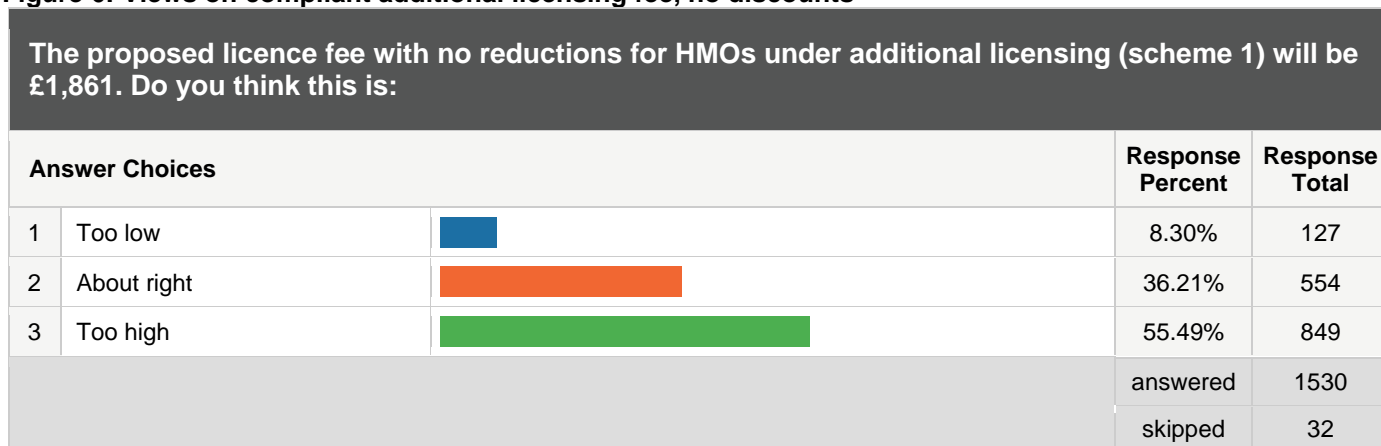
Figure 5: Views on whether introducing a selective licensing would help to resolve the poor management and poor conditions of private rented properties in the city.

Do you agree or disagree that scheme 2 would help to resolve the poor management and poor conditions of private rented properties across the city?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		18.48%	287
2	Agree		19.64%	305
3	Neither agree nor disagree		13.46%	209
4	Disagree		17.00%	264
5	Strongly disagree		31.42%	488
			answered	1553
			skipped	9

4.6 Views on the additional licence fee of £1,861 (without reductions) to license on time

Of the 1530 respondents 127 (8.3%) thought the fee was too low, 554 (36.21%) thought it was about right and 849 (55.49%) thought it was too high.

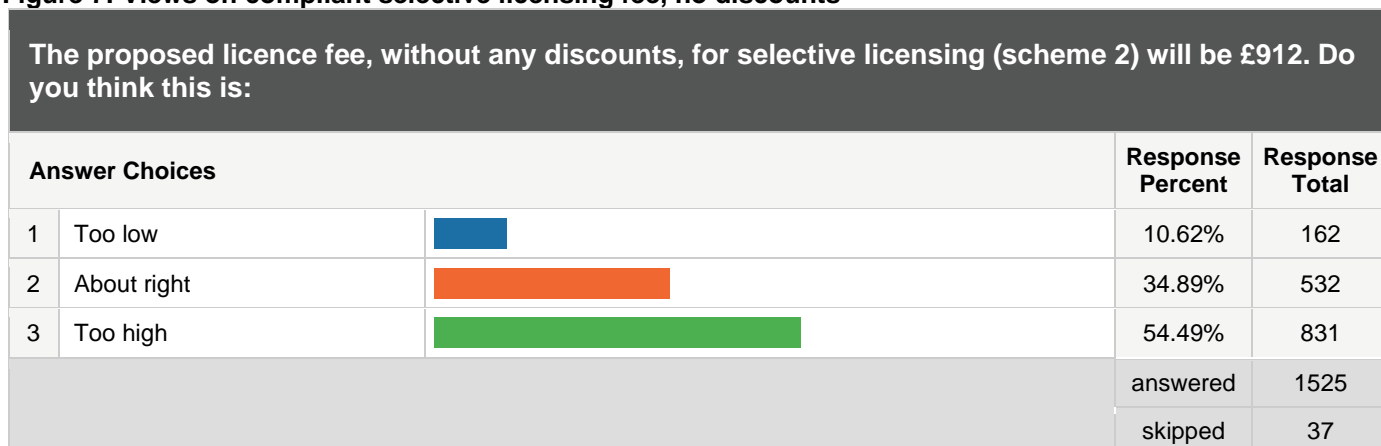
Figure 6: Views on compliant additional licensing fee, no discounts



4.7 Views on the selective licence fee of £912 (without reductions) to license on time

Of the 1525 people who responded to this question, 162 (10.62%) thought the fee was too low, 532 (34.89%) thought it was about right and 831 (54.49%) thought it was too high.

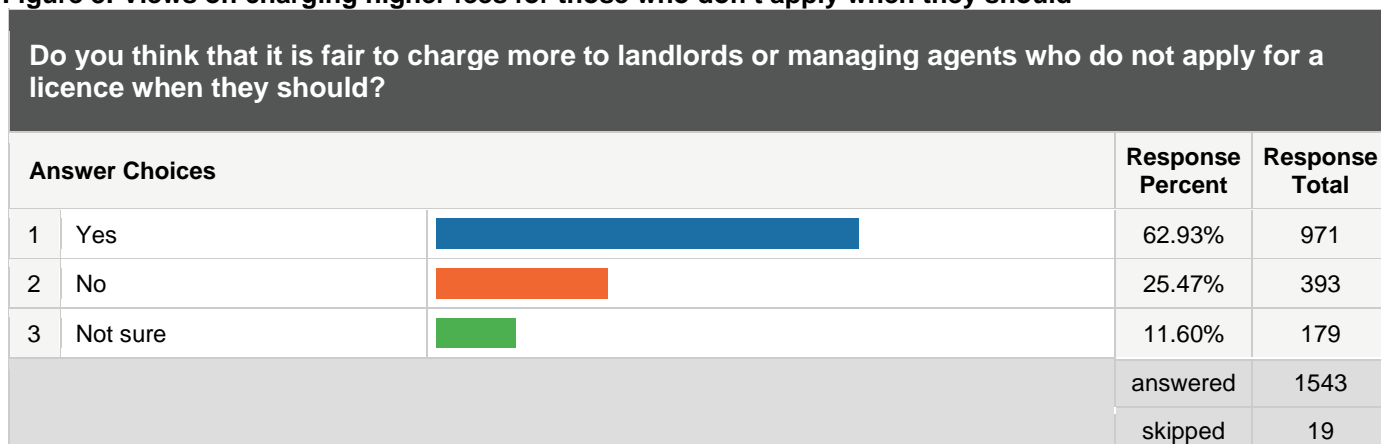
Figure 7: Views on compliant selective licensing fee, no discounts



4.8 Views on whether it is fair to charge more to landlords / agents who don't apply when they should?

Of the 1543 people who responded to this question, 971 (62.93%) said yes it was fair, 393 (25.47%) said no and 179 (11.60%) were not sure.

Figure 8: Views on charging higher fees for those who don't apply when they should



4.9 Views on whether the £140 ‘found fee’ is fair for landlords/agents who do not licence their property on time

Of the 1,376 people who responded to this question, 532 (38.66%) said it was too low; 530 (38.52%) said it was about right and 314 (22.82%) it was too high.

Figure 9: Views on £100 Finder’s Fee for those who do not licence their property on time

Do you think the ‘found fee’ of £140 proposed for landlords/agents who do not license their property on time is:				
Answer Choices			Response Percent	Response Total
1	Too low		33.70%	515
2	About right		34.49%	527
3	Too high		31.81%	486
			answered	1528
			skipped	34

4.10 Views on a discount of £150 for those landlords who provide satisfactory gas safety certificates, electrical condition reports/installation certificates, fire safety (alarm and emergency lighting) and EPCs (where appropriate) on time.

Of the 1536 respondents who expressed a view on whether we should give a discount for satisfactory certificates, 1028 (66.93%) said yes, 349 (22.72%) said no and 159 (10.35%) weren’t sure.




Figure 10: View on discounts for satisfactory certificates submitted on time

Do you agree or disagree that there should be a discount of £150 for those landlords who provide satisfactory certificates on time?				
Answer Choices			Response Percent	Response Total
1	Yes		66.93%	1028
2	No		22.72%	349
3	Not sure		10.35%	159
			answered	1536
			skipped	26

4.11 Views on the proposed discount of £150 for a landlord accredited under an approved Rent with Confidence scheme

Of the 1521 respondents who expressed a view on whether we should give a discount for being an accredited member under the Rent with Confidence scheme, 800 (52.60%) said yes, 410 (26.96%) said no and 311 (20.45%) weren’t sure.

Figure 11: View on discounts for landlords accredited under Rent with Confidence scheme.

Do you agree or disagree that there should be a discount of £150 for a landlord who is accredited under one of our approved Rent with Confidence schemes?			Response Percent	Response Total
Answer Choices			Response Percent	Response Total
1	Yes		52.60%	800
2	No		26.96%	410
3	Not sure		20.45%	311
			answered	1521
			skipped	41

5 Context

The council has a statutory duty to consult for a minimum period of 10 weeks¹ with all people, organisations and businesses that would be affected by the proposal. The consultation was open between 29 August 2023 and 7 November 2023 and sought views from the public (including private landlords and private tenants with property in the proposal area, managing agents and residents, local universities, businesses, and organisations which represent private landlords and tenants) about the proposal.

6 Bristol Corporate Strategy 2022-27

The Corporate Strategy recognises that a warm, secure and affordable home provides a springboard to achieving a high-quality life. It acknowledges that the private rented sector continues to grow, bringing issues such as the insecurity of short-term tenancies and for some poor conditions or tenancy management. The strategy brings together representatives of different housing sectors at the Bristol Homes Board to provide leadership across a range of housing issues, including making improvements to the private rented sector.

7 Bristol's One City Plan – Raising Standards in the Private Rented Sector

Under the One City Plan there is the aim to raise standards in the PRS through the introduction of discretionary licensing schemes.

8 Scope of this report

This consultation report describes the methodology and results of the consultation. It summarises and quantifies the views expressed in the consultation survey responses and in other written correspondence received between 29th August and 7th November 2023.

¹ Duty to consult Section 56 of the Housing Act 2004

9 Methodology

9.1 The Survey

An online consultation survey was available on the city council's Ask Bristol consultation hub. (<https://www.ask.bristol.gov.uk/property-licensing-2023>) between 29th August and 7th November 2023. The online survey pages contained:

- an overview of the consultation proposal.
- links to the Proposal Consultation Information Booklet and the survey questions.
- options to request alternative formats (Easy Read, Audio, Braille large print, language translations and British Sign Language).

The survey questions included six sections:

- Section A: questions for all respondents
- Section B: questions for private landlords and managing agents who let property in the proposal area.
- Section C: questions for private tenants who are living or have lived in the proposal area.
- Section D: questions to owner-occupiers or other residents currently living in the proposal area.
- Section E: questions to other interested parties.
- Section F: equalities monitoring and next steps – all respondents.

Respondents could choose to answer some or all the questions in any order and save and return to the survey later.

9.2 Paper copies

The proposal survey form (questionnaire) and information booklet were produced which together provided all the information that was available online and were made available with Freepost return envelopes by request.

9.3 Alternative formats

The following alternative formats were made available on request:

- Braille
- Large Print
- Easy Read
- Audio file
- British Sign Language (BSL) videos
- Translation to other languages. (No translations were directly requested by citizens)
- Accessible

9.4 Other correspondence

247 emails and 5 submissions from organisations were received and responded to during the consultation.

9.5 Publicity

9.5.1 Objective

The following programme of activity was undertaken to publicise and explain the consultation. The primary objective was to ensure that information was shared across a wide range of channels, reaching as broad a

range of audiences as possible to maximise response rates, including feedback by groups that are often under-represented in surveys.

9.5.2 Bristol City Council channels

Copy and electronic material were shared via the following council and partner channels and networks:

- Item on the mayors blog on 29th August 2023 [Improving the quality of private rented properties across Bristol - The Bristol Mayor](#)
- Ask Bristol newsletter
- Press release to local print, TV, radio media and specialist publications
- Emails to all ward Councillors with publicity material attached
- 20,119 letters were sent to known private landlords, letting agents, private tenants living in the proposed area
- Email to 31,947 private landlords, letting agents and private tenants and 30,066 to owner occupiers.
- Emails sent to all local councillors with publicity material to disseminate to their communities.
- Emails sent to the two Bristol universities and to landlord and tenant organisations including Bristol CAB, CHAS, ACORN, Shelter, BALMA, North Bristol Advice Centre and Bristol City Council's Private Renting Team.
- Emails sent to neighbouring West of England Local Authorities – South Gloucestershire, Bath & North East Somerset, and North Somerset.
- Article in the Landlord Newsletter sent on 30th August 2023 to 6,924 landlords and agents and follow up reminder in the next issue to 7,632 landlords and agents.
- Article in the Tenant Newsletter sent to 35 tenant organisations on 30th August and follow up reminder in next issue.
- Discussion at the Landlord Panel meeting 20th September 2023
- Discussion with Shelter and Acorn tenant organisations
- Discussion with Living Rent Commission tasking group and its members also asked to share details on the consultation
- Link to consultation from property licensing pages of Bristol City Council website throughout 10-week consultation period.
- Posters put up in all 27 libraries and distributed by the Community Development Team to community centres across Bristol and shared electronically through their network to other organisations such as the Community Exchange Network (over 100 organisations) and Avon Task groups
- Social media posts were made throughout the ten-week consultation.

9.5.3 Social Media – posts, outreach, and advertising

Regular posts on Bristol City Council's social media channels (Twitter and Facebook and Nextdoor) were made for the duration of the consultation.

- **Press release 29th August 2023**
- **BBC news item 30th August 2023 - Bristol City Council propose tighter measures for private renting** <https://www.bbc.co.uk/news/uk-england-bristol-66648129>
- **Nextdoor social media:** targeted to the 3 wards had a total of 131 impressions.
- **Paid Facebook and Instagram advertising:** cost £48.47 got 243 clicks and 16,203 impressions .
- **Twitter:** 13 clicks and 3,700 impressions

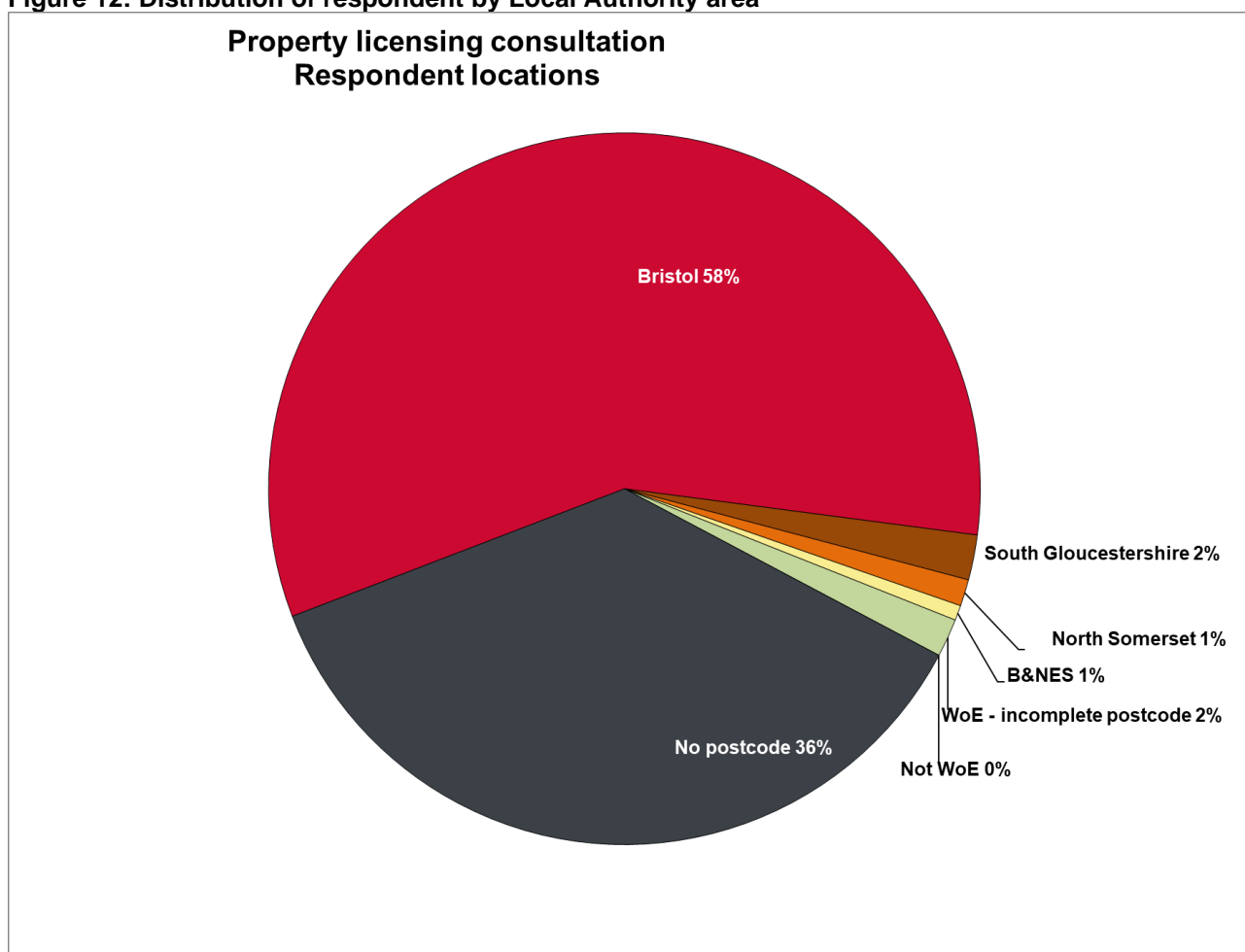
10 Survey Response rate and Respondent characteristics

1,562 completed surveys were received. 1,559 respondents self-completed it online and 3 completed the survey on paper. 247 emails and 5 organisational submissions were also received.

10.1 Geographic distribution of responses

58% of responses were received from postcodes within the Bristol City Council area, 2% were from South Gloucestershire, 1% were from North Somerset, and 1% were from Bath & North East Somerset (B&NES). 2% response was from outside the West of England region and 36% did not provide a postcode.

Figure 12: Distribution of respondent by Local Authority area



10.2 Responses by post codes within Bristol City Council area

Of the 58% responses from within the Bristol City Council area who provided full or partial postcodes from which the ward of origin could be identified.

Figure 13: Geographic distribution of responses

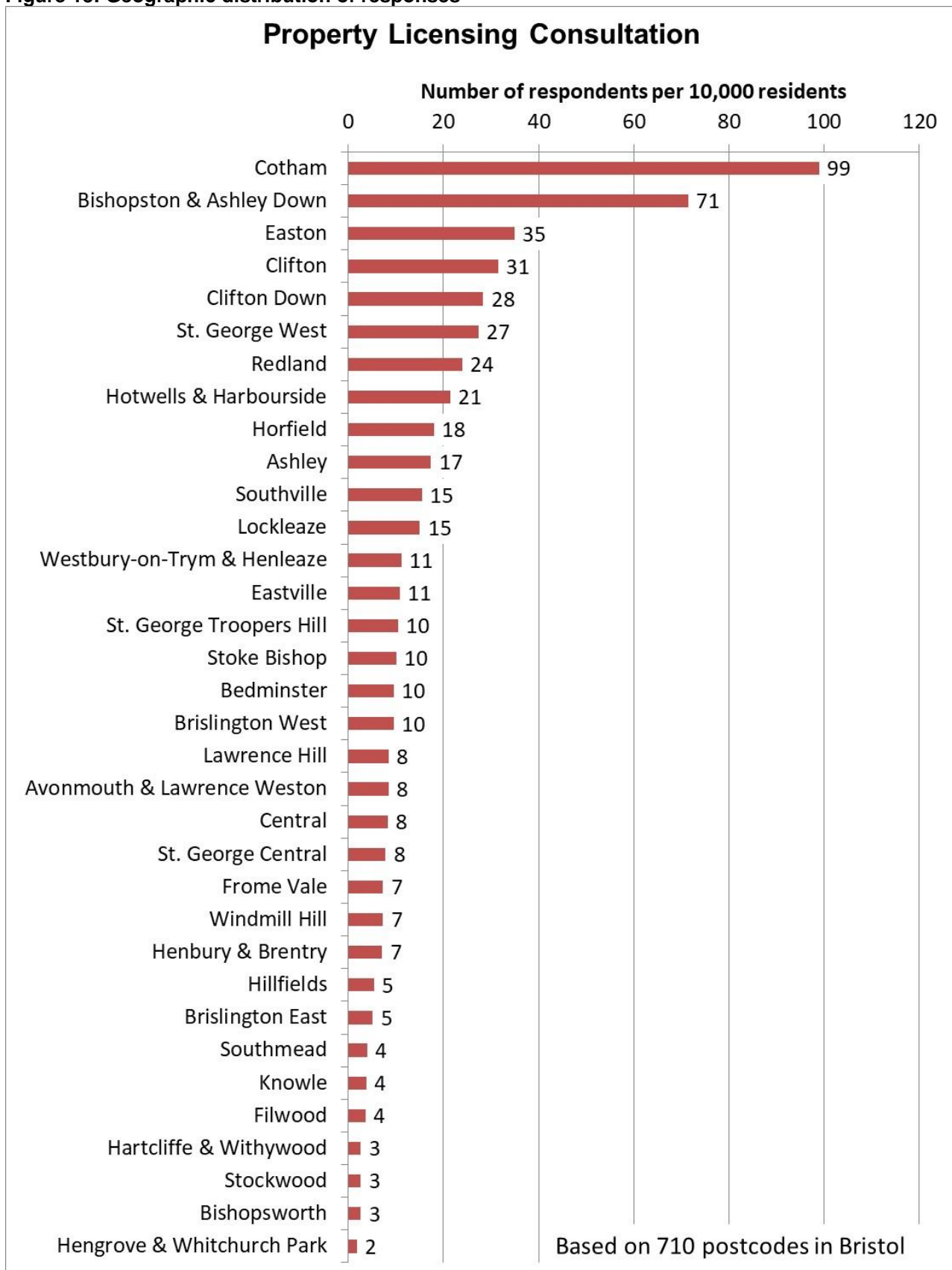
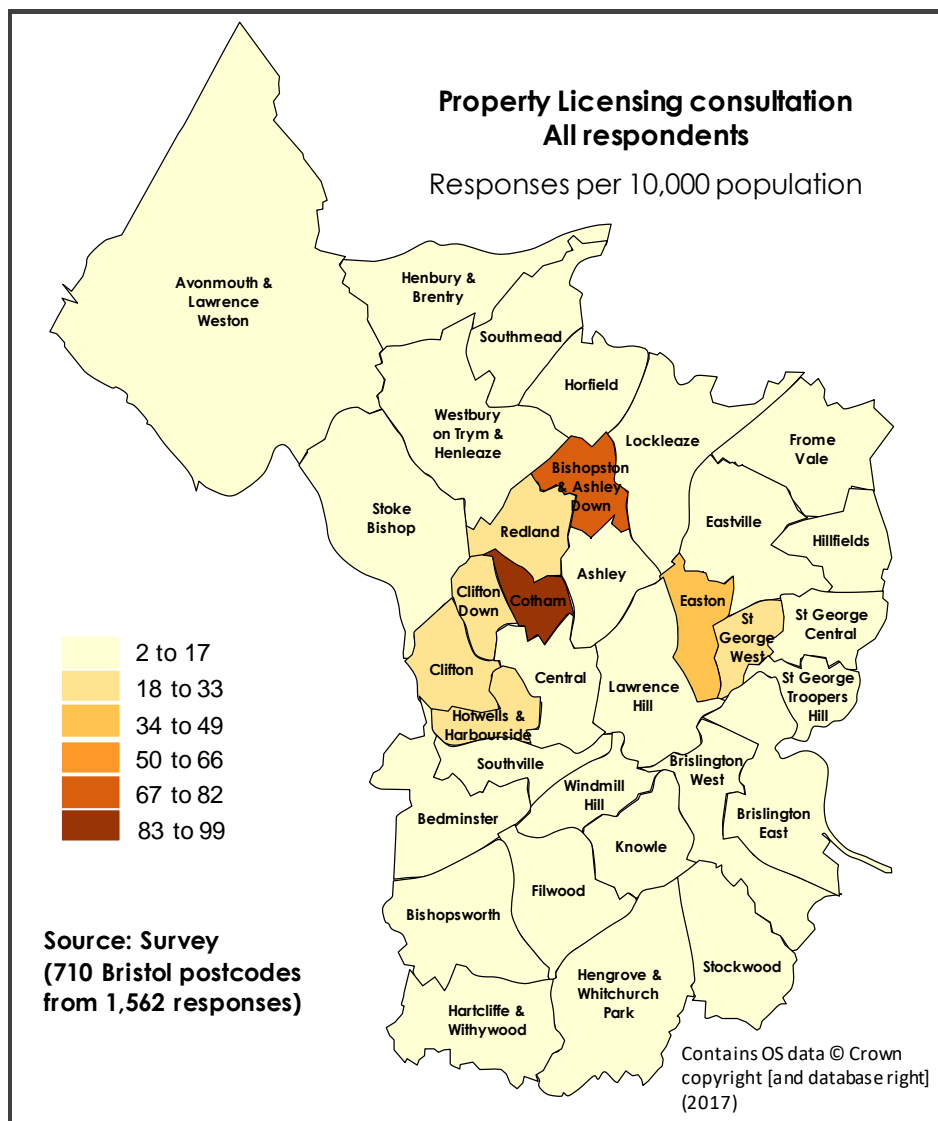


Figure 14: of the 58% of responses from Bristol post codes – distribution by ward



10.3 Characteristics of respondents

Of the 1562 survey responses to this question, 570 (36.49%) described themselves as private landlords or agents with property in the area, 384 (24.58%) private tenants living in the area, 453 (29%) owner-occupiers and other residents living in the area, and 302 (19.33%) from other interested parties (including councillors, landlords and tenants living outside of the area, local businesses, and landlord organisations). Obviously, some respondents identified under more than one category i.e. a landlord who is also an owner occupier living in Bristol.

10.4 Equalities monitoring information

The following Figures 15 - 23 show the equalities characteristics of the respondents, where provided.

Figure 15: What is your age?

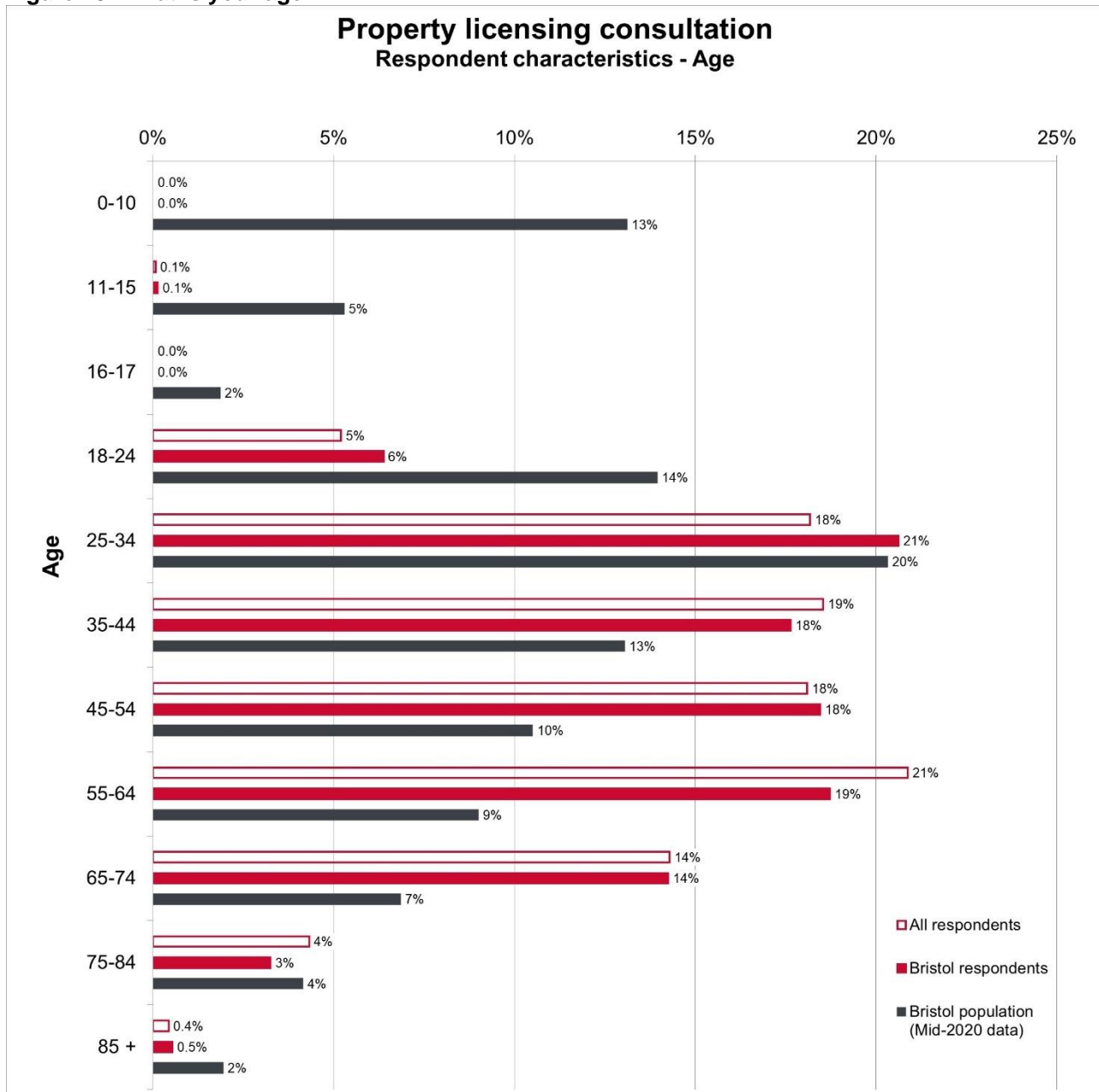


Figure 16: Do you consider yourself to be a disabled person

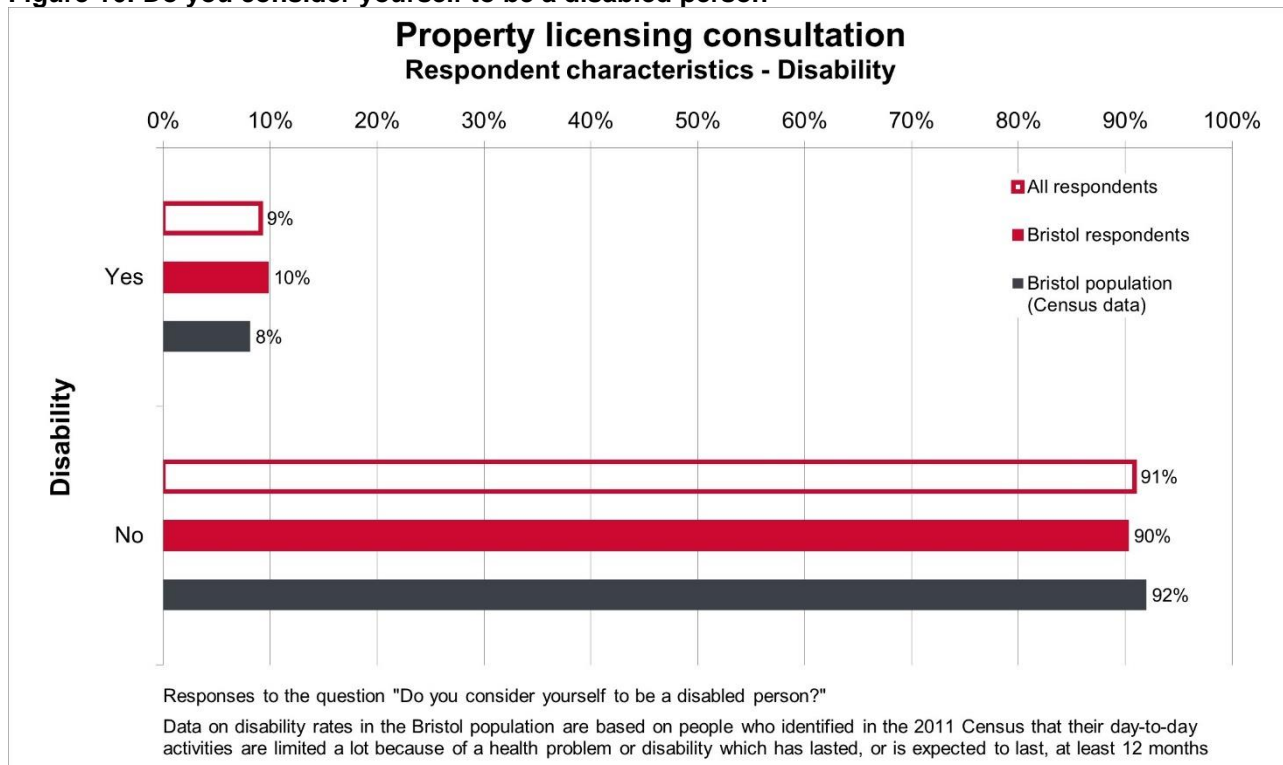


Figure 17: What is your sex?

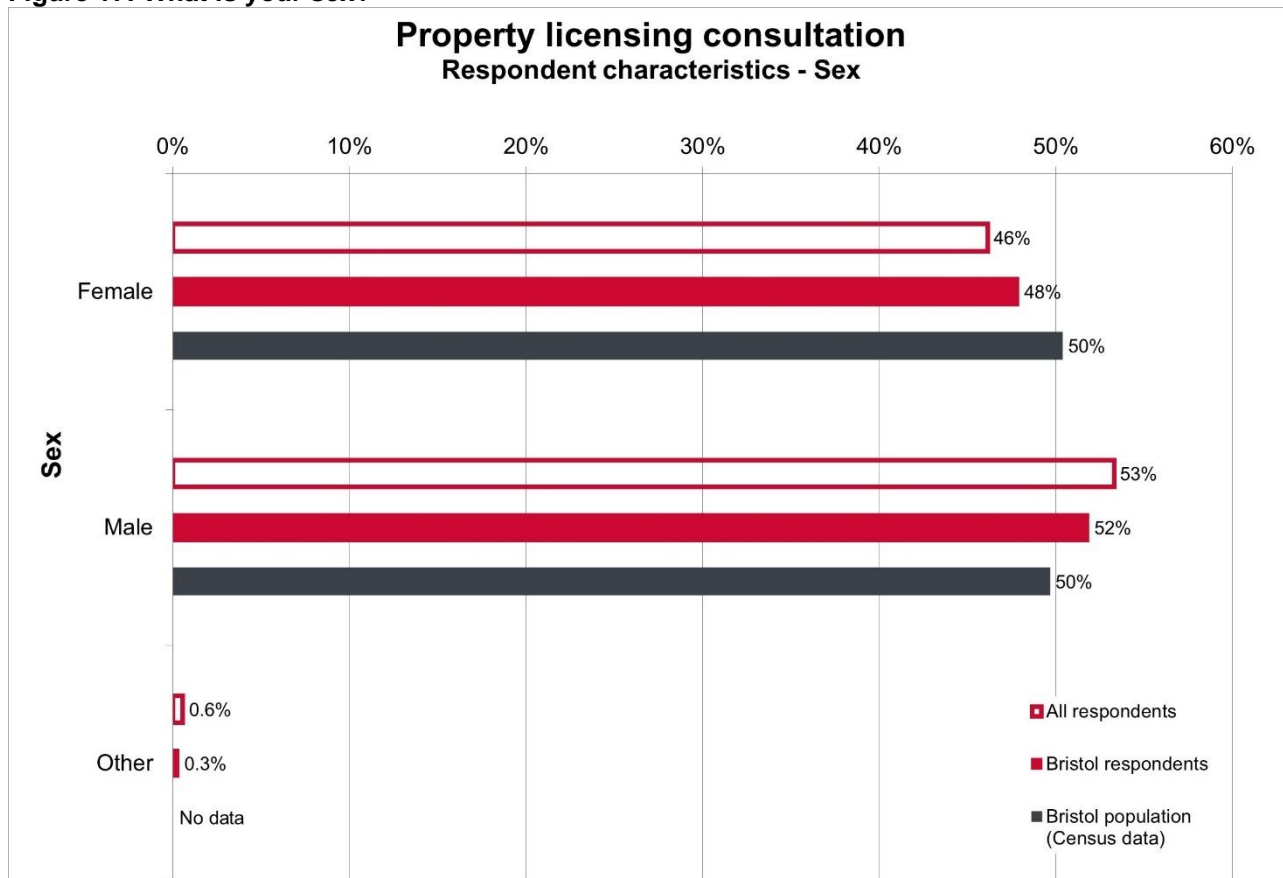


Figure 18: Have you gone through any part of a gender reassignment process, or do you intend to?

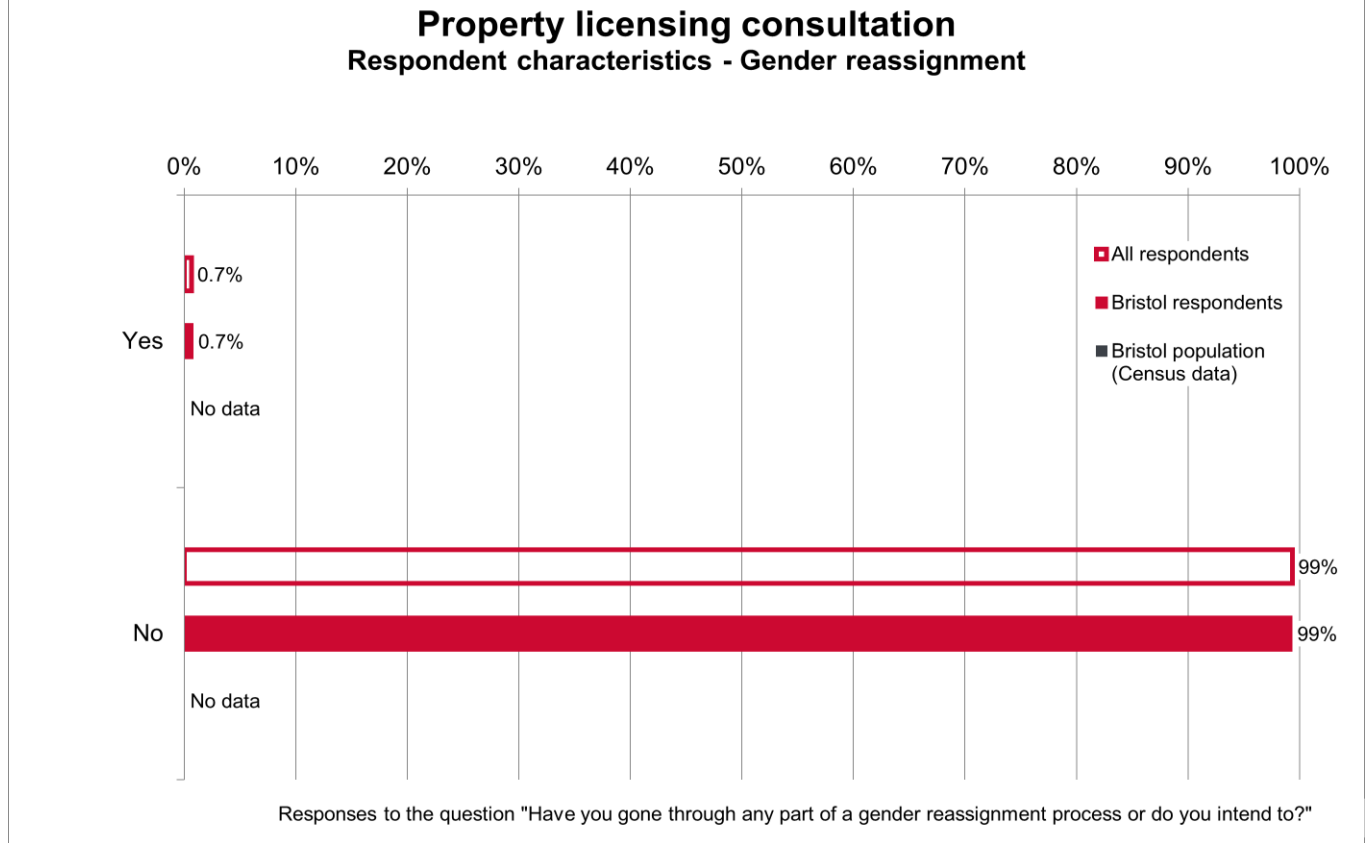


Figure 19: What is your ethnic group?

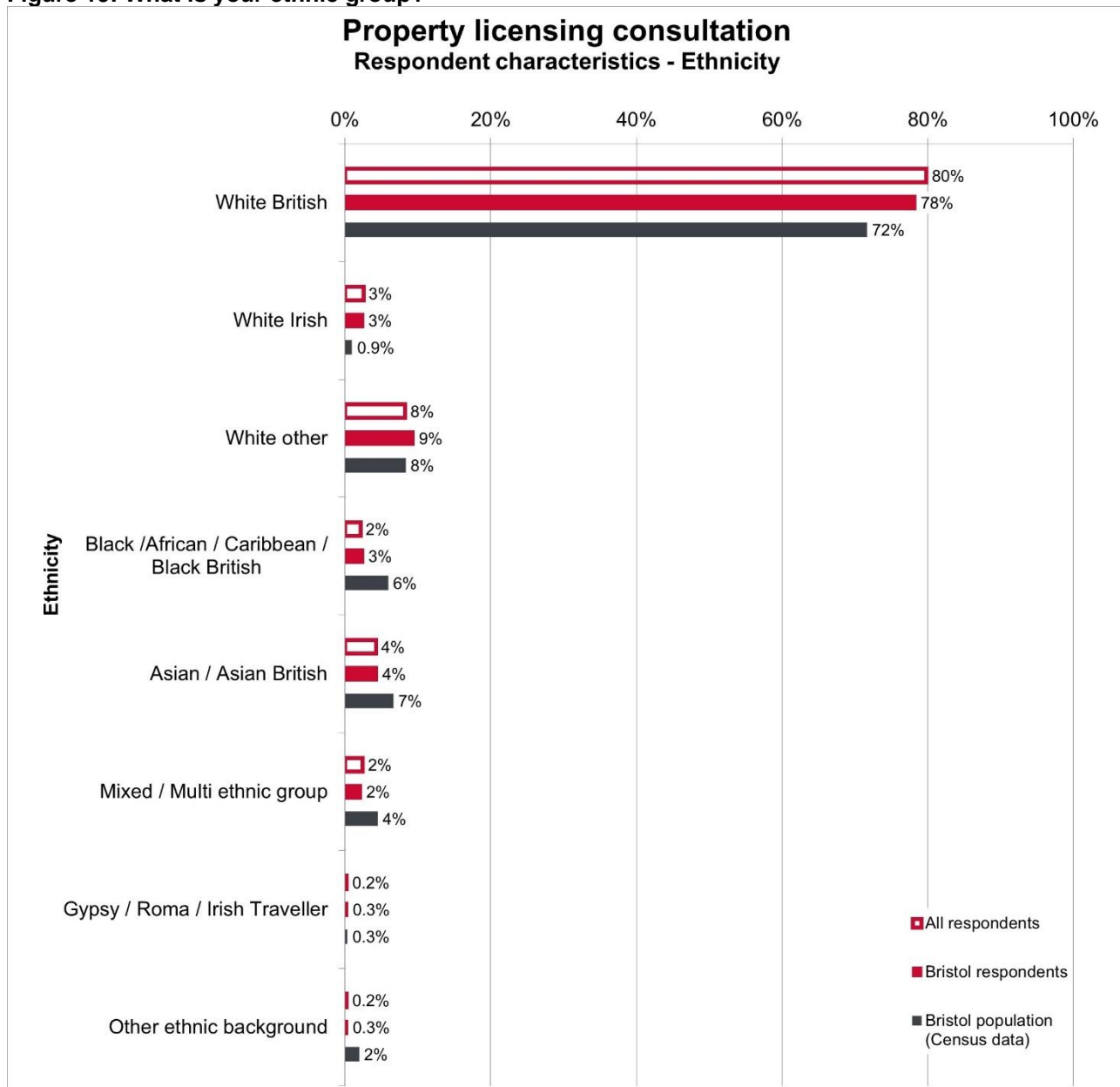


Figure 20: What is your sexual orientation?

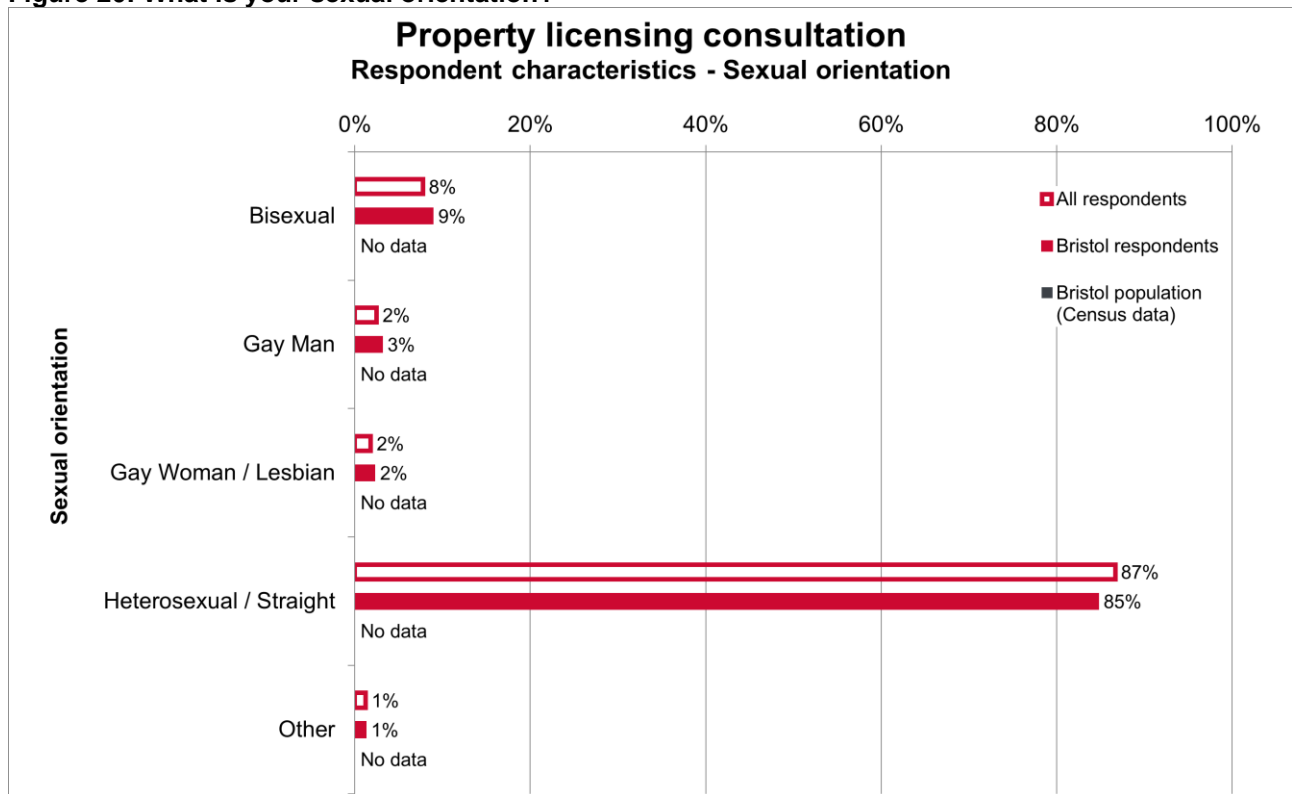


Figure 21: What is your religion / faith?

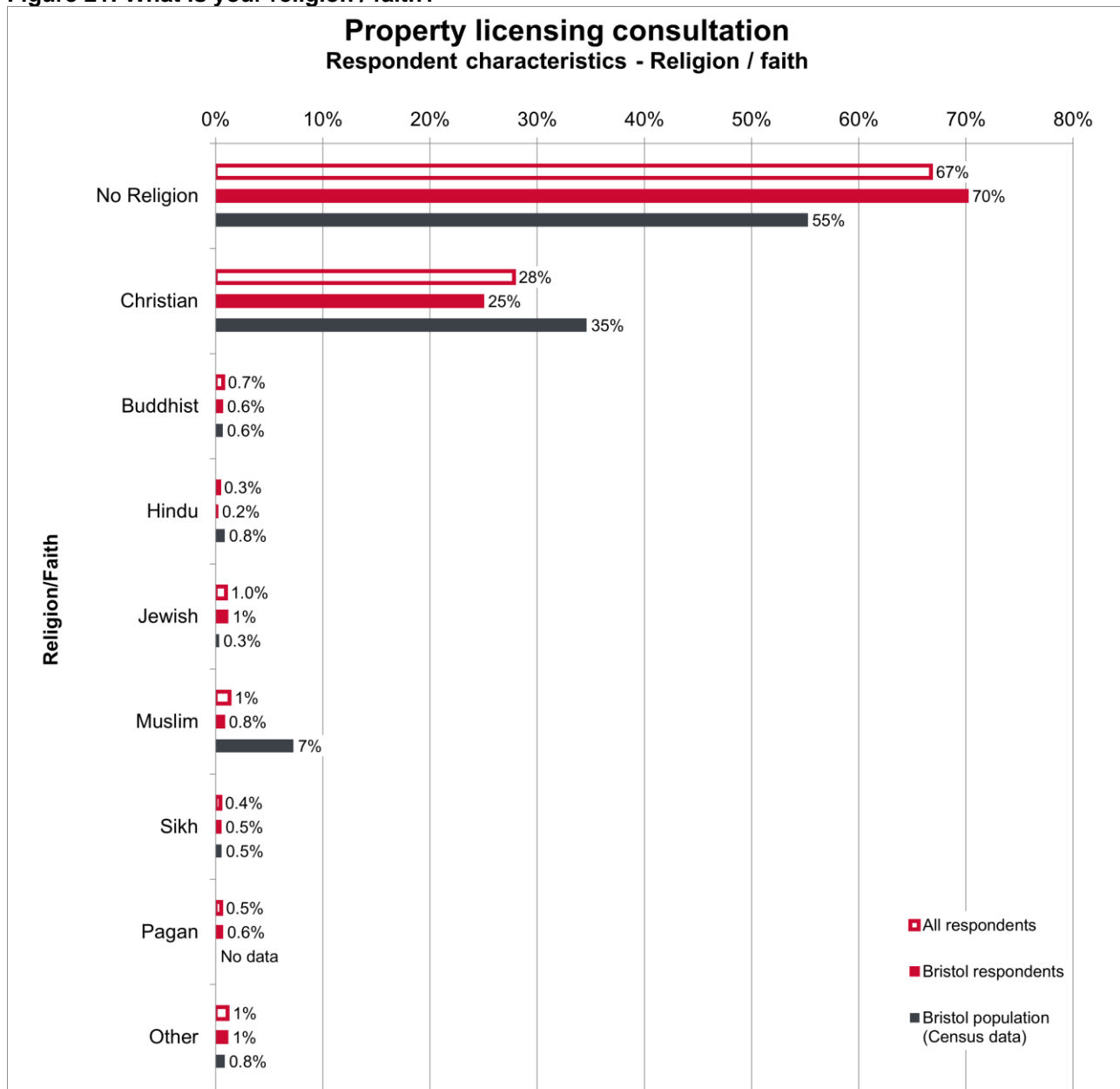


Figure 22: Are you pregnant or have you given birth in the last 26 weeks?

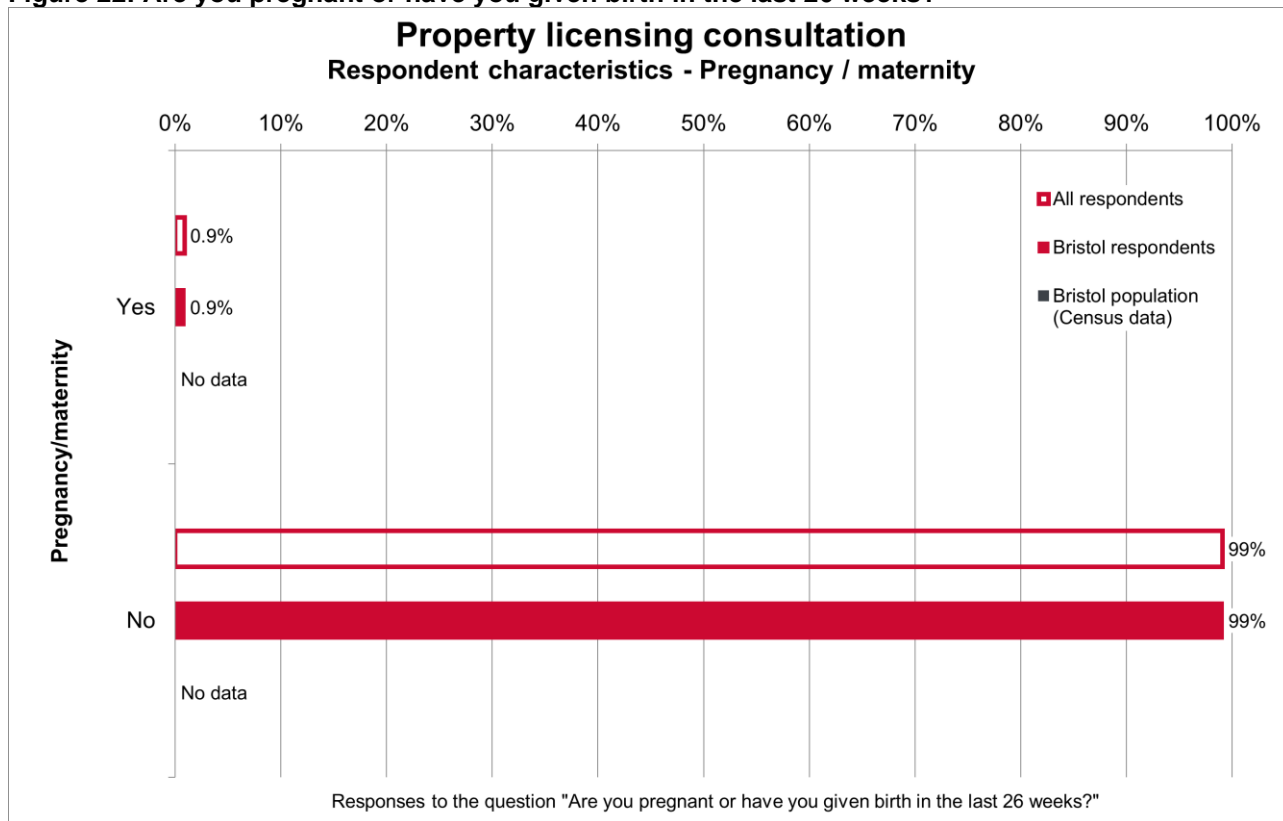
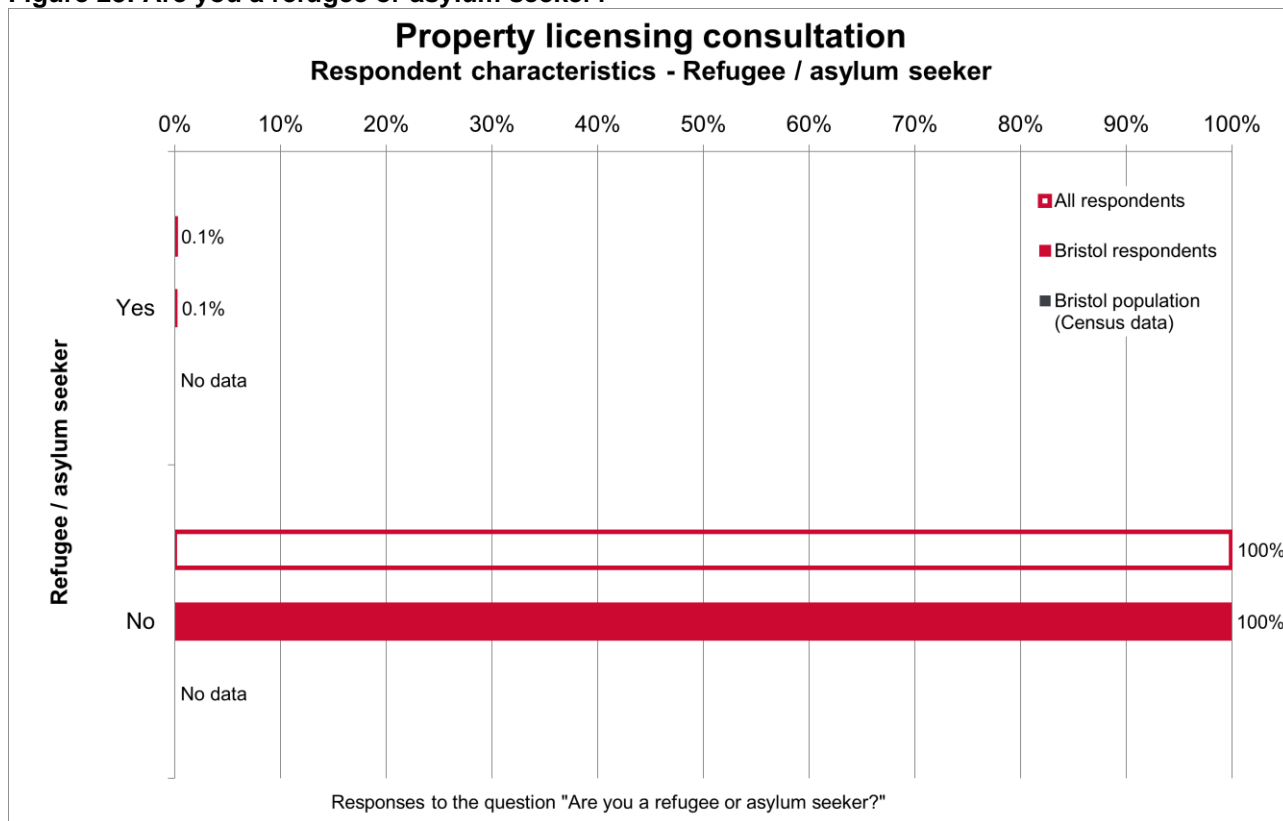


Figure 23: Are you a refugee or asylum seeker?



11 Survey results: Overall views on the proposal






Survey respondents were asked to provide their views on the key commitments using a five-point scale from 'strongly agree' to 'strongly disagree'.

11.1 Respondents were asked if they agreed with the proposal to introduce a citywide additional licensing scheme.

Of the 1554 respondents who expressed a view, 817 (52.57%) agreed or strongly agreed, 609 (39.19%) disagreed or strongly disagreed and 128 (8.24%) neither agreed nor disagreed. 8 skipped the question.

Breaking that down by respondent type – 28.6% of respondents who identified as landlords or agents, 63.8% private tenants, 76.15% owner occupiers and 40.4% Other category agreed or strongly agreed with the additional licensing proposal.

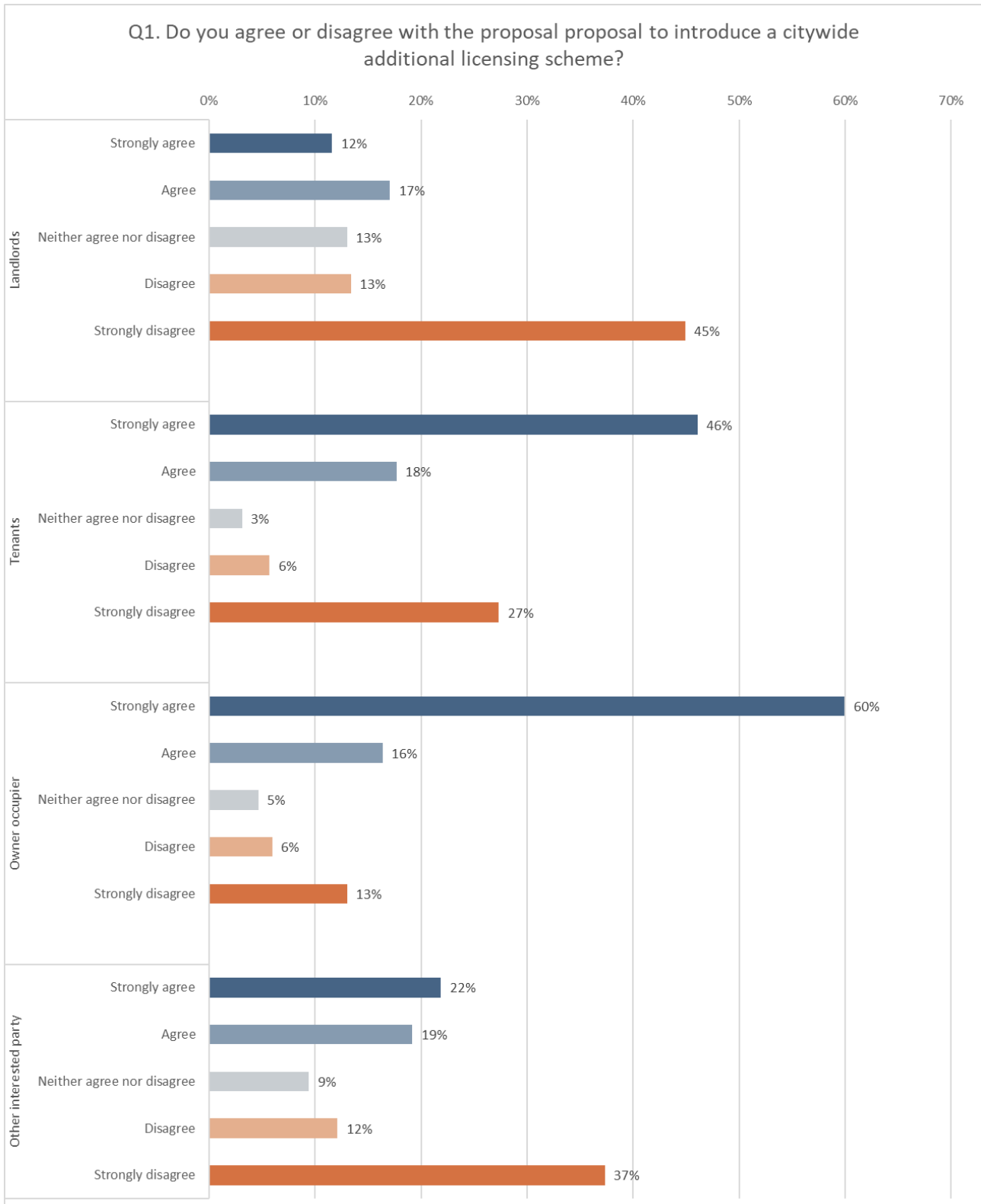
Figure 24: Do you agree or disagree with the proposal for scheme 1 – a citywide additional licensing scheme covering all smaller HMOs?

Do you agree or disagree with the proposal for scheme 1 – a citywide additional licensing scheme covering all smaller HMOs?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		34.36%	534
2	Agree		18.21%	283
3	Neither agree nor disagree		8.24%	128
4	Disagree		8.88%	138
5	Strongly disagree		30.31%	471
			answered	1554
			skipped	8

11.2 Breakdown of views by respondent category on the question do you agree or disagree with the proposal to introduce a citywide additional licensing scheme?

- 12% of landlords / agents with property in the area strongly agreed with the proposal, 17% agreed, 13% neither agreed nor disagreed, 13% disagreed and 45% strongly disagreed.
- 46% of private tenants living or have lived in the area strongly agreed with the proposal, 18% agreed, 3% neither agreed nor disagreed, 6% disagreed and 27% strongly disagreed.
- 60% of owner occupier or other resident living in the area strongly agreed with the proposal, 16% agreed, 5% neither agreed nor disagreed, 6% disagreed and 13% strongly disagreed.
- 22% of other interested parties strongly agreed with the proposal, 19% agreed, 9% neither agreed nor disagreed, 12% disagreed and 37% strongly disagreed.






Figure 28: Breakdown of whether respondents support proposal or not for an additional licensing scheme by respondent category



11.3 Views on whether introducing an additional licensing scheme would help to resolve the poor management and poor conditions of the private rented properties in the city.

Of the 1550 respondents who expressed a view, 749 (48.31%) agreed or strongly agreed, 591 (38.13%) disagreed and 210 (13.55%) neither agreed nor disagreed.

Figure 26: Views on whether introducing an additional licensing scheme would help to resolve the poor management and poor conditions of private rented properties in the city.






Do you agree or disagree that scheme 1 would help to resolve the poor management and poor conditions of private rented properties in the city?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		21.68%	336
2	Agree		26.65%	413
3	Neither agree nor disagree		13.55%	210
4	Disagree		14.58%	226
5	Strongly disagree		23.55%	365
			answered	1550
			skipped	12

11.4 Views on the proposal to introduce a selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards.

Of the 1550 respondents who expressed a view, 604 (38.96%) agreed or strongly agreed, 794 (51.22%) disagreed or strongly disagreed and 152 (9.81%) neither agreed nor disagreed.

Breaking that down by respondent type – 13.86% of respondents who identified as landlords or agents, 53.9% private tenants, 60.71% owner occupiers and 29.47% Other category agreed or strongly agreed with the selective licensing proposal.

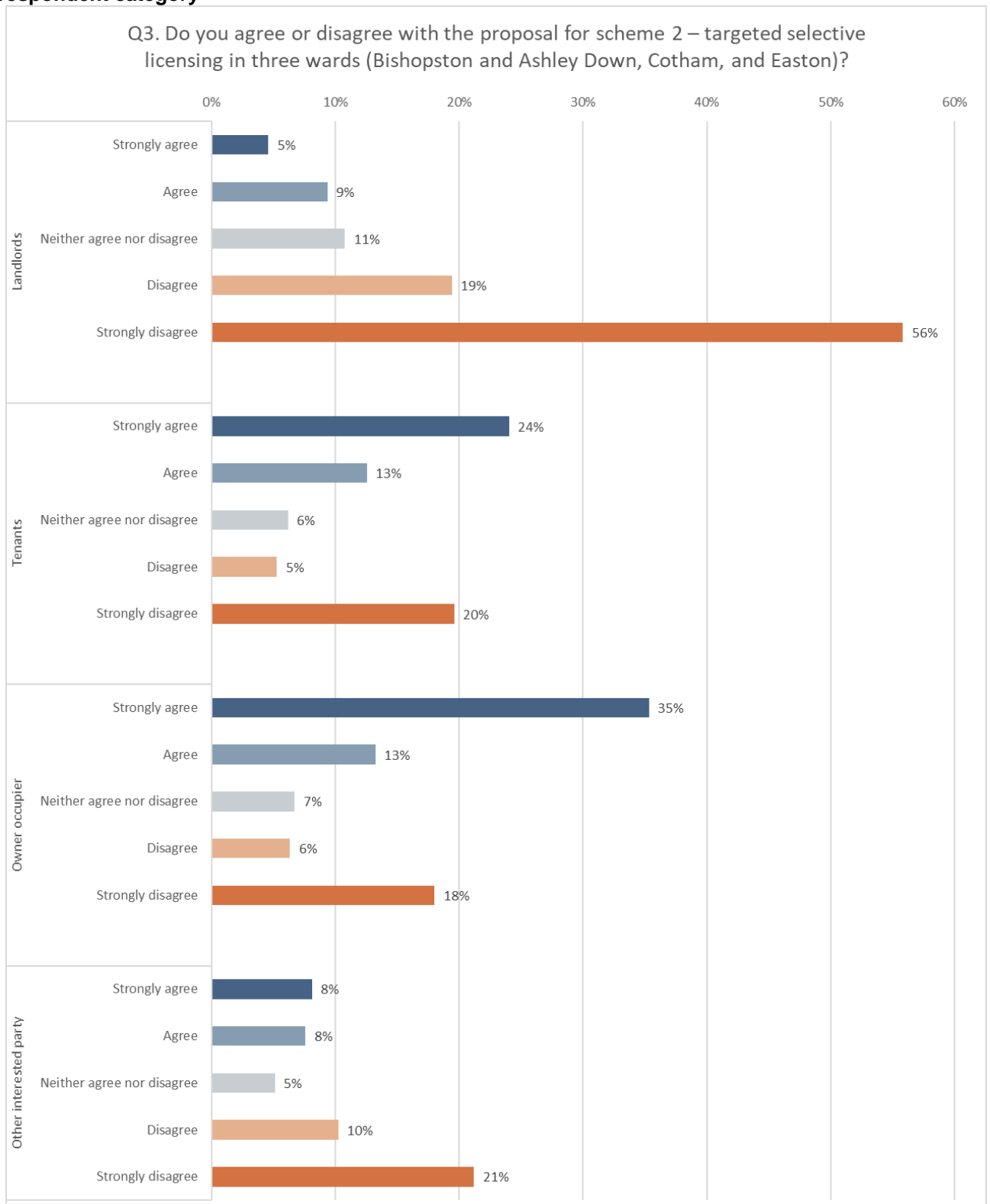
Figure 25: Views on the proposal to introduce a selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards.

Do you agree or disagree with the proposal for scheme 2 – targeted selective licensing in three wards (Bishopston and Ashley Down, Cotham, and Easton)?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		24.19%	375
2	Agree		14.77%	229
3	Neither agree nor disagree		9.81%	152
4	Disagree		13.74%	213
5	Strongly disagree		37.48%	581
			answered	1550
			skipped	12

11.5 Breakdown of views by respondent category on the question do you agree or disagreed with the proposal to introduce a targeted selective licensing scheme?

- 5% of landlords / agents with property in the area strongly agreed with the proposal, 9% agreed, 11% neither agreed nor disagreed, 19% disagreed and 56% strongly disagreed.
- 36% of private tenants living or have lived in the area strongly agreed with the proposal, 19% agreed, 9% neither agreed nor disagreed, 8% disagreed and 29% strongly disagreed.
- 44% of owner occupier or other resident living in the area strongly agreed with the proposal, 17% agreed, 8% neither agreed nor disagreed, 8% disagreed and 23% strongly disagreed.
- 16% of other interested parties strongly agreed with the proposal, 15% agreed, 10% neither agreed nor disagreed, 20% disagreed and 41% strongly disagreed.

Figure 29: Breakdown of whether respondents support proposal or not for a selective licensing scheme by respondent category



11.6 Views on whether introducing a selective licensing scheme would help to resolve the poor management and poor conditions of private rented properties in the city.

Of the 1553 respondents who expressed a view on whether the proposal to introduce a selective licensing scheme would improve poor management and poor conditions in private rented properties in the city, 592 (38.12%) agreed, 752 (48.42%) disagreed and 209 (13.46%) neither agreed nor disagreed.

Figure 5: Views on whether introducing a selective licensing would help to resolve the poor management and poor conditions of private rented properties in the city.

Do you agree or disagree that scheme 2 would help to resolve the poor management and poor conditions of private rented properties across the city?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		18.48%	287
2	Agree		19.64%	305
3	Neither agree nor disagree		13.46%	209
4	Disagree		17.00%	264
5	Strongly disagree		31.42%	488
			answered	1553
			skipped	9

11.7 Views on the additional licence fee of £1,861 (without reductions) to license on time

Of the 1530 respondents 127 (8.3%) thought the fee was too low, 554 (36.21%) thought it was about right and 849 (55.49%) thought it was too high.

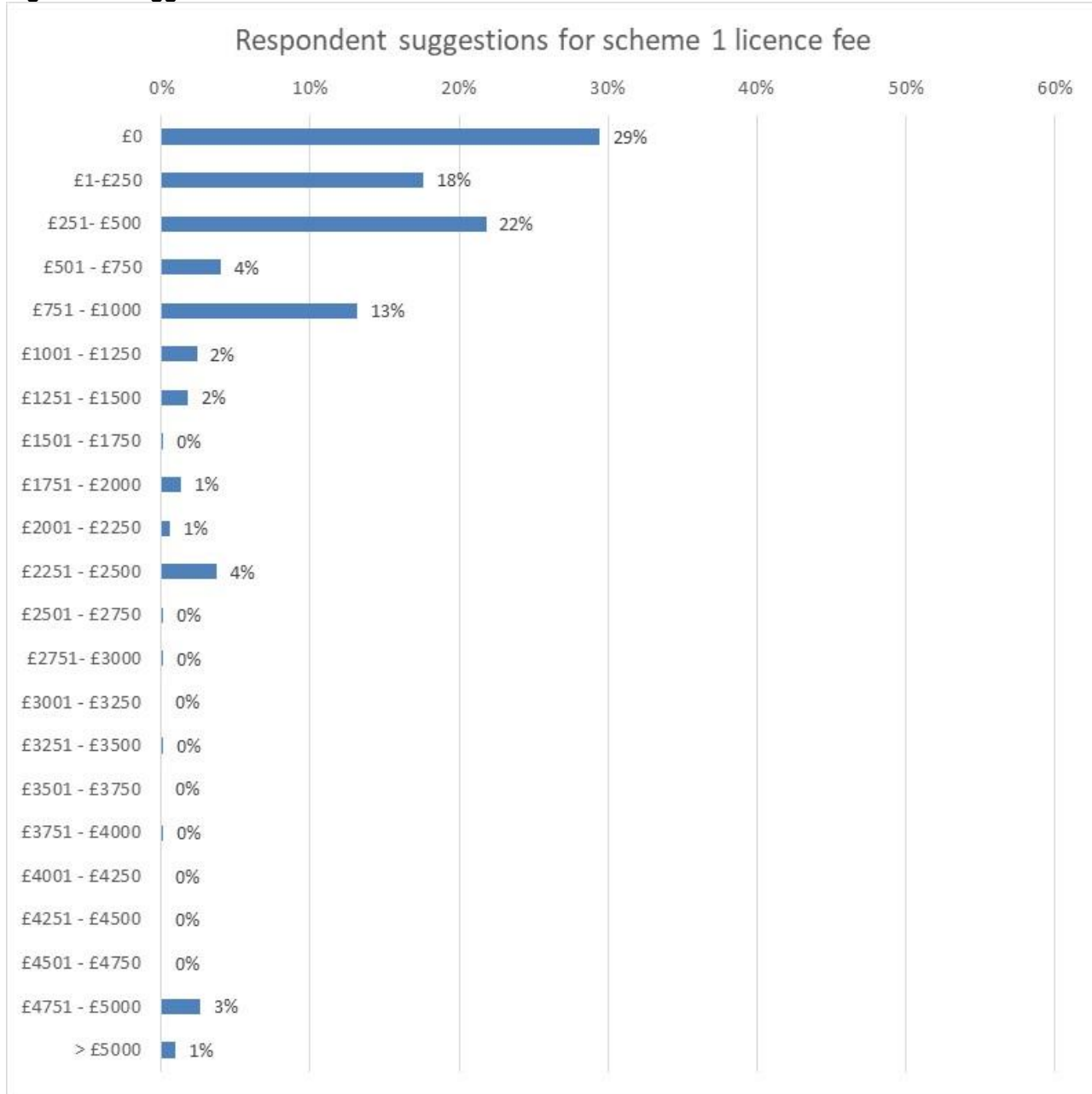
Figure 30: Views on compliant additional licensing fee, no discounts

The proposed licence fee with no reductions for HMOs under additional licensing (scheme 1) will be £1,861. Do you think this is:				
Answer Choices			Response Percent	Response Total
1	Too low		8.30%	127
2	About right		36.21%	554
3	Too high		55.49%	849
			answered	1530
			skipped	32

11.8 Views on alternative fee levels for additional licence applications

911 responded offering an alternative fee level as in the table below.




Figure 31: Suggestions on alternative fee levels



11.9 Views on the selective licence fee of £912 (without reductions) to license on time

Of the 1525 people who responded to this question, 162 (10.62%) thought the fee was too low, 532 (34.89%) thought it was about right and 831 (54.49%) thought it was too high.

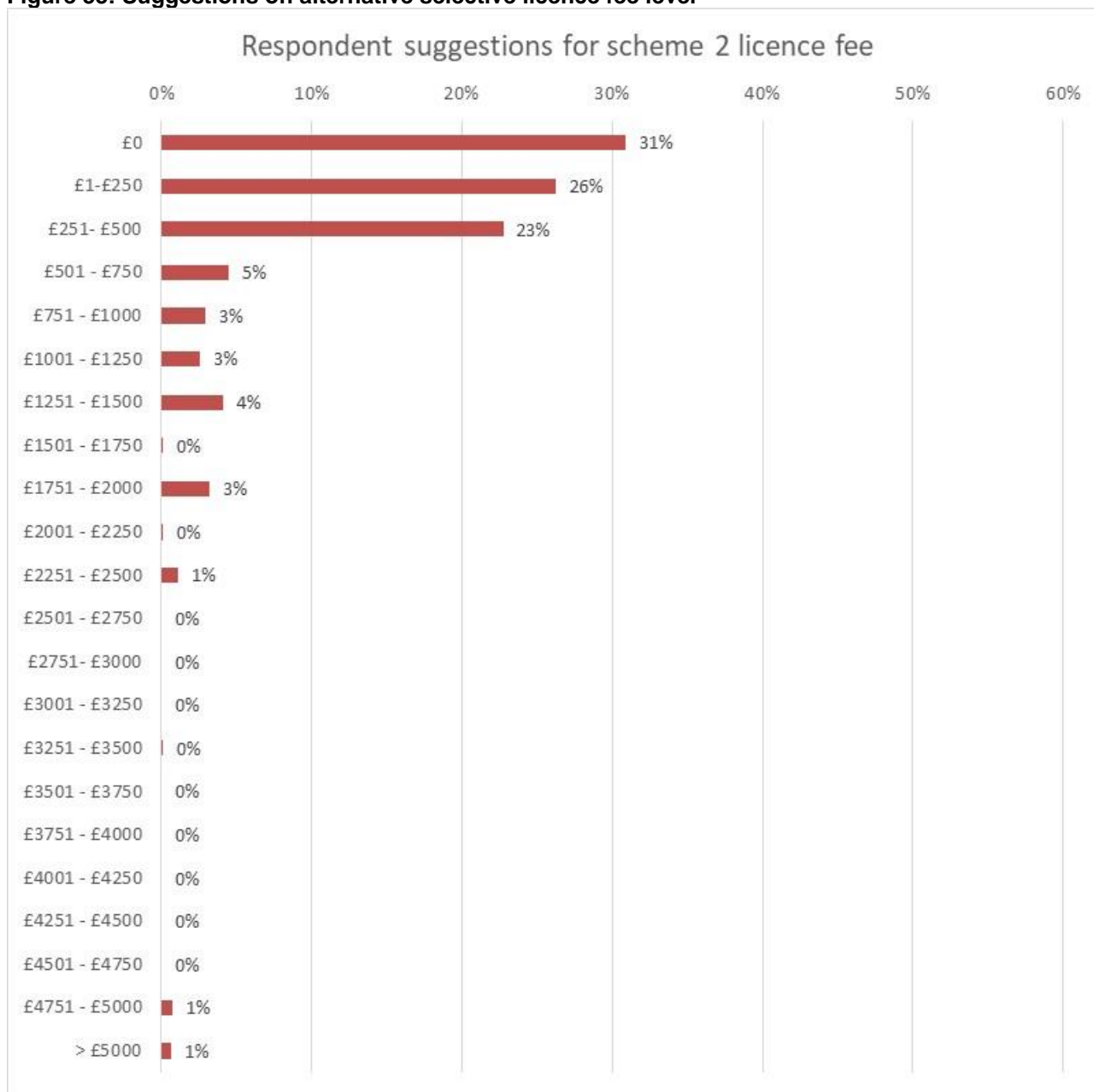
Figure 32: Views on compliant selective licensing fee, no discounts

The proposed licence fee, without any discounts, for selective licensing (scheme 2) will be £912. Do you think this is:				
Answer Choices			Response Percent	Response Total
1	Too low		10.62%	162
2	About right		34.89%	532
3	Too high		54.49%	831
			answered	1525
			skipped	37

11.10 Views on alternative fee levels for selective licence applications

943 responded offering an alternative fee level as in the table below.

Figure 33: Suggestions on alternative selective licence fee level



11.11 Views on whether it is fair to charge more to landlords / agents who don't apply when they should?

Of the 1543 people who responded to this question, 971 (62.93%) said yes it was fair, 393 (25.47%) said no and 179 (11.6%) were not sure.

Figure 34: Views on charging higher fees for those who don't apply when they should

Do you think that it is fair to charge more to landlords or managing agents who do not apply for a licence when they should?				
Answer Choices			Response Percent	Response Total
1	Yes		62.93%	971
2	No		25.47%	393
3	Not sure		11.60%	179
			answered	1543
			skipped	19

11.12 Views on whether the £140 'found fee' is fair for landlords/agents who do not licence their property on time

Of the 1528 people who responded to this question, 515 (33.7%) said it was too low; 527 (34.49%) said it was about right and 486 (31.81%) it was too high.

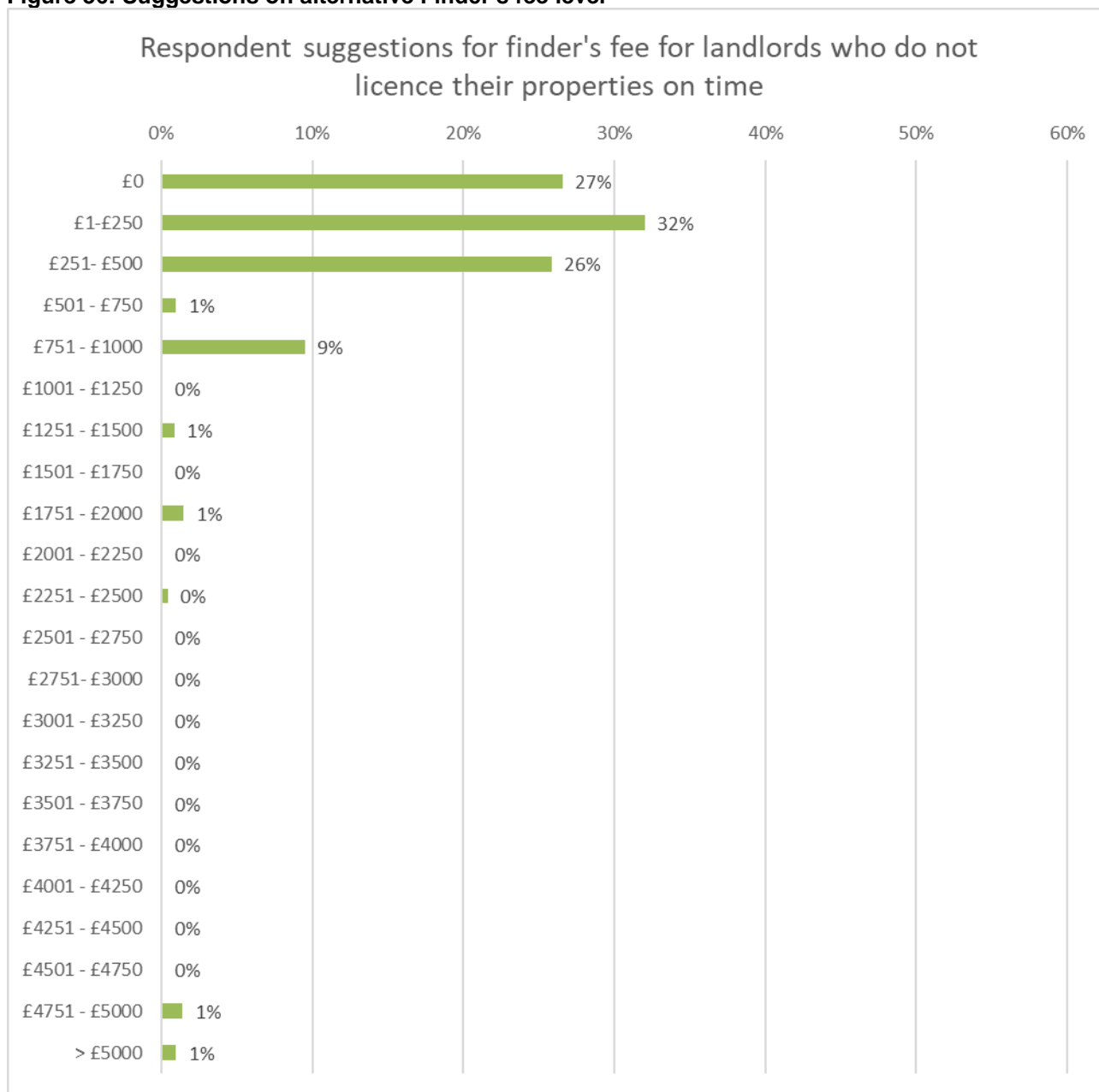
Figure 35: Views on £100 Finder's Fee for those who do not licence their property on time

Do you think the 'found fee' of £140 proposed for landlords/agents who do not license their property on time is:				
Answer Choices			Response Percent	Response Total
1	Too low		33.70%	515
2	About right		34.49%	527
3	Too high		31.81%	486
			answered	1528
			skipped	34

11.13 Views on alternative finder's fee levels

943 responded offering an alternative finder's fee level as in the table below. 27% suggested that no fee should be payable, 32% suggested that the fee should be between £1 to £250, 26% suggested between £251 and £500; 1% suggested between £501-£750, 9% suggested between £751 - £1,000. The other 5% ranged from £1,251 to more than £5,000




Figure 36: Suggestions on alternative Finder's fee level



11.14 Views on a discount of £150 for those landlords who provide satisfactory gas safety certificates, electrical condition reports/installation certificates, fire safety (alarm and emergency lighting) and EPCs (where appropriate) on time.

Of the 1536 respondents who expressed a view on whether we should give a discount for satisfactory certificates, 1028 (66.93%) said yes, 349 (22.72%) said no and 159 (10.35%) weren't sure.

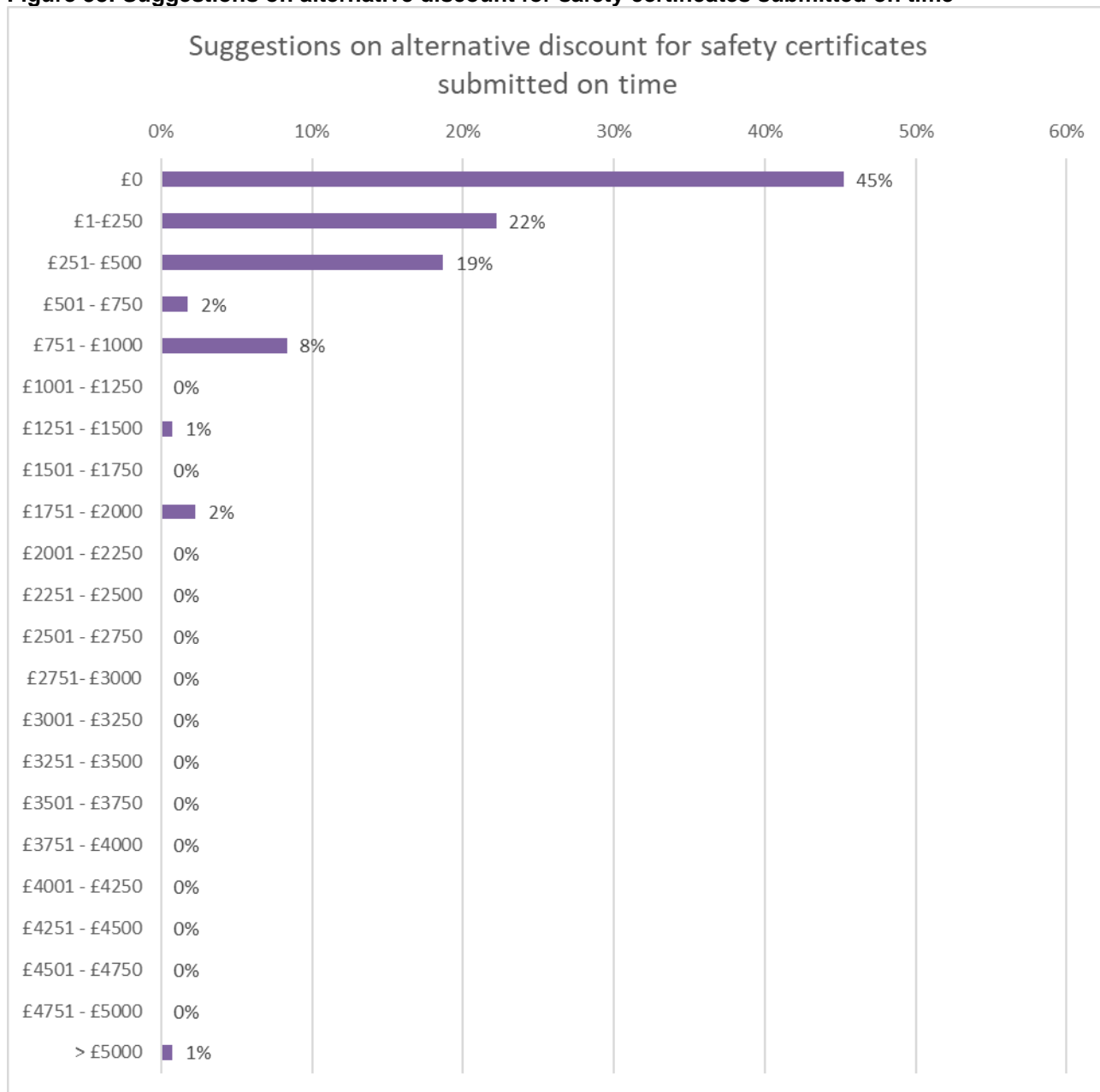
Figure 37: View on discounts for satisfactory certificates submitted on time

Do you agree or disagree that there should be a discount of £150 for those landlords who provide satisfactory certificates on time?				
Answer Choices			Response Percent	Response Total
1	Yes		66.93%	1028
2	No		22.72%	349
3	Not sure		10.35%	159
			answered	1536
			skipped	26

11.15 Views on alternative fee levels for discount for submitting safety certificates on time

398 responses as per the table below offering an alternative discount. 45% of those who suggested an alternative discount for submitting safety certificates on time said there should be no discount, 22% said the discount should be between £1 and £250, 19% said between £251 and £500, 2% said between £501 and £750, 8% said the discount should be between £751 and £1,000. The remaining 4% said discounts should be ranging from £1,251 to over £5,000.

Figure 38: Suggestions on alternative discount for safety certificates submitted on time



11.16 Views on the proposed discount of £150 for a landlord accredited under an approved Rent with Confidence scheme

Of the 1521 respondents who expressed a view on whether we should give a discount for being an accredited member under the Rent with Confidence scheme, 800 (52.60%) said yes, 410 (26.96%) said no and 311 (20.45%) weren't sure.

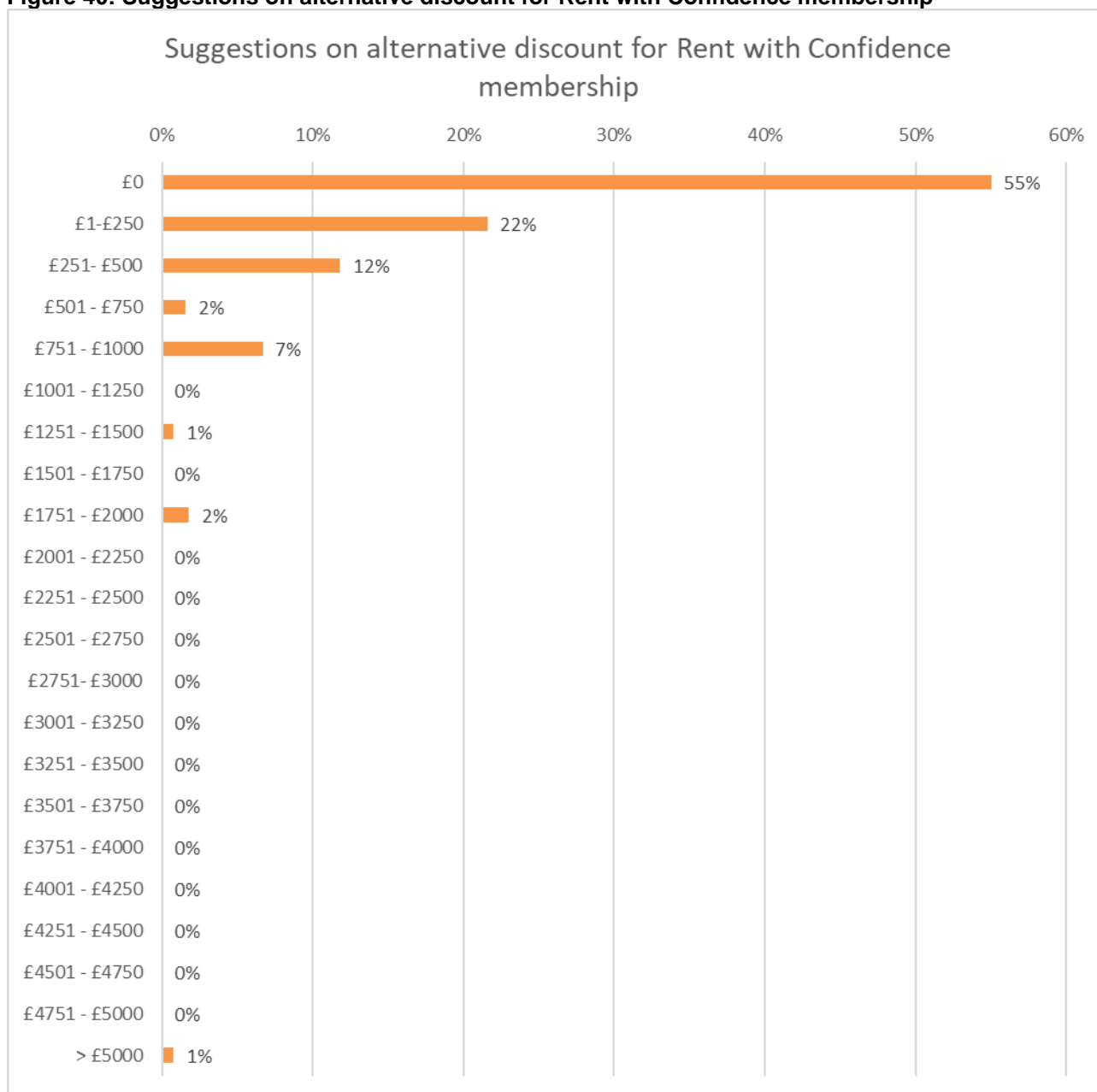
Figure 39: View on discounts for landlords accredited under Rent with Confidence scheme

Do you agree or disagree that there should be a discount of £150 for a landlord who is accredited under one of our approved Rent with Confidence schemes?			Response Percent	Response Total
1	Yes		52.60%	800
2	No		26.96%	410
3	Not sure		20.45%	311
			answered	1521
			skipped	41

11.17 Views on alternative discount for Rent with Confidence membership

390 responded as per the table below offering an alternative discount.

Figure 40: Suggestions on alternative discount for Rent with Confidence membership



11.18 Any other comments about the proposals?

All respondents were asked if they had any other comments to make about the proposal for additional licensing. Of the 1562 people who responded to the consultation, 926 (59%) respondents left free text comments about the Additional Licensing scheme proposal and 976 (62%) about the selective licensing scheme proposal which are categorised and summarised together below:

11.18.1 Against the proposals – 47% of all Additional licensing comments and 57% of selective licensing comments were on this subject with such comments as:

- It's unnecessary
- The council should use existing powers to deal with rogue landlords
- Licensing punishes good landlords just to deal with rogue landlords
- Licensing is stifling the rental market
- Rogue landlords will operate HMOs below the radar to avoid paying a licence fee
- Tenants are most badly affected by this
- It's a waste of time
- It's simply increases the costs for landlords which are passed on to tenants
- A citywide scheme will negatively impact the rental market and increase homelessness
- Completely anti landlord
- Bureaucratic overkill to licence non-HMOs
- This is out of touch with the needs of the public

11.18.2 Support the proposals – 23% of all Additional licensing comments and 12% of selective licensing comments were on this subject with comments such as:

- A welcome scheme especially for HMOs
- All private rented properties should be licensed
- Landlords should be forced to make their properties habitable
- Rogue landlords put up rent but don't look after the property
- Expansion of licensing schemes seems beneficial
- I agree with the premise, but worried landlords will put the rent up
- I think it's a wonderful idea
- HMOs need particular attention as they contribute to urban blight through low standards
- I fully support rooting out bad landlords
- This needs to be enforced and bad landlords held accountable
- HMOs are associated with anti-social behaviour and need licensing
- Makes total sense
- We need more safe homes for families
- Poor quality accommodation is not just a problem in HMOs
- Anything to prevent sub-standard rental accommodation is a good thing

11.18.3 Licensing is forcing landlords to leave the market – 28% of all Additional licensing comments and 27% of selective licensing comments were on this subject with comments such as:

- This is the final straw for landlords who have had enough of government bureaucracy and the additional costs of letting a property
- This will lead to increased homelessness as more landlords leave the market

- I would rather now let as an Airbnb as private renting is no longer worth the hassle
- I will sell all my properties in Bristol and buy elsewhere
- This is not the right time to be doing this and will result in negatively impacting the market as landlords sell up
- The PRS is already contracting at an alarming rate, and this will just make it worse
- Landlords are already struggling financially and will leave the market as it is no longer viable
- The council should be helping landlords not driving them away
- This will lead to more evictions and homelessness
- Before Bristol Council extends this scheme, it needs to look closely at the impact this has had on the supply : demand ratio.

11.18.4 This will lead to increased rents - 36% of all Additional licensing comments and 37% of selective licensing comments were on this subject such as:

- Tenants are already struggling with high rents, and this will make it worse
- Tenants who cannot afford the likely higher rents will be made homeless
- Renters will be significantly harmed if landlords are forced to get a licence as they would inevitably pass the costs on to the tenant
- This will lead to less homes available to rent and those that are left will increase rent as demand will increase even more

11.18.5 Fees are too high - 11% of all Additional licensing comments and 12% of selective licensing comments were on this subject such as:

- The fees are unreasonable
- Landlords get nothing out of this but have to pay such a high fee
- These fees are unfair on compliant landlords who already meet standards
- The costs will be passed on to tenants as landlords cannot absorb them
- These fees will force landlords to leave the market
- There shouldn't be discounts to landlords for doing the bare minimum
- Those who comply with the law are being penalised by being made to pay for those who don't
- It's impossible to comment on these fees without more information
- Fees should be based on property size not a blanket fee
- One of the highest fee rates in England
- The cost of new licences should be higher but renewals much lower
- The council needs to be more efficient to keep the costs down
- You should be lobbying central government for more funding to do this job
- It would be better if payment of the fees could be staggered to make them more affordable

11.18.6 This is a council money-making scheme - 11% of all Additional licensing comments and 8% of selective licensing comments were on this subject such as:

- The council trying to raise funds and nobody else benefits from it except the council
- The council will take the cash but not fix the problem
- This is a cash driven activity
- Another money-making initiative by Bristol City Council. Totally ridiculous

- It just feels like a way make money but will result in less housing
- This is just another revenue raising exercise by the council
- Licensing schemes are only supposed to cover costs, but you will make a profit.
- This is purely a self-funding distraction
- This is clearly an outrageous council money making scheme targeting private landlords
- Money for old rope for the council

11.18.7 Private Housing will not be able to deliver this scheme — 11% of all Additional licensing comments and 9% of selective licensing comments were on this subject such as:

- This scheme is too big, and you won't be able to deliver it properly
- You need to employ properly qualified officers to inspect properties
- There are not enough staff to properly enforce these schemes
- You still haven't licensed previous scheme applications
- You should just employ an agency to do this – it's bound to be cheaper and more efficient
- If the council did their job properly and monitored the PRS, such schemes would not be necessary
- I do not trust BCC to do anything with common sense
- I have concerns about how the council will be able to resource the schemes
- Council already appears to be overwhelmed with workload from the introduction of previous schemes

11.18.8 The standards are set too high – 3% of all Additional licensing comments and 3% of selective licensing comments were on this subject such as:

- The high standards are difficult for landlords to afford and seem unnecessary
- With fee and these costs, it is very expensive for landlords many of whom are already struggling, so the cost will be passed on as higher rents
- Rather than paying such huge costs for fire doors etc. most landlords will change their operating methods and only let to families or couples, adding to pressures on the rental market
- Some of these works have been caused by bad tenants
- The relentless pressure to try to bring older housing up to standard expected for new build is unrealistic

11.18.9 The council are not doing enough to enforce standards – 3% of all Additional licensing comments and 2% of selective licensing comments were on this subject such as:

- One inspection is not enough to stop rogue landlords
- Nothing being done to those landlords breaching standards nor chasing those operating below the radar
- BCC should focus on being more responsive to investigating tenant complaints
- Council seems unwilling to anything about landlords who increase rent but do not look after the property
- Bad landlords always dodge the licence and if fined, just don't bother to pay
- Concerns about how this will be communicated to landlord and whether they will all be "found"?
- The council needs to spend its money on searching and ousting the bad landlords

- Local authorities have more than enough legislation to prosecute poor landlords without the need for licensing. Money would be better spent on enforcement of current legislation
- Instead of ignoring complaints from tenants in the private rental sector, how about the council investigates them
- Resources would be better used to enforce existing legislation
- You only have to view HMO properties for sale around Bristol to understand that the council is grossly failing their responsibility to enforce their existing licensing schemes.
- Meaningless without rent controls and registering landlords who continuously evict and harass tenants. This is rife in Bristol, and no-one does anything about it.

11.18.10 There should be a large discount or fees should not apply when landlords employ managing agents to oversee their properties etc. - 2% of all Additional licensing comments and 2% of selective licensing comments were on this subject such as:

- Tenancy through a reputable agency should be exempt from this scheme
- Landlords have already paid the Agents to be inspected and check standards, so why should they pay twice for same service
- Council should satisfy itself with letting standards of agents and give more credit for this
- This scheme means that landlords who manage their properties well are in effect paying for those who don't.
- The level of discount is not enough for those landlords letting through ARLA agents and already meet high standards
- I believe the licensing fee should only apply to those not already managed by an agent

11.18.11 Focus your efforts on your own stock first - 4% of all Additional licensing comments and 4% of selective licensing comments were on this subject such as:

- get our own houses in order before pushing these scheme on landlords, the hypocrisy of council
- BCC should be building more council housing not pushing away those landlords willing to help the council cover for the lack of affordable housing in the city
- Why is social housing exempt?
- The tragedy of all of this is the lack of social housing, if Bristol had more social housing, this would have kept property prices and therefore private rents more affordable
- BCC should use the £12m to build more social housing
- BCC is driving away private landlords who are filling the gap that social housing should have provided, the council is making the housing crisis even worse than it already is
- seems ironic to charge private landlords when the problems are in social housing

11.18.12 There is no evidence that licensing works nor that it is necessary – 4% of all Additional licensing comments and 3% of selective licensing comments were on this subject such as:

- We see NO EVIDENCE that these schemes are of any benefit at all, so why expand them
- Is your evidence for targeting those wards robust
- I would be interested to see any evidence that licensing has improved HMOs
- The council's figures for justifying the scheme are not very convincing

- Falls hazards and excess are not especially relevant for houses occupied by sharers who tend to be young and able bodied
- Im surprised that Cotham has worse housing than any other areas of the city
- Is there evidence from other cities that this scheme will actually work
- There is no evidence that private housing is more dangerous to live in than council or social housing, quite the opposite
- The areas in question really don't strike me as having an issue
- Why citywide when Bristol City Council have failed to raise standards with targeted schemes which have been withdrawn i.e. Stapleton Road
- The evidence to support this scheme is speculative and not based on ward surveys
- This is not just a building issue as you suggest but very dependent on the behaviours of the tenants
- Why are you re-licensing Easton when you said the previous scheme would improve the area.

11.18.13 Comments on choice of three wards –11% of selective licensing comments were on this subject such as:

- Should be citywide or not all
- Other areas of the city are far worst
- You should not be targeting Cotham
- It's really unfair to target some areas – you will push the problem to other areas
- Why not Avonmouth?
- I don't see why there should be any difference in these schemes
- Discrimination – it is just as important to protect one tenant as several living together
- I object to the fact that because my properties are 200 meters inside Cotham ward (rather than Redland) I am being forced to spend thousands of pounds to show the council that I already comply with all relevant legislation
- Focusing on one area will just move the problem, bad landlords will move their operations to avoid the regulations
- This will lead to an unfair two-tier system
- If all private let properties require a licence, the overall quality of private renting will increase
- All private housing needs to be the same or ghettos are formed
-

11.18.14 Comments on Consultation – 1% of all Additional licensing comments and 1% of selective licensing comments were on this subject such as:

- Question 14 does not make sense 0- you have asked if we agree or disagree but given us the answer choices yes or no
- The font is too small
- This consultation is another farse, at the end of the day BCC is going to charge whatever they want regardless of what landlords, tenants or anybody else says
- It's easy to establish that Bristol City Council has already decided on these schemes
- The survey is just a formality that had to be completed
- The survey is poorly worded as it doesn't allow clear answers
- You have written too much text about scheme 2 and not enough on Scheme 1

11.18.15 Miscellaneous comments - 9% of all Additional licensing comments and 5% of selective licensing comments were on this subject such as:

- Why does an HMO have a licence where there is no record of planning approval for an HMO
- An HMO shouldn't be three people sharing only 4 and above
- This does not address the situation of lodgers
- Why do I have to licence property where my mother lives
- There were already too many HMOs in the area causing problems in the community
- There should not be discounts for the certificates that are already mandatory
- Standards should include limits on number of cars
- This doesn't deal with temporary landlords who just let for a year
- Sort out the Planning system
- Licensing should only apply to landlords letting HMO property to young people
- A system should be put in place where a licence cannot be re-newed if they are persistently causing issues and complaints in the neighbourhood
- This misses the short-term market altogether – these hotels in residential streets are a nuisance
- Look at the dreadful state of the Planning Department
- Raise the council tax on empty properties before you do this

12 Responses to questions directed to private landlords or managing agents who let property in the area.

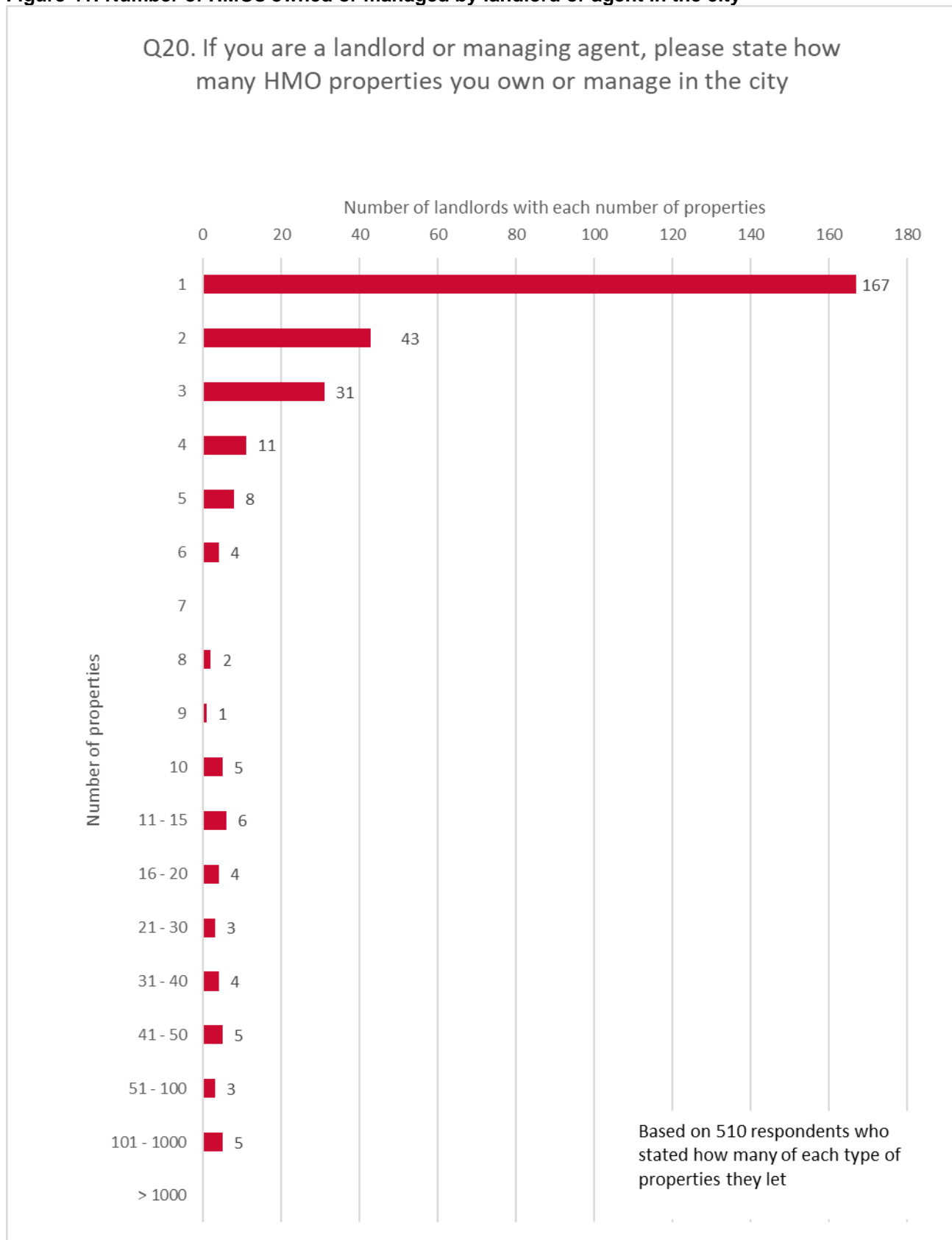
12.1 Which of the following best describes your situation?

570 respondents identified themselves as landlords or managing agents with properties in the area. This accounted for 36.49% of the 1562 respondents who answered this question.

12.2 How many HMO properties do you own or manage in the city?

510 responded as per the table below on the number of HMOs they own or manage. 167 respondent said he/she owned or managed only one HMO, 43 had 2 HMOs, 31 had 3HMOs, 11 had 4 HMOs, 8 had 5 HMOs, 4 had 6 HMOs, 2 had 8 HMOs, 1 had 9 HMOs, 5 had 10 HMOs, 6 had 11-15 HMOs, 4 had 16-20 HMOs, 3 had 21-30 HMOs, 4 had 31-40 HMOs, 5 had 41-50 HMOs, 3 had 51 to 100 HMOs and 5 had between 101 and 1,000 HMOs.

Figure 41: Number of HMOs owned or managed by landlord or agent in the city



12.3 Types of properties the landlord / agent respondents let

Of the 540 respondents who answered this question, 130 (24.07%) said they let HMOs and 320 (59.26%) that they let other rented accommodation and 105 (19.44%) said that they let both HMOs and non-HMOs.

Figure 42: The types of properties let by respondents

Are the properties that you let:				
Answer Choices			Response Percent	Response Total
1	HMOs*		24.07%	130
2	Other rented accommodation		59.26%	320
3	Both		19.44%	105
			answered	540
			skipped	1022

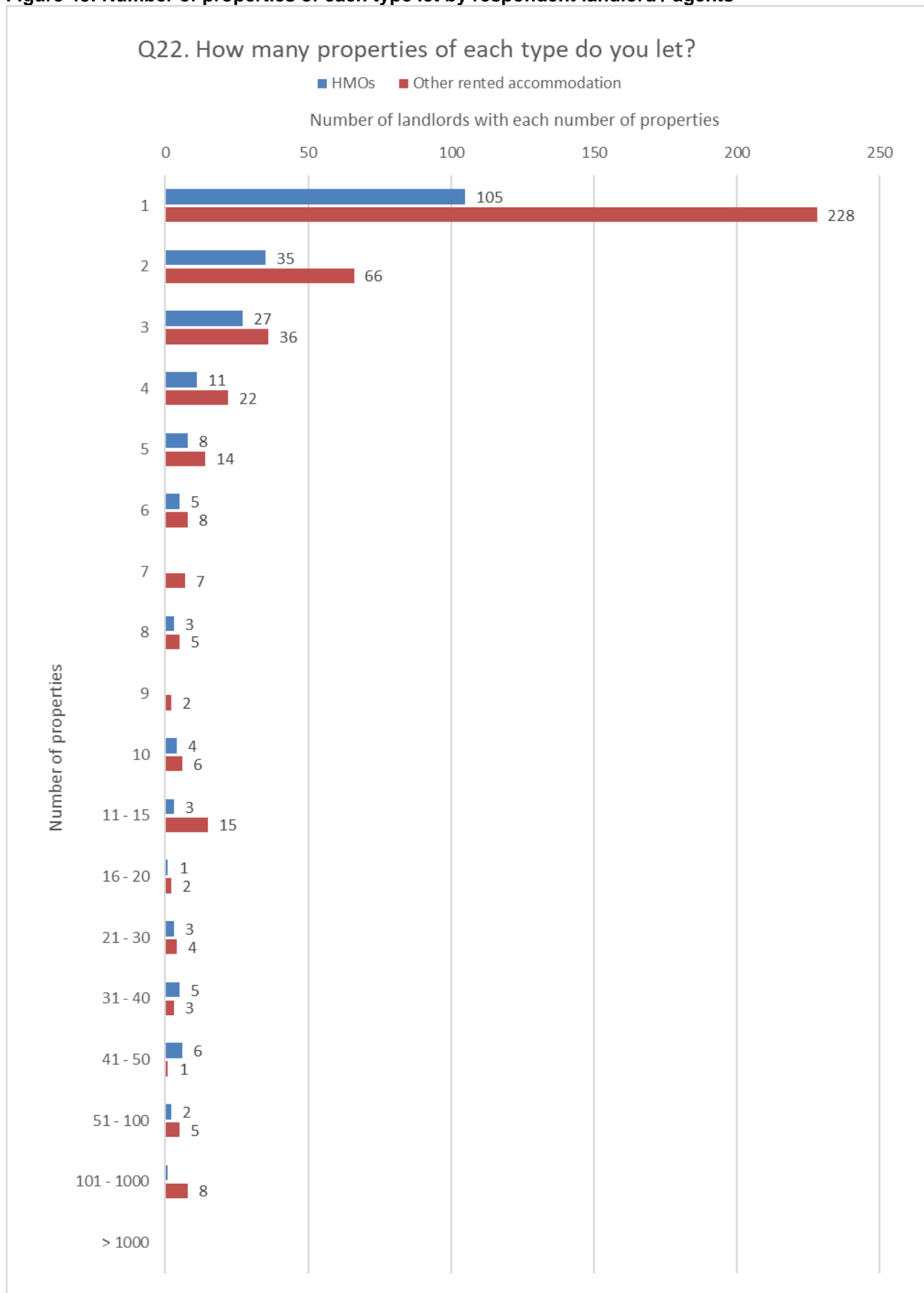
12.4 Number of properties of each type let by respondent landlords/ agents

Based on 540 respondents who stated how many of each type of properties that they let the ranges appear in Figure 43 below.

105 said they had 1 HMO, 35 had 2 HMOs, 27 had 3 HMOs, 11 had 4, 8 had 5, 5 had 6, 0 had 7, 3 had 8, 0 had 9, 4 had 10, 3 had between 11-15 , 1 had between 16—20, 3 had between 21-30, 5 had between 31-40, 6 had between 41-50, 2 had between 51-100 and none had over 100 HMOs.

228 said they had 1non-HMO, 66 had 2, 36 had 3, 22 had 4, 14 had 5, 8 had 6, 7 had 7, 5 had 8, 2 had 9, 6 had 10, 15 had between 11-15 , 2 had between 16—20, 4 had between 21-30, 3 had between 31-40, 1 had between 41-50, 5 had between 51-100 and none 8 had over 100 but less than 1,000 non-HMOs.

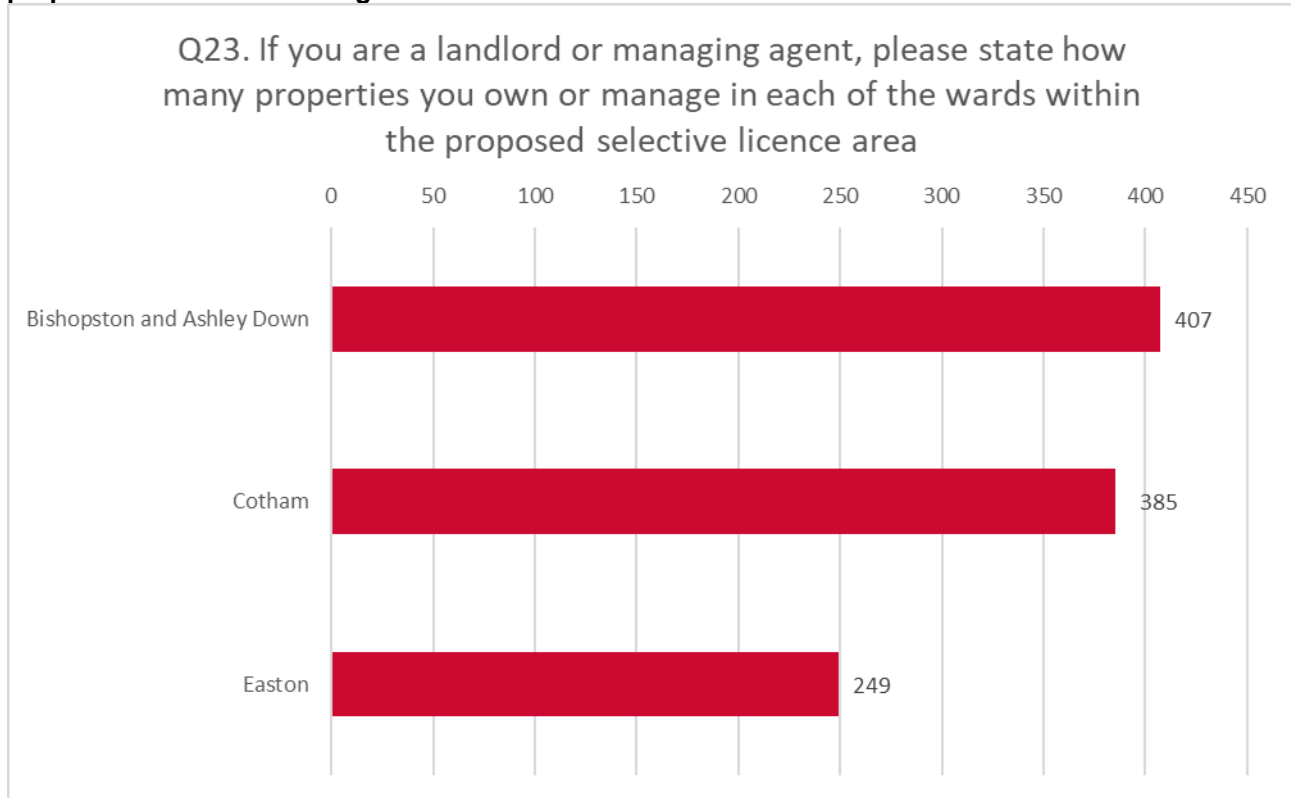
Figure 43: Number of properties of each type let by respondent landlord / agents



12.5 How many properties do you own or manage in each of the wards within the proposed selective licensing scheme?

330 responded as per the table below on the number of properties in the selective licensing wards that they own or manage.

Figure 44: Number of properties owned or managed by landlord or agent in each of wards within the proposed selective licensing scheme



12.6 How often do respondent landlord / agents visit their properties?

Of the 549 responses to this question, 36 (6.56%) said they visited the property annually; 112 (20.40%) visited every 6 months and 202 (36.79%) visited quarterly. 14 (2.55%) were resident landlords. 185 (33.70%) said Other.

Figure 45: How often do you respondent landlords / agents visit their properties?

How often do you visit your properties?				
Answer Choices			Response Percent	Response Total
1	Annually		6.56%	36
2	Every six months		20.40%	112
3	Quarterly		36.79%	202
4	I live at the property		2.55%	14
5	Other (please specify):		33.70%	185
			answered	549

How often do you visit your properties?

skipped

1013

The 185 Other responses included:

- Weekly
- Monthly
- 2 monthly
- Every 2 – 3 months
- Every 2 weeks
- Every 2 years
- 3 times a year
- Several times a year
- Regularly as required by tenant
- Managed and inspected by agents regularly
- At change of tenancy
- As often as necessary
- Often – friends/ family live at property
- I have regular Skype visits
- Talk to tenant a lot and visit if needed
- 3 monthly for HMOs but 6 monthly for non-HMOs
- Not as often as needed as you've introduced CAZ tax
- Infrequently
- Never

12.7 Do landlords / agents comply with their legal responsibilities in relation to gas, electrical and fire safety?

Of the 552 respondents 542 (99.45%) said they provided gas certificates; 548 (99.46%) provided electrical safety certificates and 543 (99.27%) provided fire safety certificates.




Figure 46: Number of respondents who supply relevant safety certificates.

Do you comply with your legal responsibilities in relation to:				
Answer Choices	Yes	No	Don't know	Response Total
Gas	99.45% 542	0.18% 1	0.37% 2	545
Electrical	99.46% 548	0.00% 0	0.54% 3	551
Fire safety	99.27% 543	0.00% 0	0.73% 4	547
			answered	552
			skipped	1010

12.8 Do respondent landlords have a planned maintenance programme for their properties?

Of the 548 respondents 436 (79.56%) said they had a planned maintenance programme, 103 (18.80%) said no and 9 (1.64%) said they didn't know if they had a planned maintenance programme.




Figure 47: Number of landlords who say they have a planned maintenance programme

Do you have a planned maintenance programme for your properties?				
Answer Choices			Response Percent	Response Total
1	Yes		79.56%	436
2	No		18.80%	103
3	Don't know		1.64%	9
			answered	548
			skipped	1014

12.9 Do respondent landlords/agents issue a written tenancy agreement?

Of the 552 respondents, 543 (98.37%) issued a written tenancy agreement, 6 (1.09%) said they didn't and 3 (0.54%) said they didn't know.

Figure 48: Number of respondents who issue a written tenancy agreement

Do you issue a written tenancy agreement?				
Answer Choices			Response Percent	Response Total
1	Yes		98.37%	543
2	No		1.09%	6
3	Don't know		0.54%	3
			answered	552
			skipped	1010

12.10 Do respondent landlords / agents have an agreement of how quickly they respond to requests for repairs etc.?

Of 549 respondents 397 (72.31%) have an agreement for how quickly they respond to requests for repairs, 127 (23.13%) do not have an agreed response time and 25 (4.55%) said they didn't know.

Figure 49: Number of respondents who have an agreed response time for repairs

Do you have an agreement of how quickly you respond to requests for repairs etc.?				
Answer Choices			Response Percent	Response Total
1	Yes		72.31%	397
2	No		23.13%	127
3	Don't know		4.55%	25
			answered	549
			skipped	1013

12.11 Do respondent landlords /agents provide a current Energy Performance Certificate (EPC)?

Of the 552 who responded, 509 (92.21%) said they provide a current EPC, 23 (4.17%) don't provide one and 20 (3.62%) don't know if they provide an EPC.




Figure 50: Number of respondents who provide a current Energy Performance Certificate (EPC)

Do you provide a current Energy Performance Certificate (EPC)?				
Answer Choices			Response Percent	Response Total
1	Yes		92.21%	509
2	No		4.17%	23
3	Don't know		3.62%	20
			answered	552
			skipped	1010

12.12 Do respondent landlord /agents provide emergency contact details?

Of the 551 respondents, 545 (98.91%) provide their tenants with emergency contact details, 1 (0.18%) said that they don't provide contact details and 5 (0.91%) said they didn't know.



Figure 51: Number of respondents who provide emergency contact details

Do you provide tenants with emergency contact details?				
Answer Choices			Response Percent	Response Total
1	Yes		98.91%	545
2	No		0.18%	1
3	Don't know		0.91%	5
			answered	551
			skipped	1011

12.13 Do respondent landlords /agents keep within overcrowding limits?

Of the 540 respondents to this question, 540 (98.18%) said they kept to within overcrowding limits, 3 (0.55%) didn't and 7 (1.27%) didn't know if they did or not.

Figure 52: Respondents who keep to overcrowding limits

Do you keep within overcrowding limits?				
Answer Choices			Response Percent	Response Total
1	Yes		98.18%	540
2	No		0.55%	3
3	Don't know		1.27%	7
			answered	550
			skipped	1012

12.14 Problems experienced by respondent landlords and agents

Of the 550 people who responded to this question, 92 (16.79%) said they had experienced problems with antisocial behaviour from their tenants or their visitors; 170 (31.08%) said there had been damage to their property (more than reasonable wear and tear); 77 (14.15%) had received noise complaints about their tenants; 75 (13.84%) had received complaints about rubbish / waste; 74 (13.63%) had experienced difficulty evicting their tenants; 43 (7.98%) had received other complaints from neighbours and 39 (8.80%) other issues with the tenancy.

Figure 53: Problems experienced by respondent landlords

Have you experienced any of the following problems?			
Answer Choices	Yes	No	Response Total
Antisocial behaviour from your tenants or their visitors	16.79% 92	83.21% 456	548
Damage to your property (more than reasonable wear and tear)	31.08% 170	68.92% 377	547
Noise complaints about your tenants	14.15% 77	85.85% 467	544
Complaints about rubbish/waste	13.84% 75	86.16% 467	542
Difficulty legally evicting your tenants	13.63% 74	86.37% 469	543
Other complaints from neighbours	7.98% 43	92.02% 496	539
Other	8.80% 39	91.20% 404	443
		answered	550
		skipped	1012

12.15 Other problems experienced by respondent landlords / agents (Free Text).

Of the 550 people who responded to the consultation, 52 (0.09%) left comments about other problems experienced by landlords /agents in addition to the issues recorded above. These include:

- Non-payment of rent
- Difficulty evicting tenant with rent arrears
- Council making eviction process so much more difficult forcing landlord to go through court process
- My tenants are extremely happy with their tenancies and have been with me for 5-11 years
- Huge disturbance to tenants installing totally unnecessary safety rails, alarms and doors demanded by Bristol City Council
- I do not think Section 21 should be scrapped. It is very dangerous, and it will reduce landlords' ability to control who lives in their property and may incur enormous court costs
- We have spent over £150,000 in the past year on improving our flats
- Complaints from our tenants about noise from their neighbours
- Freeholder poor support and response
- No help from council when we reported a derelict neighbouring property that was affecting our property causing damp and vermin problems in my flats over the last 10+ years
- Parking issues
- Burglary
- Frequent irrelevant contact from tenants
- Clutter in common parts
- Struggles with protected tenants, abusing his rights over other tenants and myself
- Never had any complaints or issues with my property or tenants
- Complaints about rubbish being dumped at property but not by tenants
- Failure by managing agent to do essential works on property causing issues in my flat.

- Abandonment
- Harassment by youths
- Tenants didn't pay utility bills, left place in a mess and forwarding address was not valid
- Tenants not informing landlord about problems
- Condensation caused by tenant lifestyle
- Unreasonable demands made by Bristol City Council
- Aggressive behaviour from tenants
- Issues to do with support needs of tenants
- Difficulty communicating and getting help from council
- Anti-social neighbours causing problems for tenants
- Drug dealing / cannabis growing
- Damage to property
- Tenants moving in other people without agreement
- Excessive water uses by tenants
- Difficulty collecting rent from tenants on benefits



13 Questions directed to private tenants who are living or have lived in the area

13.1 Status of respondents to tenant questions

Of the 1562 respondents who completed the survey, when asked which best described their situation 384 (24.58%) stated that they were a private tenant living, or had lived, in the proposed licensing area. Types of properties rented by respondents.

Of the 372 respondents to this question 164 (44.09%) said they live or had lived in an HMO and 208 (55.91%) said they live or lived in a non-HMO.

Figure 54: What type of property do you live in (tenants)

Do/did you live in:				
Answer Choices			Response Percent	Response Total
1	an HMO*		44.09%	164
2	Other type of private rented accommodation		55.91%	208
			answered	372
			skipped	1190

13.2 What is the postcode of the rented property where you live or used to live?

Of the 372 who had identified themselves as owner occupiers, 336 answered this question. Of these, 261 respondents provided valid full Bristol postcodes. See Figure 55.

41 tenant respondents live or lived in Cotham ward,

22 in Bishopston & Ashley Down,

14 in Easton or Ashley,

13 in Clifton Down,

11 in Lockleaze,

10 in Clifton,

9 in Southville,

6 in Redland or Horfield,

5 in Eastville or St George West,

4 in Lawrence Hill or Central,

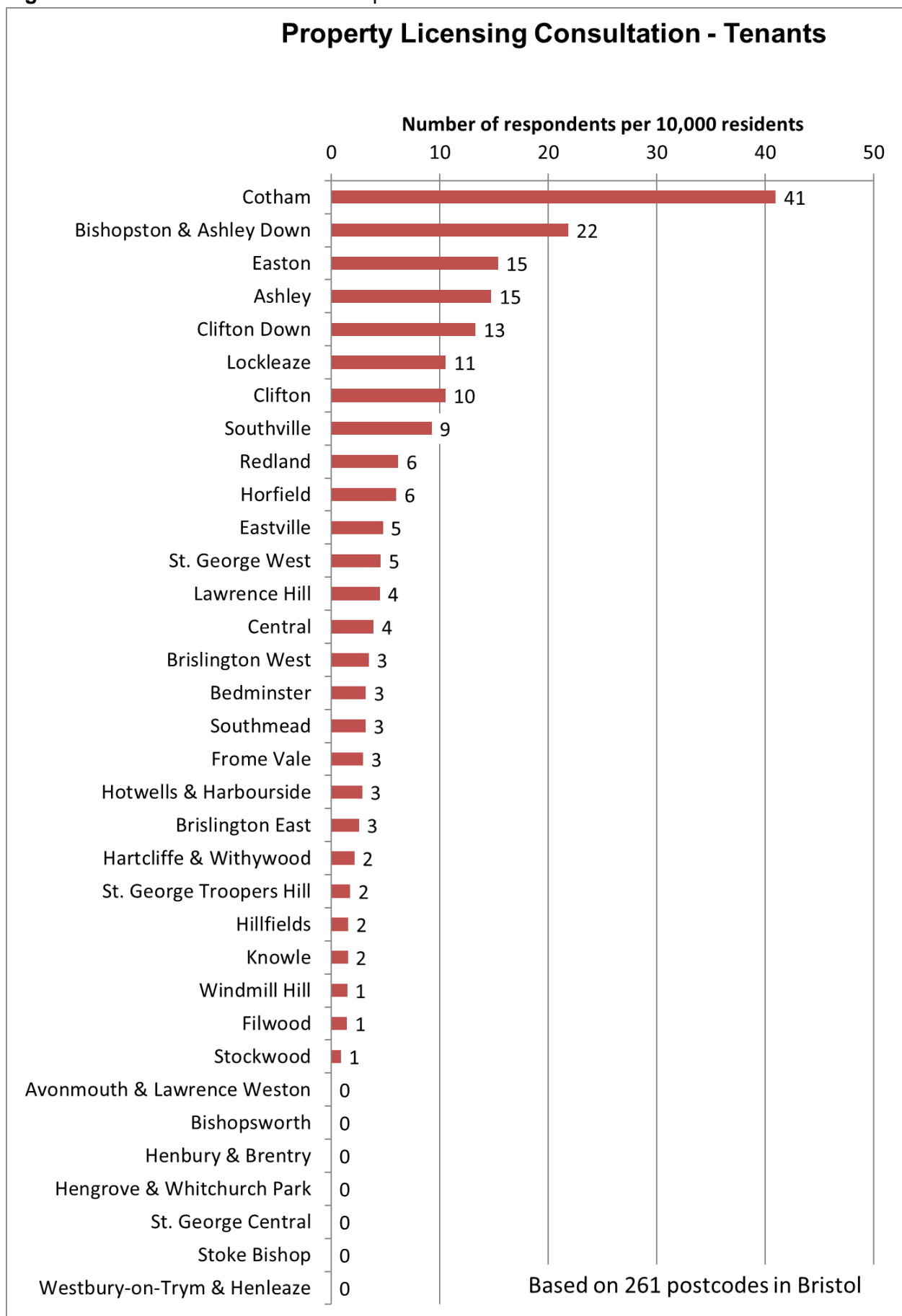
3 in Brislington West, Bedminster, Southmead, Fromevale, Hotwells & Harbourside or Brislington East,

2 in Hartcliffe & Withywood, St George Troopers Hill, Hillfields or Knowle,

1 in Filwood or Stockwood,

None in Avonmouth & Lawrence Weston, Bishopsworth, Henbury & Brentry, Hengrove & Whitchurch Park, St George Central, Stoke Bishop or Westbury on Trym.

Figure 55: Postcode area of tenant respondents



13.3 How often does/did your landlord visit your property?

Of the 367 people who responded to this question, 75 (20.44%) said that their landlords visited annually; 68 (18.53%) visited every 6 months, 65 (17.71%) visited quarterly, 12 (3.27%) had a resident landlord and 147 (40.05%) said other frequency.

Figure 56: How often does your landlord inspect the property

How often does/did your landlord visit your property?				
Answer Choices			Response Percent	Response Total
1	Annually		20.44%	75
2	Every six months		18.53%	68
3	Quarterly		17.71%	65
4	They live at the property		3.27%	12
5	Other (please specify):		40.05%	147
			answered	367
			skipped	1195

The 147 'Other' responses included:

- landlord has never visited (45)
- when asked or as required for obligatory safety checks (24)
- managing agents carry out all inspections etc.(16)
- once a month (11)
- rarely (19)
- regularly (6)
- ad hoc / random (12)
- landlord is resident (2)
- too often (2)
- housing co-operative resident (2)
- my landlord blocked me and refused to do even basic maintenance (1)
- weekly (2)
- landlord lives abroad (1)
- every 2 months (1)
- annually (1)
- not sure (2)

13.4 Do your landlords/agents have current satisfactory safety certificates?

Of the 368 respondents 240 (66.12%) said yes, the landlord has a current gas safety certificate, 26 (7.16%) said no the landlord does not have a current gas safety certificate and 97 (26.72%) said they didn't know.

Of the 368 respondents 225 (61.48%) said yes, the landlord has a current electrical safety certificate , 28 (7.65%) said no the landlord does not have a current electrical safety certificate and 113 (30.87%) said they didn't know.

Of the 368 respondents 192 (52.89%) said yes, the landlord has a current fire safety certificate. 34 (9.37%) said no the landlord does not have a current fire safety certificate and 137 (37.74%) said they didn't know.




Figure 57: Numbers of respondents who said their landlord/agent have relevant certificates

Does/did your landlord have current satisfactory certificates for:				
Answer Choices	Yes	No	Don't know	Response Total
Gas	66.12% 240	7.16% 26	26.72% 97	363
Electrical	61.48% 225	7.65% 28	30.87% 113	366
Fire safety	52.89% 192	9.37% 34	37.74% 137	363
			answered	368
			skipped	1194

13.5 Does the landlord have a planned maintenance programme?

Of 370 respondents 85 (22.97%) said their landlord did have a planned maintenance programme, 141 (38.11%) said they did not have a planned maintenance programme and 144 (38.92%) didn't know.




Figure 58: Numbers of tenants whose landlord has a planned maintenance programme

Does/did your landlord have a planned maintenance programme?				
Answer Choices			Response Percent	Response Total
1	Yes		22.97%	85
2	No		38.11%	141
3	Don't know		38.92%	144
			answered	370
			skipped	1192

13.6 Does your landlord issue a written tenancy agreement?

Of 371 respondents 346 (93.26%) said yes, 19 (5.12%) said no they didn't have a written tenancy agreement and 6 (1.62%) said they didn't know.




Figure 59: Numbers of tenants whose landlord issues a written tenancy agreement

Does/did your landlord issue a written tenancy agreement?				
Answer Choices			Response Percent	Response Total
1	Yes		93.26%	346
2	No		5.12%	19
3	Don't know		1.62%	6
			answered	371
			skipped	1191

13.7 Does your landlord have an agreement of how quickly he/she responds to requests for repairs etc.?

Of 372 respondents 115 (30.91%) said there was no agreement on how quickly a landlord/manager would respond to requests for repairs, 184 (49.46%) said they didn't have an agreement and 73 (19.62%) didn't know.




Figure 60: Numbers of tenants whose landlord has an agreed response time for repairs

Does/did your landlord have an agreement of how quickly they respond to your requests for repairs etc.?				
Answer Choices			Response Percent	Response Total
1	Yes		30.91%	115
2	No		49.46%	184
3	Don't know		19.62%	73
			answered	372
			skipped	1190

13.8 Does your landlord provide emergency contact details?

Of 372 respondents to this question 259 (69.62%) said their landlord / manager did provide them with emergency contact details, 89 (23.92%) said they did not provide contact details and 24 (6.45%) said they didn't know.




Figure 61: Numbers of tenants whose landlord provides them with emergency contact details

Does/did your landlord provide you with emergency contact details?				
Answer Choices			Response Percent	Response Total
1	Yes		69.62%	259
2	No		23.92%	89
3	Don't know		6.45%	24
			answered	372
			skipped	1190

13.9 Does your landlord deal with anti-social behaviour of other tenants and their visitors?

Of 364 respondents, 108 (29.67%) said that their landlord / manager does deal with anti-social behaviour of other tenants or their visitors; 99 (27.20%) said they did not and 157 (43.13%) said they didn't know.

Figure 62: Numbers of tenants whose landlords deal with anti-social behaviour issues

Does/did your landlord deal with anti-social behaviour of other tenants and their visitors?				
Answer Choices			Response Percent	Response Total
1	Yes		29.67%	108
2	No		27.20%	99
3	Don't know		43.13%	157
			answered	364
			skipped	1198

13.10 Tenants were asked if they had experienced any problems with their tenancy.

Of the 367 who responded to this question 44 (12.09%) had experienced harassment by their landlord / manager; 27 (7.46%) had experienced overcrowding; 134 (36.71%) said their landlord had ignored requests for repairs; 35 (9.64%) had unsafe gas appliances, 17 (4.71%) had been illegally evicted; 68 (18.99%) said there was inadequate refuse bins or storage; 56 (15.77%) said there were inadequate amenities and 205 (84%) had experienced other issues.

Figure 63: Numbers of tenants experiencing problems

Have you experienced any of the following problems?			
Answer Choices	Yes	No	Response Total
Harassment from your landlord	12.09% 44	87.91% 320	364
Overcrowding in your property	7.46% 27	92.54% 335	362
No response to requests for repairs	36.71% 134	63.29% 231	365
Unsafe gas appliances	9.64% 35	90.36% 328	363
Illegal eviction	4.71% 17	95.29% 344	361
Inadequate waste/refuse bins and storage	18.99% 68	81.01% 290	358
Inadequate amenities (e.g. washing facilities, toilet)	15.77% 56	84.23% 299	355
Other	29.07% 84	70.93% 205	289
		answered	367
		skipped	1195

Of the 95 respondents who said they had experienced “other” problems, these included:

- Issues with damp and mould (26)
- Ignored reports of disrepair in the property (17)
- Insecure property (4)
- Unreasonable rent increases of 11%, 20%, 25% and 50% (4)
- Poor quality repairs / unqualified contractors used (4)
- Hard to contact landlord – does not answer calls or emails (7)
- Left with no heating, hot water or electricity for long periods, controlled by landlord (2)
- I am a builder - Landlord leaves me to do repairs but in return he doesn't put up my rent
- So many things that made our life hell
- Leaks, lack of hot water, being advised to fiddle with the boiler us to fix the hot water,
- No information on deposit registration
- Landlord fraudulently misrepresented the property (signed us to a different flat than we were shown)
- Incorrect disposal of my own items
- Every property we looked at was subpar and could not be considered fit for independent adults to reasonably cohabit in.
- Landlord references should be scrapped this would prevent landlords from holding undue power over tenants.
- Unsure if the house is a registered HMO but 4 of us live here
- Landlord would let contractors in without telling me (2)
- Failed to provide a carbon monoxide detector for half a year
- F or G rated EPC score (2)

- The house was immaculate and landlord very responsive. Clearly no need for government oversight on quality.
- Being prohibited from entering the property despite paying rent and faced verbal abuse from my student landlord.
- My landlords have all been very fair.
- Dangerous and unsafe electrical appliances (2)
- Illegal occupant in HMO and landlord refused to evict him.
- Illegal entry into property by landlord
- Back garden full of rubbish but landlord won't remove it even though it is a fire hazard
- Inadequate heating (2)
- No fire alarms or means of escape (3)
- Rent increased after repair work done
- Poorly converted property (2)
- Harassment not just from landlord but also from other tenants not dealt with (3)
- Illegal eviction

14 Questions directed at owner-occupiers or other residents currently living in the area

14.1 What is the postcode of the property where you live?

Of the 453 who had identified themselves as owner occupiers, 427 answered this question.

144 came from owner occupiers living in one of the three targeted wards of Bishopston and Ashley Down, Cotham and Easton,

12 from Clifton Down,

11 from St George West,

10 from Redland,

9 from Horfield,

8 from Ashley,

7 from Brislington West,

6 from Lockleaze, Frome Vale and Windmill Hill,

5 from Hillfields, Clifton and Avonmouth and Lawrence Weston,

4 from Stoke Bishop and Knowle,

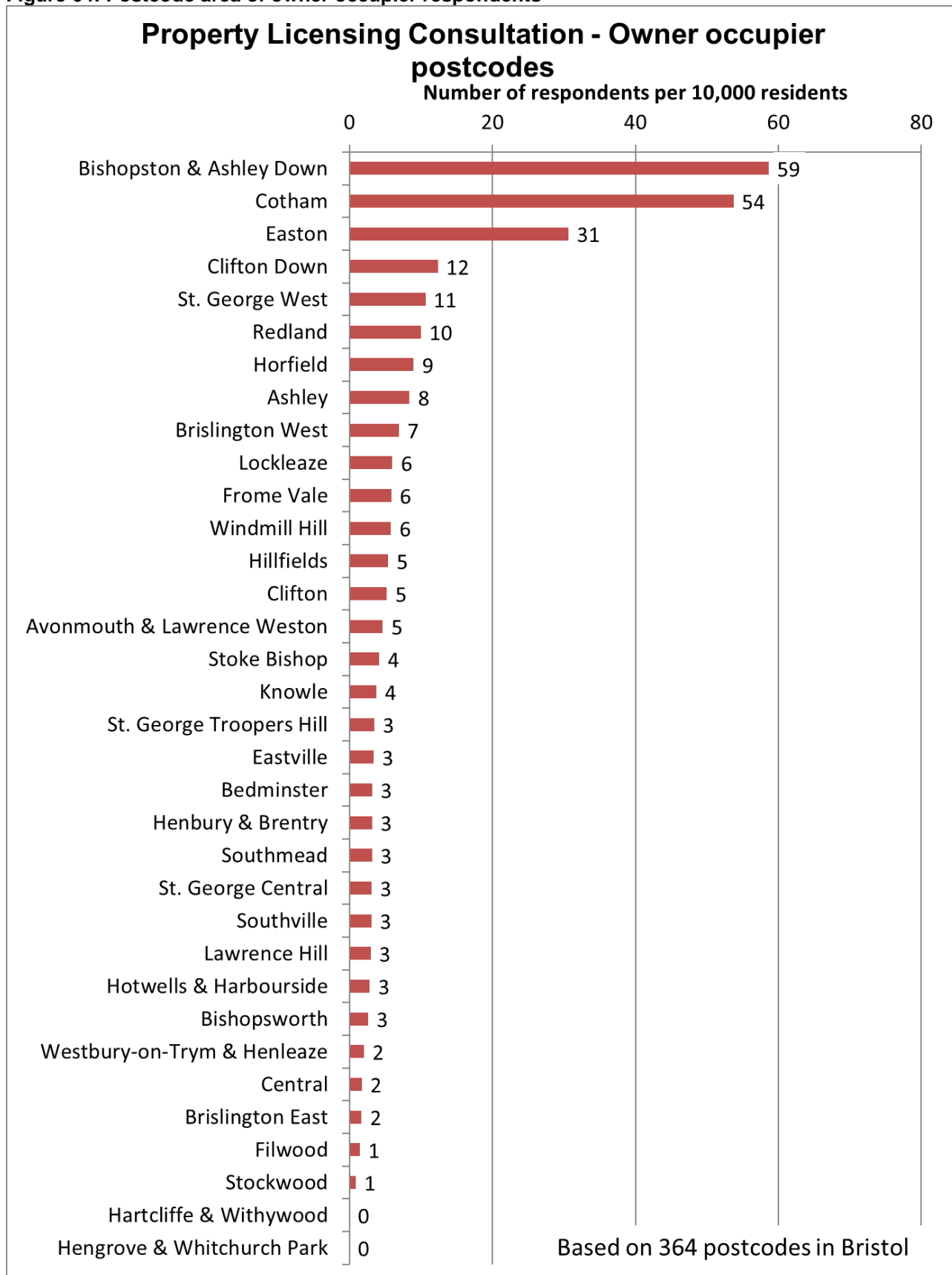
3 from St George Troopers Hill, Eastville, Bedminster, Henbury and Brentry, Southmead, St George Central, Southville, Lawrence Hill, Hotwells and Harbourside and Bishopsworth,

2 from Westbury on Trym and Henleaze, central and Brislington East,

1 from Filwood and Stockwood,

None from Hartcliffe and Withywood and Hengrove and Whitchurch Park wards.

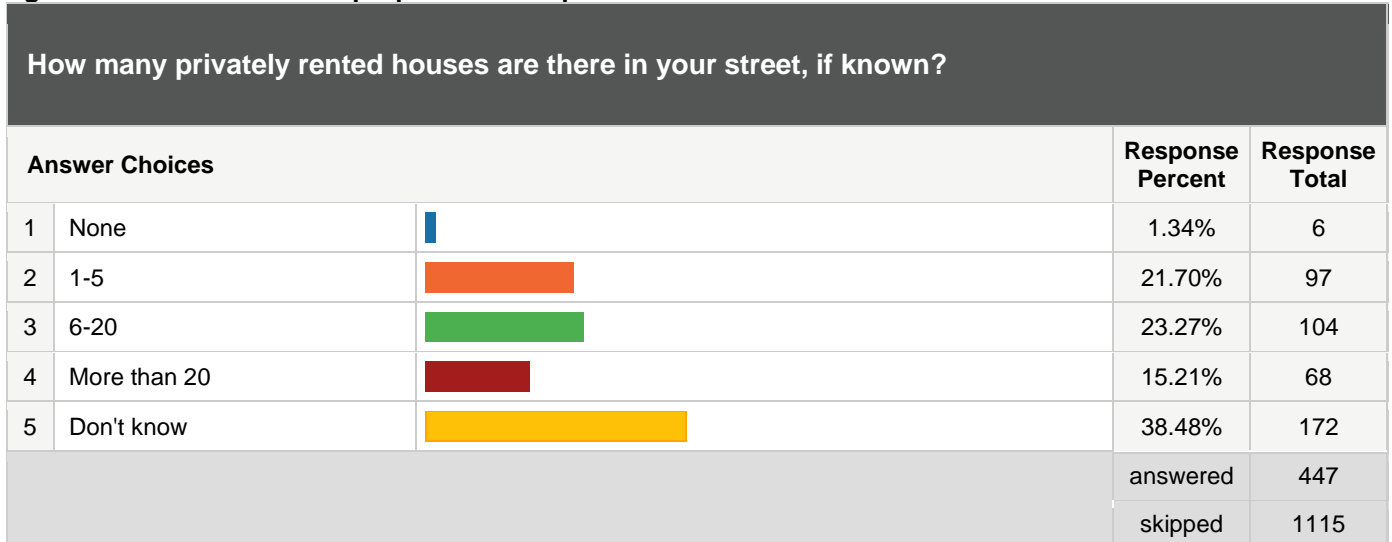
Figure 64: Postcode area of owner occupier respondents



14.2 How many private rented properties are there in your street?

Of 447 respondents who answered this question, 6 (1.34%) said they thought there were none; 97 (21.70%) said there were between 1 and 5, 104 (23.27%) said there were between 6 and 20, and 68 (15.21%) said that there were more than 20 privately rented properties in their street. 172 (38.48%) Didn't know how many private rented properties there were in their street.

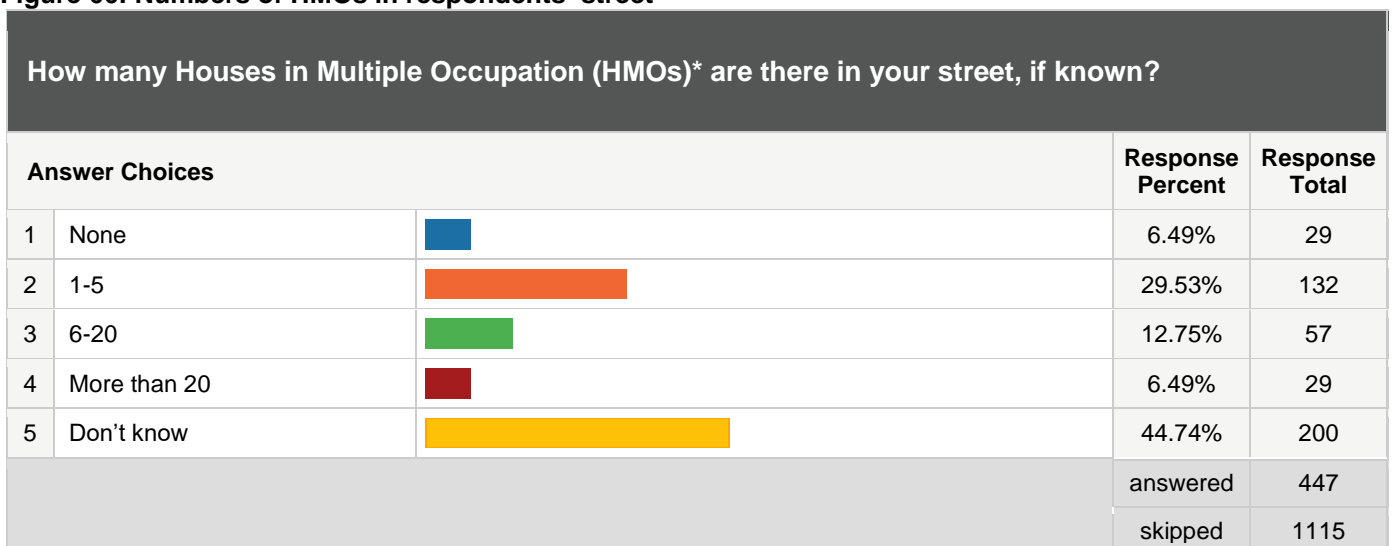
Figure 65: Numbers of PRS properties in respondents' street



14.3 How many HMOs are there in your street?

Of 447 respondents who answered this question, 29 (6.49%) said they thought there were no HMOs in their street; 132 (29.53%) said there were between 1 and 5 HMOs, 57 (12.75%) said there were between 6 and 20 and 29 (6.49%) said that there were more than 20 HMOs in their street. 200 (44.74%) said they didn't know how many HMOs were in their street.




Figure 66: Numbers of HMOs in respondents' street



14.4 Do you know who the landlord /agents of the rented properties are?

Of the 439 who responded to this 22 (5.01%) said they knew who most of the landlords / agents are; 155 (35.31%) said they knew who some of the landlords/agents are and 262 (59.68%) did not know who the landlords or agents of these properties are.



Figure 67: Numbers of owner/occupiers who know who the landlord /agent of rented properties are

Do you know who the landlords/agents of the rented properties are?				
Answer Choices			Response Percent	Response Total
1	Most		5.01%	22
2	Some		35.31%	155
3	None		59.68%	262
			answered	439
			skipped	1123

14.5 Have you ever had to make a complaint about noise from a rented property in your area?

Of the 444 owner-occupiers who have responded to this question 171 (38.51%) had made a complaint about noise from a privately rented property in their area, 273 (61.49%) had not made a complaint .





Figure 68: Complaints about noise from PRS property in the area

Have you ever had to make a complaint about noise from a privately rented property in your area?				
Answer Choices			Response Percent	Response Total
1	Yes		38.51%	171
2	No		61.49%	273
			answered	444
			skipped	1118

14.6 If you have made a complaint about noise, how often have you complained?

Of 184 respondents who had made a complaint noise, 20 (10.87%) said they complained most weeks, 46 (25.00%) said they complained once a month 49 (26.63%) said they complained once a year and 69 (37.50%) said other frequency.

Figure 69: How often had owner-occupiers who had experienced problems with noise, complained

If 'Yes', how often have you complained:				
Answer Choices			Response Percent	Response Total
1	Most weeks		10.87%	20
2	Once a month		25.00%	46
3	Once a year		26.63%	49
4	Other (please specify):		37.50%	69
			answered	184
			skipped	1378

Of those who answered “Other”:

23.18% said they frequently complained

10.1% said they had complained only once or twice

21.73% said they occasionally complain

5.79% said it depended on the tenants

15.94% said they never complain

4.34% said they tend to complain when students move in

2.89% said it was a waste of time complaining as nothing gets done

4.34% said they didn't know/ can't remember



1.4% who they didn't know who to complain to?

10.14% said they complain every 3 or 4 months

14.7 Have you ever made a complaint about anti-social behaviour from a privately rented property in your area?

Of the 440 owner-occupiers who have responded to this question 127 (28.86%) had xx (xx%) did not know if they had made a complaint.





Figure 70: Have you ever made a complaint about anti-social behaviour from a privately rented property in your area

Have you ever had to make a complaint about antisocial behaviour from a privately rented property in your area?				
Answer Choices			Response Percent	Response Total
1	Yes		28.86%	127
2	No		71.14%	313
			answered	440
			skipped	1122

14.8 If you have made a complaint, how often have you complained about anti-social behaviour (ASB)?

Of the 142 respondents who had complained about anti-social behaviour 15 (10.55%) said that they complained most weeks, 23 (16.20%) complained once a month; 48 (33.80%) complained once a year and 56 (39.44%) said other.

Figure 71: How often had owner-occupiers who had experienced problems with ASB, complained

If 'Yes', how often have you complained:				
Answer Choices			Response Percent	Response Total
1	Most weeks		10.56%	15
2	Once a month		16.20%	23
3	Once a year		33.80%	48
4	Other (please specify):		39.44%	56
			answered	142
			skipped	1420

Of those who answered “Other”:

21.42% said they frequently complained

17.85% said they had complained only once or twice

21.42% said they occasionally complain

5.35% said it depended on the tenants

10.71% said they never complain

7.14% said it was a waste of time complaining as nothing gets done

10.71% said they didn't know

1.78% said there are issues, but never complain




1.78% said once or twice and would complain more but didn't through fear of reprisals

1.78% said they had complained about council tenant

14.9 Have you ever had to make a complaint about rubbish / waste from a privately rented property?

Of the 439 owner-occupiers who have responded to this question 159 (36.22%) had made a complaint, 265 (60.36%) had not made a complaint and 15 (3.42%) did not know if they had made a complaint.





Figure 72: Have you ever made a complaint about rubbish/waste from a privately rented property in your area

Have you ever had to make a complaint about the rubbish/waste from a privately rented property in your area?				
Answer Choices			Response Percent	Response Total
1	Yes		36.22%	159
2	No		60.36%	265
3	Don't know		3.42%	15
			answered	439
			skipped	1123

14.10 If you have made a complaint, how often have you complained about rubbish/waste?

Of the 173 respondents who said they had complained about rubbish/waste 32 (18.50%) that they complained most weeks, 36 (20.81%) once a month; 60 (34.68%) once a year and 45 (26.01%) said other.

Figure 73: How often had owner-occupiers who had experienced problems with rubbish/waste complained

If 'Yes', how often have you complained:				
Answer Choices			Response Percent	Response Total
1	Most weeks		18.50%	32
2	Once a month		20.81%	36
3	Once a year		34.68%	60
4	Other (please specify):		26.01%	45
			answered	173
			skipped	1389

Of those who answered "Other":

22.22% said they had complained only once or twice

17.78% said they frequently complained

4.44% said it was an issue but no point complaining as nothing gets done

20.00% said they occasionally complain

8.89% said they never complain

2.22% said they were unable to complain as didn't know who landlord was

2.22% said the tenants never sort rubbish and leave it on the street

2.22% said they were fed up with the response from the council

13.33% said they didn't know

2.22% said it depended on the tenants

2.22% said they were too nervous of complaining to the occupiers

2.22 said situation was unsatisfactory but the landlord wasn't interested

14.11 Do you think there is a problem with overcrowding in any of the privately rented properties in your area?

Of the 442 owner-occupiers who have responded to this question 146 (33.03%) thought there was an overcrowding problem, 119 (26.92%) did not think there was a problem and 177 (40.05%) did not know.

Figure 74: Do you think there is a problem with overcrowding in any of the privately rented properties in your area

Do you think there is a problem with overcrowding in any of the privately rented properties in your area?				
Answer Choices			Response Percent	Response Total
1	Yes		33.03%	146
2	No		26.92%	119
3	Don't know		40.05%	177
			answered	442
			skipped	1120

14.12 If you have made a complaint, who did you complain to?

Of the 222 respondents 91 (40.99%) complained to the landlord; 64 (28.83%) complained to the Letting Agent; 98 (44.14%) complained to the council, 52 (23.42%) complained to the police and 78 (35.14%) said Other.

Figure 75: If an owner occupier made a complaint, who did they complain to?

If you made a complaint, who did you complain to? (please tick all that apply)				
Answer Choices			Response Percent	Response Total
1	Landlord		40.99%	91
2	Letting agent		28.83%	64
3	Council		44.14%	98
4	Police		23.42%	52
5	Other (please specify):		35.14%	78
			answered	222
			skipped	1340

Of those who they complained to “Other”:

- 37.18% complained directly to occupant
- 39.74% complained to the universities
- 1.28% complained to the management company
- 3.85% complained to their local councillor
- 1.28% didn't know how they could complain
- 5.13% never complained
- 2.56% complained to the landlord
- 1.28% complained to Police
- 1.28% complained to Avonmouth Planning group
- 1.28% complained to all of the above but it was ineffective
- 1.28% complained to the refuse collectors
- 1.28% complained to the council
- 1.28% complained to their street group who escalated it
- 1.28% said it was an Airbnb

15 Questions directed to other interested parties

15.1 What is your postcode or if responding on behalf of an organisation, please provide the postcode of the organisation's premises in Bristol?

Of the 241 who responded to this question, 132 provided a full valid Bristol postcode. Broken down by ward as:

9 came from residents of Bishopston & Ashley Down.

8 from Stoke Bishop.

7 from Cotham and Hotwells and Harbourside.

6 from St George West.

5 from Redland, 9 from Horfield.

4 from Clifton, Clifton Down, Westbury on Trym & Henleaze, Lockleaze and Windmill Hill.

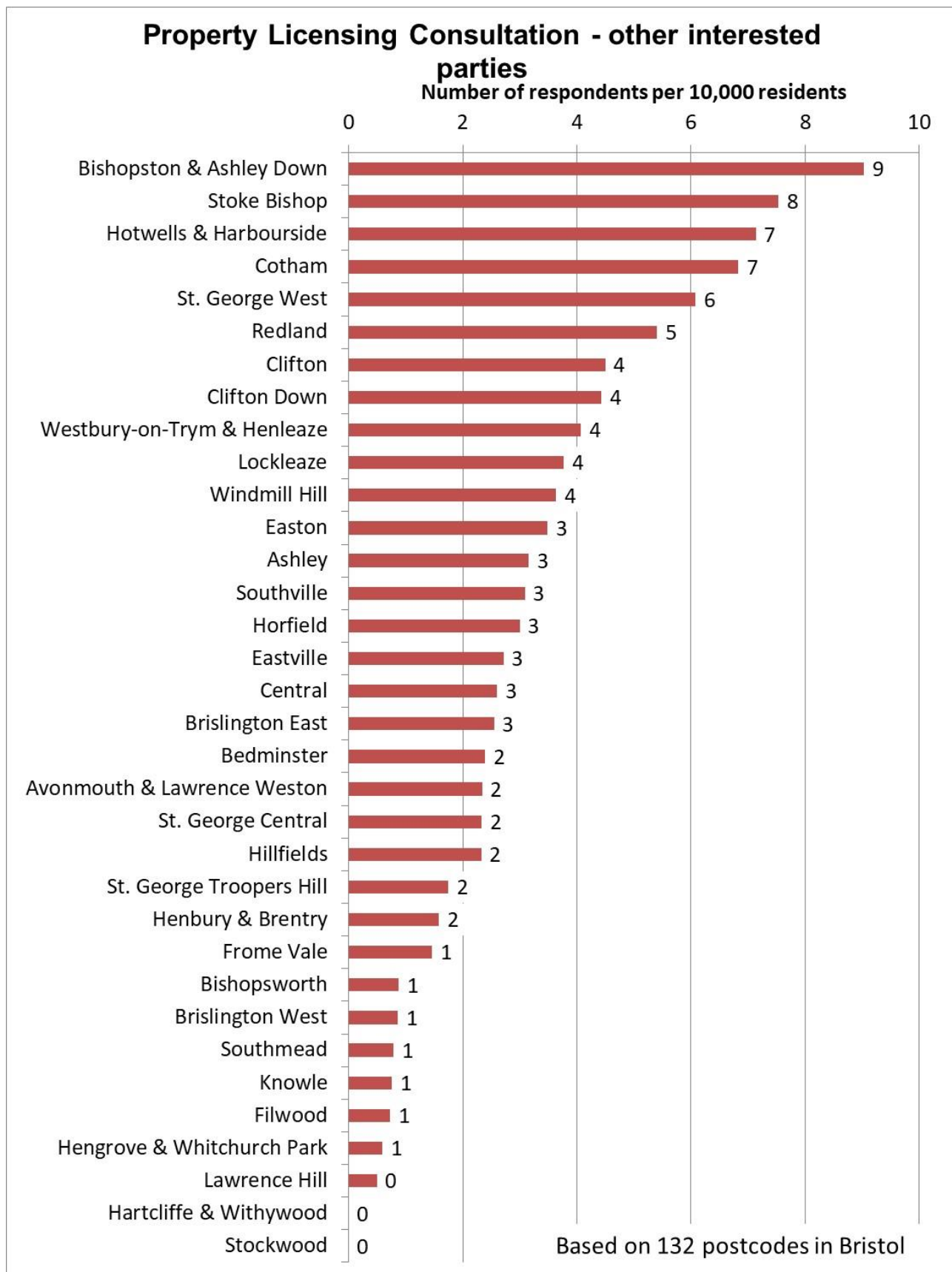
3 from Easton, Ashley, Southville, Horfield, Eastville, Central, Brislington East.

2 from Bedminster, Avonmouth & Lawrence West Weston, St George Central, Hillfields, St George Troopers Hill, Henbury & Brentry.

1 from Fromevale, Bishopsworth, Brislington West, Southmead, Knowle, Filwood and Hengrove & Whitchurch Park.

None from Lawrence Hill, Hartcliffe and Withywood and Hengrove and Stockwood wards.










Figure 76: Numbers of responses from other interested parties by their postcode



15.2 Reason for interest in the consultation in “Other” category

Of 250 respondents who answered this question, 10 (4.00%) have an interest as a Local Councillor, 1 (0.40%) an MP, 147 (58.80%) a landlord with property outside of the area, 7 (2.80%) a Landlord Association, 15 (6.00%) a local business, 4 (1.60%) a tenants organisation, 4 (1.60%) a social housing tenant in the area, 3 (0.80%) a provider of social housing and 89 (35.60%) selected the “Other” category.

Figure 77: Status of ‘Other Interested Party’ respondents

I am interested in the proposed licensing scheme because I am, or represent, a: (please tick all that apply)				
Answer Choices			Response Percent	Response Total
1	Local councillor		4.00%	10
2	MP (Members of Parliament)		0.40%	1
3	Landlord with a property outside of the area		58.80%	147
4	Landlord Association		2.80%	7
5	Local business		6.00%	15
6	Tenants' organisation		1.60%	4
7	Council or housing association tenant in the area		1.60%	4
8	A provider of social housing		0.80%	2
9	Other (please specify):		35.60%	89
			answered	250
			skipped	1312

Of the 89 who stated “Other” included:

- 20 (22.47%) Private Landlord
- 11 (12.36%) Local resident
- 8 (8.99%) Private tenant or former private tenants
- 6 (6.74%) Relatives / Friends of private tenant
- 5 (5.62%) Former landlord
- 5 (5.62%) Housing Charity or Charitable Trust
- 4 (4.49%) Partner / Parent of landlord / landlady
- 2 (2.25%) Planned landlord
- 1 (1.12%) Housing professional
- 1 (1.12%) Member of residents' group
- 1 (1.12%) Interested citizen
- 1 (1.12%) Council Tax payer

- 1 (1.12%) Letting agent
- 1 (1.12.12%) Live with family
- 1 (1.12%) Housing Advice Agency
- 1 (1.12%) Ex housing lawyer now working for housing ombudsman
- 1 (1.12%) Owner occupier previously impacted by an unlicensed HMO
- 1 (1.12%) Living next door to an HMO
- 1 (1.12%) Work in property
- 1 (1.12%) Honorary life official of the TGWU (Unite)
- 1 (1.12%) Council worker – Homelessness prevention
- 1 (1.12%) An organisation representing Lettings & Management Agents
- 1 (1.12%) Prospective councillor
- 1 (1.12%) Former social housing CEO
- 1 (1.12%) Not supportive
- 11 (12.35%) Blank

16 Responses from written communication and free text comments from the survey forms during the consultations

The consultation on the proposal to introduce a citywide additional licensing (of HMOs) scheme and a targeted selective licensing scheme in Bishopston and Ashley Down, Cotham and Easton wards drew 1,562 survey responses. 926 (58%) respondents also left free text comments about the additional licensing scheme and 976 (62%) about the selective licensing scheme. These are summarised in Chapter 5.19.

This section is the summary of the free text comments that were provided by consultation respondents. We have considered all representations made in the consultations and our responses are set out below.

16.1 Consultation comment 1: Against the proposals for additional and selective licensing

47% of all Additional licensing comments and 57% of selective licensing most saying the scheme was unnecessary and the council should use existing powers. Many also felt that not only does licensing penalise good landlords but ultimately the tenants will be most badly affected. Licensing is stifling the private rented market.

BCC Response:

The outcomes from the consultation broadly support the proposal for additional licensing (52.57%) whilst 38.96% support the proposal for selective licensing.

However, when broken down by respondent type, 13.86% of respondents who identified as landlords or agents; 53.9% of private tenants, 60.71% of owner occupiers and 29.47% of Other respondents agreed or strongly agreed with the selective licensing proposal.

For the additional licensing proposal, 28.6% of landlords, 63.8% of private tenants, 76.16% of owner occupiers and 40.4% of Other respondents agreed or strongly agreed with the additional licensing proposal.

The council have powers to deal with non-compliant landlords that have been brought to our attention, however only licensing powers give us the resources to proactively visit every licensable property to assess conditions. In many cases, licensable properties have often been found not to meet minimum legal standards even where a landlord believed he/she had a good property. Licensing legislation also allows us to set standards higher than just a legal minimum.

Many tenants do not report problems for fear of their tenancy being ended but where there is a licensing scheme, we can pro-actively inspect every property which means tenants should not need to fear that their tenancy is at risk.

There are a number of factors which may affect the private rented sector, and there is no evidence that licensing is stifling the market.

16.2 Consultation comment 2: Support the proposals for Additional and Selective Licensing

23% of all Additional licensing comments and 12% of selective licensing comments were on this subject. Most comments welcomed the schemes proposed especially for HMOs and many agreed that there should be safe homes for family accommodation too and not just for HMO tenants as poor-quality accommodation is not just a problem in HMOs.

BCC Response:

The outcomes from the consultation broadly support the proposal for additional licensing (52.57%), whilst 38.96% support the proposal for selective licensing.

See response 16.1

16.3 Consultation comment 3: Licensing is forcing landlords to leave the market

28% of all Additional licensing comments and 27% of selective licensing comments were on this subject with some respondents saying that they would sell up as the rental market was becoming too onerous and too full of bureaucracy. Licensing is stifling the market and landlords leaving the market will lead to an increase in homelessness.

BCC Response:

Licensing is a tool that allows the Council to tackle the issues in the PRS (private rented sector). We must follow the legal process in the administration of the scheme. However, in most cases where standards are not met the landlord will be given the opportunity to remedy this before any other action is considered.

Analysis of numbers in previous areas where licensing has been declared has not led to the numbers of PRS properties being reduced necessarily as a result of licensing. The numbers of the private rented sector are decreasing across England but in the licensing schemes we have declared so far, the numbers of the private rented sector have remained fairly stable and the number of licences we predicted to receive applications for have been achieved. There are a number of factors that may be affecting the private rented sector.

16.4 Consultation comment 4: Licensing scheme will lead to increased rents and hardship for private tenants

36% of all Additional licensing comments and 37% of selective licensing comments were on this subject with many fearing that the fees and costs of making necessary improvements will be passed on to the tenant by way of increased rent. This at a time when rents in Bristol are already very high could lead to some people to be unable to afford the increased rent payable.

BCC Response:

The licensing fees charged cover the costs of processing applications, administration of the scheme and its enforcement. Fees are calculated on a break-even basis (not for profit). We are aware that the cost to the scheme will need to be paid for by the landlord and that it may or may not be passed onto the tenant.

However, this must also be considered with the overall aims and objectives of the scheme and what it will achieve in raising standards of living conditions for many tenants living in the PRS as well as improved management and raise awareness of the landlord's legal responsibilities.

The demand for housing in Bristol is very high. Naturally market rents continue to rise as a result, and this is totally outside of our control and is generally due to market forces rather than licensing. An example of the high demand is the reported numbers of Bristol university students being housed in Bath because they could not find accommodation in Bristol.

Over the life of the five-year scheme the fee payable for an additional licence without discounts is a maximum £1,861 which equates to £26.001 per month / £6 per week per property, with discounts of £300 the licence would cost £1,561 and that equates to £31.01 pm or £7.15 per week. If passed on to each occupant in an HMO of 4 people for example, it would on average cost £6.50 maximum per calendar month.

For a selective licence fee, the cost without discounts is £912 which equates to £15.20 per month / £3.50 per week; with discounts of £300 the selective licensing fee would cost £612 which equates to £10.20 per month or £2.35 per week.

16.5 Consultation comment 5: The fees are too high.

11% of all Additional licensing comments and 12% of selective licensing comments were on this subject with comments such as the fees are unreasonable and unfair on compliant landlords who already meet standards. The council needs to work more efficiently and bring the cost of the fees down.

BCC Response:

The fees are calculated to reflect the resources required to deliver the scheme. The cost of the scheme is based on a 'break-even' basis and does not generate a surplus. They have been signed off by the council's Finance team and meet legal requirements. They are not subsidised from other resources or from Council Tax payments.

16.6 Consultation comment 6: This is a council money making scheme

11% of all Additional licensing comments and 8% of selective licensing comments were on this subject such as the council will take the money, but it will not fix the problem or that this is just a way for the council to raise revenue through the profits.

BCC Response:

The Housing Act 2004 allows local authorities to charge a fee for licensing. Each local council sets its own fees for licensing. The fees are required to only cover the costs of licensing and cannot be used to subsidise other local council work. The scheme cannot make a profit and is ring-fenced for the licensing function only. See response 16.5.

16.7 Consultation comment 7: Private Housing Service will not be able to deliver this scheme

11% of all Additional licensing comments and 9% of selective licensing comments were on this subject saying that the scheme is too big and Private Housing Team will not be able to deliver it properly or there is not enough staff to properly enforce the scheme.

BCC response:

If the scheme or schemes are approved, the council recognises that it will be necessary to recruit additional staff in order to deliver the scheme and this has already been built in to the relevant scheme costs. We have also commissioned new technology to improve efficiency of processing the applications and serving licences which will be in place by the time any new scheme goes live. The Council has committed to inspect all licensed properties.

16.8 Consultation comment 8: The licensing standards are set too high

3% of all Additional licensing comments and 3% of selective licensing comments were on this subject and are difficult for landlords to achieve and cost of necessary works is prohibitive and will be passed on to tenants.

BCC Response:

The licensing standards have regard to regulations which are required to provide safe accommodation for tenants. The standards are naturally higher in Houses in Multiple Occupation as the relationship of the tenants in a shared property of 3 or more individuals means there are higher risks than when let to families or to couples for example.

The Housing Act 2004 sets out mandatory licensing conditions which must be included on a licence, as well as other conditions which the local authority may apply if they satisfy the requirements of the Act. Further, properties are inspected to determine if any hazards exist under the Housing Health and Safety Rating System and any property found with serious hazards in the homes will be required to make the necessary improvements to reduce the risks to the occupants.

16.9 Consultation comment 9: The council are not doing enough to enforce standards

3% of all Additional licensing comments and 2% of selective licensing comments were on this subject such as the council should be using the money to use existing powers to search out and deal with rogue landlords.

BCC Response:

The council have powers to deal with non-compliant landlords that have been brought to our attention, however only licensing powers give us the resources to proactively visit every licensable property to assess conditions. In many cases, licensable properties have often been found not to meet minimum legal standards even where a landlord believed he/she had a good property. Licensing legislation also allows us to set standards higher than just a legal minimum.

Many tenants do not report problems for fear of their tenancy being ended but where there is a licensing scheme, we can inspect every property which means tenants should not need to fear that their tenancy is at risk.

16.10 Consultation comment 10: The Council should give discounts for those with Managing Agents

2% of all Additional licensing comments and 2% of selective licensing comments were on this subject such as landlords should not have to pay a fee where they have a managing agent who is looking after their property. It feels like they are paying twice for the same thing and their properties will already meet standards and been regularly inspected by the agent.

BCC Response:

Membership of other accreditation schemes or having a managing agent does not necessarily mean that the same level of standards is met or that the properties are adequately monitored or have an acceptable complaints procedure etc. for tenants.

Although some landlords have paid managing agents to manage their properties, it does not replace the checks made by qualified council officers regarding housing standards.

Managing agents who have the accredited level of membership with one of the Rent With Confidence (RWC) approved providers when applying for a licence, can claim a discount on their licence fee.

16.11 Consultation comment 11: the council should be focusing on its own stock first

4% of all Additional licensing comments and 4% of selective licensing comments were on this subject such as before pushing these schemes on private landlords the council should sort out the very poor standards in its own stock first.

BCC response:

Registered social housing providers are regulated by the Regulator of Social Housing. Shelter has some useful information on their website: Shelter Legal England - Regulation of social housing providers - Shelter England and more information can be found on the Government website. Part 1 of the Housing Act 2004 also applies to registered social landlords in relation to housing conditions and the Housing Health and Safety Rating System (HHSRS).

16.12 Consultation comment 12: Lack of evidence to support proposal

4% of all Additional licensing comments and 3% of selective licensing comments were on this subject such as there is no evidence that these schemes are needed or that previous schemes have been successful. The figures that the council have produced to justify the proposals are not convincing.

BCC Response:

Under Part 2 of the Housing Act 2004, Section 56 a local authority can designate an area for additional licensing where: -

“A significant proportion of the HMOs ... are being managed sufficiently ineffectively as to give rise to, or likely to give rise to one or more particular problems either for those occupying the HMOs or for members of the public”.

Additionally under their powers in Part 3 of the Housing Act 2004, Section 80 a local authority can designate an area for selective licensing where having carried out a review of housing conditions under section 3(1) of the Act, they consider it would be appropriate for a significant number of the properties to be inspected, with a view to determining whether any category 1 or category 2 hazards exist.

Certain factors have to be met and we believe that there is sufficient evidence. We have set out our reasons for this in the proposal document. Appendix A Chapter 5 and Appendix 5 of the same document. All criteria have been met and checked by our Legal Service. They also appear In our previous schemes the number of hazards found, and formal notices served indicates that a good proportion of poor housing conditions and management practices had not been reported to us and would not therefore had been dealt with outside of a licensing scheme.

In the Stapleton Road scheme 1,207 properties were licensed and 845 (70%) properties were improved to meet licensing conditions; 665 formal and informal notices were served to improve health and safety issues; 10 landlords were prosecuted for 37 offences and 204 referrals were made to other agencies including Bristol Waste, Noise Team and anti-social behaviour team.

In the Eastville / St George scheme 3,316 properties were licensed and 3,019 properties were improved to meet licensing standards; 752 formal and informal notices were served to improve health and safety issues and 675 properties had fire safety improvements made. 4 landlords were prosecuted, and 10 civil penalty notices issued, totalling more than £62,000.

In the Central Area Licensing Scheme which is still running 3,158 properties have been licensed so far and 2,157 inspections undertaken. To date 2,020 (94%) properties were improved to meet licensing standards and 1,644 (76%) were in breach of HMO management regulations; 1,115 properties needed fire safety

improvements and 5 Civil Penalty Notices were served for failure to licence a property, meet the conditions or manage it in accordance with regulations. The scheme will end in July 2024.

In the Bedminster, Brislington West and Horfield scheme we have received 2,424 licence applications so far. It is too early to report outputs.

16.13 Consultation comment 13: Choice of the three wards

11% of selective licensing comments were on this subject such as it will lead to a two-tier system in Bristol and should be citywide or not at all. Also there appear to be areas in Bristol that are far worse than the three selected for targeted action.

BCC Response:

The evidence for why the areas were chosen is based on the [Building Research Establishment report](#) commissioned by the council. Based on the areas with the highest density of private rented stock above the national average level in England (above 19%) and on the wards with the highest level of serious hazards and disrepair. Disregarding areas where we are already operating a selective licence scheme (Bedminster and Brislington West wards), the next 3 wards with the highest levels of the criteria above, and based on the BRE statistical data, is for Bishopston and Ashley Down, Easton and Cotham wards.

16.14 Consultation comment 14: Comments on the consultation itself

1% of all Additional licensing comments and 1% of selective licensing comments were on this subject but mainly that the council have already made up their minds on what they are going to do, and the consultation is just a formality that had to be completed.

BCC Response:

The Government's guidance on consultation for licensing is very clear and has been closely followed by the council. The council has met all its legal obligations to deliver the consultation and has been supported in this by the council's Communications Team who run all the council's surveys. The findings will be included in a report that will be taken to Cabinet in February 2024 for a decision to be made.

16.15 Consultation comment 15: Miscellaneous comments

9% of all Additional licensing comments and 5% of selective licensing comments were on this subject with a focus on Planning performance and challenging the HMO definition mainly. There were quite a few misunderstanding such as asking why it was fair to license where a family member was living in a property or where the landlords was resident. (These were actually included in the proposal document Appendix 1: Types of properties that are exempt from licensing.)

BCC Response:

The Licensing and Planning Legislation are separate and therefore we cannot comment on the performance of Planning as regards approval of HMOs etc.

The definitions we have used for HMOs is a legal definition under the Housing Act 2004.

17 Submissions received from Landlord and Agent Organisations

In addition to the survey and emails, we also received five submissions from organisations - two from the National Residential Landlords Association (NRLA) , Black South West Network (BSWN), SafeAgent and Grainger PLC. Our responses where appropriate, appear below:

17.1 Bristol City Council Response to NLRA Submission #1:

Firstly, I would like to stress that NRLA members share the concerns of local authorities that substandard properties should be prevented by enforcement and that bad landlords should not be allowed to operate in the private rented sector.

However, as we mentioned, at our NRLA meeting last night there were many landlords concerned about the two proposed new licensing schemes. We have impressed upon our attendees how important it is for them to respond directly to the consultation but there are also some pertinent questions which we believe deserve a response and would not necessarily be addressed by any response to consultation feedback.

Question 1

NLRA: Based on BCCs own figures from this proposed, and previous selective licensing schemes, there are an estimated 6005 privately rented properties in the four wards of Bishopston and Ashley Down, Cotham and Easton. The projected cost of implementation of this scheme is quoted as £3.5m with the fee being proposed of £912. This would generate a revenue of £5.48m. Given that the local authority is not permitted to make a profit from any licensing scheme, a) why is the Scheme 2 fee disproportionate to the cost? and b) what will happen to any surplus?

BCC response: There are three wards covered by the scheme 2 proposal: Bishopston and Ashley Down (one ward), Cotham and Easton.

The scheme costs have been calculated based on an estimated 4,354 properties being covered under this proposal. It is important to note that the fee you've quoted is the full fee without any discounts applied. Certain assumptions have been made (based on previous schemes) as to how many properties will pay the full fee and how many will pay a discounted fee – which could be reduced to £612.

When fixing fees, the Local Housing Authority may consider all costs incurred in carrying out their licensing functions. It cannot make a profit from property licensing schemes.

Question 2

NLRA: Given that the projected cost of implementation of Scheme 1 for Additional Licensing is £12.5m, and the proposed fee is £1861, this would suggest the number of currently unlicensed HMOs in these 4 wards to be over 6,700. What is the actual estimated number of small HMOs used in the calculation of the fee?

BCC response: The estimated number of small HMOs that would be covered by an Additional licensing designation, and therefore included in the fee calculation is 8,128. It is important to note that the fee you've quoted is the full fee without any discounts applied. Certain assumptions have been made

(based on previous schemes) as to how many properties will pay the full fee and how many will pay a discounted fee – which could be reduced to £1,170.

When fixing fees, the Local Housing Authority may consider all costs incurred in carrying out their licensing functions. It cannot make a profit from property licensing schemes.

Question 3

NLRA: The “Proposals to introduce new property licensing schemes in Bristol Information Booklet” makes clear in section 8 that BCC have already investigated and disregarded any alternative courses of action to achieve the objective of improving standards in the PRS. If this is the case, how can landlords have any confidence that the outcome of this consultation is anything other than a foregone conclusion that these two new licensing scheme will be introduced?

BCC response: It is a requirement of sections 57 (Additional licensing) and 81 (Selective licensing) of the Housing Act 2004 that a designation of a licensing scheme cannot be made unless they have considered whether there are any other courses of action available to them that might provide an effective method of achieving the objective(s) that the designation would be intended to achieve.

The information booklet reflects that those other courses of action have been considered and seeks people’s views on the licensing scheme proposals.

The consultation is being conducted in line with the requirements of the Housing Act 2004, as well as [Government guidance](#).

Question 4

NLRA: Given that licensing applies only to the private rented sector and that both local authorities and Registered Providers are exempt from licensing and various other aspects of what would be considered essential quality and safety standards in the PRS, how does BCC enforce standards in the social sector and to what standards are third party social housing providers held?

As BCC is unable to take enforcement action against itself, to whom is BCC accountable in terms of inspection and enforcement of standards in its own portfolio of properties?

BCC response: Registered social housing providers are regulated by the Regulator of Social Housing. Shelter has some useful information on their website: [Shelter Legal England - Regulation of social housing providers - Shelter England](#) and more information can be found on the [Government website](#).

The service that is responsible for delivering property licensing schemes is not involved with the social housing sector either as a regulator or in managing the stock.

Question 5

NLRA: As our colleagues from other associations indicated, there is a general feeling that penalising good, conscientious and compliant landlords by imposing license fees on them in order to subsidise the local authority in its obligations to enforce standards is not well-received. We will be making the case for landlords who are forced to obtain licences and found by inspection to be fully compliant, to be refunded their licence fee in full and for those landlords found to be breaching standards and regulations to face increased fees to offset this.

BCC Response: As previously stated, when fixing fees, the Local Housing Authority (LHA) may consider all costs incurred in carrying out their licensing functions. It cannot make a profit from

property licensing schemes. The Act allows an LHA to require the application to be accompanied by a fee fixed by the authority.

The proposed fee structure includes discounts of up to £300 where satisfactory electrical, gas (if applicable) safety and energy performance certificates are submitted before the licence is issued, and where the landlord or agent is a member of an accreditation scheme provided by an approved provider under the West of England Rent with Confidence scheme at the time of the application.

The proposed fee structure also includes an additional fee where a property is found to be unlicensed and those who are found to be unlicensed could also be subject to a Financial Penalty Notice (FPN) of up to £30,000 or a prosecution with an unlimited fine, as well as a Rent Repayment Order for up to 12 months' rent.

The proposed licence fee is based on an overall scheme cost and any licence fee structure will be considered as part of a report that will be taken to Cabinet if a scheme is recommended for approval. If a scheme is designated under the Housing Act 2004 ('the Act'), the fee structure will form part of that scheme. The Act sets out reasons when the licence fee needs to be refunded and does not include where landlords are found to be fully compliant. Regardless of whether a property is fully compliant, there are costs incurred by the Authority in terms of processing the licence, enforcement and general scheme administration.

Where licence holders are found to be in breach of licence conditions or other Regulations, these may be subject to FPNs or prosecution. It would not be appropriate to charge increased licence fees as a result.

17.2 Bristol City Council Response to NRLA Submission #2:

Question 1

NRLA: ...the overcrowding issue is complicated for a landlord to manage if the tenant has overfilled the property. A landlord will tell a tenant how many people are permitted to live on the property and that the tenant is not to sublet it or allow additional people to live there. Beyond that, how is the landlord managing this matter without interfering with the tenant's welfare? Equally, how will the council assist landlords when this problem arises? It is impractical for landlords to monitor tenants' everyday activities or sleeping arrangements.

Regarding reducing antisocial behaviour, landlords must tackle such activity within their properties; it should be highlighted that landlords and agents can only enforce a contract; they cannot manage behaviour.

BCC response: The licence holder is responsible for complying with the conditions of the licence, including in relation to permitted numbers. Quarterly inspections to monitor anti-social behaviour (in the proposed licence conditions) should also help to identify any over-occupation of the property. Where tenants are found to be in breach of their tenancy agreement with the landlord, it is up to the landlord to take appropriate action to enforce the terms of that agreement.

The Housing Act 2004 allows the local housing authority to include licence conditions requiring the taking of reasonable and practicable steps to prevent or reduce anti-social behaviour by persons occupying or visiting the house.

Question 2

NRLA: When tenants are nearing the end of their contract/tenancy and are moving out, they will dispose of excess household waste through various methods. These include but are not limited to putting waste out on the street for the council to collect. This is in the hope of getting their deposit back and is made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with many privately rented properties need to consider a strategy for collecting excess waste at the end of a tenancy in place of selective licensing.

Would the council consider a free/low-cost service for private landlords to remove numerous bunk items when tenants vacate the property and not dispose of such waste beforehand if such a mechanism is not already in place?

BCC response: Bristol Waste is responsible for the collection of household waste in the city and they have frequently asked questions on their website, including what to do with bulky items when tenants move out: [FAQ - landlords and letting agents - Bristol Waste Company](#) Any free/low-cost service for private landlords would need to be subsidised and this question falls outside of the licensing scheme proposals and should be directed to Bristol Waste.

Question 3

NRLA: Proposed additional and selective licence condition 7.3 states “supply to the council on demand the names of all occupants”. If a tenant does not want their name disclosed to the council and refuses permission for the landlord to supply their name, where does this leave a licence holder who would be in breach of a licence condition?

BCC response: Failure to comply with this proposed licence condition could be considered a breach. The Council believes that this proposed condition is appropriate for regulating the management, use or occupation of properties.

Question 4

NRLA: The choice by the council to not consult with public stakeholders for such large proposals that will affect many landlords is counterproductive. Potential licence holders quite rightly want to ask questions whilst the consultation process is live to receive clarity and feedback. Only accepting questions and feedback and addressing them once the formal consultation process is concluded shows a limited amount of engagement, especially important as the proposed additional licensing scheme will be city-wide for example. The NRLA offered to co-host a webinar with Bristol City Council during the consultation process to invite members and landlords to present the proposals and take questions about the licensing consultation. This was rejected by the council.

BCC response: The Council has taken reasonable steps to consult persons who are likely to be affected by the designation and considered any representations made in accordance with the consultation (and not

withdrawn) as required by the Housing Act 2004. It has engaged with a wide range of stakeholders, ensuring that the consultation is widely publicised using various channels of communication.

The Council has had due regard to the requirements set out in Government guidance: [Selective licensing in the private rented sector - A guide for local authorities](#).

Question 5

NRLA: If the scheme is approved, the council should consider providing an annual summary of outcomes to demonstrate to tenants and landlords' behaviour improvements and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall.

BCC response: In accordance with the Housing Act 2004, the Council must from time to time review the operation of any designation made by them. For previous discretionary licensing schemes, the Council has undertaken a review approximately half-way through the designation, and we would propose to do the same for this scheme if it is approved. However, we will also consider the request for providing more regular reports of licensing scheme outputs and outcomes.

17.3 Black South West Network (BSWN) submission:

We thought you would be interested in a new [BSWN Policy Research Briefing: Landlord Licensing Schemes](#) which explores the viability of both landlord licensing schemes proposed by Bristol City Council in their new [community consultation](#).

This briefing explains:

- The regulations behind landlord licensing schemes.
- The effectiveness of previous schemes in the city.
- How landlord licensing schemes relate to regulation in the Private Rented Sector (PRS).

Our recommendation would be to opt for Scheme 1, which provides more protection to a wider variety of individuals in Bristol's PRS.

If you would like further information on the attached, our Senior Policy Officer, [Angelique Retief](#), would be happy to discuss this with you.

An integral part of Black South West Network's policy work aims to support the development of dynamic, independent and strong Black and Minoritised communities, businesses and organisations in the South West. Our work reveals the barriers to accessing opportunities, and highlights local and regional needs, enabling us to design and improve our projects in order to catalyse change and have a tangible impact. If you would like further information on this topic, or if you are interested in other policy briefings, please do not hesitate to get in touch. Sign up here to receive BSWN's newsletters, event information and more.

Kind regards,
Morayo

Morayo Omogbenigun
Project Officer
Black South West Network

www.blacksouthwestnetwork.org

@BlackSWNet

17.4 Bristol City Council Response to safeagent submission:

Question 1

Safeagent: We would urge Bristol City Council to work closely with accredited lettings & management agents to ensure that the regulatory effort associated with the licensing schemes is focussed on the greatest risks. The highest priority should be tackling rogue landlords and agents, not policing the compliant.

BCC response: BCC already prioritises inspections of licensed properties, by considering a number of factors. Further, it operates a responsive service for managing and responding to private tenant complaints in non-licensable properties. However, we are also committed to visiting every property during the licence term.

Question 2

Safeagent: We would also suggest that the Council work closely with accredited agents to proactively seek out and identify unlicensed properties.

BCC response: The Council is committed to identifying and investigating unlicensed properties and would welcome any information which assists with this.

Question 3

Safeagent: The "Proposals to introduce new property licensing schemes in Bristol Information Booklet" makes clear at Section 8 that BCC have already investigated and disregarded any alternative courses of action to achieve the objective of improving standards in the PRS. If this is the case, how can landlords have any confidence that the outcome of this consultation is anything other than a foregone conclusion?

BCC response: It is a requirement of sections 57 (Additional licensing) and 81 (Selective licensing) of the Housing Act 2004 that a designation of a licensing scheme cannot be made unless they have considered whether there are any other courses of action available to them that might provide an effective method of achieving the objective(s) that the designation would be intended to achieve.

The information booklet reflects that those other courses of action have been considered and seeks people's views on the licensing scheme proposals.

The consultation is being conducted in line with the requirements of the Housing Act 2004, as well as [Government guidance](#). Any decision to designate an area as subject to additional or selective licensing will be made by Cabinet, who have not yet considered this proposal.

Question 4

Safeagent: As things stand, the proposal document's lukewarm comments about Rent with Confidence seem to undermine the scheme, by dwelling in its current limitations. We would urge the council to make

full use of the scheme, together with passporting for accredited agents. We would be happy to engage positively with discussions about this.

It seems to us that many of the licencing requirements in the Bristol City council scheme highlight how important it is for landlords to work with reputable agents such as safeagent members. Offering a discount to licence holders who work with a safeagent accredited agent would help to promote this.

Safeagent would welcome a collaborative approach with Bristol City Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace Additional and Selective Licensing and less likely to generate complaints or breaches of their licence. Discounted fees for safeagent members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

BCC response: The Council believes that such schemes have a part to play alongside licensing schemes and has outlined the importance of such schemes. We have also acknowledged the limitations in attracting those landlords and agents who continue to mismanage their properties or fail to meet their legal obligations.

The Rent with Confidence scheme was introduced to encourage all accrediting bodies to meet similar standards set by the four West of England local authorities. Those who have applied to become approved providers of accreditation schemes are vetted by the four WoE LAs and pay a fee to join the scheme.

We are aware of Safeagent's business aims to improve how properties are managed in the Private Rented Sector and we welcome them to apply to join the scheme, which if approved would give their clients access to the discount. If approved, the small cost of applying would soon be recovered by refunds on any applications to agents under their membership.

Question 5

Safeagent: The proposed baseline fees of £1,861 (Additional) and £912 (Selective) are unreasonably high. They are far in excess of those charged by most Local Authorities in England.

We note that, as colleagues on the West of England Landlords Panel have pointed out, BCC's figures suggest there are some 6005 privately rented properties in the four wards of Bishopston, Ashley Down, Cotham and Easton. The projected cost of implementation of the selective licensing scheme is quoted as £3.5m. The fee being proposed (£912) would generate a revenue of £5.48m. Given that the local authority is not permitted to make a profit from any licensing scheme, the fee seems disproportionate to the cost, even allowing for the discounts that are available.

There is a danger here that BCC will be perceived to be penalising good, conscientious and compliant landlords by imposing high license fees on them, in order to subsidise the local authority in funding its obligations to enforce standards. We know that some representative bodies will be making the case for landlords who are found by inspection to be fully compliant to be refunded their licence fee, with those landlords found to be breaching standards and regulations facing increased fees to offset this. As an alternative, we would suggest that the fees are lowered and that more focus is put on non-compliant landlords and agents who are not members of recognised industry bodies such as safeagent.

BCC response: There are three wards covered by the scheme 2 proposal: Bishopston and Ashley Down (as one ward), Cotham and Easton.

The scheme costs have been calculated based on an estimated 4,354 properties being covered under this proposal. It is important to note that the fee you've quoted is the full fee without any discounts applied. Certain assumptions have been made (based on previous schemes) as to how many properties will pay the full fee and how many will pay a discounted fee – which could be reduced to £612. The same applies for the scheme 1 proposal.

When fixing fees, the Local Housing Authority may consider all costs incurred in carrying out their licensing functions. It cannot make a profit from property licensing schemes. The Act allows an LHA to require the application to be accompanied by a fee fixed by the authority.

The proposed fee structure includes discounts of up to £300 where satisfactory electrical, gas (if applicable) safety and energy performance certificates are submitted before the licence is issued, and where the landlord or agent is a member of an accreditation scheme provided by an approved provider under the West of England Rent with Confidence scheme at the time of the application.

The proposed fee structure also includes an additional fee where a property is found to be unlicensed and those who are found to be unlicensed could be subject to a Financial Penalty Notice (FPN) of up to £30,000 or a prosecution with an unlimited fine, as well as a Rent Repayment Order for up to 12 months' rent.

The proposed licence fee is based on an overall scheme cost and the licence fee structure will be considered as part of a report that will be taken to Cabinet if a scheme is recommended for approval. If a scheme is designated under the Housing Act 2004 ('the Act'), the fee structure will form part of that scheme. The Act sets out reasons when the licence fee needs to be refunded and does not include where landlords are found to be fully compliant. Regardless of whether a property is fully compliant, there are costs incurred by the Authority in terms of processing the licence, enforcement and general scheme administration.

Where licence holders are found to be in breach of licence conditions or other Regulations, these may be subject to FPNs or prosecution. It would not be appropriate to charge increased licence fees as a result.

Question 6

Safeagent: For our members, dealing with actual and perceived anti-social behaviour in the PRS is a day-to-day activity. However, in general, we have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

BCC response: The Council does expect landlords to take responsibility for the management of their properties to make sure as far as is reasonably possible the behaviour of their tenants or their tenants' visitors in the vicinity of the property. The Housing Act 2004 allows the local housing authority to include licence conditions requiring the taking of reasonable and practicable steps to prevent or reduce anti-social behaviour by persons occupying or visiting the house. There is no assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB, however it should also be noted there is evidence of increased ASB in some areas where there are high concentrations of HMOs.

Question 7

Safeagent: We believe that regular information on implementation of the scheme should be made available in a clear and consistent format.

BCC response: A review is normally undertaken halfway through a scheme and reported to Cabinet member, but some key details are shared in the Landlord Newsletter which is distributed to all licensed landlords. Updates on outputs are also provided in the WoE Landlord Forum meetings. This can be expanded so regular updates are given on schemes progress as necessary and we are actively looking at how we can improve the sharing of information in this regard.

17.5 Grainger Plc Submission

Question 1:

Grainger: With licensing schemes now costing Grainger in excess of £1m, the additional cost of licencing is not insignificant and, with additional pressures on construction costs and finance rates, has the ability to have a major impact on project viability and housing delivery. This will likely lead to an increase in viability challenges to s106 and affordable housing contributions, as well as forcing many landlords to increase the rents charged to their customers.

BCC response: When fixing fees, the Local Housing Authority (LHA) may consider all costs incurred in carrying out their licensing functions. It cannot make a profit from property licensing schemes.

The Council does not feel that it is appropriate to introduce a separate fee structure for build-to-rent (BTR) properties. Any reduction in net income would be the same for any property and the Council does not believe that individual finances should be considered when setting licensing fees.

Whilst there would clearly be an increase in costs for properties that require a licence, we do not believe that these costs are disproportionate for BTR properties.

The Selective licensing fee with full discounts is £612 for a five-year licence. This equates to £10.20 per month so should not lead to significant rental increases.

Question 2:

Grainger: For similar reasons, we also do not believe that HMO licensing is suitably applicable to BTR properties, and that it would only serve to disincentivise the future supply of larger rental properties within the city. This is both due to the cost associated with HMO licensing and operational difficulties associated with such licensing. HMO licensing should be targeted toward properties in which tenants hold separate lease agreements and are set up to occupy genuinely separate spaces with shared kitchen and bathroom facilities. By including larger BTR properties within this category, Bristol residents are denied the opportunity occupy larger properties alongside friends or partners – situations in which they can create both a more affordable and enjoyable living experience. We believe provisions should be created within the licensing rules to accommodate such situations.

BCC response: There are currently no exemptions for BTR properties from HMO licensing and this would require legislative change. Further, BTR properties may be operated by a range of organisations and does not guarantee effective management. We do not believe that Bristol residents are denied the opportunity to occupy larger properties, and these may be covered by national mandatory HMO licensing (five or more persons) anyway.

The Housing Act 2004 allows LHAs to designate licensing schemes where certain criteria are met, and Government guidance is followed. These are Additional licensing schemes in relation to HMOs and Selective licensing schemes in relation to other rented properties.

In the absence of legislation which allows for BTR properties to be exempted, these properties must be licensed in accordance with applicable designations.

Question 3:

Grainger: There is however a strong case for BTR to be exempt from selective licensing or, alternatively, for the selective licensing framework to be reformed to make it fit-for purpose for large scale landlords.

BCC response: There are currently no exemptions for BTR properties from Selective licensing and this would require legislative change. Any reforms to the selective licensing framework would need to be made by central Government.

Question 4:

Grainger: Grainger is subject to numerous licensing schemes across different boroughs, however very few local authorities have attended any of our properties to complete inspections and check documentation.

BCC response: All properties subject to licensing under the proposed schemes, will be inspected. This is the same approach taken for previous discretionary licensing schemes.

Question 5:

Grainger: Licensing is a tool for addressing poor quality PRS, which is unnecessarily catching responsible actors and thereby discouraging investment by the very type of landlords we should be encouraging.

BCC response: There are a range of criteria for designating Selective licensing schemes including poor housing conditions and high levels of migration, deprivation or crime. There are defined criteria for designating an Additional licensing scheme in relation to the management of properties.

Question 6:

Grainger: Licensing forms require a named individual – this means that, should that individual leave the business, we are required to re-apply for all licenses associated with that individual. The scheme is not designed for landlord businesses, such as Grainger and other BTR landlords and operators.

BCC response: Although a named individual is the applicant, businesses can be the licence holder for properties. It does not have to be the same individual who applies or re-applies for licences. Further, there is no requirement to re-license for Additional and Selective licensing schemes unless another scheme is designated.

Question 7:

Grainger: In our experience of property licensing requirements around the country, we have found that application requirements for licenses are often overly burdensome and repetitive for large-scale landlords with hundreds of properties within a single building ownership. This is largely due to the inability for any efficiency savings when completing forms for a large number of homes within single buildings where many of the details are identical.

Lack of economies of scale for large-scale landlords – with a form being required for each home, which are repetitive and often paper-based, the administrative time and cost to BTR operators is significant.

BCC response: The information that needs to be supplied as part of a licence applicant is set out in the Housing Act 2004 and The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006. Each application must contain the information set out in this legislation. We use an online application system; however, the system does not allow for the pre-population of application forms with landlord details.

Question 8:

Grainger: Due to the fractured and decentralised nature of licensing schemes, there are additional difficulties for largescale landlords to ensure compliance. With Local Authorities rarely directly notifying landlords of their intention to implement licensing schemes and no centralised way of understanding if there is a licensing requirement. At present, we are required to manually search Local Authorities and correlate these to our portfolio and pipeline. Whilst this is not within the gift of Bristol City Council, we would suggest that the council endeavours to notify all landlords of properties which will be subject to licensing ahead of its implementation, and allow time for licenses to be obtained prior to enforcement action being taken in instances whereby landlords are unaware.

BCC response: BCC complies with the notification requirements outlined in the Housing Act 2004, following the designation of Additional or Selective licensing schemes. The Act requires LHAs to publish a notice of the designation once it has been confirmed. An LHA must publish a notice within the designated area within seven days of the designation being confirmed and notify all those consulted on the proposed designation within two weeks of the designation being confirmed. BCC also makes every effort to contact all affected parties throughout the process from consultation, designation and when schemes go live as long as the ownership information is correctly recorded on Council Tax records.

For previously designated schemes, we have allowed a grace period to apply for licences before considering enforcement action.

Question 9:

Grainger: By targeting responsible landlords who are providing high-quality homes we feel this will inadvertently undermine the aims of many local authorities to improve the overall standards of its residents and provide additional affordable homes in the city.

BCC response: BCC does not believe that licensing schemes which includes BTR properties, would undermine the aims of the proposed schemes.

Question 10:

Grainger: ... any such scheme should be brought forward with a fee structure which is reflective of both the high standards and reduced enforcement cost associated with the BTR sector. We are aware of at least one local authority, Nottingham City Council, who offer an alternative fee structure for larger residential blocks.

For landlords accredited with DASH, Unipol or ANUK, there are also reduced fees available. This would bring the cost down to £1,771 per block + £512 per home.

Whilst this structure recognises the reduced administrative burden for enforcement authorities associated with residential blocks, we do not believe it appropriately addresses the significantly increased standards seen in BTR and will continue to discourage residential investment into the city.

We encourage policymakers to engage with industry, and in particular the BTR sector, to agree a way forward which is both of benefit to tenants and supports the future delivery of high-quality rental homes in the city.

BCC response: When designating Additional licensing schemes, the LHA must have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area in question. These codes of practice are in relation to large student accommodation e.g., ANUK. No such codes of practice have been approved in relation to BTR and this would be a decision for Central Government and require legislative change. Further, there are no such codes of practice or considerations in relation to the designation of Selective licensing schemes.

In relation to an alternative fee structure for residential blocks, we are aware of a number of different fee structures operated nationally. However, we believe that our proposed fee structure is fair to all landlords so that the same fee applies to each property, regardless of how many properties are owned. It would be unfair in our view to offer a reduced fee to a landlord who is receiving rent from multiple properties, as opposed to a landlord who owns one or two properties. The licence fee is calculated based on the overall cost of administering the scheme.

18 How will this report be used?

This report will be considered as final proposals are developed by officers to be put to Cabinet for consideration at a Full Council meeting on 6th February 2023.

Cabinet decisions will be published through normal procedures for Full Council and Cabinet decisions at democracy.bristol.gov.uk.

19 How can I keep track?

You can always find the latest consultations online at www.bristol.gov.uk/consultationhub where you can also sign up to receive automated email notifications about consultations.

All decisions related to the proposals in this consultation will be made publicly at the Full Council meeting or future Cabinet meetings.

You can find forthcoming meetings and their agenda at democracy.bristol.gov.uk.

Any decisions made by Full Council and Cabinet will also be shared at democracy.bristol.gov.uk.

Appendix B2- NRLA Submission

Bristol City Council
6th November 2023

Dear Sir or Madam,

Selective & Additional Licensing Proposals

The NRLA is an association following the merger of the National Landlords Association and the Residential Landlords Association. Our membership represents over 100,000 landlords and agents, the largest organisation in the sector.

Thank you for the opportunity to respond to the above consultation regarding the introduction of further selective and additional licensing in Bristol. The NRLA objects to the relevance of further Selective and Additional Licensing schemes by Local Authorities. Although we sympathise with the aims of Bristol City Council, we believe that Licensing does not align with the successful completion of these objectives.

The NRLA seeks a fair legislative and regulatory environment for the private rented sector while ensuring landlords know their statutory rights and responsibilities.

Main Objections

Antisocial behaviour and low housing

Landlords are usually not experienced in managing antisocial behaviour and do not have the professional capacity to resolve tenants' mental health issues or drug and alcohol dependency. Suppose there are any allegations about a tenant causing problems, and a landlord ends the tenancy. In that case, the landlord will have fulfilled their obligations, even if the tenant has any of the above issues.

This moves the problems around Bristol City Council but does not help the tenant, who could become lost in the system, or worst, move towards the criminal landlords. They will also blight another resident's life.

Furthermore, the overcrowding issue is complicated for a landlord to manage if the tenant has overfilled the property. A landlord will tell a tenant how many people are permitted to live on the property and that the tenant is not to sublet it or allow additional people to live there. Beyond that, how is the landlord managing this matter without interfering with the tenant's welfare? Equally, how will the council assist landlords when this problem arises?

It is impractical for landlords to monitor tenants' everyday activities or sleeping arrangements.

Where overcrowding occurs, the people involved know what they are doing and that they are criminals, not landlords. The council already has the power to deal with this.

Regarding reducing antisocial behaviour, landlords must tackle such activity within their properties; it should be highlighted that landlords and agents can only enforce a contract; they cannot manage behaviour.

Bristol City Council has many existing enforcing powers that can rectify the identified problems as part of the council's housing strategy. These include:

1. Criminal Behaviour Orders
1. Crime Prevention Injunctions
1. Interim Management Orders
1. Empty Dwelling Management Orders
1. Improvement Notices (for homes that do not meet the Decent Homes Standard)
1. Litter Abatement Notices (Section 92 of the Environmental Protection Act 1990)
1. Fixed Penalty Notices or Confiscation of equipment (Sections 8 and 10 of the Noise Act 1996)
1. Directions regarding the disposal of waste (for example, Section 46 of the Environmental Protection Act 1990)
1. Notices to remove rubbish from land (Section 2-3 of the Prevention of Damage by Pests Act 1949)

Waste management

When tenants are nearing the end of their contract/tenancy and are moving out, they will dispose of excess household waste through various methods. These include but are not limited to putting waste out on the street for the council to collect. This is in the hope of getting their deposit back and is made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with many privately rented properties need to consider a strategy for collecting excess waste at the end of a tenancy in place of selective licensing.

Would the council consider a free/low-cost service for private landlords to remove numerous bunk items when tenants vacate the property and not dispose of such waste beforehand if such a mechanism is not already in place?

Licensing Conditions

Proposed additional and selective licence condition 7.3 states “*supply to the council on demand the names of all occupants*”. If a tenant does not want their name disclosed to the council and refuses permission for the landlord to supply their name, where does this leave a licence holder who would be in breach of a licence condition?

Consultation method

The choice by the council to not consult with public stakeholders for such large proposals that will affect many landlords is counterproductive. Potential licence holders quite rightly want to ask questions whilst the consultation process is live to receive clarity and feedback. Only accepting questions and feedback and addressing them once the formal consultation process is concluded shows a limited amount of engagement, especially important as the proposed additional licensing scheme will be city-wide for example. The NRLA offered to co-host a webinar with Bristol City Council during the consultation process to invite members and landlords to present the proposals and take questions about the licensing consultation. This was rejected by the council.

Conclusions and alternatives

The NRLA believes local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of residents and landlords in the area. The sector is regulated, and enforcement is essential for keeping criminals who exploit landlords and tenants. An active enforcement policy that supports good landlords is crucial as it will remove those who exploit others and create a level playing field. It is essential to understand how the sector operates as landlords can often be victims of criminal activity and antisocial behaviour with their properties being exploited.

The NRLA advocates using council tax records to identify tenures used by the private rented sector and those landlords in charge of those properties. Unlike discretionary licensing, landlords do not require self-identification, making it harder for criminal landlords to operate under the radar. With this approach, the council would not need to consult and implement changes immediately.

If the scheme is approved, the council should consider providing an annual summary of outcomes to demonstrate to tenants and landlords' behaviour improvements and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall.

The NRLA has a shared interest with Bristol City Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of further selective and additional licensing is the most effective approach to achieve this aim both in the short term and long term.

Yours Faithfully,

Samantha Watkin
Policy Officer
National Residential Landlords Association
Samantha.Watkin@nrla.org.uk

APPENDIX B3: BSWN Submission

Date: 31st October, 2023

Policy BSWN

Introduction

Bristol City Council has launched a city-wide consultation to consider the introduction of two new property licensing schemes for Houses of Multiple Occupation (HMOs) in the private rented sector (PRS). The Council have given the option of two proposals:

- *Scheme 1:* A city-wide scheme which would require landlords of almost all privately rented homes to acquire a licence, including landlords who rent to single people and families.
- *Scheme 2:* A selective licensing scheme in Bishopston, Ashley Down, Cotham and Easton due to the high concentration of private rental housing in these wards (Bristol City Council, 2023c)

According to the latest 2022 English Housing Survey (Department for Levelling Up, Housing and Communities, 2023a), 23% of private rented households have ethnic minority Household Reference Persons, compared to 19% of social renters, and 8% of owner occupiers. Subsequently, any changes to regulations in the PRS will have a disproportionate impact on minoritised communities. Effective HMO Licensing ensures that local authorities can identify and enforce against bad practice (Shelter, 2023a). While previous schemes have been successful, current national regulations (the Houses in Multiple Occupation Asylum-seeker Accommodation Regulations 2023) mean that migrants might not benefit from the proposed improvements to HMO licensing (Stockwell, 2023; Department for Levelling Up, Housing and Communities, 2023).

Policy Overview

What is an HMO?

An HMO is a home with at least 3 tenants, forming more than one household where there are shared toilet, bathroom or kitchen facilities. A large HMO has at least 5 tenants, forming more than one household who share toilet, bathroom or kitchen facilities (GOV.UK, 2023c). HMOs also include converted blocks of flats known as Section 257 HMOs. Section 257 of the Housing Act 2004 applies to converted properties and describes an HMO as a building:

- Which has been converted into and consists of self-contained flats
- Where the conversion work did not comply with building standard
- Where less than two-thirds of the flats are owner-occupied (Birmingham City Council, 2022).

HMO properties in the South West make up 16% of the national HMO stock, behind London (24%) and East Midlands (19%). They are traditionally in older housing stock, which is more likely to be poorly maintained and overcrowded, with insufficient amenities (Department for Communities and Local Government, 2008).

While there has been a national 2.4% decrease in the number of HMOs from 2019 - 2022, in Bristol, there has been a 0.6% increase in the estimated number of HMOs (Smail, 2023). Bristol remains a high investment area for HMOs due to the large young, transient population who are more likely to rent HMOs. 39.6% of Bristol's population are aged 20 - 39 years old compared to the national average of 26.2% (Bristol City Council, 2023b). Furthermore, Bristol's population has grown by 10% over the last decade (Bristol City Council, 2023b). Combined with a 52% increase in private rental prices in the city and the retractions on welfare (e.g. Local Housing Allowance limits and benefit freezes), HMOs present as an affordable housing option to many students, young people and migrants, 75% of whom rent privately if they have been in the UK for less than five years (Bouzarovski et al., 2022); Bristol City Council, 2023a).

What is a licensing scheme?

The Housing Act 2004 (Part 3) sets out the framework for licensing private rented housing in a local authority, while Section 80 introduced selective licensing of private landlords. Local authorities are required to assess if there is a significant number of private rentals, and are required to consult communities by law (GOV.UK, 2023c). Local authorities are able to apply selective licensing schemes if there is low housing demand, significant amounts of anti-social behaviour and poor housing conditions (GOV.UK, 2023c).

There are two types of private property licensing:

- Mandatory licensing of HMOs began in 2006, and originally applied to houses with three storeys or more, with five people making up two or more separate households (GOV.UK, 2019). In 2018, mandatory licensing was extended to HMOs with one or two storeys (GOV.UK, 2019). Mandatory licensing ensures that HMOs pass a standard, converted or self-contained flat test. This includes testing for gas, electrical and fire safety, mandatory national minimum sleeping room sizes and waste disposal requirements (GOV.UK, 2019; Shelter, 2023a).
- Additional licensing occurs when local authorities can impose conditions on the management of an HMO not covered by mandatory licensing (Shelter, 2023a).

Selective licensing gives local authorities the power to introduce licensing for all privately rented homes in a given area. Since 2015, all local authorities have been required to obtain confirmation from the Secretary of State for Levelling Up, Housing and Communities on any selective licensing scheme which would affect more than 20% of their geographical area or more than 20% of privately rented homes in the local authority area (Department for Levelling Up, Housing and Communities, 2023b).

Policy Implications

HMOs have been associated with an increase in anti-social behaviour, lack of community cohesion due to the transient population, overcrowding and a deterioration in health (Bouzarovski *et al.*, 2022). HMOs are more likely to be older housing stock, in turn presenting higher risks to tenants' health and safety, for example through dangerous gas appliances and faulty electrical systems (Birmingham City Council, 2022). This is a prevalent issue in the South West, which has the third highest amount of non-decent dwellings (19%) (Department for Levelling Up, Housing and Communities, 2022b). Furthermore, a rise in HMOs could lead to the displacement of established residents, due to changes in local infrastructure which respond to population change, such as a decrease in youth facilities in response to less school-aged children in an area (Department for Communities and Local Government, 2008).

Scheme 1 would require all HMOs not subject to mandatory licensing to obtain a licence, while Scheme 2 would require landlords in Bishopston and Ashley Down, Cotham and Easton to obtain a licence due to the high concentration of private housing. 31.71% of residents in Easton identify as non-White, therefore a selective licensing scheme in this ward would serve a majority of non-White residents who are more likely to rent (Office for National Statistics, 2023b). According to the 2021-22 English Housing Survey, the private rented sector had the lowest proportion of HRPs who are UK nationals at 74% compared to social renters (92%) and owner occupiers (96%) (Department for Levelling Up, Housing and Communities, 2023a). Meanwhile, Cotham and Bishopston and Ashley Down have high concentrations of students (30% and 16% respectively) (Office for National Statistics, 2023b).

Previous selective licensing schemes in the city have been successful in identifying HMO landlords and enforcing good practice such as the Stapleton Road and Eastville/St George schemes (Gilchrist, 2019). The Stapleton Road licensing scheme ran from April 2013 to April 2021 (Gilchrist, 2019). A total of 1,207 properties were licensed, 2,485 licence inspections were undertaken and 396 licensable properties were identified to have at least one serious hazard (Gilchrist, 2019). The Central Additional Licensing (CAL) scheme in 12 central Bristol wards from April 2022 - July 2023 found that 94% of properties failed to meet licence conditions, highlighting the need for effective city-wide licensing (Stockwell, 2023).

Increased licensing leads to better health and proactive measures against fire safety and overcrowding. Birmingham City Council recently introduced additional licensing across all 69 wards of the city, which shows support for the effectiveness of the scheme (Birmingham City Council, 2023). However, additional licensing requires local authorities to have the resources to regulate and enforce good practice. While Scheme 2 is more expansive and seeks to licence non-HMO properties, it would cost Bristol City Council £12,516,316 compared to the cost of Scheme 1 (£3,532,288) (Bristol City Council, 2023c).

The Houses in Multiple Occupation (HMO) (Asylum-seeker Accommodation) Regulations 2023 seek to temporarily exempt asylum seeker accommodation from licensing requirements, due to complaints raised by Asylum Accommodation Service Contract (AASC) providers who raised concerns about overregulation. There are 6000 HMO properties accommodating 28000 asylum seekers (Shelter, 2023b). A lack of regulation will undoubtedly attract private landlords to AASC providers and lead to a decrease in housing conditions, housing availability and fire safety standards. Furthermore, this might drive up private rental housing prices as landlords leave the market and increasing numbers of people begin to rely on the lower quality and cost sector of the PRS due to the increase in the cost of living (Bouzarovski *et al.*, 2022). This policy will have a disproportionate impact on the many asylum-seekers from minoritised communities, who are more likely to live in overcrowded privately rented accommodation.

Policy Recommendations and Conclusion

While Scheme 1 has a wider remit, Scheme 2 is a more targeted approach towards regulating those who are not protected by any minimum standards or statutory regulations. By requiring landlords who rent to single people, couples and families to apply for a property licence, a wider variety of consumers in Bristol's PRS will have good practice enforced in their homes. Currently, there are limited protections available for tenants in non-HMO properties, who are more likely to be long term tenants. The Renters Reform Bill 2023 plans to enforce the Decent Homes Standard on the PRS, which is the statutory minimum standard for social housing, and give tenants stronger powers to challenge poor practice (Department for Levelling Up, Housing and Communities, 2022). Furthermore, the Bristol City Council Living Rent Commission report calls for the expansion of area-based and selective licensing to raise property standards (Bristol City Council, 2023a).

The consultation ends on the 7th of November, share your views here:
<https://www.ask.bristol.gov.uk/property-licensing-2023>.

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APPENDIX B4 – Safeagent Submission



BRISTOL CITY COUNCIL'S ADDITIONAL AND SELECTIVE LICENSING PROPOSALS

A RESPONSE TO THE CONSULTATION FROM SAFEAGENT – NOVEMBER 2023

INTRODUCTION

safeagent www.safeagents.co.uk is a UK wide, not for profit accreditation scheme for lettings and management agents operating in the Private Rented Sector (PRS)

safeagent firms are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Firms must provide evidence that they continue to meet **safeagent** criteria on an annual basis, in order to retain their accreditation. The scheme includes 1700 firms, with over 2500 offices.

safeagent is an accredited training provider under the Rent Smart Wales scheme and meets the requirements for training of agents under the Scottish Government Register. **safeagent** also operates a Government approved Client Money Protection Scheme.

SAFEAGENT AND LICENSING

safeagent is supportive of initiatives such as Additional and Selective Licensing, providing they are implemented in a way that takes account of the Private Rented Sector (PRS)'s own efforts to promote high standards.

safeagent believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as **safeagent**) is essential to the success of initiatives such as Additional and Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in House of Commons Standard Note SN/SP 4634.

The same note sets out how important it is for licensing schemes to avoid being burdensome. We believe that promoting voluntary schemes - and offering discounted licence fees to accredited landlords and agents, can help to achieve this. Voluntary schemes often require members to observe standards that are at least compatible with (and are often over and above) those of licensing schemes. We believe, therefore, that if Bristol City Council were to allow discounts based on membership of **safeagent** (as well as other similar bodies) implementing and policing the licensing scheme would ultimately be less costly and more effective, allowing resources to be concentrated in the areas where they are most needed.

This is a commonly accepted approach by many English Local Authorities. We would further point out that, in Wales, the Welsh Government has recently recognised the importance of membership of specified bodies such as **safeagent** and is offering discounted fees to members as a consequence <https://www.rentsmart.gov.wales/en/>

PROMOTING PROFESSIONALISM IN THE PRS - THE ROLE OF AGENTS

safeagent's engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making licensing, accreditation and other, voluntary regulatory schemes work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of licensing based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local licensing arrangements.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant fees, the redress scheme they belong to and whether they belong to a client money protection scheme. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme.

At **safeagent** we operate one of the six government approved Client Money Protection Schemes. **safeagent** ensures its members maintain defined service standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also have an extensive online training offering to support their professional development. All this can be of assistance to councils who are trying to drive up standards in the PRS.

To assist councils in regulating the private rented sector and effectively utilising these enforcement powers, we developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the **safeagent** Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021. It can be downloaded free of charge from our website: <https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-Effective-Enforcement-Toolkit-2021.pdf>

BRISTOL CITY COUNCIL'S PROPOSALS - SPECIFIC ISSUES

Partnership Working with Lettings and Management Agents

We would urge Bristol City Council to work closely with accredited lettings & management agents to ensure that the regulatory effort associated with the licensing schemes is focussed on the greatest risks. The highest priority should be tackling rogue landlords and agents, not policing the compliant.

We note the Council's view that a significant proportion of HMOs are being managed ineffectively. We would suggest that proportionately far fewer properties being managed by accredited agents suffer from this ineffective management. Greater partnership working could, therefore, potentially mitigate the need to inspect every property. Accredited agents can be trusted to pick up on issues during their six monthly inspections.

Many rogue landlords and unaccredited agents operate “under the radar”. Resources should, therefore, be directed towards these serious cases. There is danger that too much time will be spent on those properties and landlords where an existing, reputable agent is best placed to ensure compliance with license conditions.

We would urge the council to fully recognise the compliance work reputable agents carry out as part of their day to day work. We would also suggest that the Council work closely with accredited agents to proactively seek out and identify unlicensed properties.

Co-regulation

The "Proposals to introduce new property licensing schemes in Bristol Information Booklet" makes clear at Section 8 that BCC have already investigated and disregarded any alternative courses of action to achieve the objective of improving standards in the PRS. If this is the case, how can landlords have any confidence that the outcome of this consultation is anything other than a foregone conclusion?

Specifically, the description of co-regulation schemes in the proposal is somewhat misleading. In our experience, they need not be an alternative to licensing, but rather a way of implementing it in partnership. Once licensing schemes are introduced, co-regulation partners can be engaged to promote engagement from their members (in our case agents) This helps to realise some of the advantages of ensuring that accredited agents are engaged to manage properties.

The possible sanctions under co-regulation schemes are not “*limited*”. On top of the sanctions available under the licensing schemes themselves, co-regulation partners can take action against rogue members, including ultimately expulsion. Furthermore, co-regulation partners’ standards typically far exceed “*minimum legal standards*”.

We do not agree that co-regulation “*will not significantly improve the standards of management and condition of the properties within the proposed area*” In Liverpool, where **safeagent** acted as a co-regulation partner, standards and conditions were indeed greatly improved – and member agents were much more positively engaged with the licensing process as a whole.

Rent with Confidence

The proposal document points out that Rent with Confidence is a “*voluntary scheme...(that)... does not attract those landlords and agents who continue to mismanage their properties or meet their legal obligations*” It goes on to describe how “*the council does not believe it will be...(as)...effective as the proposed licensing schemes.*”

This suggests that a prime focus of any programme of full blown licensing inspections should be on the limited number of “rogues” who blight the PRS. If the potential of Rent with Confidence were to be fully realised, by passporting accredited agents into the scheme, this would:

- enable the operational focus of licensing inspections to be on targeting the seriously non-compliant, who are much more likely to be unaccredited
- simplify things for agents and the landlords they act for, by removing the duplication of effort and cost involved in compliance with two accreditation schemes (one industry, one local)

As things stand, the proposal document's lukewarm comments about Rent with Confidence seem to undermine the scheme, by dwelling in its current limitations. We would urge the council to make full use of the scheme, together with passporting for accredited agents. We would be happy to engage positively with discussions about this.

Proposed Licensing Area

We welcome the targeted nature of the selective licensing proposals. We are also supportive in principle of the City Wide HMO licensing proposal.

Additional and Selective Licensing Fee

The proposed baseline fees of £1,861 (Additional) and £912 (Selective) are unreasonably high. They are far in excess of those charged by most Local Authorities in England.

We note that, as colleagues on the West of England Landlords Panel have pointed out, BCC's figures suggest there are some 6005 privately rented properties in the four wards of Bishopston, Ashley Down, Cotham and Easton. The projected cost of implementation of the selective licensing scheme is quoted as £3.5m. The fee being proposed (£912) would generate a revenue of £5.48m. Given that the local authority is not permitted to make a profit from any licensing scheme, the fee seems disproportionate to the cost, even allowing for the discounts that are available,

There is a danger here that BCC will be perceived to be penalising good, conscientious and compliant landlords by imposing high license fees on them, in order to subsidise the local authority in funding its obligations to enforce standards. We know that some representative bodies will be making the case for landlords who are found by inspection to be fully compliant to be refunded their licence fee, with those landlords found to be breaching standards and regulations facing increased fees to offset this. As an alternative, we would suggest that the fees are lowered and that more focus is put on non-compliant landlords and agents who are not members of recognised industry bodies such as **safeagent**.

We would suggest that this is justified because **safeagent** members and the landlords who engage them are less likely to be non-compliant and that, as a result, there could be reduced costs to the council. We would also suggest that **safeagent** membership mitigates the need for full compliance visits to be carried out by the council. For example, the timing and content of visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by **safeagent** agents.

In our detailed comments below, we point out some of the areas where compliance with key standards is an inherent part of the **safeagent** scheme.

LICENCE CONDITIONS

Tenant Referencing

We are supportive of any requirement to obtain references for prospective tenants. **safeagent** is actively involved in promoting good practice in tenant referencing. We would be happy to discuss our work in this area with the Council.

Tenancy Management

safeagent agents are expected provide and fill in a tenancy agreement on behalf of the landlord. they will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement.

They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails.

At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Under **safeagent's** service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining **safeagent**, agents are asked to provide details of the number and value of the deposits they have registered with the scheme.

Agents are asked to authorise **safeagent** to contact the scheme to verify this information.

During the course of a tenancy, **safeagent** agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes.

safeagent agents are also required to:

- Have a designated client account with the bank
- Operate to strictly defined Accounting Standards
- Be part of a mandatory Client Money Protection Scheme.

These requirements provide Additional and Selective security for client monies held, over and above the requirements of the Bristol City council licensing scheme. Again, this is an area where increased **safeagent** membership would be of benefit to the Council and local tenants.

Licence Conditions Relating to the Property

We welcome Bristol City Council's drive to improve property standards. We believe that **safeagent's** standards go a long way to ensuring compliance with license conditions.

Under **safeagent's** service standards, **safeagent** agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that **safeagent** agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.

safeagent agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.

safeagent agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will

provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.

Thereafter, **safeagent's** standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. **safeagent** and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format.

This requirement exceeds the licence conditions which require “*annual inspections*” only.

Tenants will be fully aware of access arrangements. **safeagent** agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. **safeagent** agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We would welcome any proposal that agents who are license holders should undergo training.

Membership of **safeagent** means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a *condition* of **safeagent** membership, **safeagent** offers short courses and qualifications in Lettings & Management at Levels 2 and 3 which are Ofqual recognised

safeagent offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, **safeagent's** Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the **safeagent** Foundation Lettings Course successfully also has the opportunity to use the designation '**safeagent qualified**'. **safeagent** Foundation Lettings Course (Wales) is also approved training recognised by Rent Smart Wales, the Welsh Government's regulatory body as meeting the requirements for agents to have complying with their licensing requirement.

One advantage of this approach is that it makes it easy to ascertain (through on-line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation.

Modules available cover:

- Pre-tenancy issues
- Responsibilities and liabilities
- Setting up a tenancy
- During a tenancy
- Ending a tenancy
- General law concepts, statute vs contract
- Relationships
- Obligations
- Process
- Considerations for corporate tenants
- Continuing Professional Development (CPD)

In addition, **safeagent** provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as:

Assured Shorthold Tenancies (ASTs)
Client Money
Consumer Protection Regulations (CPRs)
Deposits
Disrepair
Electrical Appliances & Safety
Gas Appliances & Safety
Houses in Multiple Occupation (HMOs)
Housing, Health & Safety Rating System (HHSRS)
Inventories and schedules of condition
Joint Tenancies
Notice Requiring Possession

We would further suggest that discounted fees for **safeagent** agents would provide an incentive to positive engagement with training that is fully compatible with the requirements of the licensing scheme.

Anti-Social Behaviour

For our members, dealing with actual and perceived anti-social behaviour in the PRS is a day to day activity. However, in general, we have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

There may be some *correlation* between incidences of ASB and the prevalence of PRS accommodation on the area. However, correlation does not imply *causation*. The *causes* of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.

Furthermore, we would strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to manage their properties professionally cannot reasonably be expected to tackle wider social problems.

Suitability of Licence Holder

We support any requirement that the proposed licence holder should be a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like **safeagent**, who themselves apply a fit and proper person test.

All principals, partners and directors of a **safeagent** firm are asked to make the following declaration on application:

– “I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform.

If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct”

We believe this certification is broadly in line with Bristol City council’s licensing conditions and is another example of where promotion of **safeagent** membership through discounts could help to ensure compliance.

Complaints

All **safeagent** firms are required to have a written customer complaints procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues.

In line with statutory requirements, all **safeagent** members must also be members of a recognised redress scheme. Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed.

Under co-regulation schemes elsewhere in the UK, **safeagent** has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, **safeagent** can report to the Council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme’s adjudication would eventually lead to disqualification of the agent from **safeagent**. We would be happy to come to a similar arrangement with Bristol City council.

Anti-Discrimination

We welcome the requirement that Landlords and Agents must not discriminate either directly or indirectly against tenants or prospective tenants on the basis of a protected characteristic. We agree that this should include discrimination against people because they are in receipt of welfare benefits i.e. Universal Credit.

MEASURING THE SUCCESS OF THE SCHEME

We believe that regular information on implementation of the scheme should be made available in a clear and consistent format. Reports to local landlord and agent forums, representative bodies and other stakeholders should include at minimum:

- The estimated number of private rented properties that require licensing under the Additional and Selective licensing scheme
- The number of applications received in respect of these properties
- Progress in processing (granting, querying or refusing) the licence applications received
- Analysis of the reasons for any queries or refusals and the extent to which remedial action is identified and taken as a result
- Analysis of the outcomes of ongoing inspections and the extent to which remedial action is identified and taken as a result
- Progress reports across the whole 5 year period covered by the scheme.

This should help to enable the Council to work in partnership with landlords, agents, representative bodies and other stakeholders to ensure the success of the scheme.

CONCLUSION

It seems to us that many of the licencing requirements in the Bristol City council scheme highlight how important it is for landlords to work with reputable agents such as **safeagent** members. Offering a discount to licence holders who work with a **safeagent** accredited agent would help to promote this.

safeagent would welcome a collaborative approach with Bristol City Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace Additional and Selective Licensing and less likely to generate complaints or breaches of their licence. Discounted fees for **safeagent** members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

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APPENDIX 1 – COMPATIBILITY OF SAFEAGENT SERVICE STANDARDS WITH TYPICAL SCHEME CONDITIONS

Example Scheme Conditions	SAFEAGENT Service Standard Requirements
Fees	SAFEAGENT promotes complete transparency in agency fees. Members provide landlords with a statement of account as often as agreed.
Rent Liabilities and Payments	SAFEAGENT agents collect the rent and pass it on every month or as otherwise agreed. The agent will keep a separate clients' account to hold all monies.
Contact Details	SAFEAGENT agents are expected to respond to tenant and other legitimate enquiries in a timely manner. Up to date contact details will enable them to respond to tenants' requests for maintenance or repairs which might in some cases have to be referred to the landlord for approval.
State of Repair	SAFEAGENT agents visit the property with landlords and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can be confident that SAFEAGENT agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.
Access and Possession arrangements	SAFEAGENT agents will visit the property periodically during the course of the tenancy as often as agreed with the landlord. Tenants will be fully aware of access arrangements. At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Example Scheme Conditions	SAFEAGENT Service Standard Requirements
Repairs and Maintenance	SAFEAGENT agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.
Access, Cleaning and Maintenance of Common Parts	SAFEAGENT agents will arrange in advance a time for access to the property in order to inspect the condition of the property in accordance with the tenancy agreement.
Level of Facilities	SAFEAGENT agents ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before you commit to the tenancy. They provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.
Deposits	SAFEAGENT agents provide and fill in a tenancy agreement and take a deposit to protect against possible damage. They will explain the basis on which it is being held and the purpose for which it is required.
References	SAFEAGENT agents choose a tenant in a way agreed with the landlord, taking up references or checking the tenant's rent payment record.

Example Scheme Conditions	SAFEAGENT Service Standard Requirements
Complaints & Dispute Handling	<p>SAFEAGENT agents explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.</p> <p>During the tenancy, they will arrange to check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's initial deposit. They will return the deposit as soon as possible, less any appropriate deductions.</p>

APPENDIX B5- GRAINGER SUBMISSION

Bristol Additional & Selective Licensing Consultation November 2023

Company: Grainger PLC

1. Executive Summary

This paper is intended to provide additional information to the consultation being held by Bristol City Council on the proposed introduction of selective licensing in the Bishopston and Ashley Down, Cotham, and Easton wards, in addition to that already in place in the Bedminster and Brislington West wards.

Grainger currently operates 197 homes in Bristol at our Hawkins and George development, and has another 605 homes in the pipeline at our Millwrights Place and Redcliffe Quarter developments. Across these developments we are providing 94 affordable rented homes and contributing over £5,000,000 in S106 and CIL payments. These buildings fall within the Central ward and so are not subject to current or proposed selective licensing requirements. That said, we have ambitions to provide further homes within the city and wanted to highlight the potential detrimental impact that selective licensing may have on these future plans.

At present, Grainger is subject to selective, additional or HMO licenses in at least 12 of our buildings across the country. Grainger is hence well placed to accurately assess the impact of such schemes on build-to-rent and its impact on operational costs and investment viability, as well as the knock-on impact on S106 and affordable housing contributions.

We understand and support the purpose of licencing schemes to improve the quality of private rental properties and to reduce antisocial behaviour. There is however a strong case for BTR to be exempt from selective licensing or, alternatively, for the selective licensing framework to be reformed to make it fit-for-purpose for large scale landlords.

Grainger is subject to numerous licensing schemes across different boroughs, however very few local authorities have attended any of our properties to complete inspections and check documentation. In most situations there have been no formal checks and little work undertaken to ensure properties are of a suitable standard. This may be a result of a risk-based approach taken by local authorities who will focus resources on those properties most likely to be problematic or in breach of the licensing scheme. That said, this reinforces the point that the scheme adds little to no value in its application to build-to-rent properties, managed by professional companies.

Grainger and peers in the BTR sector deliver a high standard of accommodation to our customers in compliance with all legal and health & safety requirements. Grainger residents' benefit from Grainger's use of the 'Property Redress Scheme' and residents are made aware of this information. As such, by holding the proposed licence, there is no beneficial impact on the quality of product Grainger offers, nor can we identify how this would reduce ASB cases that may be caused by our residents.

Grainger and the wider BTR sector's quality standards exceed the quality standards that selective licensing schemes seek to address. BTR resident satisfaction is high and is evidenced by independent research data that we are happy to share. Given BTR's track record in quality and customer care, we reasonably question the value of selective licensing to drive standards in the BTR sector.

In practice, we do not believe that Selective Licensing is suitably applicable for the BTR sector. This is due to a number of reasons including:

- Licensing is a tool for addressing poor quality PRS, which is unnecessarily catching responsible actors and thereby discouraging investment by the very type of landlords we should be encouraging – The BTR business model relies on high occupancy based on customer satisfaction. As such the offering provided by the BTR sector already far-exceeds the standards seeking to be set by licensing schemes, and is unnecessarily caught by such schemes, adding administrative costs on both sides, local authority and landlord, with no discernible benefit.
- Lack of economies of scale for large-scale landlords – with a form being required for each home, which are repetitive and often paper-based, the administrative time and cost to BTR operators is significant.
- Licensing forms require a named individual – this means that, should that individual leave the business, we are required to re-apply for all licenses associated with that individual. The scheme is not designed for landlord businesses, such as Grainger and other BTR landlords and operators.

- Enforcement savings generated by BTR for local authorities with no benefit for BTR landlords – due to both the high standards and nature of BTR homes – often with over 200 homes on each site, the monitoring costs to Local Authorities is significantly reduced. This may be in-part the reason for the lack of enforcement we have seen to date.

£1m cost to Grainger for licensing schemes – With licensing schemes now costing Grainger in excess of £1m, the additional cost of licencing is not insignificant and, with additional pressures on construction costs and finance rates, has the ability to have a major impact on project viability and housing delivery. This will likely lead to an increase in viability challenges to s106 and affordable housing contributions, as well as forcing many landlords to increase the rents charged to their customers.

By way of example, under the proposed scheme in Bristol and assuming discounts are obtained for membership of Rent With Confidence and for timely provision of suitable documentation (£612 per unit fee) and based on a 200-home BTR scheme, we would see a reduction in the net income of £24,840 per annum and drop in investment value of £570k. This cost has the ability to significantly impact development viability and would likely lead to increased challenges to s.106 contributions. Should this not be possible, we would be forced to increase rents to ensure viability is maintained, something we would be reluctant to do because of affordability.

For similar reasons, we also do not believe that HMO licensing is suitably applicable to BTR properties, and that it would only serve to disincentivise the future supply of larger rental properties within the city. This is both due to the cost associated with HMO licensing and operational difficulties associated with such licensing. HMO licensing should be targeted toward properties in which tenants hold separate lease agreements and are set up to occupy genuinely separate spaces with shared kitchen and bathroom facilities. By including larger BTR properties within this category, Bristol residents are denied the opportunity occupy larger properties alongside friends or partners – situations in which they can create both a more affordable and enjoyable living experience. We believe provisions should be created within the licensing rules to accommodate such situations.

As Grainger does not currently operate any three bedroom properties within the city, this paper focusses primarily on the proposals for extended selective licensing requirements.

2. Administrative Cost of Licensing

In our experience of property licensing requirements around the country, we have found that application requirements for licenses are often overly burdensome and repetitive for large-scale landlords with hundreds of properties within a single building ownership. This is largely due to the inability for any efficiency savings when completing forms for a large number of homes within single buildings where many of the details are identical. Requirements often include:

- Written Statement of Terms of Occupancy
- Gas Safety Certificate
- Fire Alarm / Emergency Lighting Test Certificate (Including battery powered smoke detectors and battery powered Carbon Monoxide alarms)
- Electrical Installation Condition Report (EICR)
- Electrical appliance test certificate
- Property Inspection Records
- Tenancy Deposit Scheme Paperwork
- Copies of References for Occupants

c.30min per application - Based on our experience of complying with existing licensing schemes, we estimate that each license would take approximately 30 minutes to complete. This is an average, estimated figure from the information we have gathered, however it is expected that initial licenses may take longer due to information gathering processes.

There is a considerable indirect cost borne from the administration of licencing. The internal management time taken to obtain all relevant information and process licenses for each property held in a block is significant.

With 1,302 licenses across our organisation, this equates to 651 employment hours. A conservative estimate places this indirect additional cost approaching £10,000. If our existing and pipeline homes in Bristol were all to be subject to licensing requirements and with no efficiency savings, we estimate the indirect cost to the organisation would be c. 401 employment hours or around £6,000.

Due to the fractured and decentralised nature of licensing schemes, there are additional difficulties for large-scale landlords to ensure compliance. With Local Authorities rarely directly notifying landlords of their intention to implement licensing schemes and no centralised way of understanding if there is a licensing requirement. At present, we are required to manually search Local Authorities and correlate these to our portfolio and pipeline. Whilst this is not within the gift of Bristol City Council, we would suggest that the council endeavours to notify all landlords of properties which will be subject to licensing ahead of its implementation, and allow time for licenses to be obtained prior to enforcement action being taken in instances whereby landlords are unaware.

3. Cost of Licences at Grainger PLC

3.1 Direct Cost

Whilst London borough councils were initial adopters and advocates of the licencing schemes, we have now seen councils across the country adopting licensing schemes.

We are now subject to Selective, Additional and HMO licensing schemes in at least 12 boroughs, affecting 1,302 homes and at a total cost to Grainger of £1,023,099.

Should our existing and pipeline buildings in Bristol become subject to selective licensing requirements under the proposed charging structure, Grainger would be facing a cost of £490,824 (£98,165 per annum) – assuming all discounts are permitted under membership of Rent With Confidence and timely provision of satisfactory documentation. This is not an insignificant sum and would have a material impact on project viability.

By targeting responsible landlords who are providing high-quality homes we feel this will inadvertently undermine the aims of many local authorities to improve the overall standards of its residents and provide additional affordable homes in the city.

3.2 Investment Impact

Private rented developments are typically appraised on an income capitalisation approach whereby the net rental income is capitalised at a market yield. As such the viability of new privately rented developments is directly linked to the operational expenditure and resultant net income. It is hence essential that all operational costs are accounted for prior to investments being made.

It is important to note that, from an institutional investment point of view, the additional cost of licencing is not insignificant and, with additional pressures on construction costs and finance rates, has the ability to have a major impact on project viability and housing delivery. This will likely lead to a significant increase in viability challenge to s106 and affordable housing contributions, as well as forcing many landlords to increase the rent they charge to tenants.

3.3 Illustrative Example

To put this into context, we have provide an illustrative example below which considered an average 200 homes BTR scheme and a licensing charge of £612 – in line with the proposed charging schedule should discounts be obtained under the RWC and for timely provision of suitable documentation.

	# Units	Average NIA / sqft	Rent / sqft	Gross ERV / year	GtN	Net ERV / year	Yield	IV
Scenario 1: No Licence	200.0	700.00	25.00	3,500,000	25.00%	2,625,000	4.30%	61,046,512
Scenario 2: Licence	200.0	700.00	25.00	3,500,000	25.70%	2,600,520	4.30%	60,477,209
				-	0.70%	- 24,480	-	569,302

Licence	Per Year
612 Per unit / 5 years	24,480.00

We have assumed an average unit size of 700 sqft and local rents at £25psf, generating a gross rent of £3.5m. In scenario 1, with no licence, the gross rent is reduced by a market standard 25% gross to net leakage with the resultant £2.625m net rent capitalised at 4.3% yield to generate an investment value of £61.0m.

However, under Scenario 2, with the licence in place, the gross rent is reduced by the standard 25% plus the impact of the licence cost (cost amortised across 5 years) which increases the GtN to 25.8% which in turn reduces the net rent to £2.60m and when capitalised at 4.3% yield to generate an investment value of £60.5m.

In summary, the net income reduces by £24,840 per annum, the gross to net increases by 70bps and the investment value reduces by £570k. As such this cost has the ability to significantly impact development viability and would likely lead to increased challenges to s.106 contributions. Should this not be possible, we would be forced to increase rents to ensure viability is maintained, something we would be reluctant to do because of affordability.

4.0 Alternative Charging Structures

We remain supportive of the principle of licensing schemes to improve standards in the Private Rented Sector. However, any such scheme should be brought forward with a fee structure which is reflective of both the high standards and reduced enforcement cost associated with the BTR sector.

We are aware of at least one local authority, Nottingham City Council, who offer an alternative fee structure for larger residential blocks. The fee structure here is explained below, as it would apply for a non-accredited but standards-compliant landlord:

Item	Standard Charging Schedule	Block Charging Schedule
License cost	£887	£2,244 per block + £527 per home
Application cost	£65 per home	£65 per home
Cost across 200-home scheme	£190,400	£120,644

For landlords accredited with DASH, Unipol or ANUK, there are also reduced fees available. This would bring the cost down to £1,771 per block + £512 per home.

Whilst this structure recognises the reduced administrative burden for enforcement authorities associated with residential blocks, we do not believe it appropriately addresses the significantly increased standards seen in BTR and will continue to discourage residential investment into the city.

We encourage policymakers to engage with industry, and in particular the BTR sector, to agree a way forward which is both of benefit to tenants and supports the future delivery of high-quality rental homes in the city.

Proposal to introduce new property licensing schemes

Negative Risks that offer a threat to the proposed schemes and its Aims (Aim - Reduce Level of Risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Direction of travel	Current Risk Level			Monetary Impact of Risk Ek	Risk Tolerance			
										Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	Date
1	Under estimation of numbers of properties needing licences	More applications submitted than expected from pre scheme analysis	There will be delays in processing and inspecting properties	Open		Service provision	Housing	We will recruit additional officers to handle expected increase and review procedures and systems to make processing more efficient.	Stable	1	2	2		1	2	2	
2	Risk to tenants	Landlords may withdraw their properties from the market or increase rents to cover the fees	Landlords can choose whether to rent to families only (to avoid additional licensing in most wards except the three targetted areas) or sale the property thus removing the numbers of affordable units to tenants in these wards.	Open		Communities	Housing	A landlord can choose how he lets his properties but rent charged will be based on market conditions and demand for housing in the city which is high. Landlords charge rental income from these properties so would be giving up a lucrative income source if they pulled out of the market for the sake of paying a one-off licence fee. Experience from previous schemes indicates no overall loss in private rented properties at the end of licensing schemes. Landlords have in previous schemes, left and then rejoin the rented market when a licensing scheme are intially introduced. There are many other factors influencing a landlords decision to leave the market, not just licensing.	Stable	2	1	2		2	2	4	
3	Legal Challenges	Landlords unhappy with the proposals	The start of the scheme will be delayed or even stopped while we respond to the challenge	Open		Reputation	Finance, Governance & Performance	The evidence obtained to make the proposal satisfied the criteria for designation. Evidence was supplied by the BRE - an expert in this field. The fee structure has been reviewed and we are satisfied that the fee structure and level of fee is reasonable. The results of consultation has proved positive and endorsed officers recommendations to proceed with the additional licensing scheme 52.57% but NOT with selective licensing 38.96% (subject to cabinet approval)	Stable	1	2	2		1	3	3	
4	Scheme not implemented	Cabinet do not authorise designation of one or both proposals	Poor housing conditions in the PRS in the proposed scheme areas will remain or even deteriorate and badly managed properties will continue to operate below standard.	Open		Communities	Housing	The proposed scheme meets all the relevant legal requirements. This type of targeted action is in line with a BCC corporate priority, "Fair and Inclusive". There is support for the scheme from councillors and the cabinet member for housing. The results of consultation has proved positive and endorsed officers recommendations to proceed with the additional licensing scheme 52.57% however the selective licensing did not receive public support in the consultation with only 38.96% agreeing with that proposal. (subject to cabinet approval)	Stable	2	2	4		2	2	4	
5	To proceed with Selective Licensing scheme without public support	In the consultation only 38.96% supported the introduction of Selective Licensing proposal	Reputational damage to the council and a risk of challenge through a Judicial review	Open		Reputation	Finance, Governance & Performance	The results of consultation has proved positive and endorsed officers recommendations to proceed with the additional licensing scheme 52.57% but NOT with selective licensing 38.96% (subject to cabinet approval) . There is a risk of reputational damage if the decision taken is to proceed against the consultation outcomes, however the legal criteria for declaring a selective licensing scheme have been met.	Stable	3	3	9		2	2	4	

6	New IT system not in place at start of new scheme to deal with new applications electronically	The new IT system to replace Civica has already been delayed and there is now a risk that it will not go live until after the proposed start of the new scheme.	Officers will not be able to deal with the volume of applications manually and will cause a huge backlog of applications and applicants will view the Private Housing Scheme as inefficient.	Open		Reputation	Finance, Governance & Performance	The new housing IT system should prioritise the HMO/Licensing component to ensure it is operational if Cabinet approval is given to proceed with the scheme. The new IT licensing component should be operational by the time the licensing scheme starts otherwise officers will have to undertake manual processing of the applications.	Stable	3	3	6		3	3	9
7	Fewer applications made than predicted thus reducing income levels	More properties meet the exemption criteria than expected	Less income from scheme than predicted	Open		Financial Loss/Gain	Finance, Governance & Performance	Significant additional staff resources will be required to deliver the licensing scheme. The risk is that the scheme will operate with fewer staffing resources than predicted and recruitment is slower than expected. Loss of income will effect the Cost Savings achievable in the MTFP however and could result in staff losses.	Stable	2	3	6		2	3	6

You multiply the figures to get the risk rating.

Threat level	Opportunity level	Level of risk	Action required
1 to 4	1 to 4	Low	May not need any further action. Monitor at service level.
5 to 12	5 to 12	Medium	Action required. Manage and monitor at the directorate level.
14 to 21	14 to 21	High	Risks to be addressed. If directorate level risk, consider escalating to the Corporate Risk Report. If corporate, consider escalating to the Cabinet.
28	28	Significant	Action required. Escalate. If directorate level risk, escalate to the corporate level. If corporate, bring to attention of the Cabinet lead to confirm actions to be taken.

APPENDIX E - Equality Impact Assessment [version 2.9]



Title: Proposal to introduce new licensing schemes	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Tom Gilchrist
Service Area: Private Housing Service	Lead Officer role: Service Manager Private Housing

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

We are [proposing to introduce two property licensing schemes](#) (a) a citywide HMO (House in Multiple Occupation) licensing scheme and (b) to three wards – Bishopston and Ashley Down, Cotham and Easton. In the second scheme most privately rented properties would require a licence to continue letting. Citywide all HMOs (Houses in Multiple Occupation) will be required to be licensed. Some buildings are exempt from licensing such as social housing, owner occupied, purpose student accommodation, leased properties etc. and properties occupied by family members.

Under this proposal, it is estimated that 8,041 HMOs will have to apply for a licence if the additional licensing scheme is approved and 4,307 properties will need to be licensed if the selective licensing scheme is approved. Landlords will have to pay a licence fee of £1,861 less discounts of up to £300 for a new additional licence. If they are renewing an additional licence the fee is £1,470 less discounts. The fee for a selective licence is proposed to be £912 less discounts. A discount of £50 may be applied where licence holders of managers of licensed properties have accredited level of membership with one of the approved providers under the Rent with Confidence accreditation scheme. A discount of £150 may also apply if safety and performance certificates are provided within various timescales.

The total cost of running an additional licensing scheme for five years has been predicted to be £12.5m and for the selective scheme £3.5m. All income generated from licensing fees can only legally be used to run the scheme and no profit can be made nor can the funds be used for any other purpose.

A report will be taken to Cabinet on 6th February 2024 and if approved, it would come into force by the late summer of 2024.

The council recognises the need for good quality rented accommodation in the city and the positive impacts it has on the tenants of this sector. However, many tenants are not in a position of choice and live in accommodation

that does not meet minimum housing standards and with the lack of available social housing, the PRS (Private Rented Sector) is filling the gap. The demand for housing in Bristol is very high and some private landlords have taken advantage in these market conditions to let sub-standard property.

The HMOs have been targeted because they are considered as being at the highest risk of being in poor conditions and poor management practises. It is estimated that there are 8,041 properties that would be affected by the additional licensing proposal to licence all HMOs citywide. Many vulnerable people live in HMOs as this is the cheapest option for them and HMOs are some of the worst housing in the city and impact hugely on the local community when they are poorly managed.

According to the Census 2021 there are an estimated 191,638 dwellings in Bristol of which 50,213 (26%) are in the private rented sector.

The recently published report [National statistics: English Housing Survey 2021 to 2022: private rented sector](#) found:

- 14% of private rented sector homes, or 615,000 occupied dwellings, are estimated to contain a Category 1 hazard (for example severe damp and mould). This is higher than for social rented (4%) or owner occupied (10%) dwellings.
- Private rented homes were more likely to be non-decent than owner-occupied homes.
- Private rented homes were more likely to have damp than all other tenures. Almost 11% (465,000 dwellings) of private rented homes had dampness compared with 4% (177,000 dwellings) of social rented homes and 2% (262,000 dwellings) of owner-occupied homes.

The three targeted wards have been selected because there are higher than average concentrations of private rented sector (PRS) housing and have higher levels of disrepair and poor housing conditions than other areas in the city.

The evidence to identify suitable areas or types of housing that would most benefit from the introduction of licensing schemes and meet licensing criteria has come from a commissioned report from the [Building Research Establishment \(BRE\)](#).

Licensing will enable us to inspect each licensable property to ensure they meet licensing standards and thereby improving standards for many private tenants in the selected areas. Under the proposal for a targeted selective licensing scheme, it estimated that 4,307 properties would be affected and be required to be licensed and meet licensing standards.

Licensing gives us additional powers that other enforcement powers do not. Licensing conditions must be met for both property standard and good management practice. We will provide advice on the necessary improvements (and loans to finance the improvements if necessary) and enforce when landlords do not comply with the licensing standards or apply for a licence.

It is a [legal requirement](#) for us to keep a register of all properties licensed under the Housing Act 2004 which is a publicly available register. The register includes:

- names and addresses of a property's landlord and any managing agents
- permitted number of occupiers (for HMOs)

Once a scheme has been declared it is illegal for a landlord or agent to let a property without a licence nor can they evict their tenants under a section 21 if the property is unlicensed.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g., quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage, please state this clearly here and request review by the Equality and Inclusion Team.

Yes **No** [please select]

Tenants of landlords who do not comply with their legal requirements and the wider community will be positively affected through private housing improvements achieved through licensing and enforcement. Housing improvements have the potential to improve standard of living for the occupying tenants. Better management of licensable properties will have positive impacts on the local community.

It is illegal for a landlord or agent to let a property without a licence in areas where licensing schemes operate, nor can they evict their tenants under a Housing Act 1988, Section 21 notice if the property is unlicensed. For landlords who do not comply with their legal requirements in respect of licensing could result in prosecution and unlimited fine or a Civil Penalty of up to £30,000 if found unlicensed. Landlords who do not comply with relevant housing legislation such as Housing Act 2004, in relation to meeting licensing conditions or addressing disrepair where they have a duty to comply, are at risk of enforcement action including formal enforcement notices, civil penalty notices and prosecution.

Please note as part of the procedure of taking formal legal action in a case, Private Housing consider whether there are any equalities issues that should be considered (Please see checks and balances form).

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

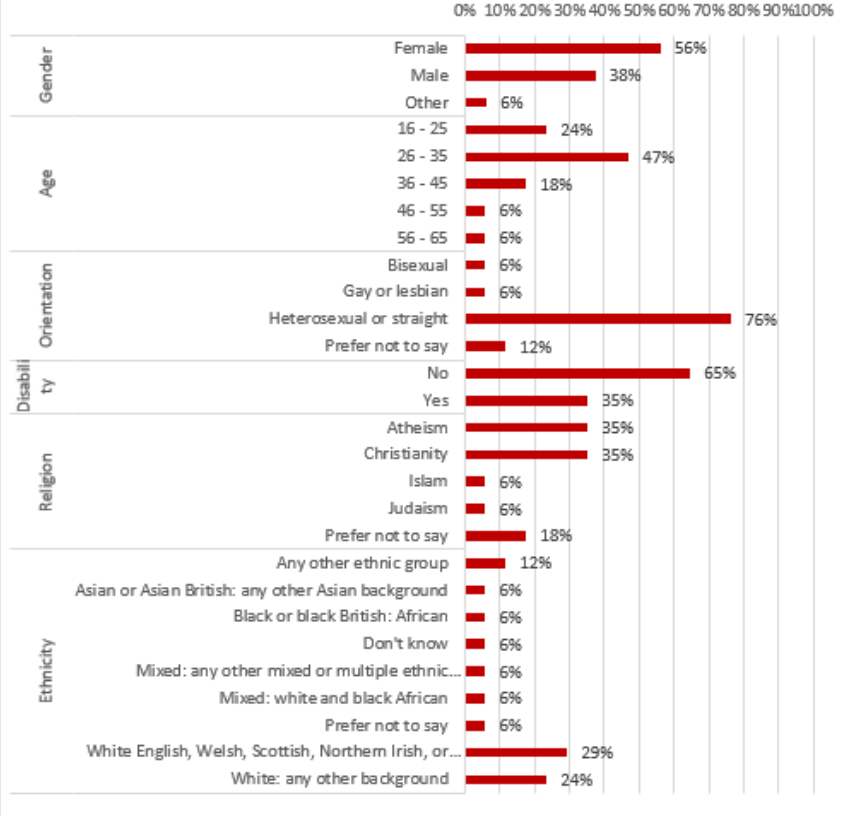
Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success> .

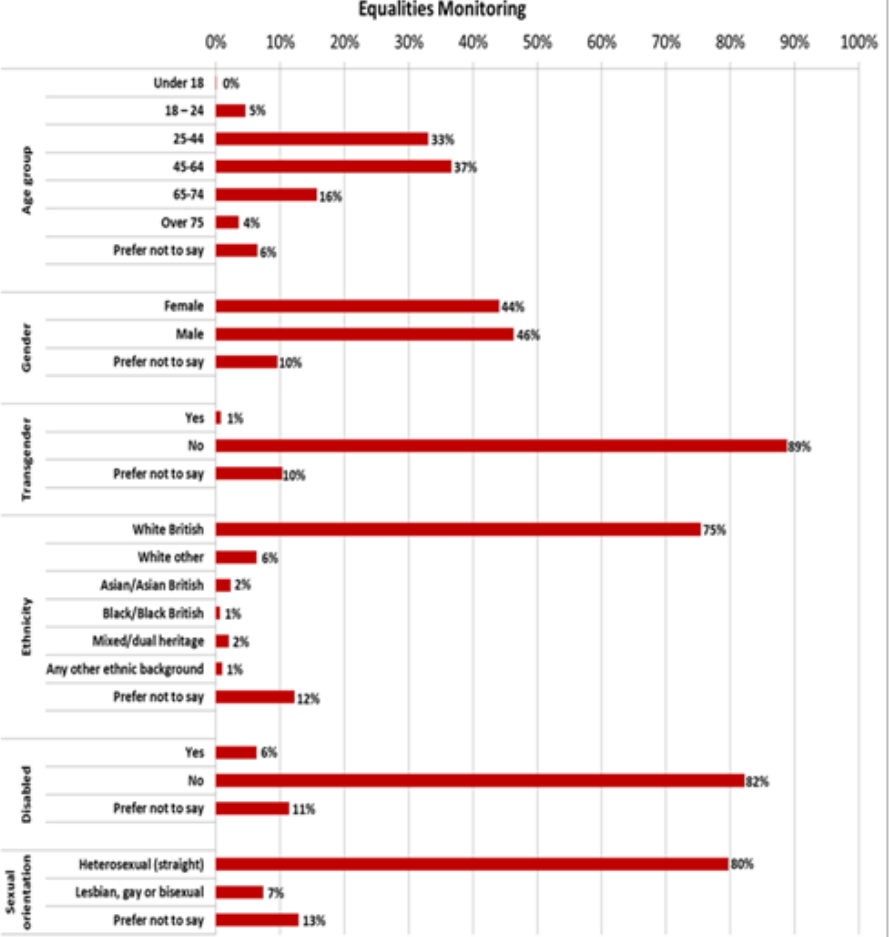
Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g., from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bristol City Council	This dwelling stock modelling report identified that there are 203,722 dwellings in Bristol of which 52.5% (107,048) are owner occupied and 27.4% (55,670) are privately rented, the rest are social rented. The percentage of dwellings in the PRS in Bristol is far higher than the national average of 19%.
A public consultation was undertaken from 29 August 2023 to 7 th November 2023 on the new proposals.	Private Landlords, private tenants and other residents living in the proposed areas were invited by letter or email to participate along with landlord and tenant organisations, councillors and neighbouring LAs (Local Authorities). Information was posted online on Facebook and on Twitter.

Data / Evidence Source [Include a reference where known]	Summary of what this tells us																																																																			
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<p>Tenancy Relation service user data (Sept – Dec 2021)</p> <p>This demonstrates the profile from private tenants who have used the tenancy relations service where they have a specific issue with their landlord and the Tenancy relations have them to resolve this problem, i.e. illegally eviction, harassment etc..</p>	<p style="text-align: center;">Tenancy Relations Equalities Monitoring Data</p>  <table border="1"> <thead> <tr> <th>Category</th> <th>Sub-group</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Gender</td> <td>Female</td> <td>56%</td> </tr> <tr> <td>Male</td> <td>38%</td> </tr> <tr> <td>Other</td> <td>6%</td> </tr> <tr> <td rowspan="6">Age</td> <td>16 - 25</td> <td>24%</td> </tr> <tr> <td>26 - 35</td> <td>47%</td> </tr> <tr> <td>36 - 45</td> <td>18%</td> </tr> <tr> <td>46 - 55</td> <td>6%</td> </tr> <tr> <td>56 - 65</td> <td>6%</td> </tr> <tr> <td>66 - 75</td> <td>6%</td> </tr> <tr> <td rowspan="4">Orientation</td> <td>Bisexual</td> <td>6%</td> </tr> <tr> <td>Gay or lesbian</td> <td>6%</td> </tr> <tr> <td>Heterosexual or straight</td> <td>76%</td> </tr> <tr> <td>Prefer not to say</td> <td>12%</td> </tr> <tr> <td rowspan="2">Disability</td> <td>No</td> <td>65%</td> </tr> <tr> <td>Yes</td> <td>35%</td> </tr> <tr> <td rowspan="5">Religion</td> <td>Atheism</td> <td>35%</td> </tr> <tr> <td>Christianity</td> <td>35%</td> </tr> <tr> <td>Islam</td> <td>6%</td> </tr> <tr> <td>Judaism</td> <td>6%</td> </tr> <tr> <td>Prefer not to say</td> <td>18%</td> </tr> <tr> <td rowspan="10">Ethnicity</td> <td>Any other ethnic group</td> <td>12%</td> </tr> <tr> <td>Asian or Asian British: any other Asian background</td> <td>6%</td> </tr> <tr> <td>Black or black British: African</td> <td>6%</td> </tr> <tr> <td>Don't know</td> <td>6%</td> </tr> <tr> <td>Mixed: any other mixed or multiple ethnic...</td> <td>6%</td> </tr> <tr> <td>Mixed: white and black African</td> <td>6%</td> </tr> <tr> <td>Prefer not to say</td> <td>6%</td> </tr> <tr> <td>White English, Welsh, Scottish, Northern Irish, or...</td> <td>29%</td> </tr> <tr> <td>White: any other background</td> <td>24%</td> </tr> </tbody> </table>	Category	Sub-group	Percentage	Gender	Female	56%	Male	38%	Other	6%	Age	16 - 25	24%	26 - 35	47%	36 - 45	18%	46 - 55	6%	56 - 65	6%	66 - 75	6%	Orientation	Bisexual	6%	Gay or lesbian	6%	Heterosexual or straight	76%	Prefer not to say	12%	Disability	No	65%	Yes	35%	Religion	Atheism	35%	Christianity	35%	Islam	6%	Judaism	6%	Prefer not to say	18%	Ethnicity	Any other ethnic group	12%	Asian or Asian British: any other Asian background	6%	Black or black British: African	6%	Don't know	6%	Mixed: any other mixed or multiple ethnic...	6%	Mixed: white and black African	6%	Prefer not to say	6%	White English, Welsh, Scottish, Northern Irish, or...	29%	White: any other background	24%
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	<p>Bristol Key Fact 2022 (July 2022 update) document</p>	<p>The population of Bristol is estimated to be 472,400 people and has become increasingly diverse.</p> <p>Age: Bristol has a relatively young age profile with more children aged 0-15 than people aged 65 and over. Bristol's 60,300 older people make up 13% of the total population, i.e., 1 in every seven people living in Bristol is aged 65 or over. The median age of people living in Bristol was 32.4 years old.</p> <p>Race: The proportion of the population who are not 'White British' is at 22% of the total population. The proportion of people living in Bristol who were not born in the UK has increased from 8% to 15% of the total population. In Bristol, at least 187 countries of birth represented and at least 91 main languages spoken by people living in Bristol.</p> <p>Religion: In Bristol, there are now at least 45 religions. 47% of population state they are Christian. 37% of the population state they have no religion.</p> <p>Bristol Household tenure: 53%, Owner occupied, 29% Private Rented, 18% Social Rented</p> <p>This is general population data which shows the general population being affected by the proposal.</p>																																																																		

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Quality of Life Survey – Equalities View	Shows disparities by equalities group in Housing indicators including % with accommodation / % satisfied they can stay in their home for as long as they choose to.
Housing BAME Communities In Bristol - A Community-Led Initiative- 2020	Whilst focused on recommendations for housing provision this BSWN report has useful data on housing disparities for Black, Asian and minoritised communities in Bristol and the Southwest.
<p>Additional licensing consultation equalities data 2018</p> <p>This equalities information was gathered from the 2018 licensing consultation those who responded to the consultation and gave this information.</p>	
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g., pregnancy/maternity). For smaller teams' diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We have limited diversity data about our service users, and citywide and ward level diversity data is unavailable for some protected characteristics e.g., gender reassignment.

The Building Research Establishment (BRE) report focuses on the property details as licensing is property led irrespective of the tenants except by the number and relationship of the households who occupy these properties to determine the type of licence required where licensing is introduced.

Many private landlords and tenants are unknown to us and therefore we do not hold equalities data for the majority of these. We do collect the equalities data through our consultations however and we have just completed our 5th consultation on licensing across different areas of the city. Of course, this information is only on those who complete the consultation questionnaires and is not therefore representative of all those who may be affected by the proposal.

The Private Housing Service also has online equalities monitoring forms linked to our online service user forms which service users can choose to complete. However, this has only been fully in place since June and there have not been sufficient responses to allow use of data.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure, please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g., staff-led groups and trades unions as well as affected staff.

A public consultation was undertaken between 29th August 2023 and 7th November 2023 (ten weeks). The consultation ran for ten weeks via the Ask Bristol hub with an online survey form and paper copies of the consultation documents made available on request and pre-paid envelopes provided for the completed surveys to be returned and uploaded for those with no access to the internet.

A Press release was issued, and the council's private housing website was updated with details about the consultation.

Private Landlords, private tenants and other residents living in the proposed areas were invited by letter or email to participate along with landlord and tenant organisations, councillors and neighbouring LAs. In all 12,636 letters and 43,565 emails were sent during the consultation.

Information was posted online and posts on Facebook and on Twitter were made throughout the consultation period.

Posters were placed in all 27 libraries and distributed by Community Development Team. Also, an electronic version of the poster shared through their network e.g., Community Exchange network (over 100 organisations), Avon Task groups and other contacts.

Landlords who had signed up for the Private Housing Landlord newsletter were also emailed with full details of the consultation and proposals via the Landlord Newsletter including a reminder 3 weeks before the end of the consultation period.

Meetings were held both with Landlord and tenant organisations.

The results of the consultation will be published on the Consultation Hub from mid-December 2023. We received 1,562 responses.

Overall, 52.57% of respondents agreed with the proposals for a citywide additional licensing scheme and 39.19% disagreed.

38.96% respondents agreed with the proposal for a selective licensing scheme and 51.22% disagreed with the proposal.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include

any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

No further contact will be made until the Cabinet decision is known at which time we will once again write to all known landlords with properties in the area, with private tenants living in the area and with consultees who wished to be kept informed, of the decision. Also, landlord and tenant organisations will be kept updated. If the scheme is approved by Cabinet, prescribed public notices must be published in two local papers every other week for ten weeks declaring the scheme details.

We will also write out to all those affected again – mainly landlords and tenants and other stakeholders and equalities groups when the scheme is about to go live and update our web pages, newsletters etc. to publicise as widely as possible with details about how to apply for a licence. Those that remain unlicensed after the initial three-month application period will be contacted and encouraged to make an application, with help from a caseworker if necessary.

We monitor progress throughout the term of the scheme to ensure that all properties that should be licensed are licensed. All properties are inspected, and action is taken to remedy any failings that are undertaken. Statistics are kept throughout on performance and monitored against the scheme's aims.

A review of the scheme is taken halfway through and again at the end to check progress is being made and to measure its impact on the number of properties improved, enforcement action taken and analysis of the private rented sector market.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g., young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

The aim of licensing is to improve property conditions and poor management practices in the private rented sector. The positive impact of licensing schemes are the numbers of improvements made to properties that are below minimum standard. The negative impact is that for the landlord there is a financial cost and for some tenants, landlords will increase rents to cover these additional costs of relevant scheme even though for the majority the costs are low – maximum £7.15 (additional scheme) or £3.50 per week (selective scheme), before discounts.

There are risks that landlords may leave the rental market rather than pay the fees but the rental income they can receive far outweighs this one-off cost of selective and additional licensing. Analysis from earlier schemes has shown that although some landlords have left the market, but new landlords have joined and although there may be an initial drop, most landlords do come back as it is a very lucrative market currently.

Rental costs have increased over the last few years and now demand is so high in Bristol, landlords have been increasing rents anyway because of market conditions. Those increases are outside of our control and are down to the individual landlord.

Landlords who do not make an application for a licence when they should be at risk of enforcement action or even prosecution if they do not licence their properties and yet continue to rent them out. Tenants can apply for Rent Repayment Order if a landlord continues to let a property that has no licence. This means they can get some or all their rent back for the time the property was unlicensed when it should have been. Landlords who do not comply with relevant housing legislation in relation to meeting licensing conditions or addressing disrepair where they

have a duty to comply, are at risk of enforcement action including formal enforcement notices, civil penalty notices and prosecution.

There will be a lot of publicity about the scheme to make as many landlords and agents as possible aware of the scheme (and relevant private tenants). Applicants are given three months to make an application before we consider them to be unlicensed. Those who do not licence when they should, will be investigated by caseworkers to encourage and assist them to apply for a licence to avoid enforcement action. We will work with voluntary and community sector also to ensure the message reaches those who need it. Even properties owned and let by charities will require a licence to ensure conditions are met but no fee will be payable - Section 63(3), Housing Act 2004. Charities are legally exempt from paying a fee but must still make an application, be inspected and meet all licensing standards. Normally landlords will be asked to comply with housing legislation through informal if appropriate or relevant means prior to any formal enforcement action.

Please note as part of the procedure of taking formal legal action in a case, Private Housing consider whether there are any equalities issues that should be considered and actions that should have been taken when deciding whether formal action is to be taken/appropriate/determining level of financial penalty.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As most people renting in the private rented sector are younger people, they will be impacted the most by licensing.
Mitigations:	Licensing aims to improve living conditions for those renting in the private rented sector so the overall impact should be positive. All tenants will benefit from any improvements and better management that licensing can bring and may have cost savings through utility bills if property improvement related to energy efficiency. Please also see Section 1.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some landlords rent out property as a retirement fund so licensing and the additional costs involved may impact those and potentially reduce their profit in the first year.
Mitigations:	The aim of licensing is to improve property conditions and poor management practises in the PRS. Financial impact on landlords is minimal given the income collected from the rent. Additional impact a maximum of £7.15 (additional scheme) or £3.50 per week (selective scheme), before discounts. Landlords may have longer term savings through better management of properties in terms of maintenance costs by address disrepair before becoming a more serious issue. Without the proactive work carried out under declared licensing schemes, many properties in the private rented sector could continue to be let in sub-standard conditions and we would only be able to do something about them on a responsive basis.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Tenants: Disabled people in Bristol are less likely to be satisfied overall with their current accommodation, therefore the licensing scheme is likely to have a positive impact on Disabled people and potential health and wellbeing improvements from improved accommodation quality. Landlords: Disability (including hidden impairments and neurodiverse conditions such as Dyslexia, ADHD, Dyscalculia or Autism) may be a factor in not being able to achieve compliance with legislation. There may be financial implications associated with disability status.
Mitigations:	Tenants: Licensing aims to improve living conditions for those renting in the PRS so the overall impact should be positive. Landlords: See general comments. Checks and balances forms completed prior to enforcement support officers identify when Disabled landlords may require reasonable adjustments such as additional time to complete works, alternative means of communication, additional time/visits with landlords to discuss requirements and consider any landlord representations.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	Although we don't collect local data national indicates that female landlords are more likely to own one property (55% of landlords owning one property were female compared to 45% male) English Private Landlord Survey 2021: main report - GOV.UK (www.gov.uk) . However male landlords made up a higher proportion of all portfolio size categories owning more than one property.
Mitigations:	Although men would appear therefore to be more greatly affected than females by the licensing fees, they are also receiving greater rental income having more than property in the rental market. The fees are payable per property and would only ever come under one scheme not both.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	In previous schemes, consultees expressed concern that co-habiting same sex couples will be forced to come out to their landlord to avoid paying licence fees.
Mitigations:	If any three or more people are living in a privately rented property which is not rented as a family dwelling it would be licensable regardless of their relationship status to each other – however they would not be required to declare what the nature of their relationship is. The definition of a family for the purposes of HMO licencing is defined by central government and outside the scope of this proposal. https://www.gov.uk/private-renting/houses-in-multiple-occupation Under this proposal however we are also licencing family accommodation, so the landlord does not need to be made aware of a relationship as all properties need to be licensed and will be based on numbers of occupants on whether it is an HMO or non-HMO. No other detail is necessary.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Babies and children do not count as an occupant under this legislation so are not included in HMO occupants for the purposes of licensing. In fact, some landlords in previous schemes have stopped letting HMOs in preference to letting to families to avoid additional licensing
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	If English is not a landlords first language, there may be misunderstanding of the requirement to licence, and they may not understand the implications of enforcement which could lead to non-compliance and enforcement action. Private tenants who do not speak English as a first language may not be aware of the scheme or their rights as a tenant. Black, Asian and minority ethnic people in Bristol are also less likely to be satisfied overall with their current accommodation.
Mitigations:	Information about the potential schemes will be disseminated to landlord and tenant groups and stakeholder contacts as well as posting on social media, online and by mail including information about how to access translation and interpretation services. The renting of private properties is a business, and all landlords of private rented properties should be competent to manage their property(s). If they are not and then it is likely they have an agent or an appointed manager to manage the property for them. Where circumstances require, and no family member or agent is available to translate, we can arrange for access to translation and interpretation services. Licensing aims to improve living conditions for those renting in the PRS so the overall impact should be positive
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Potential impacts:	Co-habiting couples who live in rented accommodation with other are not disproportionately affected by this proposal
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Financial impact on landlords, and tenants if additional costs are passed on.
Mitigations:	The aim of licensing is to improve property conditions and poor management practises in the PRS. Financial impact on landlords is minimal given the income collected from the rent. Additional impact a maximum of £7.15 (additional scheme) or £3.50 per week (selective scheme), before discounts for timely submission of relevant certificates and membership of an approved landlord accreditation scheme. Landlords may have longer term savings through better management of properties in terms of maintenance costs and address disrepair before becoming a more serious issue. All tenants will benefit from any improvements and better management that licensing can bring and may have cost savings through utility bills if property improvement related to energy efficiency. We cannot control how much of these additional costs' landlords will pass on to their tenants by way of higher rents although separately the Bristol Living Rent Commission is looking into how this might be achieved going forward.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	People who are carers in Bristol are less likely to be satisfied overall with their current accommodation.
Mitigations:	Licensing aims to improve living conditions for those renting in the PRS so the overall impact should be positive.
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g., Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Depending on the status of the landlord some of these groups would be exempt from licensing if leased through the council for the purposes of council objectives
Mitigations:	Legal exemptions may be appropriate.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The aim of licensing is to improve property conditions and as most private tenants are young people, they will feel the improvements more than other groups. All tenants of licensed properties have better protection and are more able to access services if there are issues as each property will have an assigned case officer who can be contacted.

Tenants from particular protected characteristic groups are overrepresented in the private rented sector. Any scheme which encourages better accommodation and better management of the accommodation would therefore benefit people with protected characteristics ..

People who spend a considerable proportion of their time at home should benefit from better quality accommodation in particular – e.g., some Disabled people, single parents with small children, some older people.

Tenants with additional vulnerabilities, for example people with mental health needs, women leaving refuges, homeless men and women are increasingly placed in private rented accommodation. The scheme will make it easier for vulnerable tenants and their support workers to identify landlords and letting agencies who are licenced and offer good standards of accommodation.

Some private rented tenants are less settled within their communities than those in social housing or homeowners. Some accommodation sees a high turnover of tenants for example students. Poor quality accommodation can include severe overcrowding and result in a high turnover of tenants. High turnover can cause community cohesion issues with neighbours and creates additional strain on local services e.g., local schools.

Details of landlords who license their properties are placed on a 'Public register' and this information will be available to all. Our web site will also give information and how to contact the council if there are issues with the condition or management of these properties. It is a requirement of the licence to display the contact details of landlord within the rented property and inform the neighbouring property owners the details of the landlord/agent. This will enable tenants and neighbours to report concerns which will ease community cohesion tensions.

It should also make it easier for people to stay in rented accommodation for longer, rather than needing to move because of poor quality accommodation.

We know that some Black, Asian and minority ethnic people and migrants are particularly vulnerable to exploitation regarding poor housing as they are less likely to know their rights and the standards that are deemed acceptable and appropriate. Licensing will highlight their rights through the provision of information, signposting and referrals to the relevant departments and organisations where necessary. For most private tenants licensing will have a positive impact in that the council will ensure that their home is safe and responsibly managed. Under a declared licensing scheme, every licensable property in the area will be inspected and steps taken to ensure the properties meet licensing conditions. This is done without any need for the tenant to contact us as would be necessary outside of licensing in a reactive complaint service.

The equalities screening process used by officers prior to enforcement action aims to eliminate unlawful discrimination, and advance equality of opportunity by the provision of relevant information and removing barriers such as communication barriers.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

There are concerns around the cost of the fees both on landlords and on the tenants - if the costs are passed on to the tenants but at a maximum fee equivalent of £5 pw or £3pw it is hoped that increase is minimal given the income collected from the rent and all tenants will benefit from any improvements and better management that licensing can bring.

There are risks that landlords may leave the rental market rather than pay the fees but the rental income they can receive far outweighs this one-off cost of selective and additional licensing. Analysis from previous schemes has shown that although there is a churn in the market, and some may initially leave, they seem to come back into the market especially as demand is currently so high.

Rental costs have increased over the last few years across the city and now demand is so high in Bristol, landlords have been increasing rents to take advantage of this market. Those increases are outside of our control and are down to the individual landlord.

Some landlords may try to continue to operate below the radar and not apply for a licence. However, we have a team of officers who investigate those properties that we believe require a licence and will encourage them to apply for a licence and meet licensing conditions or face prosecution if they still fail to engage. In those situations, we can assist tenants to make an application for a Rent Repayment Order as a landlord cannot legally charge a rent while being unlicensed when the property is required to be licensed.

As part of the procedure of taking formal legal action in a case, Private Housing consider whether there are any equalities issues that should be considered and actions that should have been taken when deciding whether

formal action is to be taken and appropriate. The enforcement process normally allows for landlords to provide representations which will be considered. See checks and balances form attached.

The Living Rent Commission is looking into these issues and considering introducing rent caps, this is outside the scope of this scheme. Bristol City Council are actively involved in this working group.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Licensing will improve property conditions and poor management practises in PRS properties in the area and should have a positive impact on the local community if property standards are being improved and issues around ASB (Anti-Social Behaviour), noise etc are being dealt with. So, all people who live in these privately rented properties and other residents of various characteristics will feel the benefit.

We hope that individuals will be empowered to report poor conditions and poor management practises as we will already be involved in an inspection programme etc. so the tenants do not have to fear retaliatory action if they report anything because the landlord will assume that the actions we take are normal licensing activity.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

Improvement / action required	Responsible Officer	Timescale

4.3 How will the impact of your proposal and actions be measured?

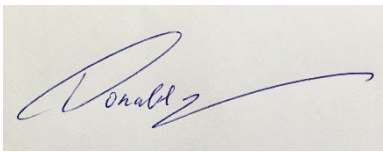
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

We monitor progress throughout the term of the scheme to ensure that all properties that should be licensed are licensed. All properties are inspected and action to remedy any failings are undertaken.

A review of the scheme is taken halfway through and again at the end to check progress is being made and to measure its impact on the number of properties improved, enforcement action taken and analysis of the PRS market.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

<p>Equality and Inclusion Team Review:</p> <p>The Equality and Inclusion Team</p>	<p>Director Sign-Off: Donald Graham, Director Housing and Landlord Services</p> 
<p>Date: 30.11.2023</p>	<p>Date: 30/11/2023</p>

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

APPENDIX F



Environmental Impact Assessment [version 1.0]

Proposal title: Proposal to introduce new property licensing schemes		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Housing & Landlord Services	Lead Officer name: Tom Gilchrist	
Service Area: Private Housing	Lead Officer role: Private Housing Service Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council's policies and supports the council's strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

The proposal is to licence all smaller privately rented Houses in Multiple Occupation (HMOs) (with 3 or 4 unrelated occupants sharing some facilities) across the city and to target most other privately rented properties in three wards – Bishopston and Ashley Down, Cotham and Easton. This potentially would mean licensing just over 8,000 HMOs and 3,000 other PRS properties in the three targeted wards. For each licence issued the property will be inspected and checked to ensure that the properties meet the licensing standards appropriate for the licence type.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If 'Yes' complete the rest of this assessment.

Yes No [please select]

The introduction of licensing would bring a general improvement of property conditions that are adversely affecting the occupants in the area. This will be achieved by inspecting every property that will be subject to licensing proposals to identify and remedy serious hazards. This will be remedied through enforcement under Part 1 of the Act or other enforcement powers as appropriate, to ensure compliance with licensing conditions.

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
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If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
ENV1 Carbon neutral: Emissions of climate changing gases	Benefits	Based on existing licensing schemes which have led to improved energy efficiency, it is expected that the proposal will lead to further improvement through works which will reduce emissions over the lifetime of the buildings to meet minimum housing standards and ensure properties are Minimum Energy Efficiency Standards (MEES) compliant for all private rented properties inspected.
BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city		

<p>in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>All properties that come under the licensing requirement will be inspected and enforcement action taken if the properties do not meet licensing standards and improvements will be required.</p> <p>Inspections will identify measures that could assist landlords and tenants as well as those that are necessary to meet licensing standards. This should include fuel poverty reduction, climate benefits and low embodied emission impacts.</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>	<p>Physical inspections of more than 11,000 properties will lead to emissions associated with transport. These inspections are likely to result in landlords being required to carry out works to improve their properties. Any new vehicles procured for these additional inspections will be battery electric vehicles.</p>	
	<p>Mitigating actions</p>	<p>Route planning should be considered to ensure that inspections are carried out efficiently, using the least number of car miles possible, with preference given to sustainable travel options wherever possible.</p> <p>It is not possible to predict the types of works that may be required after properties are inspected, but it would offer a good chance to engage with private landlords on the benefits of making sustainability improvements to their properties for them and their tenants. A British Gas report issued last week found private landlords to be poorly informed and unwilling to make such improvements, so engagement could be needed.</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>			
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p>	<p>Benefits</p>		
	<p>Enhancing actions</p>		
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>		
<p>Mitigating actions</p>			

<input checked="" type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits			
	Enhancing actions			
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years			
	Adverse impacts	Remedial works will lead to some production of waste.		
	Mitigating actions	BCC has no direct control over waste generated as these works will be arranged privately by individual landlords, however standard requirements for disposal of waste will ensure that correct disposal routes are followed.		
<input type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	A number of properties will receive energy efficiency upgrades improving their overall performance and resilience to climate change.		
	Enhancing actions	Improved energy efficiency measures will be required where the property does not meet minimum standards (currently EPC E) under the Minimum Energy Efficiency Standard Regulations that are applicable to all private rented homes. If improvements are not made, enforcement action will be commenced against the landlord/managing agent.		
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years			
	Adverse impacts			
	Mitigating actions			
<input type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Route and timing planning for inspection teams will reduce the impact of additional travel.	Paul Tregale	Throughout the five-year term of the scheme
Procurement of battery electric vehicles if any additional vehicles are needed for inspection.	Paul Tregale	Officers will use BCC pool cars, public transport or walk/cycle to inspections.
A comprehensive landlord engagement package will be created to allay their concerns, demonstrate the benefits of being proactive and provide any help they need.	Shona ALi	Ongoing - We already have landlord liaison and tenant liaison officers in post and landlords, managing agents and tenants have been consulted on these proposals to meet the legal requirements for introducing a licensing scheme.

Enhancing / mitigating action required	Responsible Officer	Timescale
Inspectors will be trained and inspection reports formatted to identify measures that could assist landlords and tenants as well as those that are necessary to meet licensing standards. This would include measures to reduce fuel poverty, emissions and cost of living. It would include improving climate resilience and using materials with low embodied emissions.	Paul Tregale	Officers are trained to inspect rented properties against the licensing standards. These properties must meet licensing standards. Licensing conditions are prescribed by legislation and government guidance and restricted by case law decisions. Where suitable measures can be introduced to reduce fuel poverty, emissions and cost of living these will be implemented. However licensing conditions are restricted by legislation and the service would not be able to require measures not prescribed by licensing regulations or guidance.

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
Summary of significant adverse impacts and how they can be mitigated:

Environmental Performance Team Reviewer: Giles Liddell, Environmental Performance Co-ordinator	Submitting author: Jan Hamilton
Date: 24/11/2023	Date: 28/11/23



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	A37/A4018 Victoria Street & Colston Avenue Full Business Case (FBC)		
Ward(s)	Central		
Author: Thor Sever	Job title: Technical Lead Public Transport Delivery		
Cabinet lead: Cllr Donald Alexander, Cabinet Member for Transport	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: To seek approval for the submission of a Full Business Case (FBC) to the West of England Combined Authority (WECA) for City Regional Sustainable Transport Settlement (CRSTS) funding and subject to approval, to accept and spend the funding to deliver the A37/A4018 Victoria Street & Colston Avenue Improvements.			
Evidence Base: <ol style="list-style-type: none"> 1. Work began in 2020 on the A37/A4018 route 2 “Bus Deal” corridor project which is tasked with forming an Outline Business Case to propose delivery on a range of sustainable transport improvements for a 16 mile corridor stretching from Henbury to Stockwood. The work was broken into 3 sections (North, South & Central) with the Victoria St (including Bristol Bridge) and Colston Avenue proposals forming a significant section of the Central area OBC work. The corridor proposals were subject to public consultation between November 2021 and February 2022. 2. The Bristol Bridge section of the project was fast-tracked last year with agreement at Cabinet on 6 September (see background documents). The Victoria Street project and the Bristol Bridge project sit adjacent to each other and together form proposals to reallocate road space to sustainable transport modes, whilst keeping key vehicle routes moving, following implementation of the Bristol Bridge bus gate system (August 2020). Since the implementation of the bus gate system traffic volumes have significantly reduced on Victoria Street as Victoria Street to High Street and Baldwin Street or vice versa is no longer available as a through route for general traffic. This consequential and pronounced change has created the necessary conditions to reallocate road space to sustainable transport modes and public realm as the FBC proposes. This reallocation of road space has recently been realised at Bristol Bridge where the remodelling of the junction has just been completed (December 2023). Pedestrians, cyclists and permitted vehicles that use the bus gates now experience less delay when crossing the junction whilst the public realm and space available has been much improved at one of the most significant crossing points in the city. 3. The interventions proposed within the FBC for Victoria Street include improved public realm (including, trees, planting and the opportunity for businesses to use extra space for café tables) , the continuation of the bi-directional segregated cycleway on Bristol Bridge to connect with the existing Temple Gate segregated cycleway, improved and enlarged bus stops at Bristol Bridge ready in scale for Mass Transit and the remodelling of the Counterslip/Victoria Street junction, raised tables and continuous footways at appropriate junctions and a wholesale replacement of the footway and highway material used along the corridor that will 			

create a superior environment whilst reducing the ongoing maintenance liability for BCC. These changes will represent a significant change for Victoria Street corridor and help make it more a destination rather than just being a through corridor. The segregated cycle way will link up the shopping district to the railway station and to the east connect with the new cycleways on Counterslip an onward to the Bristol & Bath Railway path.

4. The greater part of the FBC is concerned with wide-ranging improvements planned for Victoria Street, however, the proposals also include the extension of the inbound Colston Avenue bus lane from its current position in line with the war memorial to just beyond Colston Ave East (the bus only road into Broad Quay). This connects a missing piece within the existing bus priority network and ensures that buses are not delayed by general traffic as they seek to approach bus stops on The Centre and Broad Quay.
5. Consultation for the proposals first took place within the central section of the A37/A4018 Route 2 strategic corridor project in 2021/2022. Since the Victoria Street & Colston Avenue proposals were fast tracked to go straight to FBC an information exercise was carried out on these specific proposals in June 2023 ahead of statutory consultation taking place in October/November 2023 (see consultation section for full details)
6. The FBC (see appendix A1) calculates the total estimated outturn costs (not including sunk costs) to deliver the project, including risk and inflation, as £5,565,143.
7. The results of benefit analysis as calculated within the FBC (see appendix A1) generate total Present Value Benefits of £8m. With Present Value Costs estimated at £2.8m, this gives an adjusted Benefit Cost Ratio(BCR) of 3.42 which represents a High Value for Money (Department for Transport Value for Money categories – BCR between 2 and 4 = High).
8. Assuming a successful bid for funding is achieved, following the release of funds a procurement exercise will be undertaken that will target a construction start date during October 2024.
9. The proposals include the removal of 29 pay and display parking bays on Victoria Street and Mitchell Lane. This will reduce parking income resulting in a cumulative shortfall of £387,947 over a 5-year period which is the standard period used to assess the impact on parking income. A funding reserve of up to £2million has been proposed from Clean Air Zone revenue to enable reallocation of road space associated with CRSTS projects which could potentially cover these costs. A wider assessment of the expected loss of parking revenue, moving forward, within the city is now being undertaken. This assessment will take a holistic approach and evaluate parking revenue on a city-wide basis alongside increases in revenue generation by PCN's (bus gates/lanes and double yellow lines) and bus shelter advertising income that are attributable to CRSTS or other funded transport projects. A Parking Strategy will follow the assessment so that a sustainable approach can be taken in the long-term.

Cabinet Member / Officer Recommendations:

That cabinet:

1. Approves the submission of a Full Business Case (Appendix A1 and exempt appendix I1) to the West of England Combined Authority (WECA).
2. Authorises the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Transport and Section 151 officer, subject to approval of the Full Business Case by WECA to:
 - i. Take all steps required to accept and spend the City Region Sustainable Transport Settlement (CRSTS) funding amount as set out in this report and appendices,
 - ii. Tender and procure contracts (including any over £500K) necessary to deliver the works,
 - iii. Award contracts and spend the funding to deliver the works as set out in the Full Business Case up to the maximum budget envelope outlined in this report.

Corporate Strategy alignment:

1. Children and Young People: Better public transport connectivity increases independence particularly among younger people and helps to maintain social inclusivity. Whilst improving the provision of infrastructure for active travel is beneficial in promoting health and wellbeing among younger people.
2. Economy and Skills: Improved transport connectivity, be it by public transport, walking or cycling, has benefits to improving access to employment opportunities. Better public transport will also assist in enabling development and economic growth.
3. Environment and Sustainability: Making infrastructure improvements that make public transport, walking,

and cycling people's natural choice in mode in travel can help encourage the modal shift away from cars, and subsequently reduce congestion and vehicle emissions. This can help Bristol achieve its target of becoming carbon neutral by 2030.

4. **Health, Care and Wellbeing:** Improving infrastructure for active travel is beneficial in promoting health and wellbeing among citizens. Additionally, there are health benefits of improving the air quality by reducing the congestion and vehicle emissions.
5. **Homes and Communities:** Improving connectivity of all neighbourhoods will help to improve community participation, enabling citizens to maintain inclusivity in all aspects of life.
6. **Transport and Connectivity:** By improving the public transport infrastructure the reliability of bus services is improved, and opportunity to increase frequency and facilitate additional services is safeguarded. Upgrading transport interchanges and improving the frequency of bus stops will contribute to the improvement of safety, and perception of safety for citizens. Making improvements to the walking and cycle infrastructure will encourage the uptake in active travel.
7. **A Development Organisation:** In following the Department for Transport's Business Case process, we are demonstrating the characteristics of an Effective Development Organisation, specifically by using research and data to inform decisions.

City Benefits:

1. Provide greater bus service frequency and reliability through highway improvements.
2. Improving the physical accessibility of public transport modes such as bus and rail, and wider connectivity to jobs, education, and other opportunities across the city for all citizens.
3. Promoting the use of more sustainable travel including bus, rail, walking, and cycling as preferential modes. Subsequently delivering better air quality by reducing the reliance on private vehicles, and improving the health and wellbeing of the population, and especially for those living with a pre-existing health condition
4. The delivery of walking and cycling infrastructure improvements will help to contribute to the uptake in active travel methods which offers social value benefits, including health and wellbeing.
5. Creating an enhanced urban realm to supplement the developments in and around the Temple Quarter Enterprise Zone

Consultation Details:

The following principal consultation activities have taken place for the Project:

1. *A37/A4018 Route 2 Corridor:* Early Engagement Exercise from 24 July 2020 to 21 September 2020 (see Appendix B for the Early Engagement Report);
2. *A37/A4018 Route 2 Corridor:* Public Consultation from 29 November 2021 to 28 January 2022 (see Appendix B for the Public Consultation Report);
3. *A37/A4018 Route 2 Corridor:* Regular briefings with Cabinet Member and Senior Management throughout the Public Consultation Process providing updates on the response and key issues emerging;
4. *A37/A4018 Route 2 Corridor:* Briefings and email updates post Public Consultation with Cabinet Member and Senior Management advising on the current status of the project, initial recommendations, and the key issues;
5. *A37/A4018 Route 2 Corridor:* Ad-hoc meetings and communications with various stakeholders post public consultation.
6. *A37/A4018 Victoria Street & Colston Avenue:* Victoria St Information Exercise (see Appendix B) - An information exercise to inform stakeholders in the Victoria Street area of the upcoming statutory consultation (October/November 2023) was carried out in June 2023. This work was supported by the Redcliffe and Temple Business Improvement District. The exercise highlighted how the specific project for

Victoria Street was separated from the original corridor project with its own trajectory. 2098 letters were sent to businesses and residents within the local area and retail frontages were visited by the BCC project team to inform them of the proposals and the upcoming statutory consultation.

7. *A37/A4018 Victoria Street & Colston Avenue*: Statutory Consultation - A statutory consultation on the schemes road humps (continuous footways), movement, waiting and loading restrictions began in October 19th 2023 and completed 17th November 2023.

Background Documents:

Bus Deal Memorandum of Understanding – Item 15 at the Oct 2019 Cabinet Meeting: [\(Public Pack\)Agenda Document for Cabinet, 01/10/2019 16:00 \(bristol.gov.uk\)](#)

Bus Deal / Strategic Corridors Update – Item 10 at the October 2021 Cabinet Meeting: [ModernGov - bristol.gov.uk](#)

Bus Deal / Strategic Corridors Update – Item 9 at the May (2nd) 2023 Cabinet Meeting: [ModernGov - bristol.gov.uk](#)

Bristol Bridge – Item 12 at the September Cabinet Meeting: [ModernGov - bristol.gov.uk](#)

West of England Bus Strategy: West of England Bus Strategy ([West of England Bus Strategy \(westofengland-ca.gov.uk\)](#))

West of England Joint Local Transport Plan: Joint Local Transport Plan 4 2020-2036 ([Joint Local Transport Plan 4 2020-2036 \(westofengland-ca.gov.uk\)](#))

West of England Bus Service Improvement Plan: West of England Bus Service Improvement Plan ([West of England Bus Service Improvement Plan \(westofengland-ca.gov.uk\)](#))

West of England Local Cycling Walking Infrastructure Plan: Local cycling and walking infrastructure plan - West of England Combined Authority ([Local cycling and walking infrastructure plan - West of England Combined Authority \(westofengland-ca.gov.uk\)](#))

Bristol Transport Strategy: [Bristol Transport Strategy](#)

National Bus Strategy for England – Bus Back Better: [Bus Back Better \(publishing.service.gov.uk\)](#)

Department for Transport Business Case Guidance: [Transport business case guidance - GOV.UK \(www.gov.uk\)](#)

Revenue Cost	£ N/A	Source of Revenue Funding	N/A
Capital Cost	£5,565,143	Source of Capital Funding	City Region Sustainable Transport Settlement (CRSTS) – Grant funding from the Department for Transport
One off cost <input checked="" type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:

This report seeks Cabinet’s approval to submit a Full Business Case (FBC) to the West of England Combined Authority (WECA). This FBC is to deliver the next stage of the A37/A4018 Victoria Street & Colston Avenue improvements.

FBC Funding

This entire cost of the FBC is to be funded by a grant from WECA. There is no requirement for any BCC funding. As a result, this proposal will not have any impact on the Council’s approved capital or revenue budget.

Parking Income

The report identifies that there will be a loss of income because of the removal of 29 pay and display parking bays on Victoria Street and Mitchell Lane. This has been estimated at £0.388m over 5 years or £77.5k per year. This will result in a permanent loss of income and a budget shortfall. This will need to be fully mitigated to avoid a budget pressure in future years. The service has suggested that a funding reserve of up to £2m is proposed from Clean Air Zone revenue to enable reallocation of road space associated with CRSTS projects which could potentially cover these costs. If implemented this will provide mitigation for 5 years.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 23 January 2024		
2. Legal Advice: The submission of the bid for grant funding raises no particular legal issues. If successful, the procurement process must be conducted in line with the 2015 Procurement Regulations and the Councils own procurement rules. Legal services will advise and assist officers with regard to the conduct of the procurement process and the resulting contractual arrangements.		
Legal Team Leader: Husinara Jones, Team Manager/Solicitor 16 January 2024		
3. Implications on IT: I can see no implications on IT in regard to this activity		
IT Team Leader: Alex Simpson/Lead Enterprise Architect 25 January 2024		
4. HR Advice: I can confirm that there are no HR implications in these proposals		
HR Partner: Chris Hather/HR Consultancy Manager 25 January 2024		
EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	22 November 2023
Cabinet Member sign-off	Cllr Donald Alexander, Cabinet Member for Transport	7 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal - Full Business Case (Public Consultation for FBC appendix featured in Appendix B) - Technical Drawings - Project Programme	YES
Appendix B – Details of consultation carried out - internal and external - Early Engagement Report (A37/A4018 corridor) - Public Consultation Report (A37/A4018 corridor) - Transport Corridor Survey Central D21 - Information Exercise (A37/A4018 Victoria Street)	YES
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment - Risk Register - QRA Report	YES
Appendix E – Equalities screening / impact assessment of proposal - EQIA (A37/A4018 Victoria Street & Colston Avenue)	YES
Appendix F – Eco-impact screening/ impact assessment of proposal - ECO Impact Report	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	YES
Appendix J – HR advice	NO
Appendix K – ICT	NO

Appendix L – Procurement	NO



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Frome Gateway Regeneration Framework	
Ward(s)	Lawrence Hill	
Author: Abigail Stratford	Job title: Head of Regeneration	
Cabinet lead: Mayor	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration	
Proposal origin: Mayor		
Decision maker: Mayor Decision forum: Cabinet		
Purpose of Report:		
Frome Gateway:		
<ol style="list-style-type: none"> 1. To seek approval of the Frome Gateway Regeneration Framework which sets out a long-term vision for the transformation of the predominantly industrial area in St Jude’s. 2. To note proposals to deliver the following requirements on two Council owned sites in the Regeneration Framework area: <ol style="list-style-type: none"> a) Universal House: where a last-mile logistics hub is proposed to provide multi-operator sustainable and efficient delivery services for the city centre and local area, as well as provide employment opportunities for local residents. b) The Wellington Road Depot Site: where an energy centre is proposed to support the expanding district heat network, co-located with residential above including larger affordable family homes. 		
Bedminster Green Land Acquisition:		
<ol style="list-style-type: none"> 3. Approve the acquisition of the land to the north of Plot 3 to enable the delivery of the river restoration project. 		
Evidence Base:		
<ol style="list-style-type: none"> 1. The Frome Gateway Regeneration Framework sets out the vision and principles for the regeneration of the predominantly industrial area in St Jude’s. The area extends from Wade Street / Houlton Street to Junction 3, and Newfoundland Way to Pennywell Road. A map of the Frome Gateway regeneration area can be found in Appendix A(1). Its purpose is to guide redevelopment in an area where change is anticipated, prioritising the provision of inclusive growth through local employment, new homes and community spaces. It is designed to stand the test of time and respond to changes in economic, property and funding environments. It also makes technical recommendations for the area to mitigate flood risk, due to parts of the framework area being in Flood Zone 2 and 3. 2. The framework seeks to deliver: <ul style="list-style-type: none"> • A minimum of 1000 new homes, with a mix of tenures and sizes to meet local need including larger homes to support family and intergenerational living 		

- A diverse range of employment spaces
- New community spaces to support existing community and cultural groups and encourage new ones
- Enhancements to the existing park spaces, as well as new pocket parks and high-quality streets that are inclusive and highly accessible
- Enhancements to the River Frome and surrounding setting, with development sensitively designed to create a high-quality new neighbourhood that face onto the river
- The prioritisation of health outcomes for the benefit of the local community
- Improved active travel links to surrounding neighbourhoods

3. The final Frome Gateway Regeneration Framework is attached in Appendix A(2).

4. To achieve the vision, the Framework proposes the following key changes:

- New and enhanced accessible and attractive streets that integrate green infrastructure and high-quality pedestrian and cycle infrastructure, that prioritise active travel.
- Enhancement of Riverside Park and Peel Street Open Space to better meet the needs of the community and environment.
- A new network of 'pocket parks' to increase the overall amount of green space
- Enhancement of the River Frome to increase the amenity value, visibility of and access to the riverside while enhancing its ecological functioning.
- Upgrading the strategic cycling route running through Riverside Park and Wellington Road.
- Enabling dedicated ground floor community spaces to meet the needs of community groups and organisations
- A local lettings policy to ensure local people have priority for new affordable homes
- New homes that meet local need, including larger, affordable family homes.
- The consolidation and diversification of employment and businesses, with the co-location of employment space at ground floor with residential above.
- A dedicated light-industrial, and night-time economy use area to the north, benefiting from access to the M32 and separation from the residential-focused area further south.

Consultation and Engagement:

5. Comprehensive and meaningful engagement has ensured the framework has been informed by an understanding of how people feel about the area at the moment and what they hope it could be like in the future. A two-year programme of community, business and stakeholder engagement and consultation events has included:

- Community walkarounds and door-to-door conversations
- An online interactive map and survey
- Story of Place mapping to tell the historical story of the Frome Gateway area
- Community and stakeholder workshops, exhibitions and presentations
- Focussed session with cultural venues
- 1-1 business engagement
- Bespoke engagement with specific stakeholder groups (such as Al-Baseera Mosque, St Nicholas of Tolentine Primary School and local youth organisations)
- 1-1 landowner / developer engagement and via a bespoke monthly Landowner & Developer Forum
- Design Review Panels with Design West
- Artist in residence to support more creative opportunities to partake in the engagement and visioning process
- An Access Audit and further engagement with the West of England Centre for Inclusive Living (WECIL)

- Utilising the Environment Agency Discretionary Service

6. Formal consultation on the draft Frome Gateway Regeneration Framework was undertaken between 23rd October and 3rd December 2023. A programme of 24 engagement activities was delivered during this period with 343 people in attendance. A consultation survey was used to collect feedback which received 327 responses. 11 formal representations were also received via letter. The consultation demonstrated significant support for the framework, vision and regeneration objectives and offered many valuable comments that helped to provide important and useful updates to the framework. All updates are documented in the Consultation Response Report, however the most significant changes included:
- Amendments to the Industrial Quarter to reduce its size but deliver industrial space exclusively, including intensified industrial workspace
 - Ensuring strategic travel routes are better represented
 - Creation of a new 'Physical Accessibility' page
 - Creation of a new 'Flood Risk Management' page
 - Amendments to affordable housing delivery
7. Full details of all consultation and engagement and its influence on the framework can be found in the Statement of Community Involvement, Consultation Report and Consultation Response Report. All are included as Appendices (Appendix B).

Inclusive Growth:

8. Through the regeneration of Frome Gateway we aspire to create a green and inclusive economy which reflects local culture and diversity, enhances the prosperity and wellbeing of the Lawrence Hill community and positively influences the evolution of a fairer and greener Bristol. To achieve this the Council will seek to partner effectively with landowners, developers, businesses and wider strategic and community partners. The following delivery priorities have been identified to help to progress our ambitions of creating a green and inclusive economy;

- Committing to the provision of commercial, community and cultural space across the ground floors
- Scoping the delivery of a Low Carbon Logistics Hub on BCC owned land (Universal House), in partnership with potential operators
- Committing to the delivery of the Frome Gateway District Heat Network (DHN) Energy Centre on Council owned land (Wellington Road Depot)
- Establishing a ground floor affordable lettings approach
- Production of a business relocation and retention strategy
- Creating a Frome Gateway Social Value Strategy
- Producing a Frome Gateway Local Lettings Policy

Delivery and Next Steps

9. Bristol City Council will use its power and influence to promote the aspirations for the transformation of Frome Gateway in line with the Framework. This includes the council's roles as Local Planning Authority, landowner, project funder and through its relationships with developers, businesses and institutions in the city. Redevelopment of individual sites will typically be delivered by private developers, but Bristol City Council is a landowner in this area, which provides a significant opportunity for influence over new development.
10. As developments are brought forward by private developers, they will be required to contribute financially to local infrastructure improvements, such as through Section 106 and Section 278 agreements and Community Infrastructure Levy (CIL).

11. Further public sector funding will also be required to implement the Framework in full. Approval is therefore sought to explore and submit external funding bids to try and secure additional investment to deliver our plans for the Framework. It is envisaged Cabinet approval will be sought for Strategic Community Infrastructure Levy (CIL) funding in the future.

BCC Freehold:

12. The Council is a significant landowner in Frome Gateway. The Council's freehold ownership is one of several 'tools and levers' that can be used to influence the delivery of new development in Frome Gateway and achieve desired benefits which cannot be achieved directly through the planning process.

13. As developers bring forward sites for redevelopment in the Frome Gateway, where the Council is the freeholder, there is a requirement to re-gear leases to enable;

- Compliance and alignment with the Frome Gateway Regeneration Framework
- The delivery of 40% policy compliant affordable housing with local nominations via Home Choice, including homes for rent and affordable home ownership products, and safeguarding of key worker homes.
- A larger proportion of 3+ bed homes as set out in the framework to meet local housing need
- Homes with private balconies and designed to comply with Design Guide and Urban Living SPD
- Connection to the District Heat Network
- Safeguarding ground floor space for affordable letting for community or cultural uses
- Enhanced sustainability and ecological requirements
- Alignment of the recommendations set out in the Frome Gateway Health Impact Assessment to maximise public health benefits through new development and regeneration
- Enhanced local employment and training provision
- New ground lease on commercial terms to be agreed to include a future income stream for the Council

14. If it is demonstrated through evidence that for viability reasons 40% policy compliant affordable housing cannot be delivered, the Council would be willing to consider the delivery of 20% planning policy compliant affordable housing with a commitment through the lease to explore the delivery of 20% affordable housing using affordable grant funding post planning.

15. The cost of delivering these objectives will be considered in achieving best consideration usually interpreted as the open market value.

16. If land is held within the Council's general fund it can be disposed of at an undervalue through the General Disposal Consents 2003 provided the undervalue does not exceed £2m. A valuation setting out the undervalue, undertaken by a qualified valuer (member of the RICS) would be required to support any disposal.

17. If the land is held within the Housing Revenue Account (HRA) any undervalue we will need Secretary of State consent to the disposal. All decisions around terms and conditions will be subject to and in accordance with the Property Scheme of Delegations.

Universal House Site

18. The Frome Gateway Framework has identified the area has the potential to accommodate a low carbon logistics hub, which serves the last mile logistics needs of the city centre in a more consolidated and

efficient way and (in the future) delivering zero carbon approaches to moving goods around. This was a recommendation of the Frome Gateway Inclusive Economy Strategy which has informed the Frome Gateway Framework.

19. The Council has committed to exploring the redevelopment of the Universal House site as identified red on plan at Appendix A(3) into a Low Carbon Logistics Hub as part of a wider sustainable last mile logistics and distribution network.
20. This site, at the north end of Frome Gateway, is Bristol City Council owned and has great potential to support 'last mile logistics' into the Broadmead/ City Centre area via cargo bike or smaller electric vehicles. This is due to its proximity to Junction 3 of the M32, and existing bike path connecting it to the city centre.
21. This would see the co-location of some of the city's larger logistics providers within new industrial space and would deliver strongly against the circular economy aspiration both for Frome Gateway and the wider city centre. An upgrade to the strategic cycle route running through Frome Gateway in the City Centre and associated infrastructure would need to be delivered to facilitate this.
22. An outline business case for the strategic cycling infrastructure is currently being developed and it is envisaged this may be submitted to the Combined Authority for further funding to progress the project in the future.

Wellington Road Depot Site

23. The Wellington Road Depot Site as identified on plan at Appendix A(4) is in the council's Housing Revenue Account (HRA) ownership. In the future, as and when the site comes forward for redevelopment, it will be required to accommodate the district heat networks energy centre to ensure all new developments in the area can connect to the heat network. In addition, to address local housing the Council aspires to deliver larger affordable accommodation on the site. A local lettings policy will also be put in place to ensure the existing local community can benefit from these homes.
24. The delivery of the energy centre will support the city wide response to the climate emergency, while also supporting the long term resilience and environmental credentials of Frome Gateway as a place to live and / or do business.

Environment Impact Assessment Summary:

25. *BCC's Environmental Impact Assessment has determined significant beneficial impacts from the proposal:*
The proposed development framework is part of a city-wide strategic approach that is intended to have positive impact on carbon neutrality and emissions through expansion of heat network connections and reduced reliance on car transport. The framework is also expected to make improvements to the ecological value and climate resilience of the development area.
26. *BCC's Environmental Impact Assessment has determined significant adverse impacts from the proposal:*
The physical delivery of the regeneration vision will mean a significant amount of construction over the next 15 years. Building and construction materials are commonly accepted to have a high carbon footprint.

Bedminster Green:

27. In November 2021, Cabinet approved the acquisition of the land to the north of Bedminster Green Plot 3; as represented by the pink area on plan at Appendix A5, to enable the river restoration works.

28. This acquisition was subject to securing a financial contribution from the current landowner towards the costs of repairs to the structure of the riverbank infrastructure. Further details can be found in the November 21 Cabinet Report and supporting appendices.
29. The land in question is required to deliver the river restoration project. Without this land, a comprehensive redesign would be required at significant time and cost to BCC and other project partners. Even if the scheme is redesigned, a revised river restoration design may not deliver the same flood risk benefits the current design will deliver. The river restoration is required to support the occupation of developments in Bedminster Green due to flood risk in the local area.
30. Since November 2021, the freeholder of the land in question has changed from one landowner to a group of businesses (ManCo) who occupy the neighbouring industrial units. BCC has been in discussions with the ManCo about acquiring the land in question. The ManCo have stated they don't have the capital to make a financial contribution but would transfer the land to BCC for a nominal fee (£1). Approval is therefore now sought to acquire the land to the north of Plot 3 to enable the river restoration works for £1.

Cabinet Member / Officer Recommendations:

That cabinet:

Frome Gateway

1. Approve the Frome Gateway Regeneration Framework and note that it will be a material planning consideration in the determination of planning applications.
2. Authorise the Executive Director for Growth and Regeneration in consultation with the Mayor to secure the freeholder requirements set out in this report through lease re-gearing negotiation in the Frome Gateway area and to note the costs of these requirements will be considered when determining best value.
3. Authorise the Executive Director for Growth and Regeneration in consultation with the Mayor to take all steps required to deliver a last-mile logistics hub on the Universal House site and an energy centre with larger family accommodation on the Wellington Road Depo Site as set out in this report.
4. Authorise the Executive Director of Growth and Regeneration, in consultation with the Section 151 Officer and Mayor, to explore and to submit funding bids (which may be over the key decision threshold) to enable the redevelopment of Frome Gateway, noting that the acceptance and spend of any funding award over the key decision threshold will be subject to further approval in accordance with the decision pathway.
5. Authorise the Executive Director of Growth and Regeneration, in consultation with the Section 151 Officer and Mayor, to explore and to submit funding bids (which may be over the key decision threshold) to enable development of a Community Land Trust or similar appropriate vehicle to run and manage community and cultural spaces in Frome Gateway, noting that the acceptance and spend of any funding award over the key decision threshold will be subject to further approval in accordance with the decision pathway.
6. To authorise the Executive Director of Growth and Regeneration, to implement a local lettings policy in the Frome Gateway Regeneration area.
7. Note the consultation report at Appendix B.

Bedminster Green:

- Authorises the Executive Director in consultation with the Cabinet Member for Growth and Regeneration to take all steps required to acquire the land as outlined in this report.

Corporate Strategy alignment:

- Homes and Communities** – the regeneration of Frome Gateway will deliver much needed new homes, including affordable homes.
- Economy and Skills** – the regeneration seeks to secure new affordable community and employment space, that seeks to support inclusive growth and support the night time economy.
- Transport and Connectivity** – the sustainable transport and public realm improvements will improve connections across the city and support active and sustainable travel, by making it easier to walk, cycle or take public transport. This, combined with new trees and vegetation planting, will help support the level of growth coming forward in the area, improve air quality and help improve climate resilience.
- Health, Care and Wellbeing** – making active travel easier and creating a high-quality pleasant public realm, combined with improved green space for people and wildlife will support healthier lifestyles. Provision of new community space will encourage integration of existing and new communities. A Health Impact Assessment has been produced and published alongside the Framework to encourage and support healthier placemaking and maximise positive public health benefits through regeneration.

City Benefits:

- The regeneration of Frome Gateway will deliver new homes alongside new employment and community use to create a vibrant place.
- At least 1,000 new, good quality homes, including affordable housing, will help create greater equality of opportunity and quality of life. Creating a mixed and balanced community with a strong sense of place and liveable environment can help benefit mental and physical health, social interaction and security.
- Improvements to highways and public realm will support climate resiliency by: i) increasing tree cover and reducing the urban heat island effect, ii) provide infrastructure to support more active forms of travel and the resultant benefits to health, air quality and congestion

Consultation Details:

- Consultation details have been set out in the supporting documents in Appendix B.

Background Documents:

[Corporate Strategy 2022-27 \(bristol.gov.uk\)](https://www.bristol.gov.uk/corporate-strategy-2022-27)

Revenue Cost	£ 0	Source of Revenue Funding	
Capital Cost	£ 0	Source of Capital Funding	
One off cost <input type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: The report seeks Cabinet approval of the Frome Gateway Regeneration Framework. Delivery of the framework will be funded through Section 106 and Section 278 agreements and Community Infrastructure Levy (CIL) along with other public sector funding. The report notes that approval to spend CIL funding will be sought at a future date and that only approval to explore sources of public sector funding is sought at this point.

The Framework assumes that the Universal House Site, for which the Council owns the Freehold but not the leasehold, will include a logistics hub. The Wellington Road Depot Site is also part of the pipeline for Goram Homes so will be transferred along with the obligation to build an energy centre and associated heat network.

Finally, as part of the Bedminster Green River restoration works the Council will buy a stretch of riverbank for a

nominal fee of £1.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 11 January 2024

2. Legal Advice:

Consultation

The consultation responses must be conscientiously taken into account in finalising the decision. The leading cases on consultation provide that consultation should occur when proposals are at a formative stage, should give sufficient reasons for any proposal to permit intelligent consideration and should allow adequate time for consideration and response. There must be clear evidence that the decision maker has considered the consultation responses, or a summary of them, before taking its decision.

Property

For the Bedminster Green site the Council's power to acquire property by agreement and at market value falls within the Local Government Act 1972 for the purpose of any of its functions or for the benefit, improvement or development of the area.

The Council is also under a duty by virtue of S123 of the Local Government Act 1972 to achieve best value for its assets and any disposal should be at the best price reasonably obtainable. The duty to seek best consideration is subject to certain exceptions, most notably section 2 of the Local Government Act 2000 providing the Council with well-being powers to accept a disposal at undervalue within the £2 million threshold, where the authority considers the disposal will help it to secure the promotion or improvement of the economic, social or environmental well-being of its citizens. A valuation setting out the undervalue, undertaken by a qualified valuer (member of the RICS) would be required to support any disposal.

If the land is held within the Housing Revenue Account any undervalue will need Secretary of State consent to the disposal.

Legal Team Leader: Husinara Jones and Andrew Jones, Team Manager/Solicitor 10 January 2024

3. Implications on IT: I can see no implications on IT in regard to this activity.

IT Team Leader: Alex Simpson – Lead Enterprise Architect 30 November 2023

4. HR Advice: There are no HR implications evident.

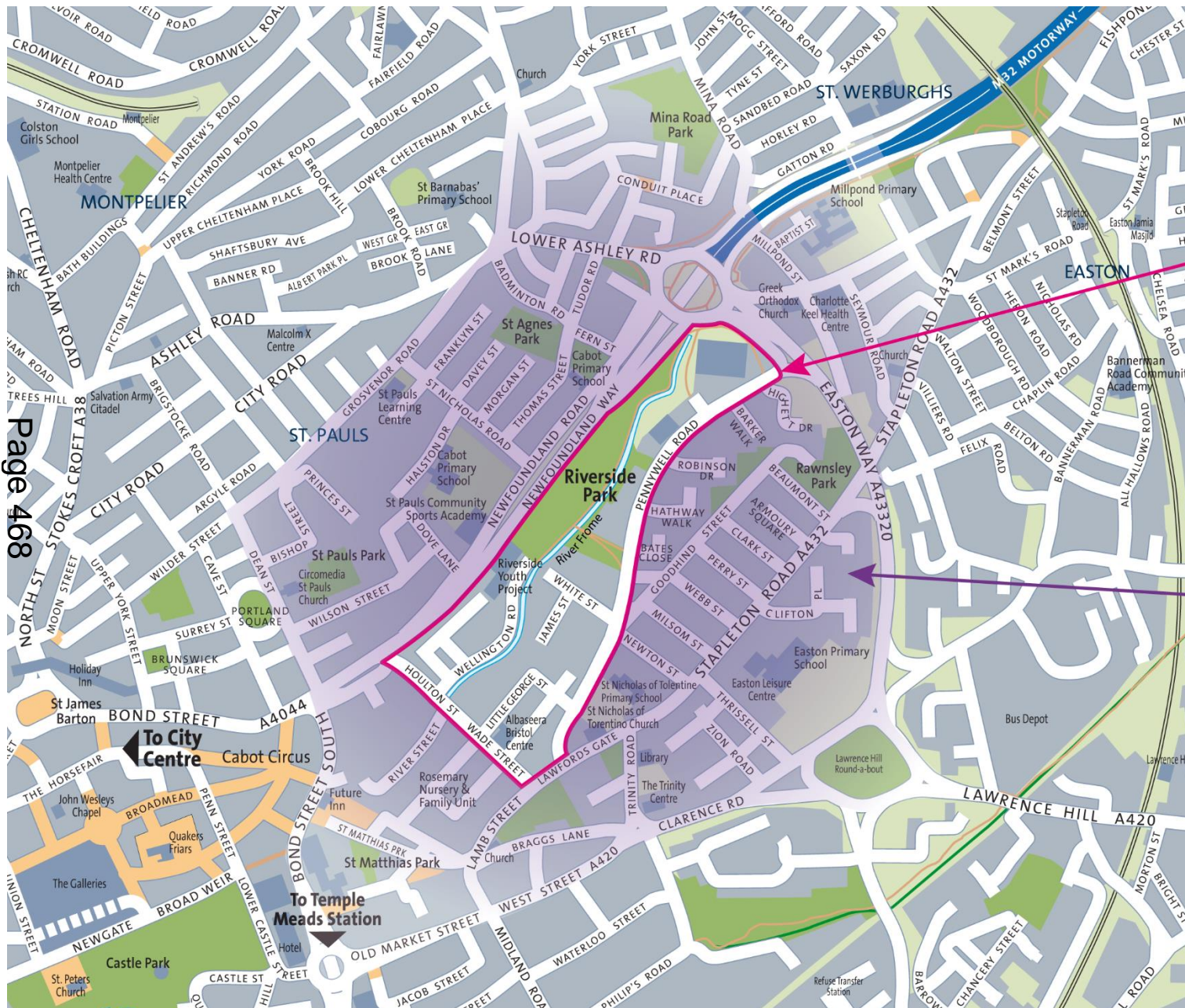
HR Partner: Celia Williams - HR Business Partner 23rd January 2023

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	29 November 2023
Cabinet Member sign-off	Mayor's Office	16 January 2024
For Key Decisions - Mayor's Office sign-off	Mayor's Office	16 January 2024

Appendix A – Further essential background / detail on the proposal A(1) Frome Gateway regeneration area boundary A(2) Frome Gateway Regeneration Framework A(3) Universal House Red Line Plan A(4) Wellington Road Depo Red Line Plan A(5) Land to the north of Bedminster Green Plot 3	YES
Appendix B – Details of consultation carried out - internal and external i) Frome Gateway Regeneration Framework: Formal Consultation Report	YES

ii) Frome Gateway Regeneration Framework: Consultation Response Report	
iii) Frome Gateway Regeneration Framework: Statement of Community Involvement	
Appendix C – Summary of any engagement with scrutiny The Frome Gateway Regeneration Framework project attended BCC Growth & Regeneration Scrutiny on Wednesday 25th January 2023. Minutes and decisions can be found at: https://democracy.bristol.gov.uk/ieListDocuments.aspx?CId=133&MId=10433&Ver=4	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Frome Gateway Regeneration Framework - Regeneration Area Boundary



Frome Gateway Regeneration Area

Core Regeneration Area

This area will see significant change as land is brought forward for redevelopment. The Regeneration Framework will outline design and development proposals within this area and guide the future delivery of new and improved homes, jobs, public and green spaces, and infrastructure.

Wider area of local context

The area surrounding the core regeneration area will not be subject to these development proposals, however it is important to consider how any development works with and are connected into the surrounding area.



Frome Gateway Spatial Regeneration Framework

January 2024



Working with





Mayor's Foreword

Statement of Intent

The Frome Gateway area in St Jude's, is in need of investment so that it can better meet the needs of the local community and the city. We've named it Frome Gateway to acknowledge it as a city entrance from the M32 and to celebrate its primary natural asset - the River Frome. As we plan to address our city challenges of the housing crisis, social and economic inequality, and the climate and ecological emergencies, we've been working with the community to shape a vision for the future of this area.

Bristol is a thriving city with world class universities, a high graduate retention rate attracting businesses, and the highest employment rate of the UK core cities. However not all residents share equally in the city's success, and growth presents challenges for using land within its limited 42-square-mile area sustainably to prevent the sprawl of the city. Regeneration must bring about vibrant, successful places at higher densities, balancing the need for homes, workspaces, green spaces and infrastructure while directing investment to existing areas most in need.

The Frome Gateway area has seen huge changes over the centuries. My grandmother lived in a terraced house that is now an embankment of the M32. It reminds me of how sweeping changes can be and the importance of preserving heritage wherever possible to tell an area's story through time.

This Regeneration Framework outlines a vision for Frome Gateway to steer the change coming for the benefit of the local community and the city. It aims to support the delivery of around 1,000 new homes, including new affordable housing, alongside new workspaces, community services and upgraded infrastructure. Central to this vision is creating new opportunities for local people, enhancing quality of life and public health, and proactively responding to climate change. I used to walk my dog along the River Frome when it was a fetid stretch of water. Through this project the river will become a thriving ecological corridor for all to enjoy.

Integral to the vision is the provision of employment space for businesses to thrive and bring about quality training and employment opportunities for local people. We'll work in collaboration with businesses and community organisations to explore how they could be part of change at Frome Gateway and grow their reach into the community.

I want to thank everyone who joined sessions and contributed to the thinking behind this document. The voice of this community is so important to highlighting the ambitions, opportunities, and challenges in the area. We'll continue to work with them, partners, and the city to deliver this shared vision for them.



Marvin Rees,
Mayor of Bristol.





Frome Gateway Regeneration Framework

Executive Summary

The Story of Frome Gateway

Cities are always changing as the needs of the city and its residents evolve. Historical records tell us that the Frome Gateway area in St Jude's was once undeveloped farmland, before becoming a dense residential and industrial community during the industrial revolution, with no green space at all. 'Slum' clearance begun in the 1930s, and by 1970 the area had dramatically changed again, with many buildings and 23 streets demolished to create new housing and places of work. This included new roads such as Newfoundland Way, which contributed to the disconnection between Easton and St Paul's. The Frome Gateway area today is the legacy of post-World War 2 re-planning of the central area of Bristol which saw a change from predominantly residential streets and a mixed-use area to an employment area characterised by industrial and warehousing uses.

Today, while industrial space accounts for most of the employment space and dominates the area's character, Frome Gateway is home to a diverse mix of businesses located here – from storage companies to dance studios, car show rooms to night-time music venues, and stage and set designers to coffee roasters. There's also a surprising amount of community and cultural organisations such as youth and faith groups providing important community services and support for the local community and the city's more vulnerable residents. Amongst this, Riverside Park and the River Frome offer quieter and natural spaces for the community.

However, there's a huge demand for new development in Bristol, and Frome Gateway has been identified as an Area of Growth and Regeneration in Bristol City Council's emerging Local Plan, to provide new opportunities for existing communities and meet the needs of Bristol's growing population. The Lawrence Hill Ward, where Frome Gateway is located, is one of the most deprived wards in Bristol, and is within the 10% most deprived areas nationally. It's critical that regeneration and investment

meets the needs of its community and is complemented by places to work and for the community to come together. New and improved infrastructure must be provided to support growth, improve quality of life, and respond to the challenges and opportunities of the climate and ecological emergencies.

This Regeneration Framework has been prepared to ensure that new development and investment in the Frome Gateway area is grounded in the needs of the community and delivers holistic, high-quality and co-ordinated change. It sets out a vision and principles for development for Frome Gateway as the area is set to embark on its next great transformation.

Vision

The vision for Frome Gateway is to create a vibrant residential neighbourhood that brings together a greater mix of uses which better meet the needs of the local community and the city. Celebrating and strengthening community, re-connecting to the natural environment, and safeguarding against the impacts of climate change are at the heart of this aspiration.

The regeneration of Frome Gateway aims to deliver:

- At least 1,000 new homes, including affordable homes.
- Reduced inequality through the provision of a mix of employment spaces to increase employment and skills opportunities.
- Improved green and public spaces such as Riverside Park including play facilities for children.
- A restored and celebrated River Frome as a thriving ecological corridor.
- Spaces for community and cultural organisations to grow and expand their reach into the community.
- Safer, greener, and more vibrant streets and improved active travel routes to better connect Frome Gateway to the City Centre, St Paul's, Easton and Old Market.
- Improved public health outcomes for the community.

Regeneration Framework

Regeneration Frameworks integrate city planning, transport and design thinking to establish a long-term vision and principles for areas where significant change is anticipated. This helps to ensure that planning applications within the regeneration area are better informed and able to respond positively to the needs of the area and the community.

The Framework will be a 'material consideration' for assessing planning applications, meaning that Bristol City Council (BCC) will take account of how well-aligned planning applications are with the vision and principles of the Framework during their assessment, alongside planning policy.

Community engagement

This Framework has been produced with extensive input from the local community and wider stakeholders, for which we are very grateful. The priorities of the community are clear – quality, affordable housing which meets local needs, inclusive skills and employment opportunities for all, community spaces and facilities (particularly for young people), and safer, better-quality streets and public spaces. These priorities have been captured in their Community Place Principles which are included on page 30 and which have greatly enriched the vision and aspiration set out in the Framework. BCC calls upon all who will be involved in delivering the vision set out in this Framework to do so with these priorities in mind.

Vision Statement

The Aspiration

By 2035, the delivery of new and improved homes, workspaces, and community and public spaces has transformed Frome Gateway to better meet the needs of the local community and the city.

The diversity and inclusivity of Frome Gateway's community and mix of activities, and re-connection with the river Frome, are celebrated as the area's greatest strengths and represent the foundations of its unique character and identity.

The delivery of roughly 1,000 new homes has created a residential community within easy reach of St Paul's, Old Market, Easton and the city centre. Improvements have been made to help reconnect St Jude's and St Paul's.

New buildings, public spaces and infrastructure have been designed with sustainability and a changing climate in mind, creating more attractive and comfortable streets and more space for wildlife to recover and thrive. Physical accessibility has been integrated into all projects ensuring the area is inclusive for all.

The quality of green spaces has been improved and the river Frome has been restored as a thriving wildlife corridor and opportunities for the community to enjoy the riverside have been integrated.

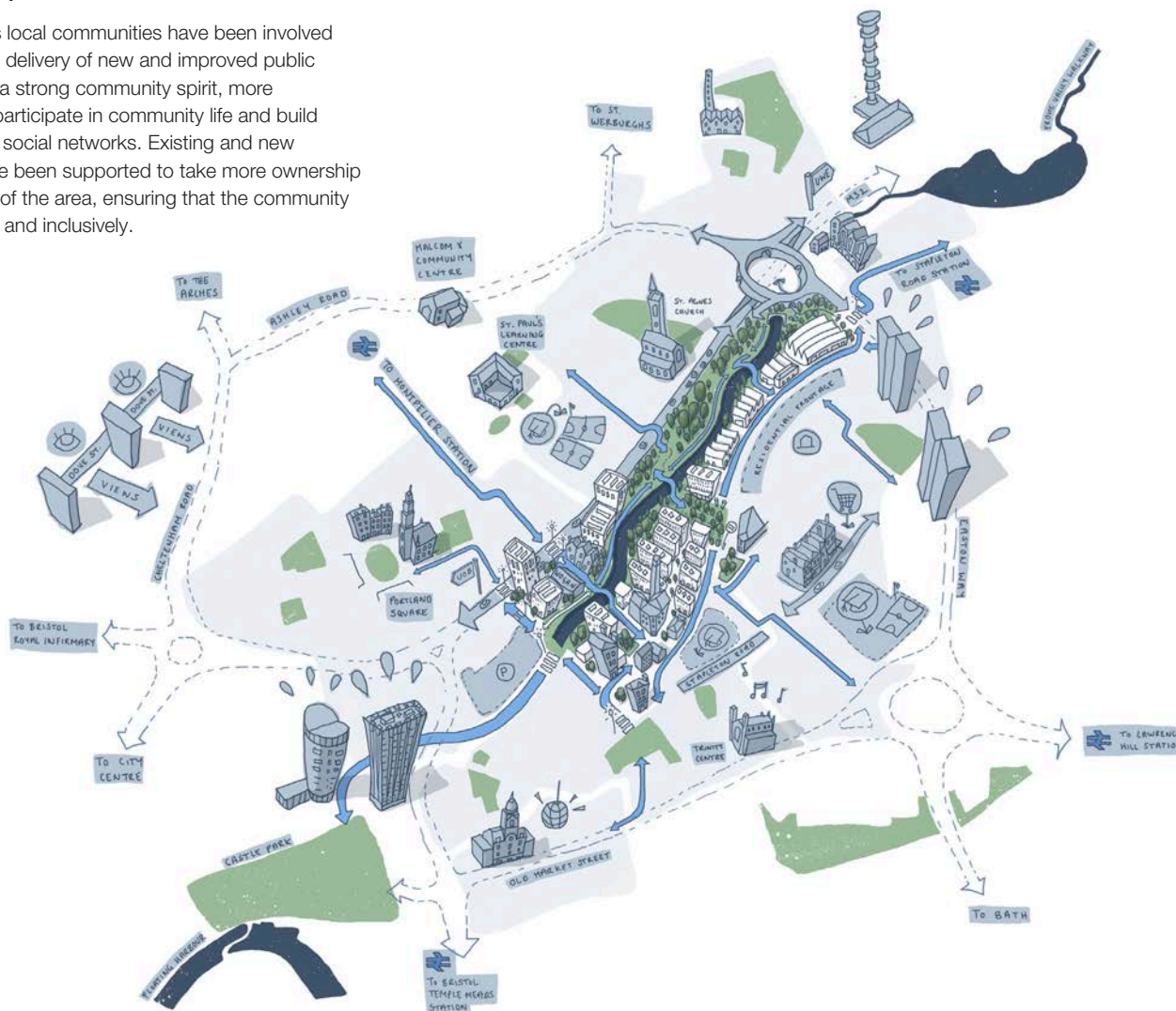
Health and well-being have been woven into design from the outset, making living more active, healthy, and sustainable lifestyles the natural choice and improving quality of life.

Frome Gateway is home to a green and inclusive economy. New workspaces accommodate a diverse range of jobs, and there are new pathways and services which help local residents to access training, skills and employment opportunities. It is a place which celebrates culture and diversity and where new and old communities come together.

Community and cultural organisations have been given the opportunity to grow in the area and help to define and

enhance the shared sense of belonging. Activity throughout the daytime and evenings adds to the area's sense of vibrancy and safety.

Frome Gateway's local communities have been involved in the design and delivery of new and improved public spaces, creating a strong community spirit, more opportunities to participate in community life and build relationships and social networks. Existing and new communities have been supported to take more ownership and stewardship of the area, ensuring that the community grows cohesively and inclusively.



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Framework Role & Purpose

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What is a Regeneration Framework?

Who is it for?

Purpose of a Regeneration Framework

This document provides a framework for the future development of Frome Gateway, a 15-hectare area in St Jude's in central Bristol.

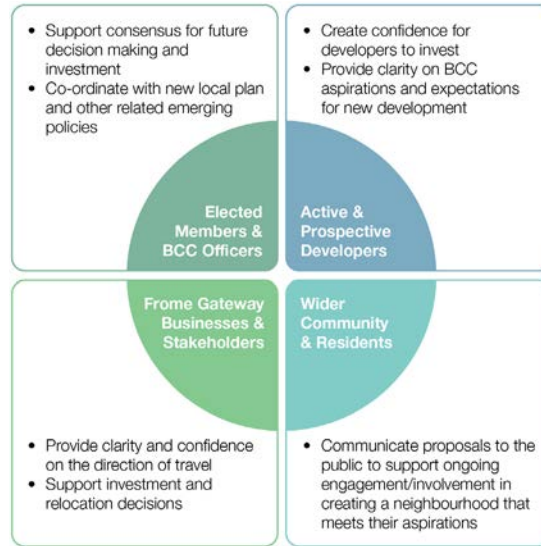
A Regeneration Framework is a non-statutory document that outlines the vision, priorities and overall spatial strategy for an area.

The purpose of this framework is to:

- Articulate the Local Authority's priorities for a place and guide development in an area where change is anticipated
- Represent community needs and aspirations alongside technical considerations and other stakeholder interests to create a holistic vision for the future
- Set coherent development principles, such as movement routes, public realm spaces and urban form, underpinned by a definition of the identity of the place and its emerging character
- Drive coherent coordination in areas of multiple ownership
- Raise the profile of this area for prospective investors
- Help focus inward investment from BCC departments and support potential future business cases

Who is this document for?

This document is intended for a wide audience base, including developers, BCC officers, businesses and residents. It is expected to be used for different purposes by different parties and represents a present day 'statement of intent' to inform future decision-making. Further engagement with stakeholders, technical studies and financial investment will be needed to realise its ambition.

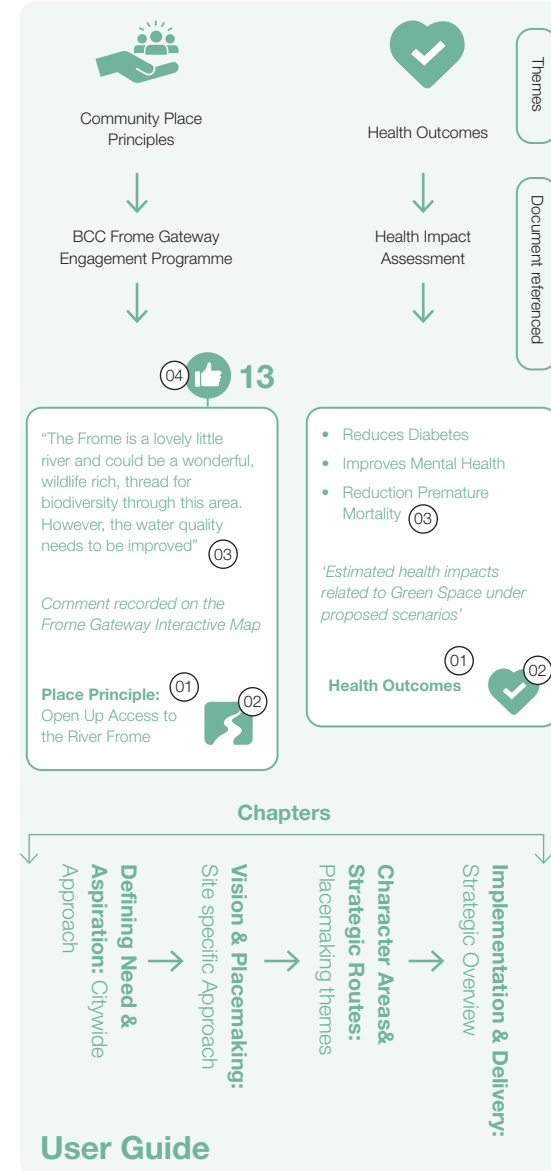


Status of a Regeneration Framework

This framework is one of several planning-led regeneration documents produced in Bristol in recent years. Others include Bristol Temple Quarter, the City Centre, and Whitehouse Street area in Southville.

While the plan is not formal planning policy, it will be a 'material consideration' for assessing future planning applications, as well as BCC investment decisions in the area. Planning decisions will be made based on evidence and policy at the time of application.

This document is not described as a 'masterplan' due to the size of the study area and the presence of multiple landowners. However, the strategic principles set out in this document should be used to inform future masterplans for smaller portions of the area.



Key

Community Place Principles & Health Outcomes Flow Diagram (Left)

Community place principles represent the aspiration of the community as an output of the engagement process.

Health outcomes aim to promote health and well-being for residents impacted by development and are guided by academic research.

These two themes will be leaved throughout the document in chapters 2-5. The themes will appear in 'speech bubble' graphics with relevant tags. See key:

1. Theme
2. Theme Icon
3. Design Principle(s)/Quote from engagement process
4. Number of likes the quote received on the Frome Gateway interactive online map.

**“The ebb and the flow, a
kingfisher flash,
the people, the breeze
through the trees
as they all come and go”**

Developing the Framework

Timeline

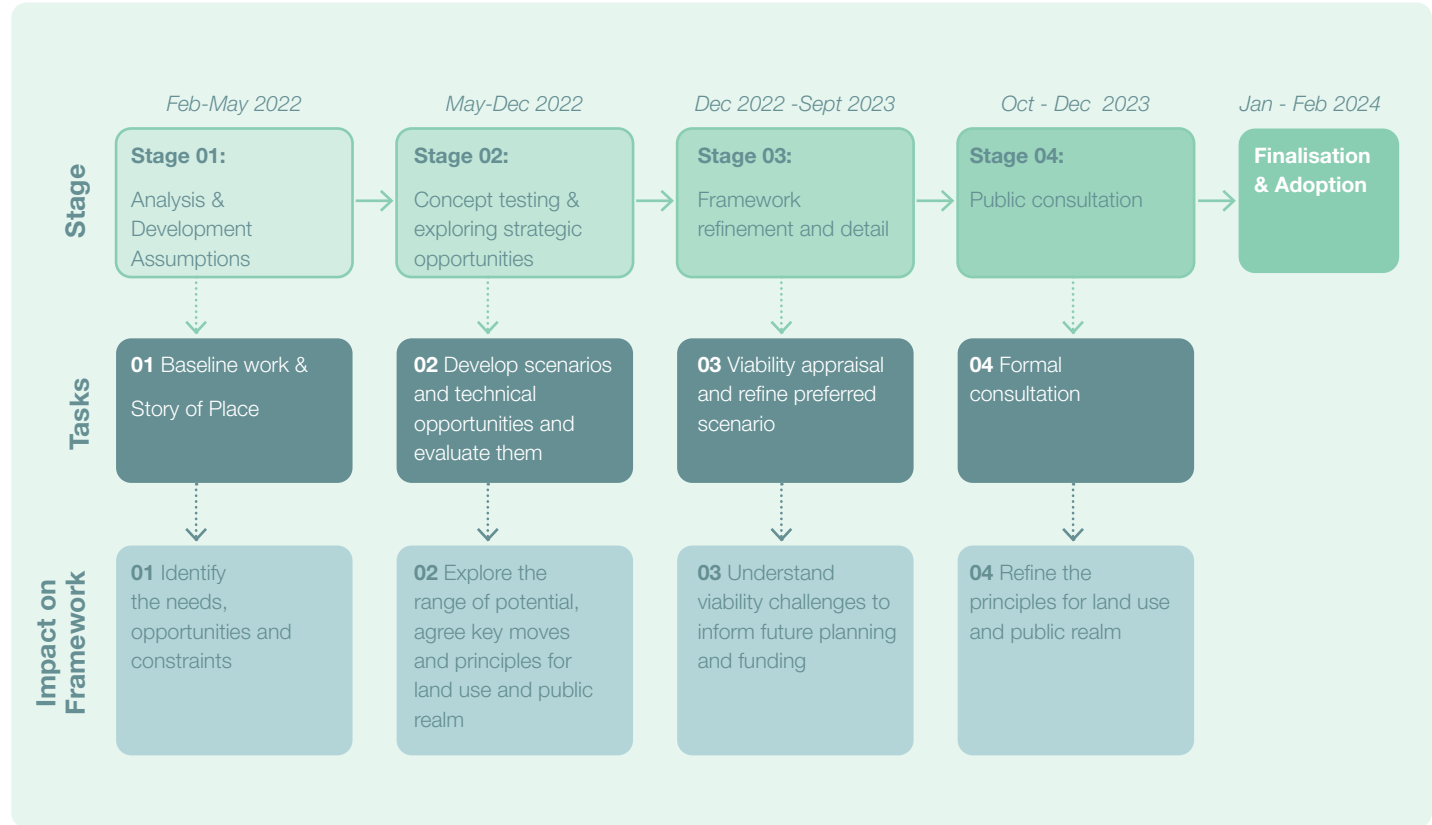
How the Framework was prepared

Work on the framework first began with early community engagement in 2019 to define local priorities for change as a set of Community Place Principles (see page 30).

This Framework was commissioned in early 2022 by BCC with support from the West of England Combined Authority. The consultant team was led and managed by Mott MacDonald as part of the Strategic Partnership (Arcadis, working with Mott MacDonald and Arup).

The urban design, place-making and overall technical coordination was led by Allford Hall Monaghan Morris (AHMM). Technical support, such as for transport, flooding and planning, was provided by the Strategic Partner (Mott MacDonald). Market, viability and delivery advice was provided by JLL in addition to creating the 'Frome Gateway Housing Strategy' report. Health economic data was provided by the TRUUD research project 'Tackling the Root causes Upstream of Unhealthy Urban Development'). PRD in-putted employment land analysis and recommendations.

The study is underpinned by a robust evidence base, including technical studies, delivery advice and internal and external stakeholder engagement. This document represents a present-day 'statement of intent', and will inform future decision-making, technical studies and financial investment to realise its ambition.



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Client	Project Partner	Consultant Team	Technical Lead	Architect	Economic Development	Viability Assessment & Frome Gateway Housing Strategy	Health Impact Assessment
Community & Stakeholder Engagement Lead; Design Quality Assurance; Heritage & Character Assessment		The Strategic Partner	Project Management, Planning, Landscape and Technical Input	Spatial Concept Design and Design Team Lead	Frome Gateway Inclusive Economy Strategy		
		 Working with 					

Defining Need & Aspiration

Regeneration in Context

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Site Context

Introduction to Frome Gateway

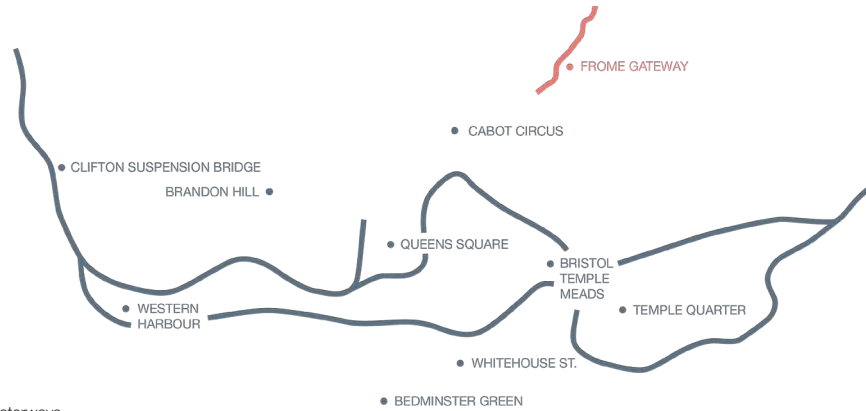
Frome Gateway is the name BCC has given to the Growth and Regeneration Area between Newfoundland Way, Easton Way, Pennywell Road and Wade Street. The area is the first point of arrival for many visitors to Bristol City Centre arriving from Newfoundland Way. It lies directly to the north-east of Bristol City Centre and covers an area of approximately 14.5 hectares.

Land in this area is generally underused for a central city location and includes vacant sites. Most space is used for industrial and service buildings however there is a surprising diversity of businesses including a number of community and cultural organisations located here.

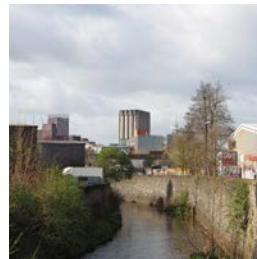
The area is bounded on all sides by roads, including Newfoundland Way to the west and A4320 Easton Way to the north. Its eastern and southern boundaries are the more local routes of Pennywell Road and Houlton Street/Wade Street. Frome Gateway is also dissected by the River Frome, which is exposed along most of this stretch before entering a culvert at the south-west

The mixed-use redevelopment of this area could provide a considerable additional supply of new homes with new forms of workspace while enhancing the accessibility, nature conservation value and recreational potential of Riverside Park and the wider River Frome corridor.

In this context, BCC has been working with the local community and stakeholders to prepare a Regeneration Framework for the area, with the purpose of establishing a clear vision and principles to guide future development. The aspiration is to ensure that regeneration delivers a resilient and future facing economy which provides tangible and meaningful benefit for local communities. There is an opportunity to set the benchmark for how regeneration in Bristol can deliver better outcomes for people and planet.



Map of Bristol Waterways



01



02



03



04



05



06

Image Key

1. River Frome - view to city centre from Peel Street bridge
2. St Agnes Church - view north over Newfoundland Way
3. River Frome - view towards city centre from above Newfoundland Way/Junction 3 Culvert
4. Riverside Park - view East to River Frome
5. Globe House and The Vestry building - view east from Little George Street
6. Pennywell Road - view north east towards Easton Way

Bristol Growth & Regeneration

A Citywide Approach

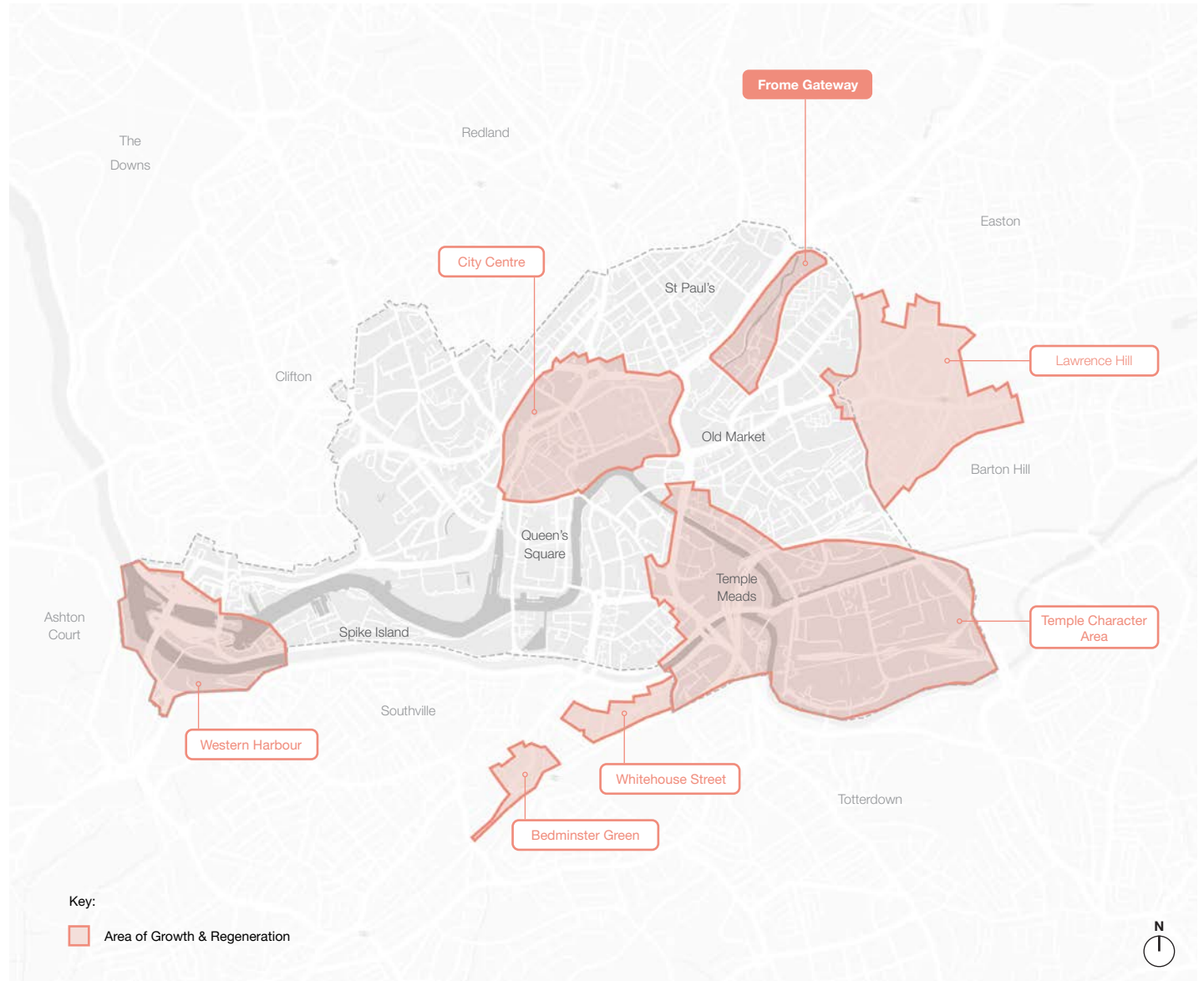
Frome Gateway is one of several areas in Central Bristol designated for Growth and Regeneration in the city's Draft Local Plan, including:

- Bristol Temple Quarter and St Philip's Marsh
- The City Centre
- Whitehouse Street
- Bedminster Green
- Western Harbour

While the context of each area is different, these areas respond to some common themes in Bristol:

- An acute need for housing, particularly affordable housing
- Continued need for employment space, including light industrial space
- Deprivation and inequality, and a need for economic opportunities and social cohesion
- The need to reduce health inequalities and improve health and wellbeing
- The climate emergency, creating an ethical imperative for actions towards a sustainable future
- The ecological emergency, emphasising the essential role of habitats and green spaces
- The potential impact and likelihood of flooding and need for resilience
- Challenges of moving around the city by foot, bicycle, public transport or car

By addressing these themes through a placemaking approach, the regeneration of Frome Gateway can contribute to a healthier and sustainable city.



Planning Context

Existing and Emerging Policy

BCC is currently preparing a new draft of the Local Plan to guide future development decisions. The emerging Local Plan identifies Frome Gateway as an area of growth and regeneration which could support significant new development as a new, mixed-use neighbourhood. The proposed changes would bring the area more in keeping with surrounding residential areas in St Paul's, St Jude's and Easton. This is a change from the adopted Local Plan (2011), in which:

- Most of the area on the south side of the River Frome was designated as a Principal Industrial and Warehousing Area (PIWA)
- Riverside Park was designated as an Important Open Space

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Some individual sites around the Pennywell Road/Wade Street intersection were allocated for residential uses, such as the Salvation Army and Globe House

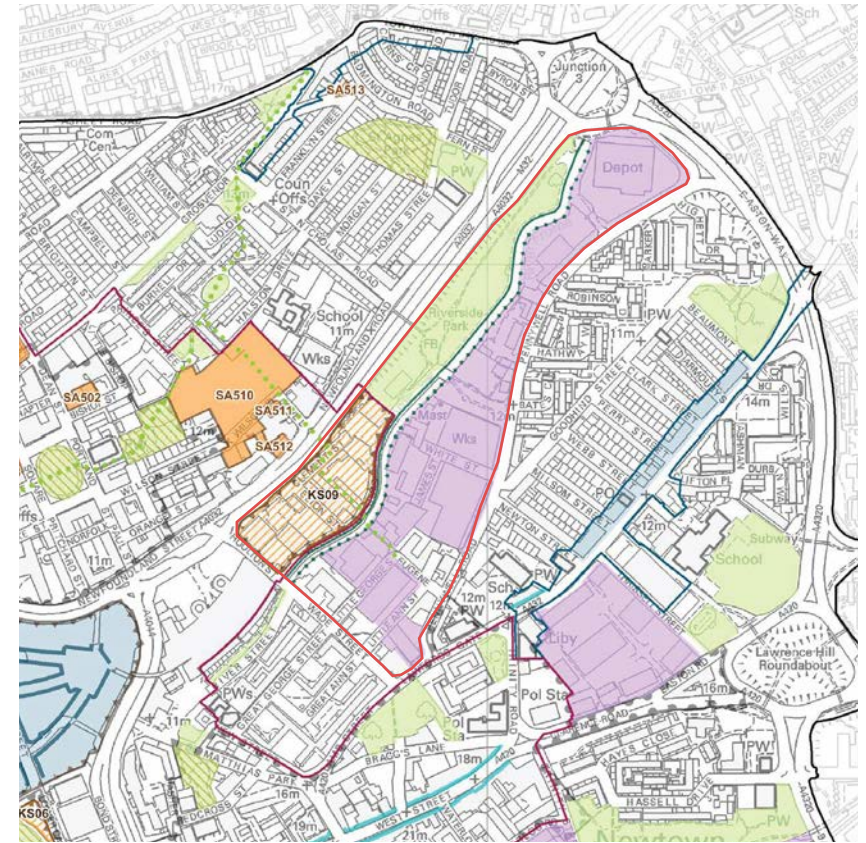
A south-west portion of the area was allocated as a Key Site (Newfoundland Way), to be 'developed for a mix of high-density city centre uses incorporating employment, new homes and leisure or other supporting city centre uses'

The key points from draft Policy DS5 Frome Gateway are set out on page 14. It states that the 'layout, form and mix of uses should have regard to the proposed Regeneration Framework for Frome Gateway' (this document).

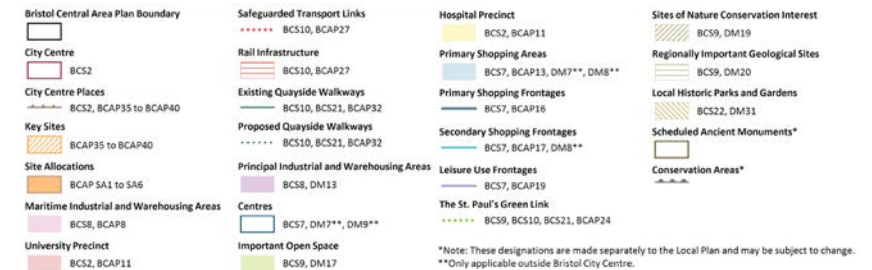
It is expected that the replacement Local Plan will be adopted in Autumn 2024.

A core element of the Local Plan is to enhance urban living. Urban living seeks to balance the efficient and effective use of land with aspirations for quality homes, successful placemaking and a positive response to context. BCC has prepared a Supplementary Planning Document (SPD) that provides further guidance on making successful places and at higher densities (Urban Living SPD, 2018).

This document and any future iterations should be used as an important guide for new development at Frome Gateway.



Bristol Central Area Plan, Policies Map, Adopted March 2015. Shows existing condition and policies applied to Frome Gateway



Frome Gateway Site Boundary

Planning Context

Existing and Emerging Policy

Draft Policy DS5: Frome Gateway

Frome Gateway will be developed as a new mixed use neighbourhood. Development will create a mixed and inclusive community with a diversity of land uses providing opportunities to live, work, take leisure and access services.

Development will include:

- At least 1,000 new homes with a mix of types, sizes and tenures at densities and forms appropriate to achieving this figure;
- Provision of workspace, including affordable workspace for a range of employment uses as part of mixed-use development. This would include logistics provision adjacent to M32 Junction 3;
- Up to 500 student bedspaces in addition to the new homes in accordance with Policy H7 'Managing the development of purpose-built student accommodation';
- Retail and leisure development to meet local needs;
- Infrastructure, services and community facilities required to support the new development;
- Provision of community facilities required to support the residential and student development;
- New and improved walking and cycling routes, including new road and river crossings, to reduce severance and connect the development to the city centre, surrounding neighbourhoods and the wider cycle network;
- Green infrastructure and public realm enhancements; and new open space to be provided in accordance with local plan policy GI A 'Open space for recreation' and secured from new development.

Old Market Neighbourhood Development Plan

A south-east portion of the study area is within the Old Market Neighbourhood Development Plan area, which was made in 2016.

This framework supports the principles set out in the Neighbourhood Development Plan. However, it represents and anticipates a greater degree of change than was envisaged in 2016, before Frome Gateway was identified as an area of growth and regeneration. Areas of alignment between the two documents include:

- Movement routes and connectivity, especially pedestrian routes
- The merit of historic buildings at the south end of the site
- The value of the River Frome and emphasis on the importance of green spaces
- Safer streets and play areas for children
- The promotion of mixed-use development that integrates employment and residential uses
- Phased change of land uses to include more residential housing and community facilities, as well as continued business uses

This Regeneration Framework departs from the Neighbourhood Development Plan in some areas where the context and wider Local Plan policies have evolved since 2016. For example:

- The number of available plots for redevelopment has increased as the local market has changed
- The subsequent publishing of the Urban Living SPD in 2018 sets different standards and criteria to the Neighbourhood Development Plan for high quality buildings. For example, the Neighbourhood Development Plan includes a design code for scale and architecture, and a schedule of accommodation. This Regeneration Framework does not provide an equivalent level of detail or prescription for design

- The Neighbourhood Development Plan specifies minimum levels of residential car parking. This Regeneration Framework does not specify levels, but does promote more recent local transport policy that emphasises active travel and public transport as the primary means of travel for this sustainable, central location

Wider Strategic Context

This framework for Frome Gateway presents a local application of wider strategic place-making principles to respond to the specific context and identity of the place.

In particular, this framework has been informed by:

- The National Planning Policy Framework – which makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve.
- The National Design Guide – which illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice.
- The West of England Placemaking Charter – which provides a framework for developers, communities and public sector partners to create better places that are: future-ready, connected, biodiverse, characterful, healthy and inclusive.
- Bristol Urban Living SPD – which gives guidance on optimal density to balance the efficient and effective use of land, with aspirations for a positive response to context, successful placemaking and liveability.
- The One City Plan – which sets out an ambitious vision for the future of Bristol, decade by decade up to 2050
- The adopted Bristol Local Plan and emerging Local Plan policies
- National Flooding Policy

Issues Affecting the Area

Summary

Introduction

There are numerous physical, social, environmental and economic issues which affect the Frome Gateway area and have informed this Regeneration Framework. This section summarises these issues to convey the context of the site today and some of the challenges for its redevelopment. The resulting constraints and opportunities have been summarised and presented on spatial plans (see pages 22-23)

Socio Economic Context & Health

The Frome Gateway area, part of the Lawrence Hill ward, is highly diverse, with large African (specifically Somali), Caribbean and Pakistani communities. 63.5% of local school pupils have a first language other than English, and the main language is not English for 23.4% of residents.

The Lawrence Hill ward is also young, with a higher proportion of children (0-15 years) than the city average and significantly lower proportion of people older than 65.

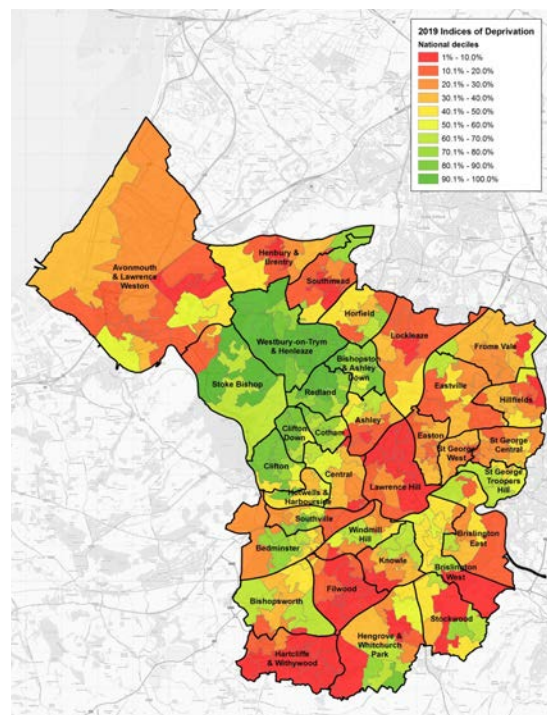
The area is home to multiple community initiatives, many of which focus on specific groups (e.g. women, migrant populations, young people).

Income levels in the area are relatively low. The Lawrence Hill ward is one of the three most deprived wards in Bristol. Some neighbourhoods within the area are within the worst 10% nationally for overall deprivation. Almost half of children in the ward live in low-income households and many homes are overcrowded. Most homes are rented, the majority being flats. Crime levels are relatively high.

There are health inequalities: premature mortality is 60% higher, and life expectancy around 5 years less for males, than overall in Bristol. Mental health and wellbeing issues are also significant. For example, only 46.3% of people in the Lawrence Hill ward reported being satisfied with life compared to a Bristol average of 62.4%.

The lived experience and health and wellbeing of people in the area presents a compelling case for inclusive regeneration, to unlock fundamental and transformational

benefits. This should include supporting people into better quality and more secure work and actively working with diverse communities to shape the future of the area.



01

Employment Land & Businesses

The Frome Gateway area is currently designated as a Principal Industrial & Warehousing Area (PIWA), and is home to around 43,000m² of employment floorspace. The area includes around 70 tenants and around 1,000 jobs. The current mix of activities is diverse, but industrial focused activities account for around 75% of current employment space.

Local residents are currently employed across a range of occupations and sectors across the city. Access to and quality of work are significant contributors to deprivation. The proportion of working age people claiming unemployment-related benefits is 9%, compared to 4% for Bristol. For those in work, it can be insecure, with higher-than-average number of residents on zero-hours contracts.

Natural business churn (businesses looking to move elsewhere or wind down activities) and low employment density use of the site means that there are opportunities to consolidate the amount of employment space at Frome Gateway whilst still replacing or even growing employment (i.e. by moving to more intensive uses of land in the area). However, it is equally important to recognise that the supply of industrial space in central, north and east Bristol is extremely limited, and decreased to the lowest level for 3 years in 2020. Uptake in first half of 2021 was 125% higher than the same period in 2020 – driven by demand from e-commerce and logistics.

The context and ambition for Frome Gateway means that there is a need to arrive at the best balance between housing delivery, economic need and wider placemaking. A breadth of employment onsite will help create new opportunities for local residents. In addition to ensuring supply of the 'right' types of spaces and uses, wider interventions will be needed to respond to the training, skills and employment needs of the local community – providing pathways and support to link residents to opportunities.

Key

1. Map from 'Deprivation in Bristol 2019, summary findings of the 2019 English indices of deprivation within Bristol Local Authority Area', October 2019.

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Issues Affecting the Area

Summary

Housing

Currently, housing makes up a reasonably small proportion of the overall floorspace within Frome Gateway which is a predominantly light industrial location. The houses within the study area are typically 1-bedroom or 2-bedroom units, with low occupation per unit. The site also includes a supported housing facility, owned by the Salvation Army, with approximately 91 units.



Page 84

There is an acute need for affordable housing in the area, despite a steady increase in affordable housing delivery in the city over the past few years. In March 2022, the lower quartile price paid for a home in the Inner East Area of Bristol was £258,879 which is substantially higher than the lower quartile price paid for England and Wales at £175,000. This is also reflected in the demand for social housing, with new build social housing properties in the Inner East Area receiving 100+ bids when advertised in 2021-22.

There are also high levels of overcrowded homes in Lawrence Hill ward – 17%, compared to 5% overall in Bristol. Due to far lower availability of larger affordable homes (both in terms of existing supply and new development), people requiring larger accommodation are likely to wait for longer than other groups to be re-homed. As such, there is a need for a mix of types, sizes and tenures to satisfy needs.

There are also significant needs for adaptable and

accessible homes to meet the needs of residents, including wheelchair users. Currently, 12% of households on the housing register have a need for accessible and adaptable housing.

Finally, housing intersects with other social, environmental and economic issues outlined in this chapter. There is a need for well-designed homes that are climate resilient, create a healthy environment and support sustainable travel choices. These complex and interrelated issues combine to create a compelling case for change and regeneration.

Transport & Movement

Frome Gateway is in a highly accessible location close to Cabot Circus on the edge of the city centre. It is well served by public transport, with a range of bus services running along the nearby Stapleton Road. The site has direct access to Newfoundland Way and adjoins the Clean Air Zone at the junction of Houlton Street and Newfoundland Street. There is a strategic cycle route that runs through Riverside Park, called the Frome Valley Greenway. This greenway connects Stoke Gifford, Stapleton and Easton with the city centre. It also adjoins National Cycle Network Route 4 further to the south. The closest railway station is Lawrence Hill station, located 1.1km away from the centre of the site.

However, there are significant accessibility and safety



02

issues for people moving in and through the site, especially for pedestrians. From engagement with the community and Healthy Street analysis, the following issues have been identified:

- Pennywell Road experiences a high volume of traffic, including heavy and fast-moving vehicles, some using this to access Newfoundland Way. Pedestrian crossings are poor and do not feel safe.
- The footways are poor, with obstacles and narrow ‘pinch points’ encountered in several areas. This creates particular concerns for parents and children accessing St Nicholas of Tolentine Primary School.
- Pavement parking on streets such as Pennywell Road, Wade Street and Houlton Street exacerbates the difficulties of travelling on foot.
- There are personal security concerns, with inadequate street lighting and passive surveillance, which discourages walking and cycling after dark.
- There are concerns about residential development increasing the number of vehicles and parking in the wider area.

Considering the relationship with surrounding areas, the area is characterised by poor wayfinding and severance. The River Frome provides a valuable navigational aid, but also acts as a barrier to east-west movement. The boundary of the Frome Gateway site has two notable severance barriers: Newfoundland Way to the west and Junction 3/Easton Road to the north. Crossings over these are infrequent, and those that are provided are not suitable for all users due to a mix of physical issues (width and gradient) as well as presenting a hostile environment.

The area requires a strategic reconsideration of movement and streets as part of its redevelopment. This holistic approach can promote active and sustainable travel, improve links with the surrounding areas and create a better relationship between its movement and place functions.

Key

1. Salvation Army Logos House. Providing accommodation for homeless people with a local Bristol connection.
2. Stapleton Road, high street offering retail, food & beverage and community ground floor uses. The street is highly successful with good levels of activity throughout the day. Stapleton road is 3 minutes walk from Peel Street open space

Prolonged exposure to housing costs above 30% of income can have a negative impact on mental health, increasing risk of mental disorders

Health Outcomes

Poor perceptions of the neighbourhood at Frome Gateway may prevent some people from leaving the house – potentially leading to problems with mental health and weight gain. Improvements planned for the site could be worth £0.5 million just for these two conditions alone.

Health Outcomes

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Issues Affecting the Area

Summary

Flood Risk

The River Frome is the most valuable natural asset of the site - there is huge potential to make the river a major piece of blue/green infrastructure that can contribute to public enjoyment, wildlife habitat and climate resilience. The River Frome is heavily modified in the Frome Gateway area. It emerges from the M32 culvert at the northern end and flows south through a high stone walled channel until it enters the Wade Street culvert at the southern end of the site and continues underground to flow into Bristol Harbour and the River Avon.

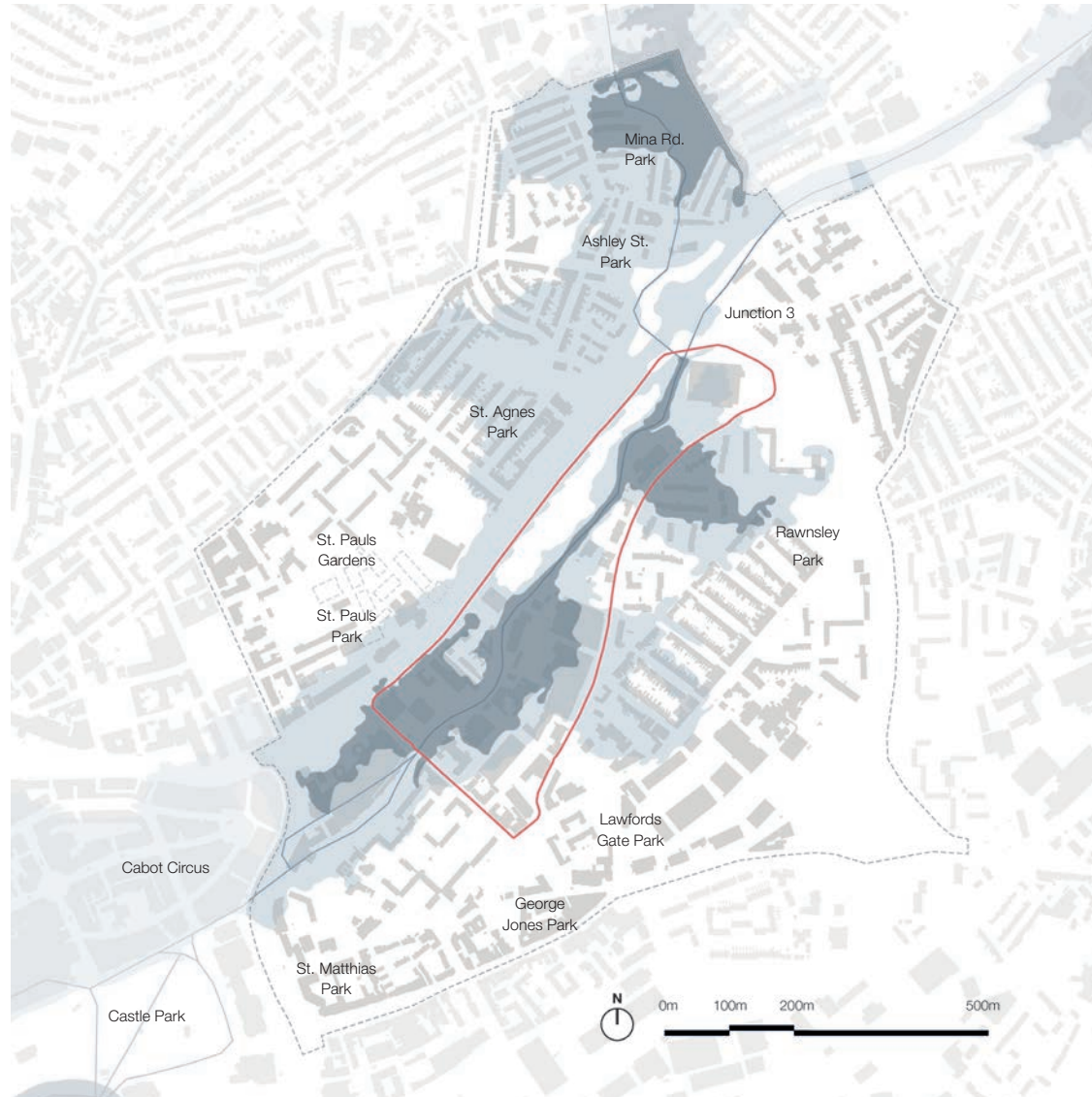
Despite the benefits that the river can provide, 72% of the site sits within either Flood Zone 2 or Flood Zone 3, as shown in the adjacent flood map.

Page 485 a review of the flood risk in 2020 it was noted that:

Flood risk is largely driven by limited capacity of the culvert under Wade Street and the operation of the upstream Northern Stormwater Interceptor (NSWI). Site flood storage will have limited impact as a mitigation measure on the predicted river levels. Measures to contain/convey flood flows could increase downstream flood risk

- Flood hazard maps shows that much of the site is at significant risk due to the predicted depth and speed of flood waters

This fluvial flood risk limits the land use potential across much of the site. An approach to flood risk management has been explored and set out on pages 53-58.



Key

- Waterway
- Floodzone 2
- Floodzone 3

Experiencing flooding can increase risk of mental and physical health problems even 3 years after a flooding event.

Health Outcomes

Not in Flood Zones 2/3 **28%**

Flood Zone 3 **37%**

Land having a 1 in 100 or greater annual probability of river flooding

Flood Zone 2 **35%**

Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding

Site Area **14.70 Ha**

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Issues Affecting the Area

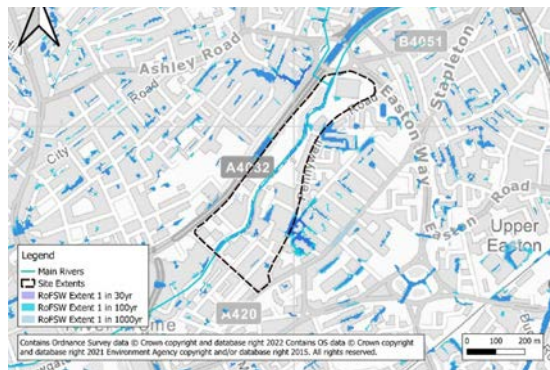
Summary

Surface Water Drainage

The Frome Gateway area is characterised by large portions of impermeable surfacing, such as roads and hard standing. With varied local topography, most rainwater discharges into the main sewers or the River Frome. Surface water discharge to the foul network will not be accepted, surface water should be discharged to the River Frome with the focus being on improving water quality, amenity and biodiversity with Sustainable Drainage features. There is the potential for limited surface water flooding in Frome Gateway, as shown below, but this is not as significant as fluvial flooding.

Heat Stress

The Frome Gateway area is vulnerable to climate change impacts including extreme high temperatures, cold events, drought and water stress. These will impact both the health and wellbeing of people and the performance of physical infrastructure. For example, the Keep Bristol Cool mapping tool has identified Frome Gateway area as being 'Very high risk for Bristol' for heat vulnerability. This risk considers factors such as age, deprivation, indoor and outdoor exposure, and emphasises the importance of mitigating heat effects in this area.



Surface water flooding map, source Mott MacDonald

Climate Change Resilience

The flood risk context for the site is described on the previous page. It is worth noting that with progressing climate change the risk of extreme flood events increases. As well as physical and financial effects, experiencing flooding can increase risk of mental and physical health problems even 3 years after a flooding event.

To limit the negative impacts of climate change, climate resilient design is imperative for the future of the area. While some measures will be implemented within individual plots, such as environmentally responsive design and building operation strategies, the Regeneration Framework presents an opportunity for a site-wide strategic response. Mitigation measures such as biodiverse green spaces implementing sustainable drainage systems within neighbourhoods; energy generation coupled with infrastructure (e.g. PV covered parking); and designing in community climate resilience (e.g. heat shelter provision) should be considered.

Zero Carbon

New development must achieve exemplary environmental performance and should aim to align with existing and emerging guidance such as:

- RIBA 2030 climate challenge
- Passivhaus requirements
- UK Green Building Council: Net Zero Carbon standard

Where possible, development should align with the principles of Climate Positive Design. Defined as providing net positive climate outcomes alongside environmental, social, cultural, and economic co-benefits



Operational carbon reduction strategy. Extract from Delivering Net Zero Guide

Key

1. On-site renewable energy production
2. Facade reducing energy demand through:
 - high performing thermal envelope
 - optimal orientation
 - appropriate glazing ratios
 - solar shading
3. Smart servicing and user control
4. Utilising local and national energy networks

Climate change is resulting in more extreme weather events, including higher summer temperatures. This increases risks of overheating and increased premature mortality for older adults. People with the poorest health, and from poorer socio-economic groups, are likely to be hit hardest by the impacts of climate change. New buildings should be adequately insulated, to avoid fuel poverty in winter and overheating in summer (both of which can contribute to excess winter and summer deaths), without excessive glazing. Greater shading and planting can reduce heat island effects.

Health Outcomes



Integrated on-site energy production and biodiverse roofs



On-plot urban greening reduces heat vulnerability

Issues Affecting the Area

Summary

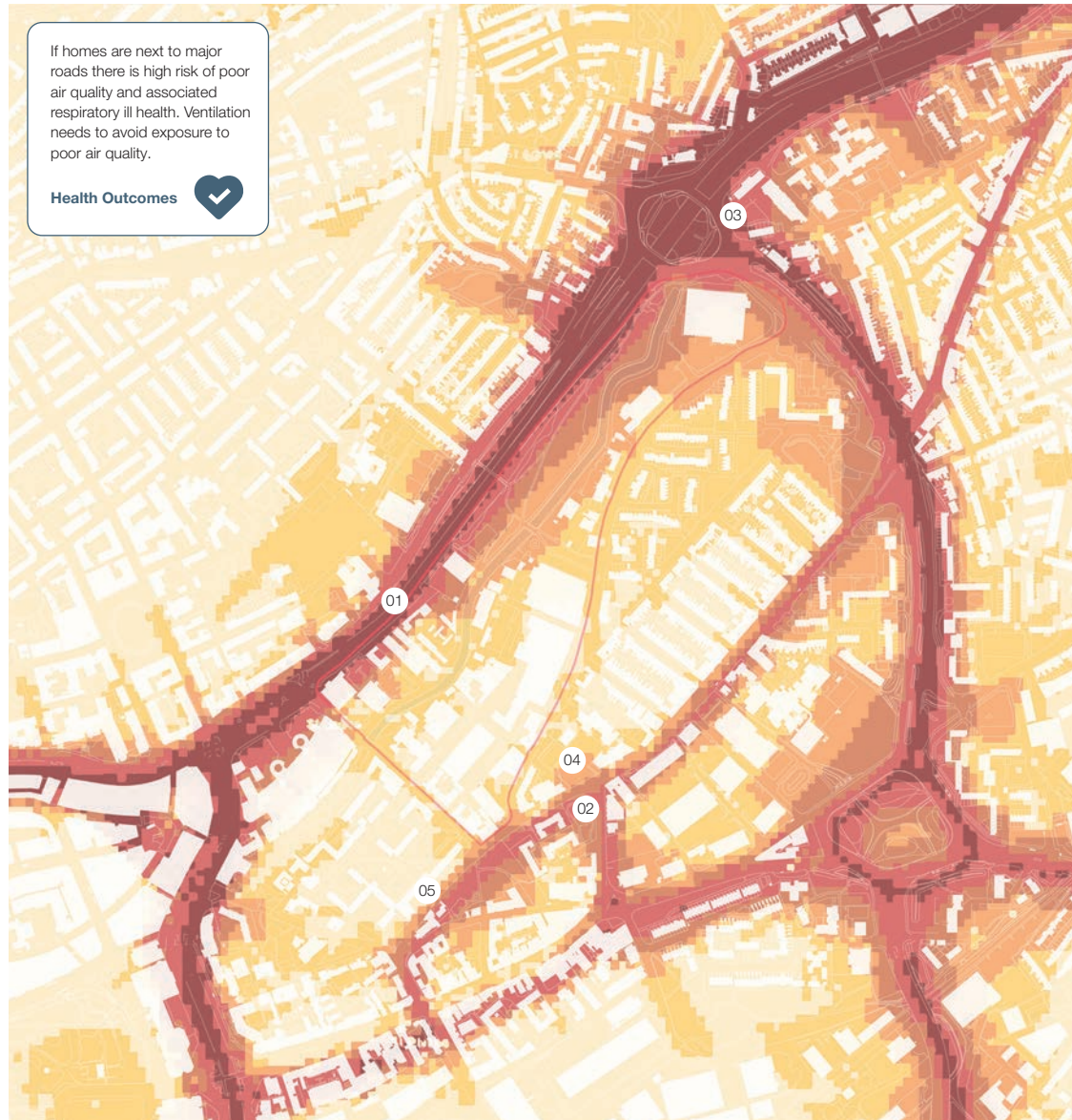
Air Quality

The Frome Gateway regeneration area is located within the Bristol Air Quality Management Area (AQMA) which covers the city centre and parts of the main radial roads, including Newfoundland Way. This AQMA was declared in 2001 for exceeding of Nitrogen Dioxide (NO2), and Particulate Matter (PM10) pollutants. A major source of air pollution is road traffic, for which a Clean Air Zone was introduced in November 2022. The south end of Frome Gateway is located on the boundary of the Clean Air Zone, where Houlton Street meets Newfoundland Way.

The impact of this context is that air pollution has the largest health impact of any factor at Frome Gateway. Current levels potentially increase the risk of premature mortality by around 6%. This could result in 1,700 premature life years lost, and result in health costs of £175 million. Development adjacent to areas of poor air quality must be sensitive to high exposure and seek to mitigate through design.

Noise Pollution

Being located within an urban environment, Frome Gateway also experiences a high level of noise associated with road traffic. There are two noise Important Areas (IAs) designated nearby for the A4032 (Newfoundland Way) and A420 (Lawfords Gate). IAs are designated based on the strategic noise map results and highlight hotspot locations where the highest 1% of noise levels at residential locations can be found. Noise has a relatively localised effect, but high levels of traffic related noise can almost double risk of depression in men and increase the risk of mental health problems for children. In addition, there are two sensitive receptors nearby: St Nicholas of Tolentine Primary School and Rosemary Nursery School and Children's Centre. Development adjacent to areas of noise pollution must be sensitive to exposure and seek to mitigate through design.



Key

Frome Gateway road noise map (left) - information source DEFRA

1. A4032 (Newfoundland Way)
2. A420 (Lawfords Gate Park)
3. Junction 3
4. St Nicholas of Totentine Primate School
5. Rosemary Nursery School

- 75+ dB(A)
- 70 - 74.9 dB(A)
- 65 - 69.9 dB(A)
- 60 - 64.9 dB(A)
- 55 - 59.9 dB(A)
- 00 - 54.9 dB(A)

External noise can negatively impact on physical and mental health. Location, layout and internal sound insulation can help protect residents.

Health Outcomes

Air pollution has the largest health impact of any factor at Frome Gateway, with current levels potentially increasing risk of premature mortality by around 6%. This could result in 1,700 premature life years lost, and result in health costs of £175 million. It is unlikely to reduce significantly without reduced traffic on Newfoundland Way.

Health Outcomes

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Issues Affecting the Area

Summary

Heritage & Character Assessment

The area has a rich history that tracks the evolution of the City of Bristol. Once an area of undeveloped farmland, Frome Gateway transitioned into a more residential area by the mid to late 1700s. By the end of the first Industrial Revolution the area was comprised of a dense blend of workers terraced housing and industrial works including a resin works, Pennywell Colliery, Tanneries, Public Houses and Churches. The original street pattern from this period is largely in place today particularly around the southern end of Pennywell Road and Wade Street.

Much of the original workers housing in the area was demolished as part of the City's 'slum' clearance beginning in the 1930s. This also saw a number of streets being lost.

The current location of Riverside Park was previously a tight knit network of housing and streets which were cleared and left in place – the undulation of the park is a result of it being built on the much of the rubble of the original houses.

Of the buildings and streets that remain a number are of local significance and should form part of a coherent and considered placemaking and regeneration response. These buildings offer clues with regards to material selection, scale and massing and composition.

There are examples of adaptive reuse of heritage buildings such as Vestry Hall, and more utilitarian examples of extension as can be seen with the former Malthouse on Little Anne Street. The Corporation Depot on Wellington Road is a newer development from around 1900. The Depot itself is in poor condition but includes some heritage buildings which provide the opportunity to retain and enhance local character. Globe House on Eugene Street holds a prominent corner site and should be repurposed to catalyse regeneration and help meet the needs of the existing and future communities while also being true to the heritage character of the area.



1.



2.



3.



4.



5.



6.



7.



8.

Key

1. A watercolour by Hugh O'Neill showing the Frome Bridge at Wade Street in 1821, Bristol Museum and Art Gallery, M2909.
2. St. Agnes Church facing onto Newfoundland Way
3. Model of proposed housing scheme at Pennywell Road and Easton Way in the 1960s, Bristol Archives, 40826/PLA/12/2
4. Red brick buildings on BCC Depot site, Wellington Road
5. The Swan with Two Necks Pub, Little Ann Street
6. Vestry Hall, Pennywell Road
7. Globe House, Eugene St
8. Extract from the Bristol City Centre Policy Report 1966, page 71

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Issues Affecting the Area

Summary

Ground Conditions

The Frome Gateway area is expected to be underlain by superficial Tidal Flat Deposits overlain by extensive areas of man-made fill ("made ground"). Beneath these soils, muds and silts, the bedrock geology comprises Redcliffe Sandstone Member, which is also a locally important aquifer.

Much of the present-day land uses were established between 1946 and 1970. Before this, Frome Gateway included areas of intensive industrial use, such as tanneries and a resin works (right), and dense residential housing. There are no known ground remediation works prior to redevelopment in this period. It is anecdotally understood that when Riverside Park was created ground levels were artificially raised using demolition material from nearby sites.

From the history of the site, contaminated ground conditions are expected to be prevalent, which will influence the cost and complexity of future development.



Key

1. The River Frome
2. Former tanneries
3. Pennywell Road
4. Terraced housing
5. School
6. Peel Street Bridge (existing)
7. Timber yard
8. Goodhind Street

Frome Gateway aerial photo (left), former industrial and residential uses create ground contamination issues - circa 1920's

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Heating Infrastructure Energy Centre, University of Liverpool

Utilities

The site is well-served by existing utilities, including gas, telecoms, water, drainage and electricity. It is expected that Pennywell Road and Stapleton Road will remain as the primary distribution routes for these, although some may require localised diversions to accommodate new buildings or highway alterations. In addition, network upgrades may be required to accommodate additional demand. For example, there are two electricity sub-stations nearby which may require upgrades to increase their capacity.

A new district heating network is proposed as part of the Bristol City Leap programme, with distribution routes along Pennywell Road, Wade Street and Newfoundland Way.

New developments would be expected to connect to this network to minimise new gas connections. A new energy centre is planned within the Frome Gateway area. This will potentially be at the south-west end of the site, adjacent to Newfoundland Way, but its exact location is to be determined.

A major constraint to the proposed development is the strategic foul sewer operated by Wessex Water. This is located just south of Peel Street footbridge and intersects the site from east to west. Easement and protection will be required for construction works nearby.

The key issues explored in this section have been used to inform, develop and refine this Regeneration Framework

Study Area

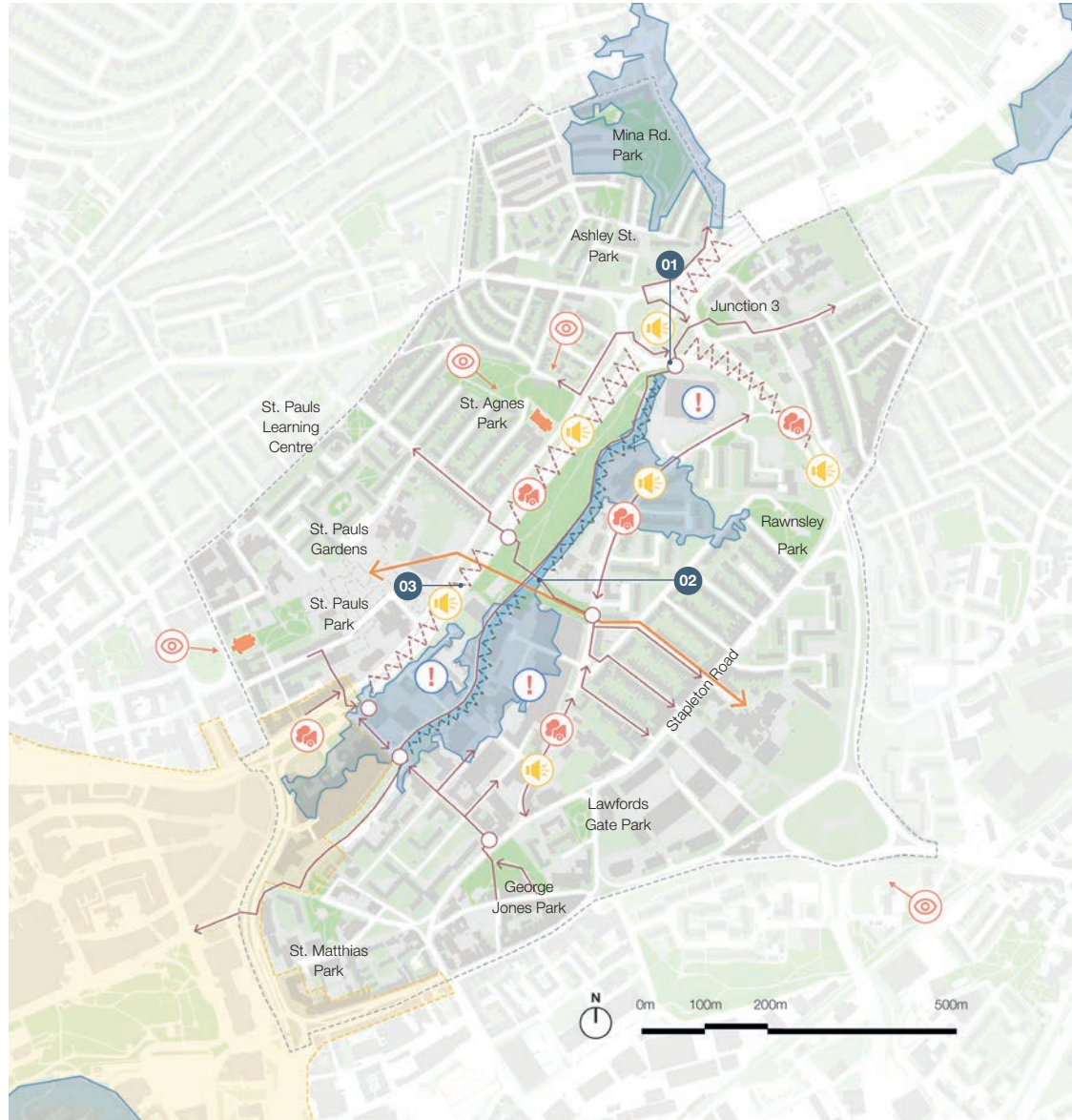
Constraints

The Frome Gateway area presents some significant constraints that will impact future development, including:

- Climate vulnerability and resilience issues – in particular, its vulnerability to flooding and heat stress. This creates challenges for new development that is healthy, sustainable and resilient
- Severance and movement barriers:
 1. The Junction 3/Easton Way area has poor pedestrian and cycle connections and a narrow underpass which creates safety concerns
 2. Peel Street Bridge is the only crossing over the River Frome in this area
 3. Newfoundland Way is a major cause of severance between St. Agnes and St. Paul's and St. Jude's and Old Market. The single pedestrian footbridge is narrow and uninviting

Noise and air quality issues – largely associated with road traffic, which have significant impacts on health

Key spatial constraints are shown in the adjacent plan.



Key Points

- New and existing viewing corridors must be considered when locating taller buildings
- Noise pollution
- Air Pollution
- Ground contamination from former industrial uses (extent tbc.)
- Barrier to movement
- Existing primary ped. & cycle routes
- Historic building in existing viewing corridor
- Clean Air Zone
- Strategic Foul Sewer Main
- Existing gateways to regeneration area
- River Frome: Barrier to movement
- Flood zone 3
High flood risk requires no homes at ground floor



3.

High levels of traffic related noise can almost double risk of depression in men, as well as increasing the risk of mental health problems for children.

Health Outcomes

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1.

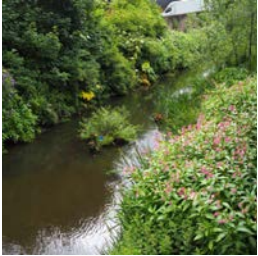


2.

Study Area

Opportunities

The Frome Gateway area presents some significant opportunities for regeneration, including:



The River Frome

The river provides a rich and diverse habitat for numerous species creating a valuable ecological corridor in an otherwise urban setting. This natural resource helps with biodiversity, helps manage the urban heat island effect and provides much needed visual amenity to the public. The flowing water and wildlife have a positive effect on the mental health and wellbeing of residents and visitors.



Riverside Park

This large, public green space could serve the local community more successfully with improved access, passive surveillance and activity throughout the day and night. The riverside path is a well-used attractive route for commuters and residents. Mature trees and vegetation provide a natural buffer to the noise and air pollution generated by the traffic on Newfoundland Way.

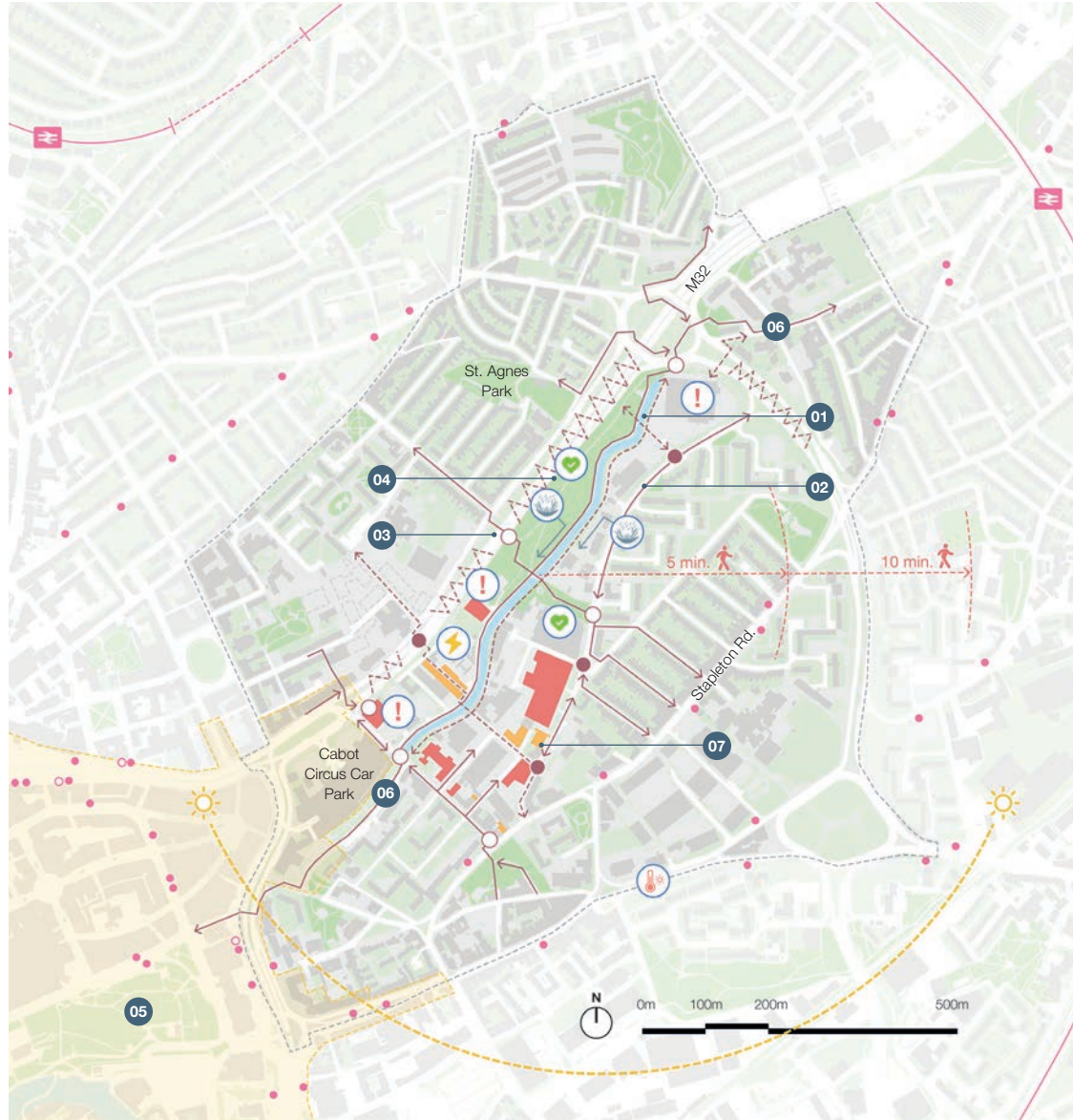


Locally Listed Buildings

There are a number of locally listed buildings within the study area. These help provide heritage and identity to the area and use a rich pallet of materials. These buildings should be considered as important structures that help define a fine urban grain. Future development must respond to these structures sensitively and celebrate them as key community assets that contribute to wider placemaking moves.

In addition, many of the constraints described on the previous page 22 can also be viewed as opportunities. For example, reducing severance and movement barriers and improving noise and air quality for the benefit of all.

Key spatial opportunities are shown in the adjacent plan.



Key Points

1. River Frome - key water source, opportunity to enhance ecology & create attractive riverside setting
2. Pennywell Rd. - opportunity to widen public realm, reduce speed, size and volume of motorised vehicles
3. Newfoundland Way pedestrian bridge - potential to enhance primary connection between St Jude's and St Paul's
4. Riverside Park - home to well established trees with potential to be further enhanced as a 'green lung' for the city
5. Proximity to the city centre reduces need for private car ownership and promotes sustainable active travel.
6. Strengthen cycle & pedestrian routes to bus station, bus routes and major employers (e.g. UOB/Hospital/North Bristol & BCAP32 via Gloucester Road etc.).
7. Enhance and conserve heritage

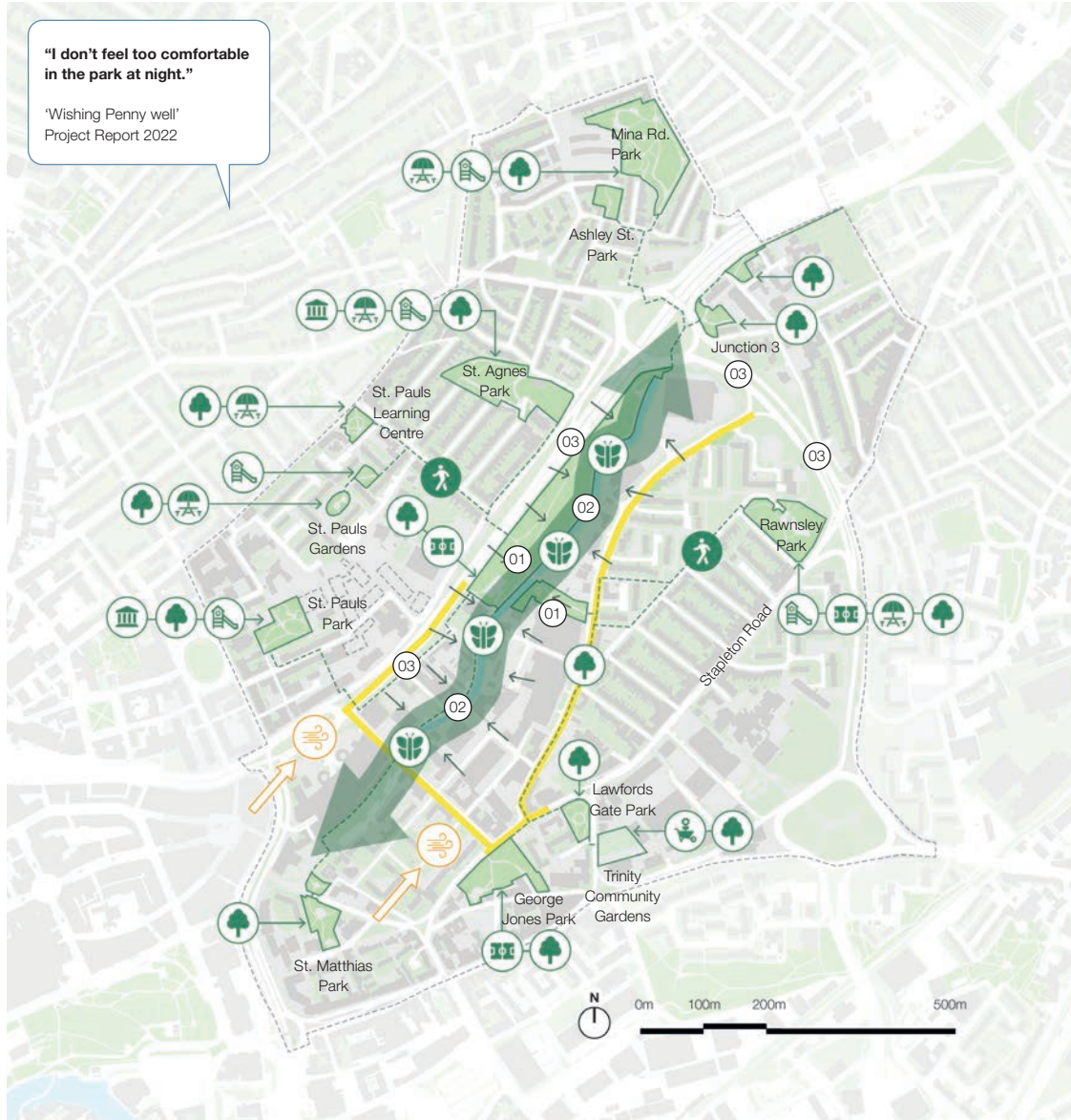
- ⚠ Potential for 'gateway' contextually tall buildings
- ↔ Existing primary ped. & cycle routes
- ↔ New pedestrian & cycle routes (as per BCAP24 'The St. Paul's Green Link' & BCAP32 'Quayside Walkways' policy requirements)
- ⚡ Energy centre (location to be determined)
- Enhance existing gateways to regeneration area
- Proposed new site gateways
- Locally Listed Buildings
- Buildings or uses of local/social/cultural importance
- Existing Bus Stop
- Existing Metro Bus Stop
- 🌿 Sustainable Drainage
- 🍃 Enhancing public green space improves health outcomes for local population
- ⚡ Barrier to movement
- ☀ Clean Air Zone

Study Area

Sustainability & Public Health: Existing Condition

The design of our built environment directly influences the health and wellbeing of local people and wildlife. Well-designed homes, workplaces, streets and public spaces that integrate nature enhance the health and wellbeing of both local people and wildlife. Creating space for biodiversity to flourish is essential to delivering placemaking outcomes. There are valuable aspects of the area that future development should further strengthen and enhance, as well as help to protect against harm.

Flood risk, heat stress, air and noise pollution are key environmental challenges which development at Frome Gateway will be expected to respond to in order to safeguard and enhance the health and wellbeing of existing and future residents.



Key Points

- Waterway
- Inaccessible Open Spaces
- Private Open Spaces
- Public Open Spaces
- 🌿 **Wildlife Corridor** to be preserved, enhanced and extended to provide safe movement through the city
- 🌀 **Prevailing wind** - sensitive approach to tall buildings mitigating draught effect
- 🚶 **Access to downland open/green space** is limited when considering wider context. To cater for new residents an extension or enhancement of green space must be considered
- **Motorised vehicle activity to be reduced** for new greening, pedestrian and cycle activity, tree planting and Sustainable Drainage

Play & Park Amenity

- 🌳 Mature Trees
- 🏊 Sport/exercise space
- 🎡 Playground
- 🏡 Social Space
- 🌱 Community Grow Space
- 🏛️ Heritage setting

3. Air and noise pollution

The major traffic routes along the edges of the site, particularly Newfoundland Way and Easton Way, result in poor air quality and noise. These can have significant impacts on health and wellbeing and are particularly harmful to residents, people using open spaces and school children. Future development should seek ways to reduce exposure to air pollution and noise.

Existing green space on site means that adult residents are more than twice as likely to be active, lowering their risk of conditions such as diabetes, weight gain and premature mortality.

Health Outcomes ✔️

Page 492
Key Observations

Public green spaces

The existing green spaces bring health and wellbeing benefits to local people. Enhancing their accessibility and quality is a key ambition of the Regeneration Framework. Green and natural spaces help to protect against heat stress. The area would benefit from expansion of green spaces and street greening to further protect against extreme heat, reduce risk of flooding, and create a more pleasant and enjoyable environment for a growing population. The River Frome is a rich and diverse biodiversity corridor that supports a broad mix of fauna and flora. This vital piece of habitat is also a key piece of public amenity that acts as an orienting spine to the regeneration area. All future development must work to enhance and provide access and views to this vital asset while enhancing the natural setting.

2. Active travel

There are popular walking and cycling routes through the area, particularly through Riverside Park and across Newfoundland Way and Easton Way. The active travel network around the site could be improved to enable more people to feel safe to walk and cycle. This would support health and well-being through increased physical activity, reduction in car use, and better connected communities.

The existing character of Pennywell Road is defined by narrow pavements, a wide, busy carriageway dominated by goods vehicles and parked cars. This environment does not create a safe, attractive street-scape that serve the adjacent local school and houses that overlook it. There is an opportunity to improve this vital movement corridor as a community street that is safe, healthy and vibrant.

Study Area

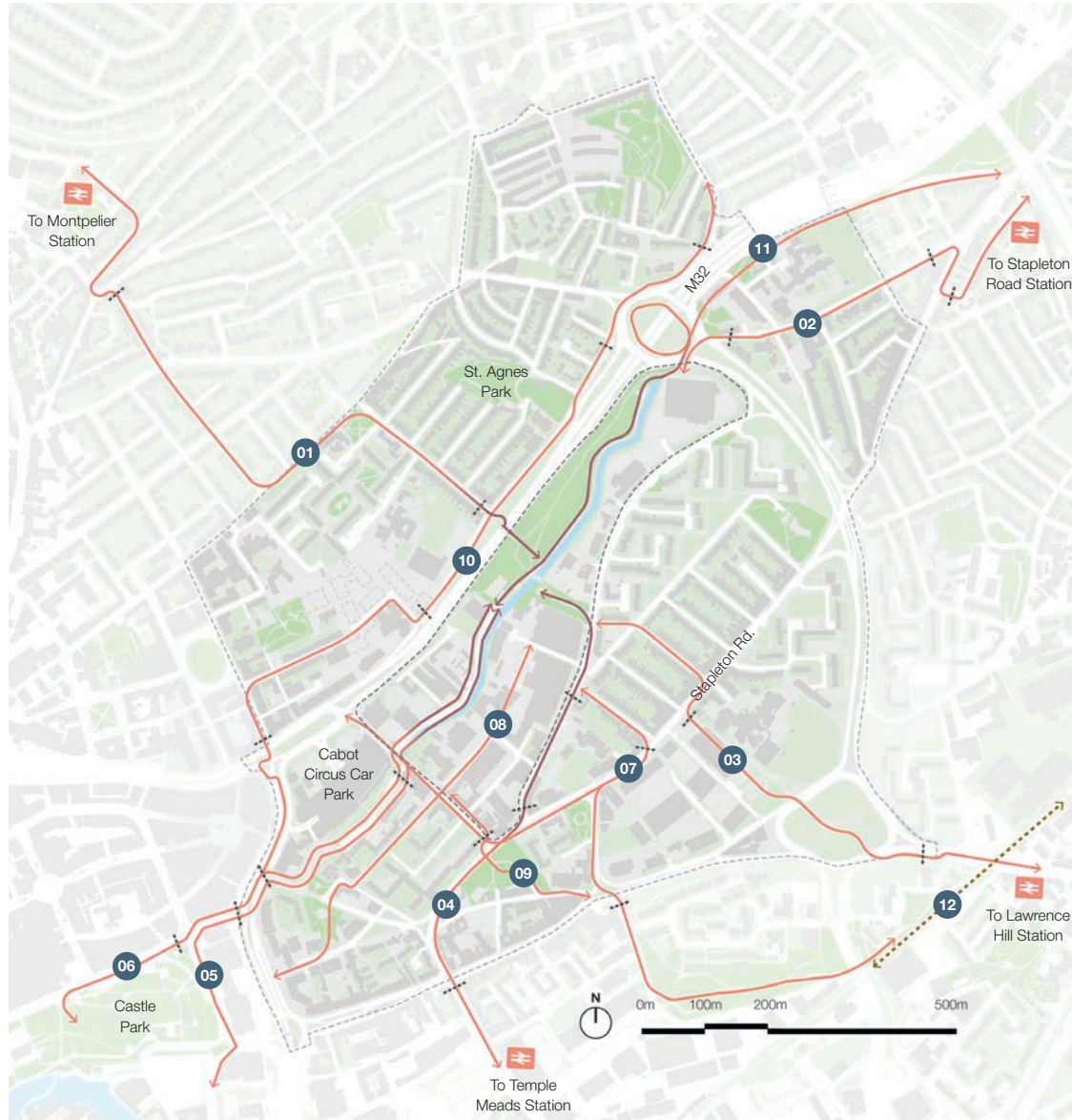
Wider Connections

Frome Gateway is highly trafficked by pedestrians and cyclist. Located between the city centre and outlying residential areas the site provides a desirable route along Riverside Park and the River Frome which is largely unaffected by vehicular movements. A number of vital citywide connections travel through the study area and connect other key transport hubs, high streets and economic centres.

This map highlights the existing network of key streets that connect these essential pieces of infrastructure. These existing movements routes have informed the wider Regeneration Framework and support the decisions to enhance and extend key movement corridors on the perimeter and through the site.

Currently routes running through Frome Gateway benefit from lower trafficked streets and enjoy a relationship with Riverside Park and the River Frome. Onward routes from the site, in most cases, are impacted by the extensive and busy road network that create less desirable, safe streets.

A Healthy Streets review has been undertaken for the key routes shown on the adjacent plan. The Healthy Streets approach was developed by Transport for London to assess the quality of a journey and 'make health and personal experience a priority'. This assessment has helped to understand existing issues, such as security, safety and severance, and has informed the proposed improvements.



Key Points

- Waterway
- Inaccessible Open Spaces
- Private Open Spaces
- Public Open Spaces
- - - Study Area
- Key Routes
- Key Site Intersections
- Break in Route

Routes Key

- 01.** Montpellier railway station - A4032 over bridge - Frome Valley Cycle Route
- 02.** Stapleton Road railway station - M32 Junction 3
- 03.** Lawrence Hill railway station - Easton Leisure Centre - Pennywell Road
- 04.** A4044 - Newtown - Pennywell Road - River Frome
- 05.** B4053 and Castle Park - Frome Valley Cycle Route
- 06.** B4053 and Castle Park - Frome Valley Cycle Route
- 07.** Bristol and Bath Railway Path - A420 - A4044
- 08.** A4044 - White Street
- 09.** A420 Trinity Road - Wade Street
- 10.** A 4044 - M32 Junction 3
- 11.** Wellington Road - River Frome - Fox Road
- 12.** Bristol and Bath Railway Path

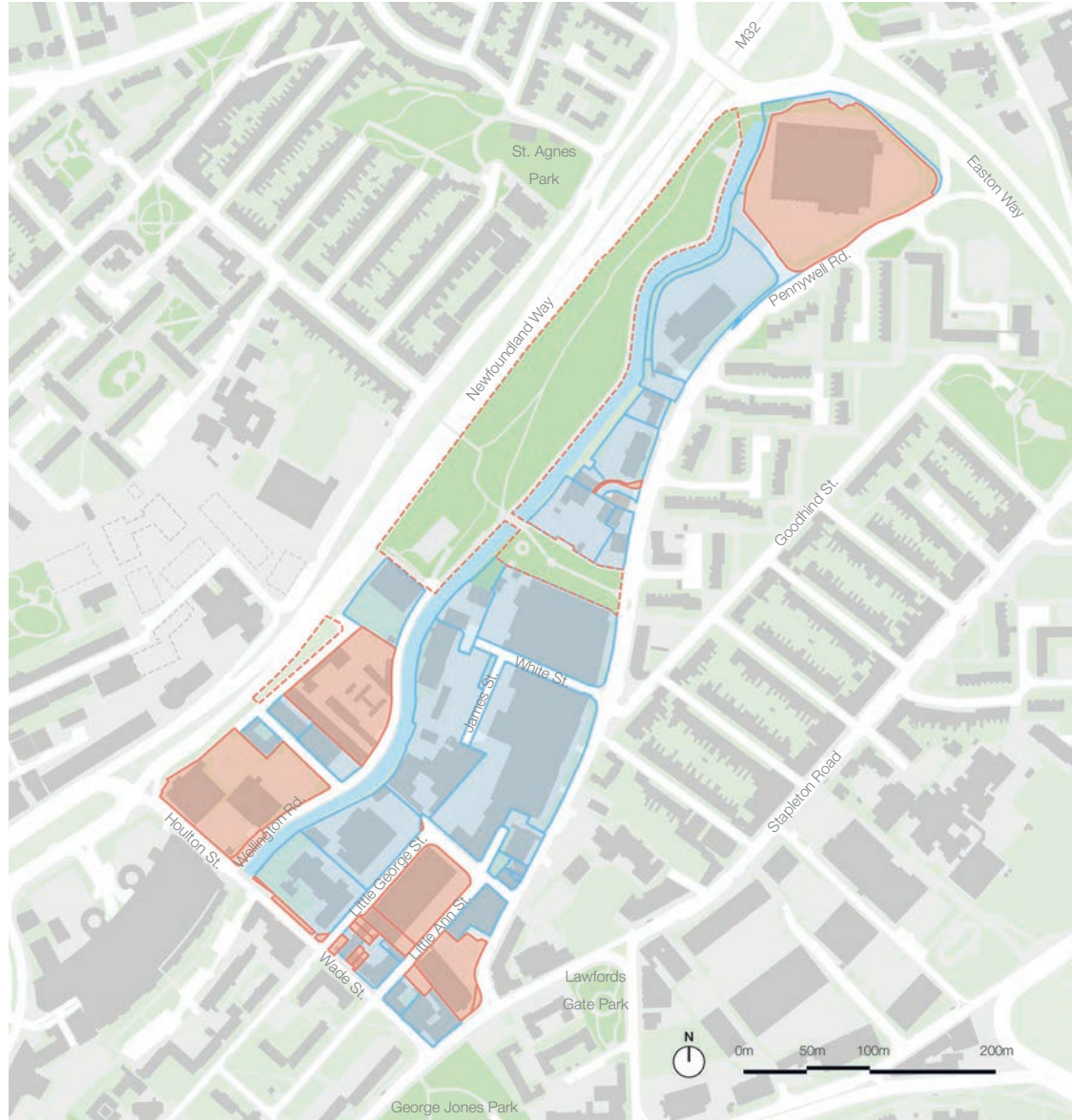
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Regeneration Area Overview

Existing Land Ownership Plan

There are approximately thirty landowners in the Frome Gateway area. BCC is landowner for several sites, as well as the public highways and parks.

As freehold owner, BCC has some influence over the development of these sites. However, it is worth noting that freehold ownership does not give BCC full control. For example, there are existing tenants and lease arrangements on some sites. In addition, redevelopment would typically be delivered by a private developer, not BCC itself, and the planning process still applies.



Key Points

- 100%** Total site area
14.7 Ha
- 22%** BCC Ownership:
Developable Land (+%)
3.3 Ha
BCC Ownerships are subject to leasehold agreements
- 20%** BCC Ownership:
Green Space (+%)
3.0 Ha
- 40%** Land in private ownership (+%)
6 Ha
- 18%** Highways & other infrastructure (+%)
2.4 Ha

Public Engagement

Introduction & Approach

Ensuring the community and other stakeholders were involved in the development of the framework has been a key focus from the outset. There were three key elements to the engagement approach:

1. Building upon community strengths and identity:

Emphasis was placed on identifying and understanding the strengths and needs of the existing community so that these can be built upon as a foundation for change. This is a key aspect of developing and building community and celebrating and growing local character and identity.

2. Understanding the area's history and listening to those who know the area best:

A 'Story of Place' was developed to capture the story, history and character of Frome Gateway. This has been used as a tool to initiate and frame conversations about the area's heritage and identity as attention has turned to establish a vision for the next step in its continual change and evolution.

3. A focus on community influence:

A Scope of Community Influence was created early in the process to build transparency and understanding about the various influencing factors on large scale, long-term regeneration projects like Frome Gateway. This has been used to focus engagement activity and engagement resource.

A summary of the community and stakeholder engagement activity which has informed and guided the development of the Frome Gateway Regeneration Framework is set out on pages 28-29.

Community Place Principles

A set of Community Place Principles were established prior to project inception to set out local priorities for growth, and these have been guiding principles throughout the development of the Regeneration Framework. The Community Place Principles are set out on page 30 and Chapter 3 (Vision & Placemaking) includes a series of plans and proposals in response to these.

Due to the strategic and long-term nature of Regeneration Frameworks, they do not typically include a lot of detail on very specific matters. Therefore, while the Regeneration Framework has integrated as much of the Community Place Principles as is possible at this strategic level (such as design and development principles), work towards delivering against the Community Place Principles will continue throughout the delivery phases of the regeneration project and doesn't end with the Regeneration Framework.

As detailed design and development proposals are prepared for Frome Gateway, all stakeholders working in the Frome Gateway area will be expected to

demonstrate how they are responding to the Community Place Principles in their proposals and projects. The local community are best placed to advise on how the Community Place Principles can be delivered in practice and it is expected that they will be given meaningful opportunities to shape detailed design and development proposals from an early stage and throughout the development process

Co-designing public and community spaces with local communities will ensure they meet local needs. Greater involvement by communities in designing neighbourhoods can improve sense of belonging.



Public Engagement

Summary & Timeline

Purpose

- Establish a baseline understanding of the area, including identification of opportunities and constraints
- Raise awareness of the project and invite views and feedback on people's lived experience of the area
- Identification of local community connectors to engage with and champion opportunities to get involved with the project
- Working together to establish priorities for future development
- Collation of key contact information

Early

- Develop project scope, aims and objectives
- Secure project funding and commission project team
- Gather intelligence to inform project delivery and engagement approach
- Develop Scope of Community Influence to increase transparency, manage expectations and focus resources

Page 496

- Formal launch & communication of scope, aims and objectives
- Re-establish contact with stakeholders from early engagement
- Re-test Community Place Principles
- Discover together the history of the place, memories, stories and experiences of the community
- Identification of local strengths, passions and skills.
- Communicating the Community Scope of Influence & various influencing factors on the project to manage expectations and focus resource
- Data gathering from businesses, landowners and developers to understand their aspirations

Stage 01

Activities

- 2 community walkabouts and 4 co-design workshops with residents, businesses, community organisations, landowners and developers, and local politicians
- Area-wide door-to-door resident visits culminating in 90 community building conversations
- 1 site walkabout with St Nicholas of Tolentine School
- 1-1 engagement sessions with 13 local organisations and institutions

- Development of project design and development brief (in accordance with Community Place Principles)
- Development of Frome Gateway Communications and Engagement Strategy
- Appointment of consultant team
- Equalities Impact Assessment
- Health Impact Assessment
- Stakeholder mapping
- Development of Scope of Community Influence
- Launch of project website

- Distribution of letters & flyers, area-wide door knocking & social media campaign to raise awareness of the project and opportunities to engage.
- 1 launch event and community workshop
- 1 engagement webinar
- 'Story of Place' mapping to develop a place narrative and context of change including site walkabouts
- Online interactive mapping
- 1-1 conversations with local community organisations
- Local business survey & 1-1 follow up conversations to understand need and aspiration.
- Local landowner & developer survey & 1-1 follow up conversations to understand need and aspiration.
- Live Local Study to gather info on lived experience of local residents
- Design West Design Review Panel

Outcomes & Learning

- Key themes and priorities distilled by the community into a set of Community Place Principles to guide change. These became guiding principles for the project and were used to shape the project design brief from the outset
- Identification of around 100 key influencers, 10 community connectors and a network of 50 active residents
- St Nicholas of Tolentine School Route Audit commission

- Agreed resources and project briefs to enable project commencement
- Clearer understanding of communication and engagement priorities and approach
- Scope of Community Influence
- Consolidated stakeholder contact information
- Project website to enable information sharing

- Identification of local community assets and a clearer understanding of local strengths, weaknesses, and priorities for change (including through 94 interactive map comments).
- A refined and prioritised set of Community Place Principles based on community feedback. These can be found of page 30
- Identification of project opportunities and constraints



Community engagement meeting at Stage 01

Public Engagement

Summary & Timeline

Purpose



Community engagement meeting at Stage 03

Page 497
Stage 03

- Share findings from Stage 1 work to build a common understanding of work to date and direction of travel
- Provide opportunities to feedback on and shape emerging design and development proposals
- Test emerging proposals against the Community Place Principles
- Bring strategic city partners and organisations into the project

Stage 03

- Testing the Frome Gateway vision and initial design and development concept
- Building a common understanding of the proposals and communicating how engagement to date has influenced them

Stage 04

- 6-week formal city-wide consultation on the full draft Framework to determine public support for the vision and objectives set out in the Spatial Regeneration Framework
- The results of the consultation were used to make final changes to the document

Activities

- Stage 2 launch event in Riverside Park to communicate findings to date with all stakeholders
- Thematic community workshops to test emerging design and development proposals
- Engagement with Old Market Neighbourhood Forum to ensure alignment with Old Market Neighbourhood Plan
- Accessibility Audit undertaken by West of England Centre for Independent Living (WECIL)
- Artist-in-Residence commission to undertake creative community engagement and further develop the Story of Place
- Cultural Infrastructure session with local creative and cultural organisations
- Design West Design Review Panel
- Establishment of a Landowner & Developer Forum
- Ongoing 1-1 business, landowner & developer sessions
- Email notification to statutory stakeholders and strategic city partners to invite them to engage in the process
- Targeted engagement with the Environment Agency on the proposed flood resilience strategy

- Streets & spaces workshop
- Frome Gateway vision and development concept webinar
- Online survey to gather feedback on Frome Gateway vision and initial design and development proposals
- Bespoke engagement sessions with:
 - West of England Centre for Independent Living (WECIL)
 - Al-Baseera Mosque
 - Local Women's Group
 - Local youth organisations
 - Ongoing 1-1 business, landowner & developer sessions

- 2 project exhibitions at Al-Baseera Mosque and Lost Horizon
- Targeted outreach with local youth groups, St Nicholas of Tolentine School, Women's Group and Old Market Neighbourhood Forum
- 3 Public Regeneration Area walking tours
- Public, business and special interest webinars
- Business West presentation
- Landowner and Developer Forum presentation
- BCC political briefings
- Riverside Park 'pop-up' exhibition

Outcomes & Learning

- Engagement in this stage reinforced key themes of importance and relevance of the Community Place Principles
- WECIL Accessibility Audit developed to inform framework and future detailed detail briefs
- Greater understanding of creative and cultural potential and appetite from local organisations to increase their capacity and reach in the area.
- Refinement of flood resilience strategy
- Outputs and learning from this stage were used to shape and inform the initial Frome Gateway Vision and Development Concept

- The results of the online survey demonstrated majority support for the regeneration vision and overall development concept for Frome Gateway
- Community feedback reinforced the importance of ensuring the regeneration benefits existing community and cultural organisations, allowing them to remain and grow in the area. The importance of key themes was once again highlighted such as identity and place, safety, connectivity, greenery and nature, health and wellbeing, and community and culture
- Feedback from youth organisations highlighted the importance of safety, antisocial behaviour, and a need for improved and new indoor and outdoor multi-functional spaces for all young people (not just boys).
- Learning from this and all other stages was used to develop the full draft framework

- 327 consultation surveys complete and 11 formal representations provided, demonstrating wide-spread support for the Regeneration Framework
- Consultation findings were used to make final changes to the document it was presented to BCC Cabinet for formal endorsement

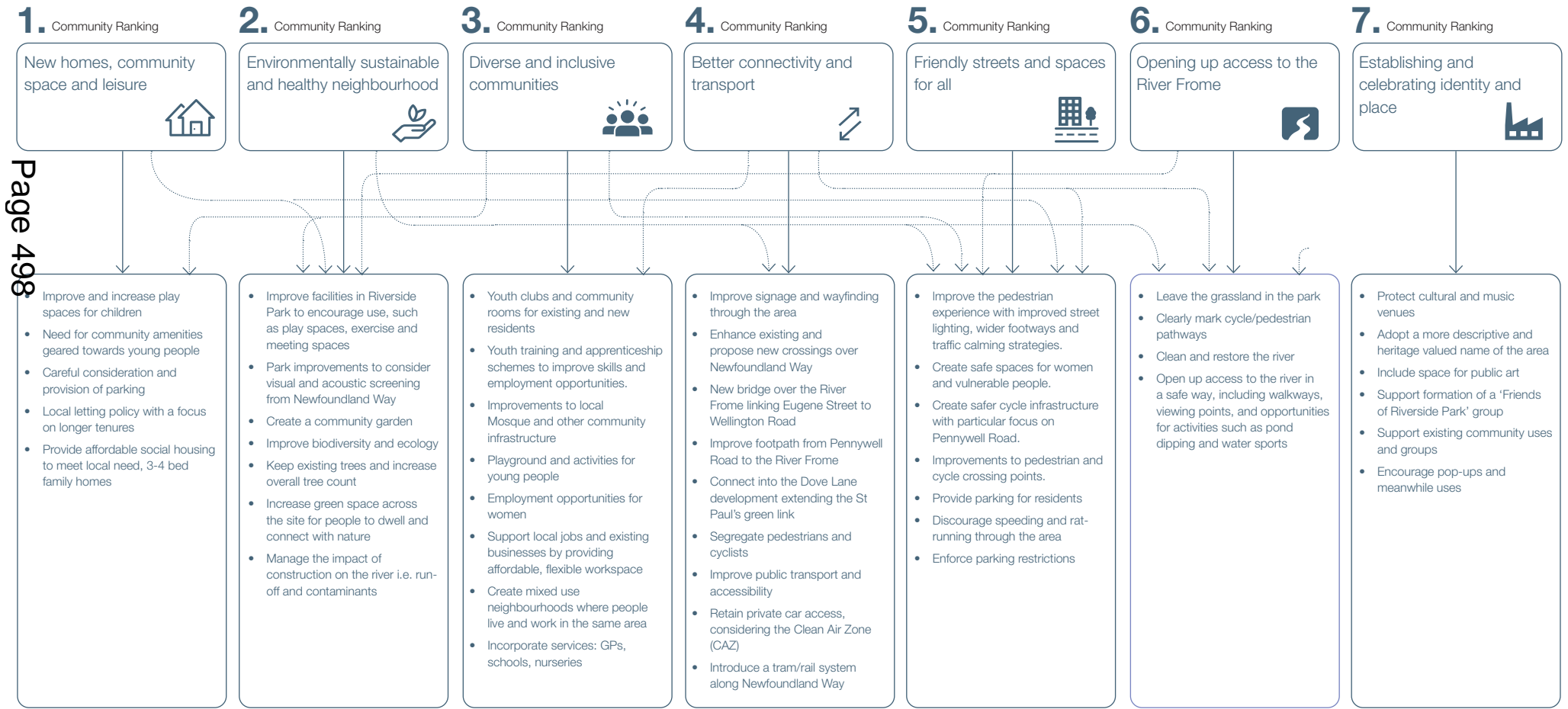
Public Engagement

Community Place Principles

Summary

There has been extensive conversations with local residents via walkabouts, co-design workshops and door knocking. Through these conversations, a strong picture of what is important to the community has emerged.

These have been distilled into a series of Community Place Principles, which set out the aspiration for change in this area. These have formed the guiding principles for the framework strategies and will follow through to future design.



Vision & Placemaking

Site Specific Approach

03

Page 499

**“Beating
to the tune
of the rhythm of
life,
a part
of the bigger
picture,
beautiful in itself,”**

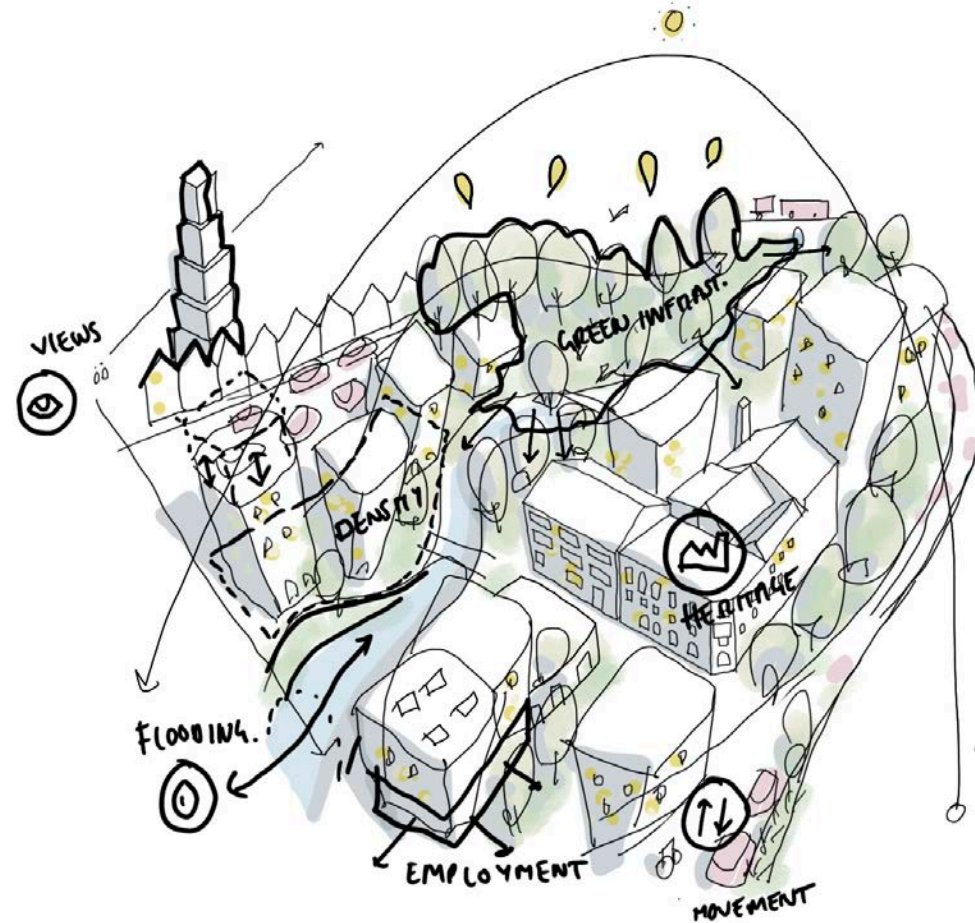
A Poem for the People and
this Place' by Scott Farlow
Artist Poet, wishing Penny
well Project Report 2022

Vision & Placemaking Approach

Introduction

The first part of this section sets out the **Regeneration Objectives** and high-level **Strategic Moves** for the Regeneration Framework. The Strategic Moves set out the level of ambition and ‘bigger picture’ for future interventions and initiatives, to which all new development and infrastructure at Frome Gateway should positively respond to as appropriate. The strategic moves are the common basis for all the subsequent topics and plans in the Framework, such as employment, housing, community assets and different modes of transport. A combination of projects will be needed over several years to realise each strategic move.

The second part of this section sets out the **Urban Design Framework** for Frome Gateway. The framework uses plans, graphics and precedents to convey the ambition for the area. It also sets out the strategic requirements for key topic areas such as housing, employment, public health, flood risk and sustainability. These have been developed through extensive community engagement, technical design review and independent peer review.



Note: In the following chapters all plans showing routes through Riverside Park and Peel St Park are indicative until a detailed design of the park is developed.

Regeneration Objectives

The Aspiration

Regeneration Objectives are an overarching, shared idea of what the Frome Gateway area will be like as a result of change. They describe the future character and identity of the area and operate as a touchstone for decisions throughout the process. They have been informed by the Community Place Principles as well as city objectives, planning policy and design and technical and design analysis.

The eleven Regeneration Objectives shown below should inform all future proposals within Frome Gateway Regeneration Area. All objectives are of strategic importance to achieve the vision for Frome Gateway.

Key Points

Page 501

- Enhancing the existing green spaces and habitats. Creating new, vibrant pockets of biodiversity, tree planting and play space. This intensive urban greening approach will help to address the climate and ecological emergencies while also creating a healthier, safer city
 - + 1ha of new public green space
 - Protect and enhance existing ecology
 - Safer, greener streets
 - New children's play spaces
- Enhance movement links between existing communities by creating strategic active travel corridors and secondary links.
- The Frome Gateway Regeneration Framework will facilitate the delivery of a truly diverse development. This mixed-use approach will help build resilient neighbourhoods that can adapt to meet the needs of the existing and future community first
 - 1,000+ new homes (including affordable, as per planning policy)
 - No net-loss of jobs

- Economic diversification
 - New community infrastructure and facilities
- Re-engage with the River Frome introducing active uses, enhanced visibility and access. Celebrate the existing wildlife and ecology.
 - High quality and inclusive public spaces should be well located to enhance existing and new movement routes and appropriately scaled in response to context and use. Public realm should reinforce the local character and help to represent the identity of the communities.
 - Enhancing public space will encourage local communities to become more active and re-connect to nature - improving health outcomes
 - Promote sustainable strategies: healthy diet, on site energy creation, biodiversity net gain on all plots, increased street greening, sustainable drainage strategies, reuse of existing buildings, site appropriate development densities



- ### Examples
- Mayfield Park, Mayfield Depot Development, Manchester
 - Active travel route, Bellamybuurt, Amsterdam
 - Hawley Wharf, Camden
 - The river Spree, Berlin
 - Concert Square, Liverpool
 - Superkilen Park, Copenhagen

The estimated overall societal value of health benefits from the framework approach is around £80-£100 million, compared to an unmanaged approach

Health Outcomes

Strategic Moves

Making Frome Gateway a Place

01

Reconnect to and Celebrate the River



01

Existing Condition

The River Frome is an underutilised asset which has greater potential as an ecological corridor and community amenity space. High channel walls and areas of inaccessible riverside significantly reduces the visibility of the river channel and opportunities to dwell and enjoy the riverside. Only one crossing point means the river channel acts as a barrier to movement.

Strategic Move

Open and enhance both sides of the riverside to provide new opportunities to see, move along, and enjoy the riverside.

Clean-up the river channel to create new spaces for wildlife to thrive.

Ambitions & Outcomes

- Improved visibility and accessibility of the riverside
- The riverside becomes the core placemaking and ecological 'spine' which helps to knit new development and public spaces together
- Enhanced wildlife and biodiversity
- Improved riverside active travel routes

02

Support & Nurture Community Groups



02

Existing Condition

Existing community and cultural organisations play an important role in building community capacity and contribute to local character and identity. However, changes in the security and affordability of space means that regeneration makes some community organisations vulnerable to change.

Strategic Move

Frome Gateway stakeholders work in collaboration from an early stage to support the retention of community and cultural organisations who wish to remain in the area. Community and cultural organisations are given the opportunity to build their

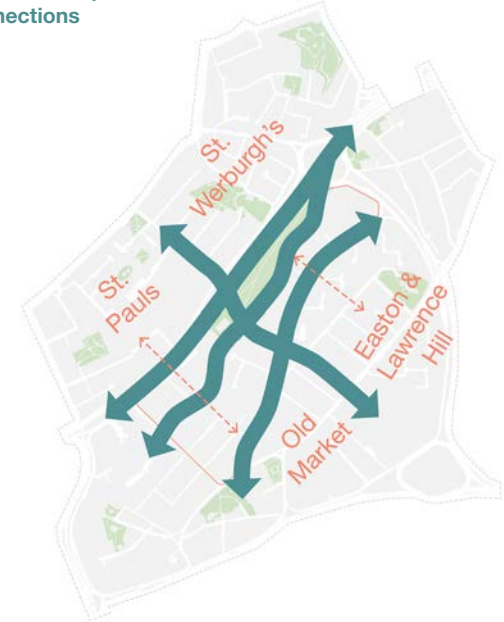
capacity and sustainability to grow their reach into the community.

Ambitions & Outcomes

- Greater community capacity and resilience
- Vibrant ground floor spaces delivering improved community services in fit-for-purpose spaces
- Improved community cohesion and social integration
- Improved public health outcomes

03

Enhance & Expand Connections



03

Existing Condition

Newfoundland Way, the River Frome, Pennywell Road and Easton Way act as significant physical and psychological barriers to movement. The existing industrial character of the area means the area is dominated by impermeable industrial sites and service yards. The movement network and public areas are primarily designed to accommodate vehicles over people.

Strategic Move

Upgrade streets and other movement routes within and to/from the Frome Gateway area to better connect existing and new residents to public spaces and

amenities such as Riverside Park, the River Frome and beyond.

Ambitions & Outcomes

- Enhanced accessibility and navigability of the area, making it easier to travel throughout the area
- Green, safe and pleasant streets which prioritise walking and cycling

Strategic Moves

Making Frome Gateway a Place

04

Diversify Uses



Page 503

04

Existing Condition

Frome Gateway is characterised by a diverse but low-density economy. Industrial and warehousing uses make up 75% of employment space. However, a much more diverse business ecosystem exists including creative, cultural, community and amenity/service uses and an increasing number of small businesses.

Strategic Move

Maximise Frome Gateway's central location and proximity to existing infrastructure and services by introducing a greater mix of uses in a sustainable location. Alongside new residential uses, consolidate the overall amount of employment space and

build upon the area's economic diversity to maximise opportunities for jobs and training for local people.

Ambitions & Outcomes

- A greater mix of uses at Frome Gateway which better meets the needs of the community – new homes, jobs, community services, public spaces
- A consolidated, efficient, and diverse employment land mix, providing opportunities for training and jobs for local people

05

Activate Ground Floors



05

Existing Condition

The majority of buildings and sites are currently sealed industrial plots with limited access for servicing and general access. A number of plots have extensive surface parking or yards with little or no green space and no contribution to public realm. There is minimal passive surveillance that is limited to daytime activity. This combines to create streets and public spaces which feel unsafe after dark.

Strategic Move

Promote active and diverse ground floor uses that overlook streets and public spaces throughout the day and night

to help create a sense of vibrancy and neighbourliness.

Ambitions & Outcomes

- Animated, vibrant, and safer streets which better serve the needs of the community. Activity should be focused around key public spaces and movement corridors to help with legibility and wayfinding.
- Re-provided employment and community space across the ground floor as part of a joined up approach to flood risk mitigation and management
- Effective flood risk management (no residential uses at ground floor in Flood Zone 2 or 3).

06

Improve Parks & Wildlife



06

Existing Condition

Riverside Park and Peel Street Open Space offer valuable spaces for wildlife and community amenity. However, they are of general poor quality and suffer from antisocial behaviour and a lack of activity. Investment in these spaces is needed to improve their quality and community amenity value. A network of small green spaces in the wider area has the potential to be improved for community amenity and wildlife.

Strategic Move

Enhance the quality, accessibility, and range of activities available in Riverside Park

and Peel Street Open Space to ensure they are better able to meet the needs of the existing and new communities. Additional public green amenity space should be sought throughout the site to enhance access to green space, provide space for wildlife, and adapt to the impacts of climate change.

Ambitions & Outcomes

- Improved green spaces which better meet community need
- New and improved children's play facilities
- Improved public health outcomes
- Enhanced resilience to climate change and extreme weather

Urban Design Framework

Spatial Concept

Frome Gateway is currently home to a diverse mix of residents, businesses and community groups. The Spatial Concept for the area is to build on the qualities of each specific area and enhance the existing character through considered, sustainable urban regeneration.

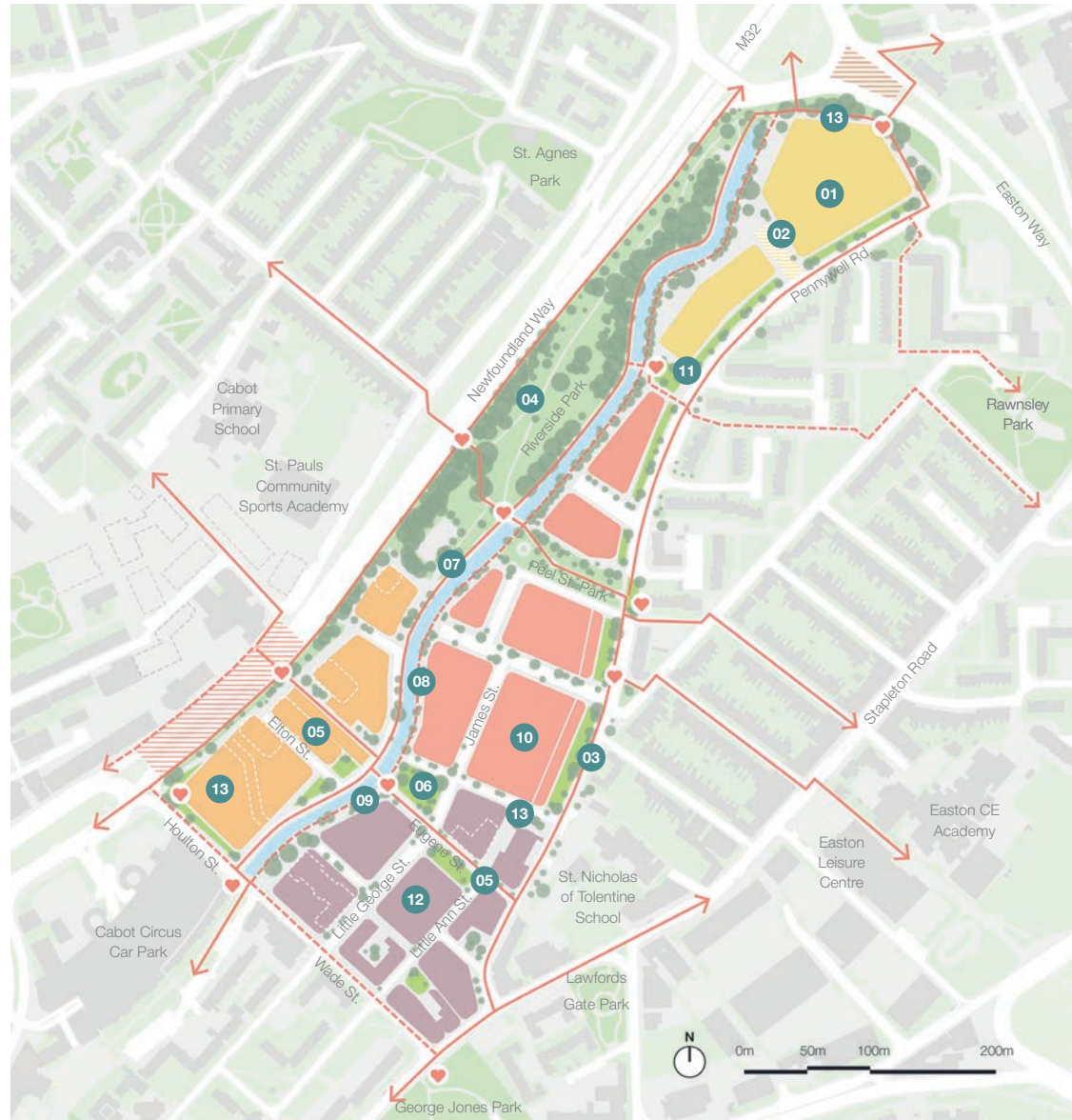
The study area has been broken down into four 'Character Areas' which are defined by historic street patterns, ownership boundaries and anticipated uses. Each Character Area has a particular regeneration focus that address site specific opportunities and constraints, community ambitions and citywide strategic need.

Key Outcomes

Page 504

1. Larger, industrial led uses located in northern area to provide direct vehicular access to primary roads with minimal impact on residential accommodation
2. Opportunities to provide shared service yards between industrial plots to minimise area take and increase available area for landscaping and existing ecology
3. Re-establish Pennywell Road as a community focused street with significant landscaping, SuDS, existing and new street trees and play on the way provision. Promote low car usage and highways upgrades to give primacy to active travel
4. Use and enhance existing public spaces such as Peel Street Open Space and Riverside Park as placemaking catalysts that promote use throughout the day
5. Identify historic streets and buildings and promote their re-use to create special places for the community
6. Maximise greening throughout the public realm and development sites to help mitigate urban heat island effect,

7. Create a fully accessible Riverside Promenade on the north bank of the river enhancing north/south connectivity and improving visual accessibility to the River Frome ecology corridor
8. Encourage retention of south bank ecology while creating a public 'nature walk' facilitated by buildings being set back from the river edge
9. Enhance existing key routes and river crossing with placemaking moves and wayfinding. Existing streets should be extended to create new river crossing points to encourage site permeability and address issues of severance
10. Large development footprints defined by existing ownership boundaries and historic street patterns. Area suitable for more intensive regeneration with larger building footprints accommodating potential industrial/maker uses as well as servicing provision for residential accommodation



Key

- Tanneries Character Area**
Modern and consolidated light industrial employment spaces. Uses of strategic importance for city logistics and distribution diversifying and intensifying use
- Peel St. Character Area**
Workshop and maker spaces at ground floor with residential above. A place for living and making
- Eugene St. Character Area**
Community and cultural uses and workspaces at ground floor with residential above. Area of heritage interest and intimate street pattern
- Elton St. Character Area**
Commercial and community uses at ground floor with residential above. A vibrant entry point to Frome Gateway

- River Frome
- Proposed public space
- Existing enhanced public space
- Green Space (Other)
- Existing Buildings
- ▨ Shared Service Yard
- ▨ Proposed at grade crossing
- Primary Route
- - - Secondary Route
- ♥ Placemaking opportunity

Key Outcomes (Continued)

11. New areas of public green amenity space used to signpost potential new river crossing points
12. Finer grain of development that responds to local heritage context with potential for more intimate pedestrian focused streets and community uses
13. Area to create inviting, accessible and safe front door to Frome Gateway with appropriate ground floor uses and generous public realm provision

Urban Design Framework

Employment and Skills

Area of Focus →



A Diverse & Resilient Business Ecosystem



Evolving a Green Economy



Connecting Residents to Opportunity



Celebrating Culture & Community



Building Local Capacity

Purpose →

To establish Frome Gateway as a more diverse and resilient business ecosystem, which provides good quality employment opportunities for local residents

Frome Gateway evolves as a green economy, embedding and piloting new approaches which can support the city's green transition

Ensuring the future Frome Gateway economy is inclusive, creating good quality employment and training opportunities and providing clear pathways for local residents to access them

Supporting the evolution of Frome Gateway as a place which celebrates culture and diversity; a place where people from different backgrounds naturally come together

Building the capacity of the community to shape change at Frome Gateway and to take long term ownership of the areas' spaces, places and projects

Precedents →



1.



2.



3.



4.



5.

Page 505

Economic Ambition

The economic ambition for Frome Gateway forms an important part of the wider regeneration aspiration for the area. This ambition is for regeneration at Frome Gateway to evolve a green and inclusive economy which reflects local culture and diversity, enhance the prosperity and wellbeing of the Lawrence Hill community, and positively influence the evolution of a fairer and greener Bristol.

As with other regeneration areas in the city, the focus is on establishing a resilient and future facing economy which delivers tangible and meaningful benefit for local communities. An inclusive economy approach aims to extract stronger and longer term social, economic and environmental benefit from development.

Consolidated Diversification

The overall amount of employment space will be consolidated to enable a greater mix of uses and more efficient use of employment land. This will be achieved through the consolidation of:

- Standalone light industrial space in the Tanneries Character Area
- Smaller industrial businesses in 'maker space' typologies
- Disparate office spaces in more space efficient 'stackable workspace typology'

The amount of community, cultural, leisure, and retail space should be broadly maintained/re-provided to meet the needs of the existing and new population. Except for the Tanneries Character Area which prioritises standalone

light industrial uses, new employment space must be provided across the ground floor of all new development and successfully co-located with residential uses above.

The aspiration is to replace the current 1,000 jobs as a minimum and go beyond this if achievable. Employment space should be provided from the earliest stages of regeneration to build a strong and resilient business ecosystem and ensure opportunities for residents are built in from the outset. A degree of flexibility will be required to ensure that provision meets the needs of evolving market demand and workspace operators should be utilised as appropriate to ensure workspace contributes to the skills and employment objectives of the Frome Gateway area.

Key Points

- 1. Islington Affordable Workspace Approach** Proactive approach to securing and managing affordable workspace to maximise impact
- 2. Ålskade Stad (Beloved City)** developed a collective distribution centre that combines goods deliveries and waste collection using electrical vehicles
- 3. Volunteer it Yourself** community interest company that combines DIY with volunteering. Working with young people to repair and refurbish youth and community facilities while gaining trade skills and qualifications.
- 4. Margate Creative Land Trust** new trust to purchase space and secure it for culture sector in perpetuity; provision of affordable rents; and delivery of community programmes
- 5. London Prosperity Board** Deeper, community led engagement; residents supported to take the lead on understanding and articulating local need

Existing Businesses

Existing businesses should be retained and accommodated where this is appropriate to do so when considered alongside wider strategic and placemaking objectives. This council will be producing a Frome Gateway Business Retention and Relocation Strategy (including community and cultural organisations) to inform the approach to this.

Place Principle:

Diverse & Inclusive Communities



Accessible employment, diversity of local jobs and training opportunities can support health and mental wellbeing.

Health Outcomes



Urban Design Framework

Employment: Typologies

Table 01 shows the mix of employment space types required at Frome Gateway. This has been informed by analysis of existing businesses and their possible space needs in the future, as well as consideration of the types of workspaces required to grow the diversity of the local economy and attract growth sectors. The figures in Table 01 are the minimum employment space requirements to meet the 1,000 jobs target, however there is additional capacity across the ground floor and through industrial intensification the potential to exceed these minimums and go beyond the 1,000 jobs target, and this is very much encouraged.

Table 02 provides further information on the suitable and required employment typologies for Frome Gateway. Successful co-location of residential and employment spaces will be critical to creating diverse and thriving neighbourhoods - developers should ensure this is integrated from the outset of the design process. The Council will be producing a Frome Gateway Workspace Design Code to provide more guidance on this.

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1. Paintworks, Bristol

Successful development where maker spaces have been successfully mixed with residential development.

Developer strategy in early phases limited leaseholders and buyers to creative sectors to try and create an early stage ecosystem.



2. 'Industria', London

Located in Barking this scheme exemplifies industrial intensification that accommodates a range of light industrial units and workspaces across multiple storeys. The spaces are highly flexible and can be adapted to meet the evolving needs of businesses.

Table 01: Employment Space Mix

	Min. Space Requirements	Character Areas	Notes
Amenity & Infrastructure	1,500m ²	<i>Retail, F&B, High Street</i>	Elton Street Character Area, Eugene Street Character Area, Peel Street Character Area
	2,000m ²	<i>Leisure and Culture</i>	
	1,500m ²	<i>Community</i>	
	5,000m²	Total	
Office/Workspace	9,000m²	Elton Street Character Area, Eugene Street Character Area, Peel Street Character Area	Potential to deliver additional space within unallocated ground floor space to be explored – ideally focus on 'affordable' provision
Industrial: Maker	2,000m²	Elton Street Character Area, Eugene Street Character Area, Peel Street Character Area	Potential to deliver additional space within unallocated ground floor space to be explored – ideally focus on 'affordable' provision
Industrial: Light	6,000m²	Tanneries Character Area	Clear demand exists – aspiration to deliver additional space in the northern part of Frome Gateway
Total	22,000m²		

Table 02: Typology

	Industrial Space: Large	Industrial Space: Small	Industrial Space: Maker	Workspace: Creative Studio (Large & Small)	Workspace: Incubator/ Co-Working/ Managed	Office: Small
Description	Larger scale industrial uses with large spatial requirements and are likely to require servicing by large goods vehicles	Small scale industrial uses with large spatial requirements and are likely to require servicing by large goods vehicles	Collaborative workspace for small scale industrial use.	Workspace for creative uses that may have additional spatial requirements above and beyond those of office-type work places	Space shared by several companies with flexible lease terms, either with shared working space or small individual units, and often with business support.	Desk based workspace found within existing buildings rather than purpose built (affordability)
Co location or Standalone?	Standalone commercial spaces reflecting more specific space and servicing requirements	Standalone commercial spaces reflecting more specific space and servicing requirements	Both - could be situated in stand alone commercial spaces or within co-located spaces (examples at Paintworks and Caxton Works in London).	Could be standalone (as part of a bigger commercial building) but also suited to co-location with residential at lower floors	Could be standalone (as part of a bigger commercial building) but also suited to co-location with residential at lower floors.	Could be standalone (as part of a bigger commercial building) but also suited to co-location with residential at lower floors.
Frome Gateway Suitability	High suitability (with mitigation) – identified as a focus for the Tanneries Character Area	High suitability (with mitigation) – identified as a focus for the Tanneries Character Area	High suitability potential to play an important role delivering co-located employment space such as in the Peel St. Character Area	High suitability ideally located employment space as part of residential schemes in the Peel St. and Eugene St. Character Areas	High suitability ideally located employment space as part of residential schemes in the Peel St. and Eugene St. Character Areas	Moderate suitability potential to play a role in delivering co-located employment space on residential scheme in the Elton, Peel and Eugene St. Character Areas

Key Points



"I like being able to see some industry working in the inner city. Gentrifying areas and pushing industrial jobs out of town makes ghettos. It would be great to see a range of jobs available in any redevelopment"

Place Principle:
Diverse & Inclusive Communities



Local employment reduces need to travel which reduces emissions from transport. Employers should support active travel by providing secure cycle parking and workplace showers and clothes drying areas.

Health Outcomes



3. Caxton Works, London

Mixed use development provides 336 new homes and 13 commercial units at ground and mezzanine levels.

All commercial units are now occupied with range of creative and making focused tenants.

Urban Design Framework

Housing

In response to evidenced localised housing need, the delivery of affordable, larger, and well-designed homes which enhance the health and wellbeing of residents is a strategic priority of this Framework.

The delivery of a minimum of 1,000 new homes at Frome Gateway will create a high-quality residential neighbourhood with a mix of employment and community uses to create a diverse and vibrant community. Homes should be well-designed to enhance health and wellbeing, support family and intergenerational living, and be resilient to a changing climate.

It is recognised that there are market conditions and other requirements of this Framework which may challenge the delivery of this strategic priority, including fragmented land ownership and plot sizes, infrastructure requirements, the need to re-provide and co-locate with employment space, and financial viability issues. Bristol City Council wish to work positively and collaboratively with all landowners and developers in the Frome Gateway area to deliver against this strategic priority.

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Affordable Housing

Affordable Housing is expected in accordance with planning policy requirements and the council's Affordable Housing Practice Note. Developers are expected to meet minimum requirements for affordable housing provision and are invited to work collaboratively with the council to explore ways to further increase the amount and pace of delivery of affordable housing above the minimum provision.

Local Lettings Policy

It is important that the existing community can access new housing choices and opportunities that are delivered at Frome Gateway. By enabling families living in overcrowded homes to move to larger family properties, smaller homes can be freed up to meet wider housing needs in the area and across the city.

Strategic Priority	Context	Development Responses
Accelerating the pace of housing delivery	An acute need for housing across Bristol	Identify appropriate sites for housing development and engage with BCC to remove barriers
Increasing the overall housing quantum	Policy DS5 Frome Gateway target of 1,000 new homes	Apply the Urban Living SPD to optimise (not maximise) density
Providing affordable housing	An acute need for affordable housing	Apply planning policy and seek bespoke partnerships with BCC to remove barriers and increase delivery
Delivering an appropriate housing mix	Lawrence Hill ward has the highest number of overcrowded homes in Bristol	Engage early with BCC Housing to understand and respond to the local need. See required housing mix for Frome Gateway below
Providing accessible homes	Demand for accessible and adaptable homes	Provide a proportion of homes that are accessible, greater than minimum policy requirements where possible

Local Letting Policies can be implemented in areas which have localised issues. Local Lettings Policies place additional criteria or restrictions on certain properties that applicants on the housing register must meet to apply to rent them. For example, a Local Lettings Policy can ensure that a proportion of the local community are given priority in developments in a particular area.

Drawing on localised housing needs, the council will explore the potential to implement a Frome Gateway Local Lettings Policy, which will be produced in consultation with the local community.

Frome Gateway Policy (DS5)

Affordable Homes:
30% 3 Bed & 10% 4 Bed ← **A local lettings policy will be applied**

All other New Homes:
25% should be 3 Bed or larger

Accessible Homes:
Should be provided in line with policy H9 at 10% for all new developments

Key Points

Homes should be highly energy efficient to reduce risk of fuel poverty and reduce climate impacts, this includes using renewable energy.

Health Outcomes

Prolonged exposure to housing costs above 30% of income could have a negative impact on mental health scores, leading to increased risk of common mental disorders. This could be worsened if the ratio of affordable homes goes down.

Health Outcomes

Accessible and adaptable homes are needed to meet the needs of people with disabilities. This enables people to remain within their community.

Health Outcomes

Urban Design Framework

Housing

Liveability & Wellbeing




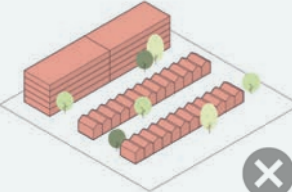
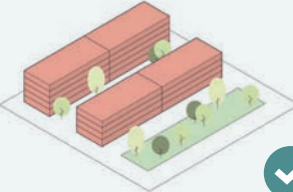
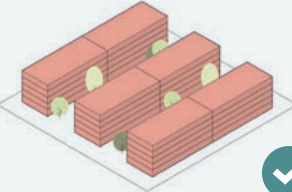
Medium to high density apartment typologies is expected for most new development given Frome Gateway's inner-city location. The Urban Living SPD sets out guidance on the successful creation of compact, characterful and healthy urban areas at higher densities. Developers are expected to proactively use this guidance from the outset to deliver new homes which meet local needs and enhances the health and wellbeing of residents. Further guidance can also be found in the Frome Gateway Health Impact Assessment. A higher proportion of larger family homes are expected at Frome Gateway, so development proposals must demonstrate how homes will support family living at higher densities. The council will be producing an Urban Family Living Design Guide to provide further guidance on this.

Student Accommodation

Frome Gateway is recognised as a desirable location for some student accommodation as part of a mix of residential types, and Bristol's emerging Local Plan includes the provision of up to 500 student bed spaces at Frome Gateway.

As per draft policy H7 (managing the development of purpose-built student accommodation), the total number of bed spaces should be only exceeded where development is directly supported through area specific guidance. This Framework re-confirms the upper cap of 500 bed spaces at Frome Gateway and student bed spaces above this limit will not be supported. Development counting towards the bed space limits for defined areas includes all development completed, started or that has gained planning permission since March 2019.

The justification for this is ensuring the provision of purpose-built student accommodation is balanced with the needs of the wider community. These include a choice of housing including affordable housing, new employment workspace, a range of services and facilities to serve the

Lower	Suggested Densities - Bristol		Higher
Outer Urban Area 100DpH	Inner Urban 120DpH	City Centre 200DpH	
			
			
<p>Low density outer urban living:</p> <p>Unlikely to achieve target of 1,000 dwellings Inclusion of apartment living adds diversity to housing mix This level of housing provision may be suitable on some localised plots within the Regeneration Area Flood extent dictates limited area of regeneration area is suitable for residential development at ground floor. To meet residential requirements at low density employment space would need to be reduced.</p>	<p>Medium density inner urban living:</p> <p>Unlikely to achieve target of 1,000 dwellings due to other essential uses to be accommodated within the Regeneration Area Apartment led housing typologies This level of housing provision may be suitable on some localised plots within the Regeneration Area Opportunity to release key parcels of green space and other infrastructure Local example: Paintworks</p>	<p>High density city centre living:</p> <p>Viable density to achieve housing delivery target Apartment led housing typologies Medium-rise high density accommodation is an efficient way to deliver an appropriate housing quantum Opportunity to release key parcels of green space and other infrastructure Local example: Wapping Wharf</p>	

needs of the whole community and appropriate standards of residential amenity. These needs may not be met where an imbalance in the provision of purpose-built student accommodation occurs.

The most appropriate location for student housing is the south of the site, where a greater mix of uses and higher

density is proposed (to mitigate the reduction of activity caused by university holiday periods).

Key Points

Good design can reduce risks of overheating in hot weather, avoiding excessive glazing and being dual aspect to allow for through breezes. Homes need adequate and efficient heating (avoiding risks of fuel poverty) and ventilation to ensure good internal air quality, avoiding mould and damp which harms health. Homes with balconies and private open spaces may help protect against depression and may support higher levels of physical activity. They can also ensure adequate access to daylight.

Health Outcomes 

Urban Design Framework

Community Cultural Assets



1. Lost Horizon



2. Al-Baseera Bristol Centre



3. The Swan with Two Necks



4. Riverside Youth Project

Page 509

Community and cultural spaces play a crucial role in building community capacity and shaping local character and identity. Providing spaces and opportunities for people from different backgrounds to come together for shared experiences, can help to build strong relationships and feelings of trust between different people, fostering community cohesion and social integration. This will be fundamental to successful regeneration as existing and new communities come together to call Frome Gateway their collective home.

The regeneration of Frome Gateway aims to support the area's evolution as a place which celebrates culture and diversity; a place where people from different backgrounds naturally come together.

The value of community organisations in the locality has been clearly demonstrated through public engagement, and the importance of and

need for safe indoor and outdoor spaces for young people has come through particularly strongly. Engagement with local organisations has demonstrated an eagerness to remain in the area, build their capacity and resilience, and be part of the Frome Gateway regeneration journey. Some of these aspirations have been set out on the map on page 42. Enabling these organisations to grow their reach into the community and play a bigger role in public life will help to build community capacity and resilience, improve local choice and quality of life, and shape local character and identity.

However, while regeneration presents opportunities to such organisations, they can also be vulnerable to changes in the security and affordability of space, or the impact of a growing residential community on their operations. BCC strongly supports and encourages the retention of these organisations within the area and commits to working with them and other stakeholders to help

them realise their ambitions through regeneration.

The provision of indoor and outdoor community and cultural space will be expected as part of new development. Spaces must be designed to meet the needs of the end users, and work towards increasing opportunities for people to be able to come together and participate in public life, with Frome Gateway acting as a new focal point for the community via its spaces and support initiatives. Where necessary, priority focus will be placed on working with landowners and developers from an early stage to support the retention of existing cultural and community organisations, should they wish to remain in the area.

As Frome Gateway's residential community and mix of uses grows, the design and location of new development should take account of the 'agent of the change' principle. This places the responsibility for addressing the impact of noise from existing

noise-generating uses such as music venues and industrial businesses, on the new development. This ensures that new development is designed in a way which protects the new occupiers from noise impacts so that the existing use is not threatened.



Urban Design Framework

Community Cultural Assets

The areas around Frome Gateway are home to diverse communities rich with numerous community groups and organisations providing important community services.

However, high levels of deprivation currently limit participation and integration between existing communities and their respective groups and organisations.

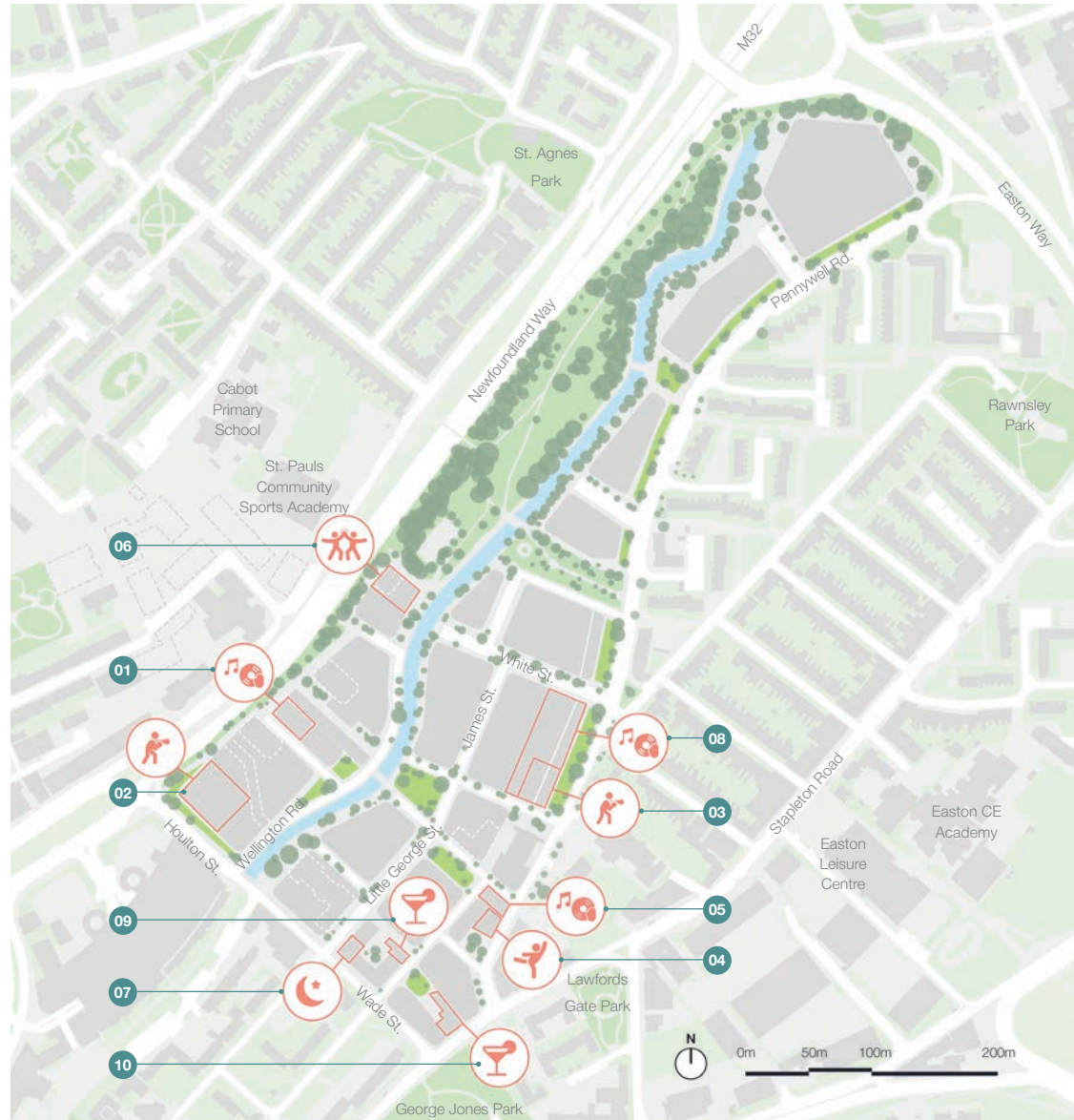
This map shows existing community groups and organisations in the Frome Gateway Regeneration Area.

Key Outcomes

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1. **Lost Horizon Arts centre** and event space. Lost Horizon is part of Shangri-la, an arts organisation hosting music and creative events since 2007. They wish to remain a key contributor to Frome Gateway's creative identity and have ambitious plans to grow their organisation and cultural offer, developing their strong community of artists, producers and makers in the process.
2. **Trojan Free Fighters.** Martial arts centre and community organisation. Trojan Free Fighters is a Community Interest Company offering martial arts and self-defence classes for adults and young people. However, their space is not fit-for-purpose and they do not have security of tenure. They hope regeneration can enable them to diversify their offer and grow their reach into the community by providing a safe space for young people to grow in confidence, learn, and be active.
3. **Personal Combat Training** Martial arts centre and gym
4. **Pink Kitten Dance School** Dance school and fitness
5. **Jam Jar Collective** Community arts and event space. The Jam Jar Collective offer a community

- arts and events programme. As Frome Gateway changes, they hope to grow their capacity to do more, helping to shape the area's cultural offer and local creative identity, both indoor and outdoor.
6. **Riverside Youth Project.** Youth and community organisation
7. **Al-Baseera Bristol Centre.** Place of worship and community hub. Al-Baseera Bristol Centre has been located at Frome Gateway for 20 years and has become one of the most frequently visited mosques and community hubs in Bristol, providing a range of community services. However, they have outgrown their premises and they wish to do more. They hope to find new, more fit-for-purpose premises at Frome Gateway to enable them to expand their reach and community services.
8. **Document.** Coworking space, artists studios and large live events venue
9. **The Swan with Two Necks.** Traditional pub hosting music events
10. **The Crown Tavern** Traditional pub



Key

- River Frome
- Proposed public space
- Existing enhanced public space
- Green Space (Other)
- Development Footprints
- Community Asset Boundary

"It is important for communities to be connected"
 'Wishing Penny well'
 Project Report 2022

Community organisations can play a role in social cohesion to support health and wellbeing. Spaces will be needed for community groups to ensure their continuation during and after urban development.

Health Outcomes

Inclusive indoor and outdoor spaces can support communities to come together. Increasing inclusivity can ensure open and natural spaces are welcoming for everyone in the local community, maximising health benefits.

Health Outcomes

Urban Design Framework

Pedestrian Routes

All streets will put pedestrian and active travel movements first to improve the walkability of streets. Streets will be made more inviting and accessible through landscaping and urban greening, increasing of pavement widths, a managed reduction in vehicle movements and the provision of active and residential frontages on key routes to bring vibrancy and safety to the streetscape.

These strategies address Bristol's climate emergency response and key regeneration objectives such as improved connectivity, improvements to public health and wellbeing, carbon reduction and climate resilience and enhancements to green infrastructure and community facilities. Improvements to pedestrian infrastructure will benefit the existing and future residents of Frome Gateway and will make the area more inviting to the wider community.

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Key Outcomes

- 1. Significant enhancements to Pennywell Road improving pedestrian safety, generous public realm and urban greening and reduction in speed and volume of vehicles
- 2. Key public pedestrian route with increased visibility of the river and more opportunities to dwell and enjoy the riverside
- 3. New at grade pedestrian crossings addressing issues of severance
- 4. Enhanced connections through improved public realm and traffic infrastructure at key entry/exit points including Junction 3 subway to improve safety and legibility
- 5. New active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space
- 6. Potential elevated boardwalk with landscape and play provision (flood evacuation route)

- 7. Encourage walkability of local street network through active street frontages, public space and amenity
- 8. New river crossings will improve connectivity across the river
- 9. Potential site for bus stop/transport interchange
- 10. Pedestrian focused area: no vehicular access (exemption for delivery and emergency vehicle access)
- 11. 'River Frome Wildlife Walk'. The east bank of the Frome is home to diverse and established habitats that contribute to the sense of tranquility along the river corridor. A new publicly accessible pedestrian walkway must be opened up here through development offsets by between 5-10m subject to site specific conditions and constraints
- 12. The environment around Lawford's Gate will be enhanced for all users



Key

- Development Footprint
- River Frome
- Proposed Public Space
- Existing enhanced public space
- Primary Route
- Secondary Route
- Potential Elevated Boardwalk (Flood Evacuation Route)
- Shared Service Yard
- Proposed at grade pedestrian crossing on Newfoundland Way And Easton Way (Medium/Long term intervention). Improved crossings are subject to technical feasibility work given strategic nature of roads.
- Development offset required for riverside walk
- Bus Stop

Compared to low walkability areas, **high walkability areas are associated with a reduction in risk of depression by around 68%** for men over 65. Walkability improvements for the site could **improve health valued at £23 million** by increasing activity and reducing risk of conditions such as diabetes and weight gain.

Health Outcomes

Urban Design Framework

Cycle Routes

Creating generous, well-located routes for cyclists will encourage more people to use bikes, scooters and other active travel means to get around the city. This should reduce the reliance on private car ownership helping to improve air quality, public safety and overall public health.

Cycle routes should follow best practice for directness, ease of use and reduction of conflict between cycle movements and pedestrians. Current primary cycle routes are identified as running parallel to the River Frome and from Peel Street Open Space to Newfoundland Way bridge – these are currently well used routes which will be enhanced. Subject to the scale and speed of regeneration in the area the hierarchy of cycle routes may alter to best serve the needs of future development

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Key Outcomes

1. Primary commuter link connecting city centre to Easton and St Agnes. Well considered cycle route that reduce pedestrian and cyclist conflict subject to site constraints - this will be explored fully during detailed design
2. Subject to site constraints, future re-design of this cycle route must be sensitive to the aspiration to create more opportunities for pedestrians to stop and dwell at the riverside, avoiding conflict with pedestrians and cyclists
3. The southern end of Pennywell Road is narrower and will be made safer and calmer as a result of the modal filter. Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict
4. Infrastructure for cycle parking and other active travel parking such as scooters and e-cargo bikes will be included across the regeneration area as part of a coordinated public realm and urban greening strategy (specific locations to be determined)
5. Junction 3 and Easton Way subway to undergo enhancements to improve usability, public safety and placemaking
6. Northern portion of Pennywell Road cycle lane to be segregated from carriageway to mitigate conflict with industrial vehicles
7. New active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space
8. The environment around Lawford's Gate will be enhanced for all users



Cycle route to Broadmead.
Potential strategic route for future logistics hub.

Key

- Development Footprint
- River Frome
- Proposed Public Space
- Existing enhanced public space
- ➔ Primary Route
- ➔ Secondary Route
- ⚡ Shared Service Yard
- ⚡ Proposed at grade crossing

Improving active travel infrastructure can increase the number of people using active modes. This has physical and mental health benefits.

Health Outcomes

“Riverside feels like a functional space with functional greenery. It should be more than a connecting space and one that also **deals with the tension between cyclists and pedestrians**”

‘Wishing Penny well’
Project Report 2022

Place Principle:

Friendly streets and spaces for all

Urban Design Framework

Vehicular Routes

Creating friendly streets that encourage social interaction, promote active travel and support cultural and economic infrastructure is a key aim. In order to achieve this vehicular movement will be managed to ensure residents and businesses can thrive without the urban environment being dominated by vehicular movements and car parking.

A hierarchy of vehicular routes has been developed. These show how different streets will function to best serve the immediate residential, commercial and cultural needs. Residentially focused areas will incorporate low speed vehicular movements providing access only. More employment and light industrial areas will accommodate wider streets capable of safely managing larger vehicular movements. Other traffic management measures will be used to limit the amount of commercial vehicle movements in residential areas. Servicing and emergency vehicle access is to be supported across the regeneration area.

Key Outcomes

1. Modal filter to prevent through-traffic travelling north/south beyond this point significantly reducing the number of vehicle movements, allowing for narrower carriageway and turning Pennywell Road into a community-focussed street with generous pavements and urban greening. Further testing of the proposed modal filter (including exact location) is required to better understand the impact of this on neighbouring residents, businesses and the wider road network including Stapleton Road.
2. Development offset along Wellington Road required to create generous space for pedestrian, cycle and vehicular route. Space should accommodate existing and new street trees, soft landscaping and SuDS

3. No general vehicle access to public spaces with key community functions (except servicing and emergency access)
4. Promote walkable legible routes to access public transport in the vicinity
5. The environment around Lawford's Gate will be enhanced for all users
6. Potential locations for new at grade pedestrian crossing - Newfoundland Way & Easton Way
7. Potential site for bus stop/transport interchange
8. All developers must ensure servicing/loading requirements do not conflict with public realm and placemaking vision



Key

- Development Footprint
- River Frome
- Proposed Public Space
- Existing enhanced public space
- **Road** A mix of local strategic roads which are 40mph+ designed to the DMRB standard
- **Primary Street** local street with mixed traffic suitable for walking, cycling, servicing and vehicular access, 20mph area, may or may not be 'access only' route. The Design Standards Manual for Streets and BCC's Transport Development Management Guidance apply
- **Secondary Street** 20mph area Access-only, no HGVs (less than <2000 Vehicles per day). Manual for Streets applies
- **Shared Service Yard**
- **Modal Filter**
- **Bus Stop**
- Area for transport study associated with point closure. Wider feasibility study required to investigate road network impact on surrounding residential streets, Stapleton Road and Lawrence Hill Roundabout, including it's interactivity with the Clean Air Zone
- Development Offset
- Clean Air Zone

Definitions

- Road:** Local and strategic roads 40mph+
- Primary Street:** Local street with mixed traffic suitable for walking, cycling, servicing and vehicular access. 20mph zone, may or may not be 'access only' route.
- Secondary Street:** 20mph zone, access-only, no HGVs

Urban Design Framework

Physical Accessibility

As Frome Gateway changes over time from an industrial and warehousing area to a residential neighbourhood, the physical accessibility of the area must be enhanced to ensure it is navigable and usable for all. The ambition to enhance the accessibility and inclusivity of the Frome Gateway area has underpinned the design response in this Framework.

The existing Frome Gateway area presents many challenges to physical accessibility including the overall quality and cohesiveness of the public realm and movement routes. There are also significant level differences across the area and many barriers to movement. This page brings together physical accessibility considerations and opportunities to inform future detailed design proposals. Engagement and collaboration with affected user groups is strongly encouraged throughout the design process.

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Key Outcomes

- 1. All streets, public spaces and development proposals should be informed by accessibility audits
- 2. Well located on-street and off-street blue badge parking spaces
- 3. Consider well located taxi collections/drop-off areas
- 4. Strategic movement routes must be exemplars of inclusive and accessible design
- 5. Accessible movement routes between Frome Gateway and local services and public transport connections (such as Stapleton Road).
- 6. Potential bus stop/transport interchange on Newfoundland Way should ensure suitable access for those with limited mobility
- 7. Benches and seating along key movement routes and public spaces to provide safe, convenient and enjoyable areas to rest, dwell and socialise
- 8. Cycle and e-scooter parking must not impede footways
- 9. New river crossing and enhanced at grade connections on Newfoundland Way and Easton Way to reduce barriers to movement and improve legibility
- 10. Enhancements to Riverside Park and Rive Frome should aim to successfully manage level changes to ensure accessibility and enjoyment of green and blue spaces for all users
- 11. Improved lighting to improve visibility and public safety
- 12. Ensure provision of accessible and adaptable homes as per planning policy
- 13. Car parking, servicing and deliveries should not impede the accessibility of the public realm



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Key Outcomes: Non location specific aims but to be considered as part of wider development and placemaking aims

Key

- Development Footprint
- River Frome
- Proposed Public Space
- Existing enhanced public space
- Key Movement Corridor
- Primary Step Free Routes
- Taxi Pick-Up / Drop-Off
- Bus Route
- Bus Stop
- Steep Pavement Section
- Proposed at Grade Crossing
- Cycle and E-scooter Parking
note: Indicative locations - quantum and placement to be determined by detailed design study

Urban Design Framework

Height, Massing & Liveability

National and local design guidance, including The Urban Living SPD, set out principles on the creation of successful compact, characterful and healthy urban areas at higher densities. This guidance must be used pro-actively from an early stage to support a design-led approach to optimising density at Frome Gateway. High quality, well-designed homes which meet local needs are a primary regeneration aim. An optimal density is one that balances the efficient use of land, with aspirations for positive response to context, successful placemaking and liveability.

The proposed scale of buildings has been developed to inform applicants of site specific constraints and opportunities when undertaking preliminary design studies.

New developments would be expected to demonstrate:

Page 515

Detailed contextual analysis to establish a design narrative including approach to height and response to local opportunities and constraints

Qualitative and quantitative micro-climate analysis to ensure maximum public benefit and minimise negative impact on neighbouring site e.g. overshadowing

Analysis of local and strategic views with a sensitivity towards heritage assets

Key Outcomes

1. Potential contextually taller gateway buildings at the northern and southern extents of the site to signpost arrival to Bristol when approached from Newfoundland Way and Easton Way. These sites will have minimal impact on existing neighbouring homes
2. Potential contextually tall building to highlight the pedestrian crossing over Newfoundland Way and to provide passive surveillance over Riverside Park
3. Buildings of amplified height to overlook Riverside Park aiding with passive surveillance and maximising views of the river Frome
4. Buildings of amplified height located towards the centre of Frome Gateway to minimise impact on neighbouring homes on Pennywell Road
5. Pennywell Road to be lined with buildings of prevailing height that respond to existing buildings and help create a community focussed street
6. Areas of higher heritage significance will require new buildings to be sensitive in terms of scale, massing and views
7. Strategic views into the site – consideration must be given to wider historic views and site lines from elevated positions around the city centre



- Key**
- Area of prevailing height (The most commonly occurring height of buildings within an area of common character)
 - Area of amplified height (Buildings that are modestly higher than the prevailing building height)
 - Potential for contextual tall buildings (Buildings that are significantly taller than the prevailing height)
 - River Frome
 - Proposed public space
 - Existing enhanced public space
 - Green Space (Other)
 - Existing Buildings
 - Shared Service Yard
 - Natural surveillance
 - Key Local Views
 - New Placemaking Views: development must protect and enhance views to the River Frome promoting wayfinding and connectivity

Increasing densities in locations with good access to services and amenities reduces the need to travel, supports public transport and/or enables active travel, with associated health and wellbeing benefits.

Health Outcomes

Urban Design Framework

Active Frontage & Community Connections

All streets in the regeneration area should be vibrant, safe and facilitate connectivity. To achieve this, active frontage must be promoted.

Strategic routes with higher levels of pedestrian and cycle traffic must be activated by ground floor uses. Less heavily trafficked streets may provide areas of secondary active frontage. These streets may also be used for servicing. However, streets that require servicing must also be safe and provide natural surveillance from secondary active uses.

New developments would be expected to:

- Look beyond the red line to positively enhance public realm and create generous streets and public spaces
 - Focus major activation along primary movement corridors and public spaces to reinforce key routes, aid with legibility and wayfinding and contribute to placemaking
- Contribute to a walkable neighbourhood that promotes safe and equitable spaces and increased permeability
- Find opportunities to deliver lower risk, active uses in ground floor areas prone to flooding to help mitigate flood risk

Key Outcomes

1. Active frontage promoted on east & west banks of the River Frome to create a vibrant route at the heart of the regeneration area and connect local communities to the wildlife corridor
2. Active frontage and landscaping promoted along Newfoundland Way to create new animated street environment
3. Active frontage promoted along historic street to connect local communities to industrial heritage
4. Active frontage should enclose public spaces. Creating safe, friendly and animated spaces for local communities
5. The northern gateway (Junction 3 / Easton Way arrival) engages with one north facing frontage. Activity in this area should be intensified to create safe and friendly streets
6. Active frontages along Pennywell Road contributes to street vibrancy and overlooking
7. In the Tanneries Character Area the river route engages with active frontage along the East Bank. Active and night time uses are encourage to create safer streets and public spaces and to enhance evening activity
8. Key 'Maker Streets' should ensure primary active frontage is promoted alongside servicing requirements for Industrial ground floor uses
9. Active frontage lining Eugene Street should promote daytime and evening activity to support existing night-time economy



Key

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Key Active Edges:**
Areas of maximum activity interacting with a strategic route or public space
- Primary Active Frontage:**
Maximum activity including building entrances, business frontages, glazed areas and associated provision for external seating, etc. (Activities that increase natural surveillance)
- Residential Frontage:**
Homes and front doors at ground floor with associated porches, seating, planting (defensible space), non habitable rooms. Subject to Flood Zone extents
- Secondary Active Frontage:**
Activities including service areas, delivery bays, entrances, parking, glazed areas, etc.
- Shared Service Yard
- Movement Corridors**
- Placemaking opportunities

Improved overlooking, natural surveillance and lighting can improve safety, and perceptions of safety, which encourages active travel. This can benefit physical and mental health.

Health Outcomes

Urban Design Framework

Green & Blue Infrastructure

A fundamental and effective approach to mitigating the effects of the climate and ecological crises is to dramatically increase the quantity, quality and resilience of our natural habitats. Preservation and enhancement of green and blue infrastructure in our built environment have myriad benefits to the health of our environment and our population.

New development will be expected to implement principles that make a positive contribution to placemaking and green/blue infrastructure. Given the significant sustainability and health benefits, enhancements beyond minimum planning policy are highly encouraged. Developers should:

- Design and plan for a future climate that is far hotter and more changeable than current regulations suggest
- Early ecological assessments of all development site must be undertaken to establish an ecological baseline
- Achieve as a minimum the Natural England Urban Green Factor standard
- Integration of sustainable drainage systems within the landscape to achieve greenfield levels of run-off
- Implement significant tree planting on-plot to contribute to placemaking, ecological enhancement and to manage urban heat island effect
- Connect to and extend existing green corridors
- Contribute to the design and delivery of ecological and placemaking enhancements to the river channel including providing space for wildlife.

Key Outcomes

1. Maximum greening will occur on streets with south facing aspect and minimal overshadowing. Greening will reduce urban heat island effect and positively influence both sustainability and health outcomes
2. Maximum greening provides a barrier between Easton Way/ Newfoundland Way to reduce noise and air pollution for residential development
3. Development offsets are required to create new pocket parks throughout the regeneration area
4. Pennywell Road development offsets required to soften edge of the residential street using landscape, SuDS and mature trees
5. Mixed Use Games Area (MUGA) in Riverside Park and all other existing play spaces in the regeneration area to be enhanced.
6. Enhance ecological recovery in the River Frome by nurturing and diversifying habitats. Improving connectivity to the river positively influences health outcomes



Key

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Maximum greening: Green infrastructure priority over parking, service bays etc.
- Base level greening: Planting Corridors, Rain Gardens, SuDS, Street Trees
- Development Offset
- Key River Junction: placemaking/ecological/public amenity opportunities. Further info p72-75
- St Pauls Green Link
- Pedestrian connection to off site spaces

7. Ensure access to river channel for Environment Agency river channel maintenance
8. Developers should undertake structural surveys of river walls to understand condition and constraints
9. Retain existing and develop new areas of tree planting along the river bank to ensure good balance of shaded and unshaded reaches for the rivers' mixed fish population
10. As a sensitive wildlife corridor with nocturnal species new lighting along the river must balance improvements to access and safety with wider ecological goals

The green and blue spaces should be retained and enhanced, with increases in quantity and quality of greenspace since the area has an open space deficiency, particularly of informal and natural spaces. Developments that maximise natural sunlight and include tree planting and accessible green roofs can also contribute towards the mental wellbeing of residents.

Health Outcomes

Urban Design Framework

Concept for Exploration: Green Space 'Big Move'

Creating an area-wide, once in a generation vision for Frome Gateway has presented an opportunity to consider possible 'big moves' in response to some of the areas more complex challenges such as flood risk, community access to green space and public health inequalities.

The idea of BCC exchanging land parcels with private landowners within the regeneration area has been conceptually explored (as set out in the plan opposite). Doing so would enable BCC to deliver a new publicly accessible park in an area which is at higher risk of flooding (Flood Zone 3).

It is anticipated that the benefits of this would include:

- An overall increase of at least 0.8ha of green space (in addition to the new network of pocket parks) for community enjoyment and wildlife.
- Significant placemaking and quality of life benefits.
- Increased resilience to climate change (flooding and rising temperatures).
- Positive public health and wellbeing outcomes for local residents.
- Enabling development to come forward in areas less constrained by flood risk (from a flood risk perspective, this has strong support from the Environment Agency).

However, this would be very practically and technically difficult to deliver and would require feasibility, technical and viability studies, as well as engagement with private landowners and developers to be undertaken to determine whether this is achievable. Delivering this would likely require significant public sector funding and leadership. It would also require a portion of Riverside Park to be developed on where the Multi-Use Games Area is currently located, however this would be re-provided elsewhere within the regeneration area. BCC will engage with the landowners of the identified sites to further explore the feasibility of this.



Urban Design Framework

Sustainability & Climate Change

BCC has declared climate and ecological emergencies. BCC has worked with partners to develop the One City Climate and Ecological Emergency Strategies. These set out a vision for how Bristol can become a carbon neutral, climate resilient, wildlife rich and ecologically resilient city by 2030.

Key outcomes relating to sustainability that we want the transformation to deliver. New development should:

- Achieve exemplar environmental targets such as the RIBA 2030 Climate Challenge
 - Demonstrate innovation in design and construction that significantly reduces embodied and operation carbon
 - Design for future climatic conditions of extreme weather and go beyond current building regulation requirements
- Key outcomes relating to sustainability that we want the transformation to deliver.

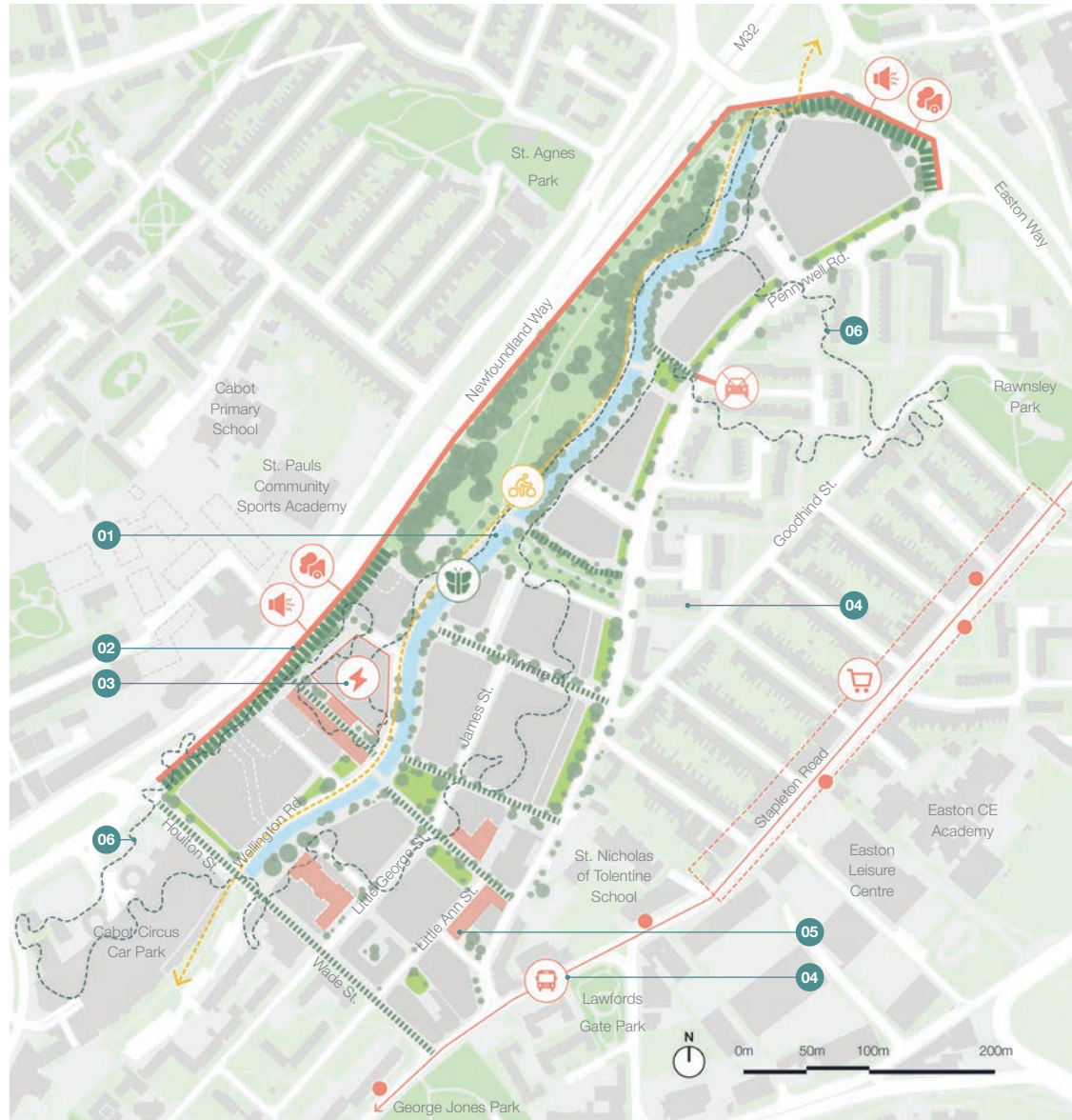
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Key Outcomes

- 1. Deliver enhanced blue and green infrastructure to increase biodiversity and climate resilience.**
Regeneration must promote street greening, new pocket parks and enhanced wildlife ecology corridor. Developers must adhere to Natural England Urban Greening Factor. Street greening can help mitigate urban heat island effect by shading buildings in the summer.
- 2. Support lower pollution levels, both on and off site.** Green infrastructure creates a barrier to both noise & air pollution from both Newfoundland Way and Easton Way.
- 3. Enable the delivery of the Frome Gateway District Heating Network** and associated strategic energy infrastructure.
- 4. Reduce the need to travel, and maximise the use of sustainable forms of transport.** Pedestrian and cycle routes on-site and connections

- 5. Minimise waste and maximise adaptability, reuse and recycling.** Developers must explore reuse of appropriate existing buildings. Developers must target embodied carbon requirements of planning policy NZC2 (Net zero carbon development – operational carbon)
- 6. Ensure new development and infrastructure is designed with our changing climate in mind.** Where applicable developers must plan Flood Escape Routes and appropriate zoning of uses at GF. Developments should include multi-functional SuDS to attenuate water. Developers must promote a sustainable approach to overheating risk. Additionally, development must promote low water consumption targets.

to surrounding areas must be enhanced. Existing streetscapes must be improved and adjustments to Pennywell Road through traffic should be explored



Key

- Development Footprint
- River Frome
- Proposed green public space/ pocket parks
- Existing enhanced public space
- South facing street greening to minimise urban heat island effect
- Enhance wildlife corridor promotes ecology and diversity of habitats in the area
- Green infrastructure creates a barrier to both noise & air pollution from both Newfoundland Way and Easton Way. Development impacted by pollution must seek to mitigate effects through design
- Developers should explore refurbishment of existing buildings
- Cycle route
- Nearby bus route located on Stapleton Road (3 minute walk from Peel St. Park to Stapleton Road)
- Flood Zone 3 Extents
- Local High Street
- Noise Pollution
- Air Pollution
- Modal filter - No through traffic
- Proposed Energy Centre Location on BCC owned site
- Heavily trafficked vehicular route (noise & air pollution)

Urban Design Framework

Sustainability & Climate Change

Embedding Sustainability

People and planet are central to the vision for Bristol and the Frome Gateway area. This Regeneration Framework advocates for a more sustainable future in its broadest sense, including environmental conditions, social health and wellbeing, and economic resilience.

This plan includes numerous core embedded aspects of sustainability in the preceding urban design framework plans. These include enhancing the river corridor, improving active travel links and diversifying land uses.

When adopted, the revised Local Plan's climate change, sustainability and nature recovery policies will be key to ensure the environmental performance of new development within Bristol. In addition, BCC will continue to develop and deliver parallel strategies, initiatives and investment to support sustainability.

Sustainability Priorities

The table adjacent identifies Bristol City Council's key priorities relating to sustainability in this area. It summarises example ways in which these priorities can be implemented to respond to the challenge, including measures for individual development sites, which could seek to go beyond planning policy.

Key Priorities	Requirements for development	Strategic Considerations
Deliver enhanced blue and green infrastructure to increase biodiversity and climate resilience	<ul style="list-style-type: none"> Incorporate green and blue infrastructure on plots such as sustainable drainage features and use of Natural England's Urban Greening Factor and Biodiversity Net Gain Contribute to the design and delivery of ecological and placemaking enhancements to the river channel including providing space for wildlife and other features such as viewing platforms and river crossings 	<ul style="list-style-type: none"> Incorporate and enhance multi-functional green and blue infrastructure across the regeneration area to build resilience to the impacts of climate change and provide space for wildlife and public enjoyment.
Support lower pollution levels both on and off site	<ul style="list-style-type: none"> Adhere to BCC planning policy to support active and sustainable travel. Integrate noise and air quality mitigation through building design and ventilation strategies. Use green infrastructure such as sustainable drainage systems to filter and reduce exposure to water, air and noise pollution. 	<ul style="list-style-type: none"> Prioritise active and sustainable travel across the regeneration and enhance public transport options and accessibility. Maximise greening between Newfoundland Way and development plots to act as air/noise pollution barrier
Enable the delivery of the Frome Gateway District Heating network and associated strategic energy infrastructure	<ul style="list-style-type: none"> Ensure connection to the Frome Gateway District Heating Network 	<ul style="list-style-type: none"> Enable the delivery of the Frome Gateway District Heating Network
Ensure new development is carbon neutral in operation	<ul style="list-style-type: none"> Deliver net zero development as per BCC Planning Policy NZC2 (Net zero carbon development – operational carbon). Ensure connection to the Frome Gateway District Heating Network Use passive systems to minimise operational energy consumption (optimised through micro-climate analysis, thermal modelling and high performance manufacturing and construction techniques etc.) 	<ul style="list-style-type: none"> Enable the delivery of the Frome Gateway District Heating Network
Minimise embodied carbon across the lifecycle of development	<ul style="list-style-type: none"> Adapt and reuse existing buildings where feasible. Where not feasible, ensure new development is designed to be flexible and adaptable and maximise re-use of materials after its lifetime. Utilising low embodied carbon construction materials and methods Ensure new development is in accordance with BCC Planning Policy (NZC3 Embodied carbon, materials and waste) 	<ul style="list-style-type: none"> Ensure new infrastructure minimises embodied carbon
Reduce the need to travel, and maximise the use of sustainable forms of transport	<ul style="list-style-type: none"> Integrate active travel infrastructure and initiatives to support modal shift such as cycle storage and travel plans. Deliver ground floor uses which enhance local amenities and services to meet local needs. 	<ul style="list-style-type: none"> Enhance active travel routes and infrastructure to support modal shift. Deliver a mix of uses and across the regeneration area and integrate local amenities and services to meet local needs.
Minimise waste and maximise adaptability, reuse and recycling	<ul style="list-style-type: none"> Retain and retrofit existing buildings where appropriate and possible Reuse existing building materials from site where feasible / reuse existing materials sourced from third parties where possible Minimise ground level changes and maximise material recovery during demolition and construction in accordance with BCC Planning Policy (NZC3 Embodied carbon, materials and waste). 	
Ensure new development and infrastructure is designed with our changing climate in mind	<ul style="list-style-type: none"> Ensure new development is resilient to a 2-degree global climate change scenario and identify adaptive pathways for resilience to a 4-degree scenario. This should take account of flood risk, heat stress and space for wildlife. Implement multi-functional SuDS within development sites Use orientation, massing, shading, facade design and effective ventilation to minimise overheating risk over the lifetime of the developments. Design buildings and landscaping to conserve water supplies 	<ul style="list-style-type: none"> Ensure new infrastructure and public spaces are designed to a 2-degree global climate change scenario including through the integration of multi-functional green infrastructure.

Urban Design Framework

Managing Flood Risk

Flood Risk Context

The primary purpose of this Regeneration Framework is to account for multiple objectives and set out the most balanced and deliverable vision for the Frome Gateway area. Creating a sustainable and healthy place to live and work is central to the Frome Gateway vision.

72% of the Frome Gateway area is within Flood Zones 2 and 3, presenting significant constraints on development resulting in flood risk management being the most strategic technical consideration informing the design process from the outset.

Despite the risk of flooding, this area is considered, in-principle, an appropriate location for new development.

The National Planning Policy Framework (NPPF) allows residential development in Flood Zones 2 and 3, subject to the sequential test and additional safety and quality criteria being met and demonstrated through the planning application process to ensure public safety.

The approach to flood risk management in this Framework has been informed by the following understanding and context:

1. Ensuring public safety is the first and foremost priority
2. The reality that most new development will be brought forward by the private sector, which has demonstrated interest in the delivery of residential-led development at Frome Gateway. Grounded in this reality of limited public sector control of land, this framework seeks to respond positively and constructively by setting out a range of ways which could be explored to safely enable development at Frome Gateway
3. Ensuring that appropriate flood risk is fully considered alongside wider sustainability and placemaking objectives

Sequential Approach

Paragraph 162 of the NPPF states that *“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding”* and *“Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding”*.

It is recognised that residential-led mixed-use development is proposed in areas of Flood Zone 2 / 3, and that the Universal House site (numbered 33 on the map on page 58) as well as Riverside Park, are proposed for less vulnerable uses despite them being in areas of lower flood risk.

In the Frome Gateway area, some of the sites with a lower risk of flooding are not appropriate for residential development for the reasons set out in this framework. Namely:

Riverside Park: Despite being the least flood prone area within the regeneration area, Riverside Park is protected as ‘open space’ in planning policy. Even if this fundamental factor was overlooked, locating new development here and re-providing open space in Flood Zone 3 areas would be extremely complex, challenging and costly due to the need to secure buy-in from multiple third parties, including landowners, policy makers and the local community. Furthermore, it would mean concentrating residential accommodation adjacent to Newfoundland Way, increasing the exposure of residents to air and noise pollution, and reducing the benefits of clustering homes around the river Frome setting.

This option has therefore been discounted, particularly as consultation and engagement highlighted that there is strong support for the retention and improvement of Riverside Park.

However, an option to enable some development in areas of lower flood risk, while creating a higher quality setting for homes has been explored. This is set out in the ‘Green Space Big Move’ on page 50, and this proposes a strategic response to enabling development in areas of lower flood risk while turning areas of higher flood risk into new green space.



Riverside Park



Riverside Park - location

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Urban Design Framework

Managing Flood Risk

Universal House: The northernmost end of the regeneration area is the focus of a strategic employment and business strategy, with an aim to consolidate light-industrial businesses in this area. This is a key commitment of the Frome Gateway framework, with an aim to maintain this employment type in the area. This key site sits on Junction 3 of the M32, providing access for the delivery of goods and services (including through HGVs). It is also large enough to accommodate light industrial activities and vehicles and has the potential for co-location of multiple businesses to create diverse employment opportunities for the local community. Furthermore, its location is separate from the community-focused ‘heart’ of the central Frome Gateway area, ensuring larger vehicles and noisier industrial activities don’t disrupt the neighbourhood.

More specifically, it is the preferred location for a Bristol low carbon last-mile logistics hub. This particular use has the potential to be a strategic facility for servicing the city centre and east Bristol neighbourhoods and would create significant employment opportunities for local communities. Locating homes here would also have the potential for detrimental health outcomes due to traffic on Easton Way, which has air and noise quality issues.

Paragraph 163 of the NPPF goes on to state that *“If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied”*. Again, the emphasis is that the framework must take in to account the wider sustainable development objectives of the framework, which has led to the spatial concept presented.

There is no guarantee that the Sequential Test will be passed by the Local Planning Authority for individual planning applications that come forward in areas within Flood Zone 2 or 3. However BCC believe that the framework sets out a robust evidence base to guide those decisions.

Safe Development

For any sites coming forward that do pass the Sequential Test, there will also be the need to pass the Exception Test, and there is a risk that the Exception Test will not be passed. As such, through the production of this Framework, a range of strategic flood resilience measures were explored to understand how the public sector could help to manage flood risk in this area to safely enable new development. More information of these measures is explored on page 56-58. While there are several potential solutions, there are also significant complexities for funding, delivery, and phasing, especially where sites are in different ownerships. At present, there are no short/medium term prospects of these significantly reducing flood extents in the Frome Gateway area.

As a result this Framework promotes a site-by-site approach to flood risk management. Individual sites will be expected to demonstrate through the planning process (supported by site-specific flood risk assessments) that they have successfully integrated a range of appropriate measures to safely manage flood risk. This Framework does not provide any guarantee that planning permission for the land uses it proposes can be approved, and planning applications will need to adhere to usual due diligence and process. To support this, several ‘Development Assumptions’ are set out on page 55 which have been informed by the flood risk context in this area and which developers should accord with, which complement and strengthen national flood risk planning practice guidance.



Universal House & Easton Way underpass



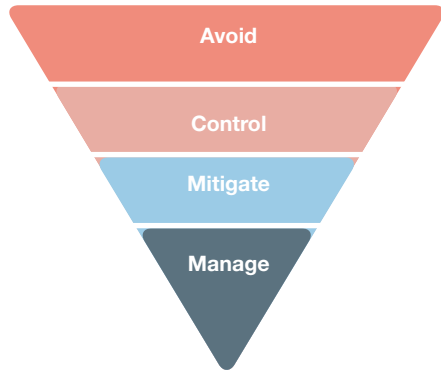
Universal House - location

Urban Design Framework

Managing Flood Risk

Regulations, Guidance and Policy

There are numerous policy and guidance documents which have informed the flood resilience strategy in this Regeneration Framework, including the National Planning Policy Framework and guidance on flood risk assessment. Proposals for new development on sites within the study area should use the latest national and local policy to assess the risk (including site-specific flood risk assessments) and design appropriate mitigation.



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Development Assumptions

The introduction of more vulnerable land uses to this area, such as residential use, requires coherent flood risk management. In this Regeneration Framework, a number of general principles are proposed across the whole study area as an appropriate response to the overall flood risk. These should be considered and implemented for all new development in the Frome Gateway area.

- To comply with the NPPF, development will need to demonstrate no increase in flood risk. If floodplain compensation is not suitable, there should be no net loss of floodplain to prevent an increase in flood risk to others
- A sequential approach should be followed for allocation of land uses within the whole Frome Gateway area and within individual plots, sitting more vulnerable uses away from the river and flood risk areas. Where possible,

opportunities for land exchanges should be explored. If individual sites are to be developed, the sequential test and exception test must be passed.

- Safe access and egress should be provided for new development, developed in liaison with the Local Authority Emergency Planner and emergency services
- No ground floor residential accommodation should be developed within Flood Zone 2 or 3
- The residential floor level in buildings should be set at a minimum of the design flood level in a 1 in 100-year scenario plus upper end climate change allowance and freeboard
- Less vulnerable ground floor uses should be designed for a 1 in 75-year flood, plus higher central climate change allowance
- Basements below ground level in the Flood Zone are highly discouraged. If unavoidable, in order to meet other policy requirements, a flood resistance strategy and internal means of escape should be employed to mitigate risk to life
- Development should be safe from flooding for its lifetime taking account of the vulnerability of its users
- Sustainable Drainage systems (SuDS) should be integrated throughout all development plots and public realm where possible to reduce surface water flooding
- Other site-specific measures should be considered and incorporated into designs without increasing flood risk elsewhere, such as:
 - Flood resistant and flood resilience building construction features
 - Refuge areas within buildings to provide temporary protection
 - Pedestrian barriers to demarcate areas of hazardous flow
 - Flood gauge boards to help people make safe decisions
 - A flood response plan for individual or multiple developments, which could include evacuation procedures

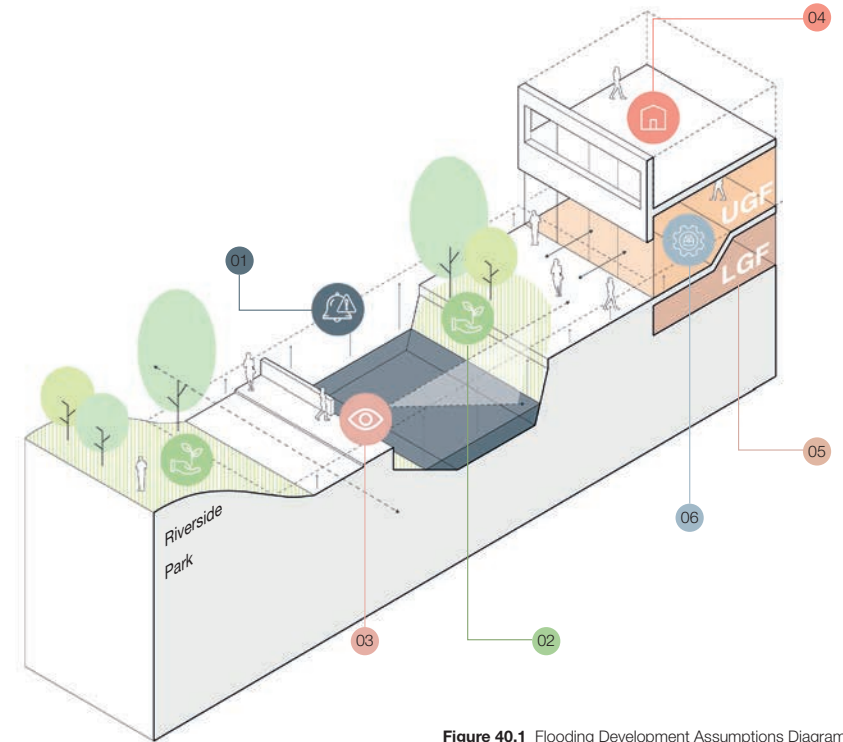


Figure 40.1 Flooding Development Assumptions Diagram

Key

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. Site-wide pre-emptive flood risk warning & evacuation strategy 2. River restoration to provide placemaking & habitat enhancement 3. Improved visual connection to river 4. No residential use below dry foot level 5. Discourage lower ground floor and basements accommodation | <ol style="list-style-type: none"> 6. Flood risk profile to help determine land use & appropriate mitigation measures |
|--|--|

Urban Design Framework

Managing Flood Risk

Strategic Flood Resilience Measures

In the creation of this Regeneration Framework, numerous strategic flood resilience measures have been explored to understand how the public sector could help reduce flood risk and enable private development. While there are many potential solutions, there are also significant complexities for funding, delivery and phasing, especially where sites are in different ownerships.

This section summarises strategic flood risk management measures which have been considered and would likely require public sector intervention. It includes the current understanding of their effectiveness and practicality to inform future use by BCC and developers. At present, there are no short/medium term prospects of these significantly reducing flood extents in the Frome Gateway area.

This places even greater emphasis on the development assumptions listed previously and continued collaboration between the public and private sector to reduce flood risk together.

Type	Potential Measure	Description	Effectiveness	Practicality
Control	Compensatory on site storage	Creation of areas that can store floodwater	Effective in reducing flood risk if the 'level for level' and 'volume for volume' principles are followed. However, excavating holes within the flood plain is ineffective.	There are limited opportunities to provide storage areas at the level of predicted flood water. Riverside Park is the only main elevated area, but the required volume of storage would be large. The ground is expected to be highly contaminated, which would be expensive to remediate or dispose.
Control	Flood defence walls	New flood defence walls adjacent to the River Frome channel	The constraints of Wade Street culvert downstream means that flood defence walls would probably increase flooding in other areas	There are no feasible plans to install flood defence walls if these would be ineffective in reducing overall flood risk
Control	Upstream natural flood management	Installation of flood storage, SuDS and natural flood management measures upstream	This has the potential to reduce flood risk in the Frome Gateway area	The flows in the Frome are significant, so traditional engineered storage schemes would be large and expensive. This is being explored through separate work by BCC and the Environment Agency (the Resilient Frome programme). This project is unlikely to have any significant impact in reducing the flood hazard posed by a design flood event in this area.
Control	River restoration	Channel modifications to restore the natural state and functioning of the river	River restoration is unlikely to significantly reduce flood risk given the site constraints. It's primary benefit will be habitat improvement and amenity	This has been included as part of the Resilient Frome programme, but there are residual challenges associated with potential contaminated land and interface with land boundaries
Control	Bristol Avon Flood Strategy (BAFS)	Flood measures and defences for the River Avon, part of Bristol's river system	While the Bristol Avon Flood Strategy (BAFS) will reduce the frequency of flooding in the city, it will not reduce the extents of Flood Zones in the Frome Gateway area	This is being progressed by BCC and the Environment Agency, seeking major investment for the city
Control	River Frome Flood Strategy	Flood measures and defences for the River Frome, which could include a combination of strategic measures in this table	This is unlikely to propose and any solution that would reduce the flood hazard posed by a design flood event in this area	There are no committed works by BCC or the Environment Agency to develop this in the short-term. The practicalities (physical, financial and environmental) could be similar in nature to the BAFS complexities, but these are unknown
Control	Northern Stormwater Interceptor enhancements	Modification of the Northern Stormwater Interceptor to increase its capacity and reduce flow along this portion of the River Frome	This could have an effect in reducing flood risk in the Frome Gateway area	This would be expensive and there are no planned/committed works. This could be part of a River Frome Flood Strategy, if progressed.
Mitigate	Elevated access/egress infrastructure	Raised roads, boardwalks or landscaping (above design flood levels) to provide escape from the Flood Zone. This would need to be permeable to avoid increasing flood risk elsewhere	Effective in reducing flood risk to people by providing a means of escape for people and access for emergency services. This is a passive solution which could require relatively low maintenance.	Infrastructure measures would introduce significant complexity for design, delivery and phasing, especially where adjacent sites are in different ownerships. Creating permanent structures that are permeable to water flow would be substantial challenges for engineering and public realm design. Public sector intervention would be required to overcome financial viability challenges and coordinate the interface with multiple development sites
Manage	Flood Warning	Enhancement of the existing flood monitoring system and roll out of flood warning to residents	The River Frome hydraulic model shows that the onset of initial flooding in Frome Gateway occurs approximately 30 hours into the design flood event and there is a further 12 hours between the onset of initial flooding and peak flood. However, the Environment Agency aim to provide a warning time for fluvial flooding of around 2 hours and there is no guarantee that a flood warning will be issued within this time NOTE: Flood warning/evacuation should not be relied upon to make a site safe	River level monitoring of the catchment is already in place. This monitoring and associated flood warning systems could be improved with investment and collaboration with the Environment Agency
Manage	Road/path closure gates	Gates could be operated during a flood event to prevent accidental entry into deep water	This could be effective if the operating procedure is clearly defined and adhered to, and gates are maintained. However, it is an active solution (reliant on systems and people) and would only be appropriate in conjunction with other mitigation measures	This can be difficult to design/locate within a network of streets and paths. A robust procedure would require coordination between multiple authorities and legal authority would be needed to permit its operation.

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Urban Design Framework

Managing Flood Risk

On Site Flood Resilience Measures

This section summarises on site measures which have the potential to be implemented by individual or collective developers. These give more detail on the development assumptions, and should be considered by any developer in their future plans for the area.

Type	Potential Measure	Description	Effectiveness	Practicality
Control	Sustainable Drainage Systems (SuDS)	SuDs help address flood risk by managing surface water runoff by mimicking natural processes to slow water ingress into sewer systems	This is an important measure for controlling surface water flooding, but is unlikely to have a significant effect on fluvial flooding	This is generally considered practical for new development and should be applied by developers, even if it has limited effect on fluvial flood risk
Mitigate	Vertical sequential land use	Locating the most vulnerable uses on upper storeys and raising internal finished floor levels	Effective in reducing flood risk to people within buildings. However, a flood could take several hours to subside, with risks of electricity loss, heating loss and security concerns for occupants. The relatively slow onset of flooding makes safe escape more preferable.	This is generally considered practical for new development and should be applied by developers
Mitigate	Resistant (water exclusion) and resilient (water entry) building construction	Design features including flood doors, upstands, barriers, non-return valves and flood-resistant air bricks	While these are proven to reduce damage and costs, they should not be relied upon to reduce safety risks to people. They are only appropriate in conjunction with other mitigation measures	This is generally considered practical for new development and should be applied by developers
Mitigate	Exclusion of basements	Basements can increase the safety hazard in a flood event	Excluding basements will avoid worsening the flood risk, but not reduce it	This is generally considered practical for new development. If unavoidable, basements will need to be defended with a flood resistance strategy and internal means of escape
Mitigate	Refuge areas	Areas of the building designed to protect residents in a flood event	Effective in reducing flood risk to people within buildings. However, a flood could take several hours to subside, with risks of electricity loss, heating loss and security concerns for occupants. The relatively slow onset of flooding makes safe escape more preferable.	This is generally considered practical for new development, but recognising that the number of occupants will create spatial and cost implications
Mitigate	Pedestrian barriers	Permanent pedestrian barriers installed to demarcate areas of deep, fast, hazardous flow	This could be effective to prevent accidental straying into hazardous areas of flood water	This can be difficult to design/locate within a network of streets and paths without affecting normal use of an area. Barriers can also attract debris during a flood.
Mitigate	Flood gauge boards	Visible flood gauge boards to allow residents to assess flood depths	This would help people to make safe decisions, but is an active solution (reliant on systems and people) and would only be appropriate in conjunction with other mitigation measures	These are simple and relatively cost effective and should be considered by developers
Mitigate	Flood response plan	A tailored plan for individual or multiple developments, which could include evacuation procedures	This would help people to make safe decisions, but is an active solution (reliant on systems and people) and would only be appropriate in conjunction with other mitigation measures	The practicality of this measure depends upon anticipated numbers of people on site, their mobility, and how the building is managed (e.g. residential or workplace management)

Urban Design Framework

Managing Flood Risk

Local Flood Resilience Measures

There are three areas of greatest flood risk in Frome Gateway. This section provides a localised summary of the flood risk and potential flood risk management measures for each of these.

Houlton Street Area

- Flood Risk:** This area includes several development sites in Flood Zone 3. At the peak of the design flood event (1% Annual Exceedance Probability + 39% Climate Change), much of the area would be over 1m floodwater depth and pose a Significant hazard (Dangerous for most). Most affecting sites 35 and 10.

Land Use Options: A land exchange of equivalent size could be considered, but there are few plots of equivalent size. Due to its location next to Newfoundland Way, large open space would not be ideally located. Alternatively, the sites could be developed for less vulnerable uses than residential development.

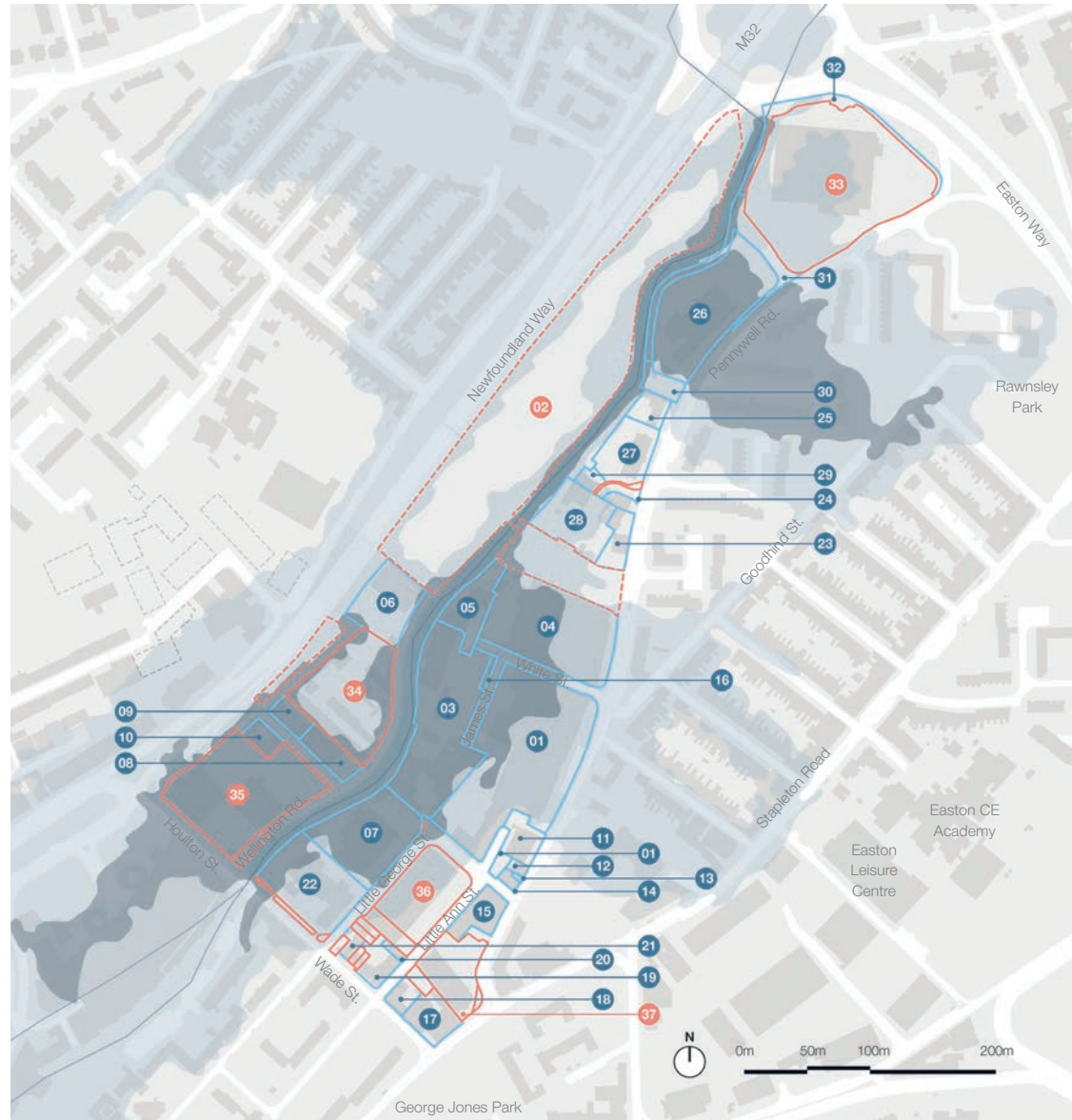
- Strategic Infrastructure Measures:** Access/egress could be via an elevated structure along Newfoundland Way, serving as a permanent route for pedestrians and cyclists. This could link to an improved bridge over Newfoundland Way or a connection to Easton Way. This would be expensive and other infrastructure solutions could be explored through future feasibility. New river crossings should be designed to ensure minimal impact to flows during a flood event, such as open-type parapets.
- On Site Measures:** The development assumptions listed above to mitigate and manage flood risk should be considered by any developer.

James Street Area

- Flood Risk:** This area includes several development sites in Flood Zone 3. At the peak of the design flood event (1% Annual Exceedance Probability + 39% Climate Change), much of the area would be over 1m floodwater depth and pose a Significant hazard (Dangerous for most). Most affecting sites 03, 05 and 07.

Land Use Options: A land exchange of equivalent size could be considered, such as a portion of Riverside Park. Due to its location along the River Frome, new green space in this area could have substantial place-making and health benefits for new and surrounding communities. Alternatively, the sites could be developed for less vulnerable uses than residential development.

- Strategic Infrastructure Measures:** Access/egress could be via an elevated structure connecting James Street and Little George Street to Eugene Street. The space available means that design for vehicles is difficult to avoid. This would create enormous complexity and likely require strategic land assembly. Other infrastructure solutions could be explored through future feasibility.
- On Site Measures:** The development assumptions listed above to mitigate and manage flood risk should be considered by any developer.



Key

Not in Flood Zones 2/3

28% 4.10 Ha

Flood Zone 3

37% 5.45 Ha

Land having a 1 in 100 or greater annual probability of river flooding

Flood Zone 2

35% 5.15 Ha

Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding

Site Area

14.70 Ha

North Pennywell Road Area

- Flood Risk:** This area includes several development sites in Flood Zone 3. At the peak of the design flood event (1% Annual Exceedance Probability + 39% Climate Change), much of the area would be over 1m floodwater depth and pose a Significant hazard (Dangerous for most). Most affecting site 26
- Land Use Options:** A land exchange of equivalent size could be considered, such as a portion of Riverside Park. Land assembly of adjacent plots could provide an access route out of the Flood Zone to the south. Given the industrial character of the area, the site could be developed for less vulnerable uses than residential development.
- Strategic Infrastructure Measures:** Access/egress could be via an elevated structure along the River Frome, serving as a permanent route for pedestrians and cyclists and connecting to Easton Way. This would be expensive and other infrastructure solutions could be explored through future feasibility.
- On Site Measures:** The development assumptions listed above to mitigate and manage flood risk should be considered by any developer.

Urban Design Framework

Health & Wellbeing

The health and wellbeing of local people is a high priority and this framework seeks to maximise benefits for both new and existing communities. This framework has been developed alongside a Health Impact Assessment which outlines expectations to create a healthy neighbourhood by considering the wider determinants of health. These are summarised below.

Key Outcomes

- Accessible and affordable family homes to meet local need
- Good layout, orientation and insulation to protect from overheating in summer and fuel poverty in winter, as well as ventilation design that avoids exposure to air pollution and noise from major roads
- Increase provision of affordable, healthy food and limited concentrations of hot food takeaways
- Support a diverse range of local employment and training opportunities for sustainable employment which can have mental health benefits
- Support social cohesion, inclusivity and sense of belonging by engaging early with different communities to inform development design.
- Sufficient local healthcare services capacity to meet the needs of a larger population
- Local social infrastructure such as community and leisure centres and places of worship to be supported and provided with opportunities to be accommodated within development plans
- Improve access to existing and new open and green spaces and nature to support physical activity and wellbeing in the area
- Enhance wildlife corridor along the River Frome to aid serenity in the area and bring ecological and mental health benefits
- Noise and air pollution must be minimised by promoting a green threshold between residential development and major roads (Newfoundland Way and Easton Way)
- Modal filter on Pennywell Road stops through traffic, increasing safety for pedestrians (including primary school children) and reduces air and noise pollution in the area
- Improved walking and cycling infrastructure encourages physical activity and potentially reduces premature mortality by around 10%
- Increase natural surveillance to reduce crime and change public perception of the area. Encouraging people to leave their homes and use green open spaces for physical activity will improve health and wellbeing
- Promote community food growing spaces in public green spaces. Access to healthy and affordable food can support healthy eating
- Reuse materials and refurbish buildings to reduce the environmental impact of construction and benefit health and well-being through reducing climate impact
- Safe escape is needed for flooding. Experiencing flooding can increase risk of mental and physical health problems



Key

- Development Footprint
- River Frome
- Proposed green public space/pocket parks
- Existing enhanced public space
- South facing street greening to minimise urban heat island effect
- Enhance wildlife corridor
- Green infrastructure creates a barrier to both noise & air pollution from both Newfoundland Way and Easton Way.
- Developers must explore refurbishment of existing buildings
- Cycle route
- Nearby bus route located on Stapleton Road (3 minute walk from Peel St. Park to Stapleton Road)
- Flood Zone 3 Extents
- Local High Street
- Community Grow Space
- Noise Pollution
- Air Pollution
- Modal Filter - No through traffic
- Proposed Energy Centre Location on BCC owned site
- Religious Centre
- Existing & enhanced Mixed Use Games Area (MUGA)
- Educational Institution
- Natural Surveillance
- Pedestrian Route to high street (3 min walk)
- Local Medical Centre
- Heavily trafficked vehicular route (noise & air pollution)

Urban Design Framework

Health & Wellbeing

Health and wellbeing issues were considered throughout the development of this Regeneration Framework as an iterative part of its refinement. This involved development of a Health Impact Assessment. The proposals within this framework would bring significant health potential to the area and mitigate existing risks.

The private sector has an important role to play in improving health outcomes. Potential opportunities and the benefits of implementing these are embedded within the urban design framework and strategic requirements in Chapter 3. Much of this can be achieved through good design, such as building layout and orientation, incorporation of green spaces and proactive engagement with the community.

A summary of important requirements that are needed to support and improve health and wellbeing are shown in the table, right.

Health & Wellbeing Related Issue

Requirements for developers

Other Strategic Recommendations

Housing design and affordability

- Include a range of housing types, including accessible and adaptable homes, affordable homes and larger family homes
- Good design and layout that avoids overheating, is energy efficient, and with private outdoor space.

- Continue to promote and apply national and local policy and guidance, including the Urban Living SPD, to embed high quality design
- Explore Local Lettings policies to support the local community to access new housing options at Frome Gateway

Access to health and social care services and other social infrastructure

- Provide opportunities for local community groups to be accommodated in development plans
- Design for community spaces to be developed in collaboration with communities to ensure they meet local needs

- Support local community groups based in the Frome Gateway area with re-location and/or remaining in the area
- Engage with the Integrated Care Board to help them plan for future health service provision

Access to open space and nature

- Contribute to improving the quality and quantity of open and natural spaces, including through development offsets.
- Sites adjacent to green spaces must integrate ways to maximise safety and inclusivity
- Integrate play spaces, with designs developed in collaboration with BCC and communities to meet local needs
- Ensure sustainable management and maintenance of new green spaces
- Protect and enhance biodiversity
- Contribute to the design and delivery of ecological and placemaking enhancements to the river channel to increase access and enjoyment of the riverside including providing space for wildlife and other features such as viewing platforms and new river crossings

- Pursue funding to improve green/open spaces
- Involve the community to help shape designs
- Ensure that the findings and recommendations of the WECIL Accessibility Audit are taken through into detailed design and delivery briefs and commissions.
- Support the community in management, maintenance and ownership of local green spaces, as appropriate. This may involve establishing a Friends of Riverside Park group
- Use strategic funding to deliver a river restoration project

Air quality, noise and neighbourhood amenity

- Use good design and appropriate location of residential units to lessen noise and air pollution impacts.
- Integrate green infrastructure to improve air quality and attenuate noise
- Ensure ventilation is designed to avoid the need to open windows onto noisy and polluting areas
- Adhere to the 'Agents of Change' principle and ensure that new development does not adversely impact on viability of existing noise-generating uses, such as night-time venues

- Pursue funding and undertake designs to reduce traffic along Pennywell Road
- Continue to promote and invest in city-wide policies and initiatives to reduce emissions from transport
- Ensure adequate provision is made to minimise air pollution and noise from the proposed new Energy Centre

Accessibility and active travel

- Residential and commercial developments to provide secure cycle storage and other support to encourage active travel
- Active travel schemes to prioritise safety and inclusively, including adequate lighting
- Ensure the opening up of the riverside 'Nature Walk' through development offsets

- Continue to promote and invest in public transport connectivity and services, such as a potential new mass transit stop on Newfoundland Way
- Pursue funding and undertake designs for public realm and highways schemes that promote active travel

Urban Design Framework

Health & Wellbeing

Health & Wellbeing Related Issue

Requirements for developers

Other Strategic Recommendations

Crime reduction and community safety

- Ensure natural surveillance of streets and public spaces is integrated into development proposals, including sensitive lighting
- Comply with 'Secured By Design' and design out opportunities for antisocial behaviour

- Continue to engage with the community during the implementation of this framework

Access to healthy food

- Integrate local food growing spaces
- Provide opportunity for different types of food stores, particularly low cost healthy options

- Continue to promote city-wide food policies and strategies, such as Bristol Good Food 2030 Framework.
- Support community parks, gardening groups and other local initiatives

Access to work and training

- Ensure the re-provision of employment space in development proposals
- Collaborate with BCC to maximise opportunities for local employment and training, as well as opportunities for affordable workspaces

- Continue to engage with the community during the implementation of this framework, such as with local women's groups.
- Ensure opportunities for training and apprenticeships are secured through the planning application process as per the Building Bristol programme

Social cohesion and inclusive design

- Engage early with local communities to ensure their meaningful involvement in development proposals to meet local needs
- Actively promote integration between new and existing communities
- Support community groups to be accommodated in development proposals

- Promote best practice for community engagement, collaboration and inclusivity through relationships with all stakeholders and the planning process
- Pursue funding for initiatives that provide opportunities to bring people together for shared experiences

Minimising the use of resources

- Positively plan for the sustainable and safe re-use and/or disposal of construction material and waste

- Continue to develop and promote policies for sustainable design

Climate change

- Maximise energy efficiency of buildings
- Ensure connection to the Frome Gateway district heating network is factored into design and development proposals
- Maximise the provision of renewable energy, with residents advised on operation for effective use
- Design buildings and public spaces for climate resilience
- Include SuDS within street greening and open spaces

- Deliver the Frome Gateway District Heating Network and associated Energy Centre.
- Continue to develop and promote policies for climate resilience and adaptation, such as the emerging Local Plan

Urban Design Framework

Public Art Principles

BCC recognises the importance of culture, creativity, and public art in contributing to the vision and sense of place for the Frome Gateway Regeneration Area. These aspects are seen as integral to supporting Frome Gateway's evolution as a place which celebrates community and diversity; a place where people from different backgrounds naturally come together.

Public art is a specific condition of planning approval for developments in the Frome Gateway Regeneration Area to 'achieve good quality urban design' and to contribute to the character of the neighbourhood. The Council's expectation is that this should be thoughtfully integrated into scheme planning from the outset, and planning applicants are encouraged to creatively engage with the local community and other stakeholders through the process to allow them to help shape the character of the neighbourhood.

any plans should, 'Ensure that the neighbourhood really feels like home for everyone here such that it engenders true sense of belonging, growth, equality and long-term connection'. (Scott Farlow Artist Poet, wishing Penny well report)

Frome Gateway place-shaping themes

Artist-led engagement with the local community in Frome Gateway has identified three place-shaping themes that should be used to help guide and shape cultural provision and public art in the area. These are:

1. **Navigability:** a place that is safe, easy, engaging and enriching for all users, residents, businesses and people moving and passing through.
2. **Legibility:** a place that is the clear and imaginative expression of an inspiring local identity, growing cultural diversity, community connectedness and local distinctiveness.
3. **Conviviality:** a place of genuine human interaction, warmth and kindness, creativity, understanding,



Image to the left shows Scott Farlow Artist Poet engaging with local residents on site near the River Frome and Riverside Park.

Image to the right is referenced from Scott Farlow's 'Wishing Penny well Report' procured by BCC

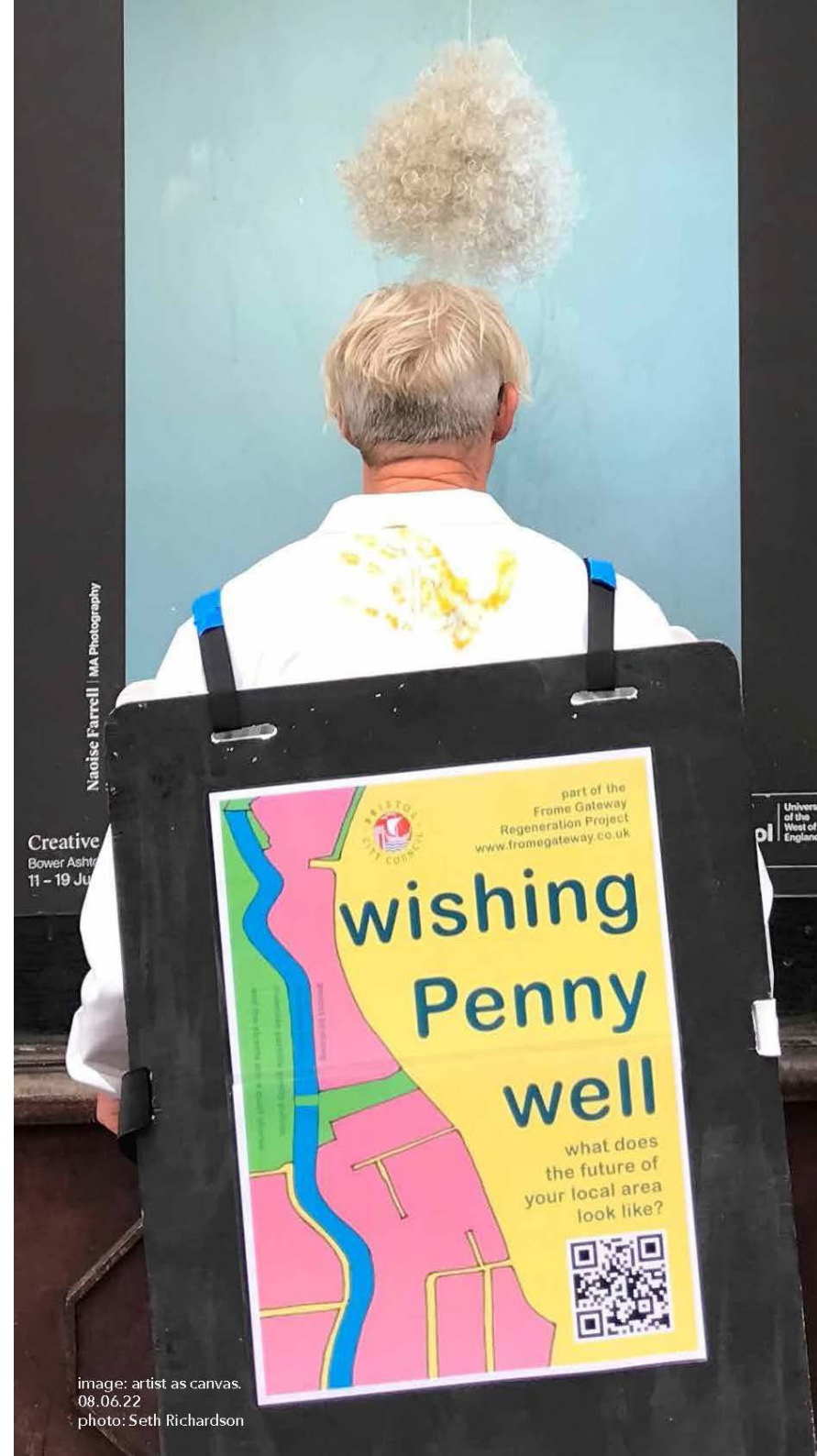
nature connection, shared learning, celebration and neighbourliness. A place for well-being.

(Scott Farlow Artist Poet, wishing Penny well report)

Bristol's Public Art Definition and Principles

The term public art refers to art in the public realm, both on private and public property, irrespective of how it is funded. Public art does not just include static, permanent sculptures and artworks, but a breadth of artist-led creative practice and cultural experiences that can take place in the public realm. Bristol's approach to public art is underpinned by five principles:

- **Social engagement:** Creatively engaging, informing and empowering Bristol's citizens, communities and multi-agency stakeholders.
- **Vibrant place making:** Imagining and contributing to liveable, loved, unique places to live, work and move through.
- **Sustainability:** Supporting a programme of work that contributes to an environmentally and socially sustainable city.
- **Quality urban design:** Embedding public art and culture into schemes as early as possible to maximise economic and social value for developers, residents and users.
- **Cultural ecology:** Nurturing Bristol's creative ecology (the city's 'brand') by commissioning artists and producers and providing space to allow their vision and ideas to thrive.



Naiose Farrell | MA Photography

Creative
Bower Ashtr
11 - 19 Ju

image: artist as canvas.
08.06.22
photo: Seth Richardson

Urban Design Framework

Public Art Principles

In the context of Frome Gateway, public art initiatives should aim to use these themes and principles to strengthen existing cultural assets and infrastructure, celebrate natural resources such as Riverside Park and the River Frome, and support residents (new and old) to come together. Initiatives might include:

- Providing permanent space (as part of the ground floor strategy), assets or infrastructure to enable ongoing cultural and community activity and experiences.
- Commissioning cultural 'happenings', socially engaged practice and public realm animation e.g. performance, street art, creative interventions and installations, that support placemaking and celebrate local assets.
- Artist-led design to support functional requirements such as lighting, wayfinding, colour schemes, landscaping and green space that encourage community cohesion.

Commissioning temporary or permanent artworks that activate the public realm.

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The process

Bristol City Council's Core Strategy (BCS) 21 is a condition for planning. It ensures that public art and culture are key ingredients for 'successful good quality urban design'. Public art planning is generally approached on an individual scheme by scheme basis. However, Frome Gateway is one of the priority regeneration areas where BCC is encouraging more cohesive, joined-up approaches to public art and culture to maximise value, benefit and impact for all. Our aspiration is to achieve this through a Frome Gateway Cultural Strategy. Led by BCC, the strategy will be developed in partnership with developers, cultural stakeholders and the community, and will inform all public art plans submitted as part of planning applications within the Frome Gateway Regeneration Area. This will enable a staged public art approach as follows:

Stage 1 Supporting the development of the Frome Gateway Cultural Strategy will be the first step in addressing the BCS 21 public art planning condition for developers. The production of the strategy will be undertaken at the earliest opportunity to ensure that the vision for culture and public art at Frome Gateway can be meaningfully integrated across the entire regeneration area and to ensure individual developer's timelines are not negatively affected. BCC Public Art, Culture and Regeneration Teams will be involved in the production of the Frome Gateway Cultural Strategy. A public art consultant will likely input into this work.

Stage 2 Once the Frome Gateway Cultural Strategy is finalised developers can then produce their public art plans which will need to demonstrate how they respond to the strategy. Developers can produce public art plans individually or work with other developers to create collective plans. Submitting a public art plan for approval furthers the process of discharging the public art planning condition.

Stage 3 Once public art plans are approved by the Public Art Team, delivery of the proposed plan can begin. The process of discharging against the planning condition generally concludes once public art proposals are physically delivered.



Image to the left shows Scott Farlow Artist Poet sweeping leaves in the temporary pocket park set up on Pennywell Road near Document (formerly Pennywell Studios).

Image to the right shows the temporary pocket park set up near the River Frome on Wellington Road.



Image: artist and participant in the Wellington Road (car) park 20.07.22. Photo: Seth Richardson

Testing the Approach

Defining Character

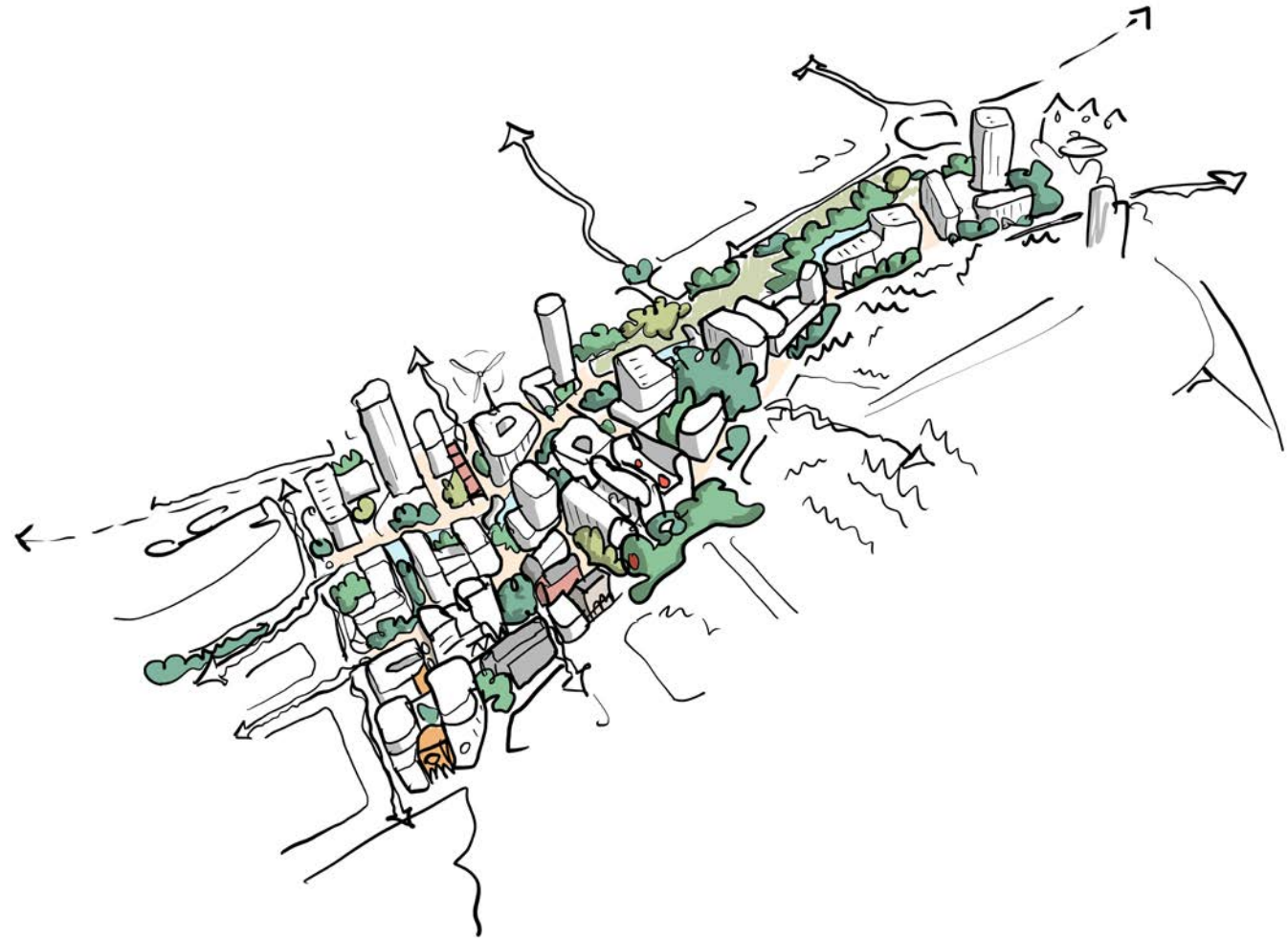
The strategic moves and urban design framework outlined in the previous section have been tested on a more local scale.

This section focuses on the placemaking vision with a particular emphasis on **Character Areas** and **Strategic Routes**. These illustrate an approach that could be deployed to meet the regeneration ambitions of stakeholders and BCC.

The Regeneration Area has been broken down into four distinct **Character Areas**. These are defined by existing street patterns and ownership boundaries, surrounding context and existing building types and uses. These areas all have a unique role to play in the larger regeneration area.

The identified **Strategic Routes** run through one or more **Character Areas** and provide a significant opportunity for achieving maximum public benefit. They are identified as major movement routes that link active frontages, public spaces, pedestrian zones, existing and proposed bridge crossings etc. **Strategic Routes** run North to South and East to West and are described in detail at the beginning of this chapter.

This chapter describes a regeneration approach that intentionally blurs the line between being conceptually aspirational and technically viable and gives clues as to the shape and nature of future development and regeneration moves.



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Character Areas & Strategic Routes

A Vision for Neighbourhoods

04

Page 533



Character Areas

Introduction

The Frome Gateway regeneration area has been separated into four Character Areas. These areas have been defined and developed in response to their site specific geography, existing legal and physical boundaries and their unique character.

Each Character Area responds to the physical and social context of their settings and play a distinct role in the wider regeneration approach.

This section will:

- Give a high level overview of regeneration aims specific to each Character Area e.g. approximate density/employment type/green infrastructure
- Demonstrate strategies that could be deployed to respond to site specific opportunities and constraints
- Suggest a strategic approach to land use and building arrangement

Outline key spatial ambitions for areas of public realm, building frontages and strategic movement routes

Highlight how relevant Community Place Principles could be incorporated in a design response

- Identify key placemaking opportunities
- Allow for sufficient flexibility to accommodate minor deviation from the framework where proposals demonstrate design excellence with clear public and environmental benefit

This section does not intend to:

- Give definitive instruction on building height, form or footprint
- Define minimum or maximum plot densities
- Demonstrate plot specific flood mitigation strategies
- Be too rigid to ignore innovative proposals that demonstrate clear public and environmental benefit



Riverside Park & Peel Street Open Space

Large green spaces with huge potential to form a safe, inviting green lung to benefit local communities. Home to established trees, diverse wildlife and hemmed by the River Frome running into the heart of the city.



Tanneries Character Area See pages 98-103

The northern spur of Frome Gateway currently accommodates large light industrial uses and extensive surface car parking. This area is well connected to more strategic infrastructure and should provide valued light industrial and logistics type employment space into the future. Significant enhancements to both the public realm and river Frome will be fundamental to the regeneration of the area.



Peel Street Character Area

See pages 92-97

The historic street pattern of the Victorian residential and industrial buildings still remains only now the area is home to large footprint light industrial sheds and yards. These larger plots have the potential for holistic regeneration that accommodates a mix of business and workspace at ground level that animates the streets and public realm.



Elton Street Character Area

See pages 80-85

A prominent corner of Frome Gateway that should become a vibrant entry point to the site. Now dominated by large areas of parking and servicing yards this area has the capacity for significant enhancement to welcome people in and set the tone for the future of the area.



Eugene Street Character Area See Pages 86-91

Much of the Victorian streets and building fabric remain lending a unique character to this important corner site. Bridging between Old Market and Frome Gateway the regeneration of this area needs sensitivity in determining both use and scale of new buildings and innovation in the reuse and reinvention of existing structures.

Key Points

- **Tanneries Character Area**
Modern and consolidated light industrial employment spaces. Uses of strategic importance for city logistics and distribution diversifying and intensifying use
- **Peel St. Character Area**
Workshop and maker spaces at ground floor with residential above. A place for living and making
- **Eugene St. Character Area**
Community and cultural uses and workspaces at ground floor with residential above. Area of heritage interest and intimate street pattern
- **Elton St. Character Area**
Commercial and community uses at ground floor with residential above. A vibrant entry point to Frome Gateway

- River Frome
- Existing public space

Feelings of neighbourhood belonging can reduce isolation and improve mental wellbeing. This can help overcome mental health inequalities associated with socio-economic deprivation, particularly in older people.

Health Outcomes

Strategic Routes

Pennywell Rd. & Riverside Walk



Key Points

- Tanneries Character Area**
Modern and consolidated light industrial employment spaces. Uses of strategic importance for city logistics and distribution diversifying and intensifying use
- Peel St. Character Area**
Workshop and maker spaces at ground floor with residential above. A place for living and making
- Eugene St. Character Area**
Community and cultural uses and workspaces at ground floor with residential above. Area of heritage interest and intimate street pattern
- Elton St. Character Area**
Commercial and community uses at ground floor with residential above. A vibrant entry point to Frome Gateway

- River Frome
- Existing public space

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Pennywell Road Pages 69-71

Pennywell Road links Easton Way to Old Market. The road is predominantly used by vehicular traffic as a through route to the M32 and as the main servicing and access route for industrial businesses at Frome Gateway. This results in the road feeling unsafe for pedestrians, particularly for children travelling to/from local schools. As a result, Pennywell Road feels very functional with little places of interest or opportunities to stop and dwell. There is a significant difference in width throughout Pennywell Road,

which generally is narrower to the south and wider to the north.

Strategic Moves & Outcomes

As the primary character of Frome Gateway transitions from an industrial to a mixed-use residential area, the role and function of Pennywell Road must also be adapted to ensure it continues to serve the needs of the community.

- Space will be re-prioritised to create a safer environment which supports walking, cycling and community activities. A modal

filter will be used to stop through-traffic

- Development plots should positively engage with and contribute to street life
- Street greening will create a more pleasant and comfortable space and help adapt to the impacts of climate change
- Outdoor public and community spaces will be integrated to support street life and community use

Riverside Walk Pages 72-75

Riverside Walk connects St Werburgh's to Castle Park. The route passes through Riverside Park along the River Frome, although there are very few opportunities to dwell and enjoy the riverside. Channel walls along the River Frome significantly limit the visibility of the river and local wildlife. This is a strategic cycle route in/out of the city centre which shares space with pedestrians and this can cause conflict among different route users. Along Wellington Road vehicular access is provided for businesses.

Strategic Moves & Outcomes

Riverside Walk will be enhanced to create a high-quality movement route which integrates opportunities to enjoy the riverside and wildlife.

- Upgrades to the walking and cycle route will be delivered to make it easier and safer to walk and cycle while maintain servicing and access for businesses in the Elton Street Character Area

- Opportunities will be explored to enhance the ecological value of the river corridor, make the river more visible and create opportunities to stop, dwell and relax at the riverside

Strategic Routes

Newfoundland Way & East/West

Page 536



Key Points

- **Tanneries Character Area**
Modern and consolidated light industrial employment spaces. Uses of strategic importance for city logistics and distribution diversifying and intensifying use
 - **Peel St. Character Area**
Workshop and maker spaces at ground floor with residential above. A place for living and making
 - **Eugene St. Character Area**
Community and cultural uses and workspaces at ground floor with residential above. Area of heritage interest and intimate street pattern
 - **Elton St. Character Area**
Commercial and community uses at ground floor with residential above. A vibrant entry point to Frome Gateway
- River Frome
 - Existing public space
 - ➔ Primary existing and enhanced East West Route
 - - - ➔ Secondary proposed east/west routes facilitated by new bridge crossings

Newfoundland Way Pages 76-79

Newfoundland Way is very wide, strategic vehicular route connecting the M32 to the city centre. There are few opportunities to cross at street level, and a pedestrian and cycle bridge connecting Riverside Park to St Nicholas Street in St Paul's. Development plots tend to turn to face away from Newfoundland Way, adding to its very functional role which prioritises the needs of vehicles entering the city centre. This creates a harsh and noisy environment which offers an underwhelming entry point into

the city and acts as a physical and psychological barrier between St Jude's and St Paul's.

Strategic Moves & Outcomes

Regeneration at Frome Gateway will create both a larger population in the area as well as more reasons to cross Newfoundland Way. As this transition happens it's important that opportunities to enhance connectivity across Newfoundland Way are delivered to make this easier, safer and more pleasant. Enhanced crossing points will be explored both at street level and via

an upgraded pedestrian and cycle bridge.

Development plots in the Elton Street Character Area should:

- Visually enhance this gateway entrance into the city through innovative design responses.
- Positively engage with and contribute to street life along Newfoundland Way through ground-level active uses to help transition the nature of this road to more of a city street.
- Minimise exposure of residents to air and noise pollution.

East West Connection

Users travelling east-west from St Paul's to Easton or Old Market are required to cross Newfoundland Way either at street level or via the pedestrian footbridge. Only one crossing point over the River Frome means movement is generally funnelled over Peel Street Bridge and over Pennywell Road. The route is hostile and difficult to navigate, with significant differences in levels which present accessibility challenges.

Strategic Moves & Outcomes

Enhanced east-west connections are critical for better connectivity between St Jude's and St Paul's communities, which were historically severed when Newfoundland Way was constructed.

- Enhanced crossing points over Newfoundland Way will be explored both at street level and via an upgraded pedestrian and cycle bridge.
- New crossings over the River Frome will be delivered to increase permeability and

movement options. This will be done in conjunction with enhanced east-west streets such as Eugene Street to enhance navigability and ease of use.

- Pennywell Road will be upgraded to create a more pleasant and safer environment for onwards travel through to Old Market and Easton.
- Upgrades will be required to effectively deal with level changes to maximise the accessibility of this route.

Strategic Routes

Pennywell Road



Page 537

Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Peel St. Green Space

This sketch looks West through Peel Street Open Space to Riverside Park. The public space forms a key east/west pedestrian and cycle movement corridor linking St. Paul's to St. Jude's. Acting as a branch to the River Forne's Wildlife corridor the park extends nature and ecology East into St. Jude's. The 'Green branch' draws people into the regeneration area to re-engage with the river.

The park's intimate relationship to the residential Pennywell Road makes it an exciting potential location for community growing spaces.

Access to healthy and affordable food, community food growing and availability of supermarkets is shown to have associated health benefits, such as increased fruit and vegetable intake.

Health Outcomes 

Location Plan



Strategic Routes

Pennywell Road Plan



Page 538

Key

Active Frontage

- Primary Active Frontage
- - Secondary Active Frontage
- Residential Active Frontage
- // Key Active Edges

Green Public Space

- Existing Private Green Space
- Enhanced existing public space
- Proposed pocket parks

Movement

- ➔ Newfoundland Way + Easton Way Vehicular Route
- ➔ Primary movement Routes (Wider arrows indicate heavily trafficked route)
- ➔ Secondary Movement Routes
- ⋯ Segregated Cycle Corridor
- ⊘ Modal filter to restrict HGV/Service vehicle access to Pennywell Road

Environmentally sustainable and healthy neighbourhood

Pennywell road is not considered safe and pleasant to walk along by many local people. Improving the quality of the walking environment can encourage people to walk, reducing car use and increasing physical activity

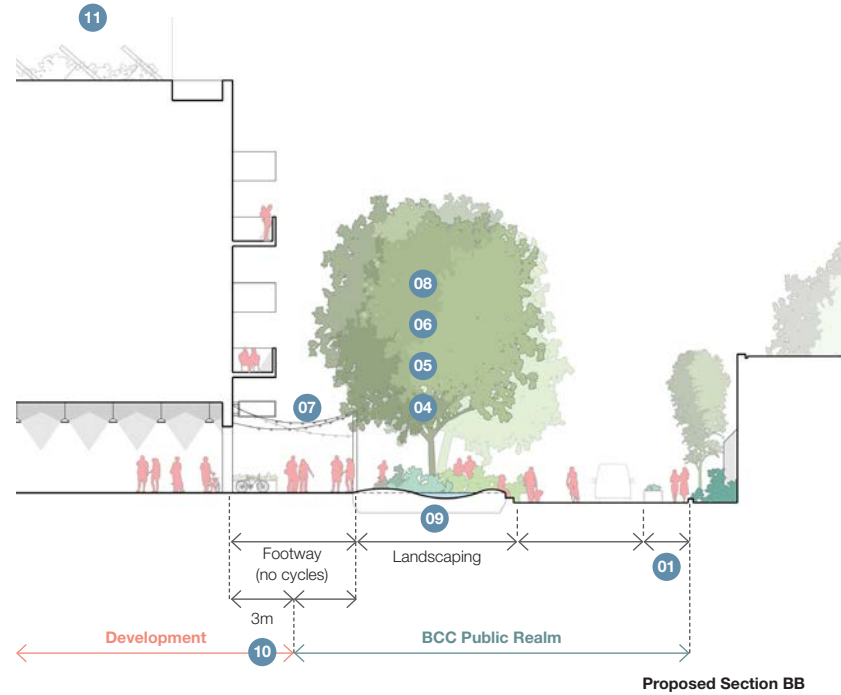
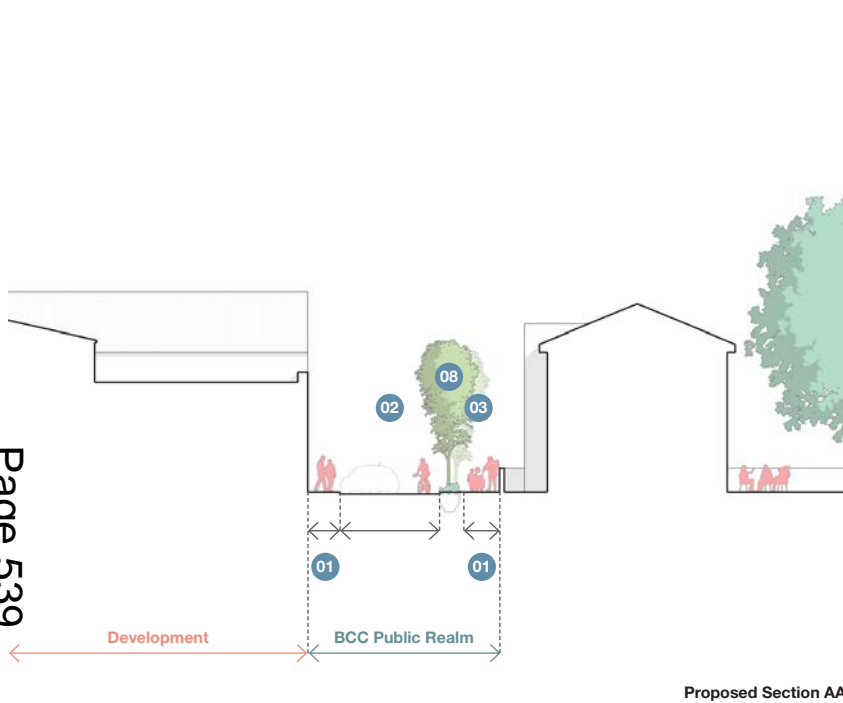
Health Outcomes ✓



Strategic Routes

Pennywell Road Sections

Page 539



Design Principles

- 1. Constrained Footways** Some constrained areas adjacent to existing buildings or walls will be unable to accommodate additional greening however a minimum width of 2m must be provided in these areas
- 2. Carriageway** Domestic traffic and limited servicing and delivery access. In areas of constrained street widths cyclist and vehicles may share a carriageway (20mph area). Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict
- 3. Enhanced Footway**, street trees, SuDs, landscaped sections and short stay cycle/scooter parking to be integrated as a buffer between carriageway and footway. 2m minimum clear footway
- 4. New linear park** along Pennywell Road will incorporate existing mature street trees and new landscaping and ecological features to soften the urban environment and create a more welcoming, human orientated environment
- 5. Mature Street Trees** must be preserved wherever possible throughout the regeneration area
- 6. Play on the Way** integrated areas for formal and informal play should be integrated into the linear park in appropriate locations that benefit from good solar orientation and passive surveillance by neighbouring residents and businesses
- 7. Linear Park Footway** Parallel to the linear park footways should be generous and provide clear access to green amenity and active frontages that will line this green space a minimum footway width of 3m clear should be provided
- 8. Urban Street Greening** Incidental spaces such as street edges and cycle parking areas should seek to maximise street greening in addition to more meaningful interventions. This will help create a variety of biophilic interventions that help build diversity and resilience in the local ecosystem. Tree planting will provide clear legibility and way finding for all users with a variety of tree types and sizes used to achieve simple understanding of the public realm
- 9. Sustainable Drainage** Climate resilient interventions through a series of SuDS such as rain gardens, connected tree pits for storm water storage and attenuation features will form an integral part of the function and aesthetics of the public realm
- 10. Development Set-Back Area** A 3m minimum set-back from ownership boundary to building line must be provided to allow for outboard balconies, ground floor breakout and defensible spaces and additional urban greening. This space will contribute to a more generous public realm enhance the wider appeal of Pennywell Road
- 11. Biodiverse Roofs** Maximise biodiversity across development plots and wider site area. Biodiverse roofs can create important unique habits for birds and insects and contribute to the wider ecosystem. Roofscape composition and the integration on on-site energy generation should factored into develop proposals from an early design stage



Strategic Routes

Riverside Walk



Page 540

Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Riverside Walk

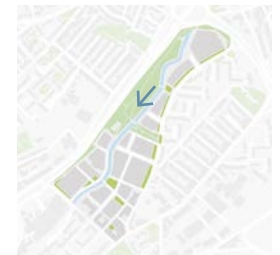
This sketch looks south along the main strategic pedestrian and cycle route that leads to the heart of the city centre. Riverside walk is a key arterial route for commuters in the city. The park will now be transformed into a much loved destination.

Providing new spaces where the public can enjoy the river and wildlife corridor. South facing aspect on the river should be celebrated with barriers removed and the river opened up for everyone to enjoy.

Pedestrian and cycle routes will be enhanced with more opportunities to stop and enjoy both the river and the park. New thresholds will be created separating cyclists and pedestrians increasing safety for all.

Park edges should be activated by cafés, restaurants, community uses and leisure offerings at ground floor to provide a destination for all the surrounding communities to enjoy.

Location Plan



Strategic Routes

Riverside Walk: Plan



Key

Active Frontage

- Primary Active Frontage
- Secondary Active Frontage
- Residential Active Frontage
- Key Active Edges

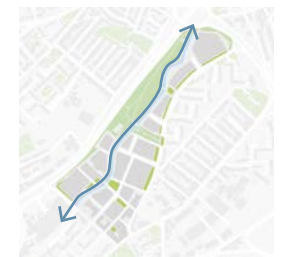
Green Public Space

- Existing Private Green Space
- Enhanced existing public space
- Proposed pocket parks

Movement

- Newfoundland Way + Easton Way Vehicular Route
- Primary movement Routes (Wider arrows indicate heavily trafficked route)
- Secondary Movement Routes
- Segregated Cycle Corridor
- Modal filter to restrict HGV/Service vehicle access to Pennywell Road

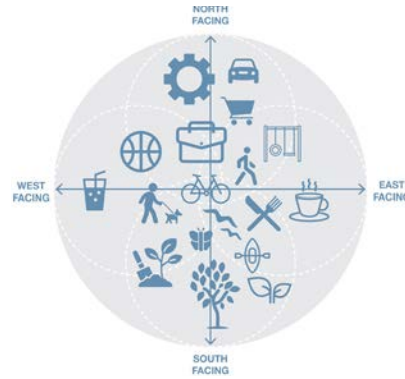
Location Plan



Strategic Routes

Riverside Walk: Solar Study

As the central ecological and movement corridor of the Regeneration area the River Frome offers great potential for future development. This section looks at the varying daylighting conditions of the river and suggest potential uses that could enhance areas of public realm. Ground floor uses are a guide for developers only and must first align with the employment strategy set out in this document.



Key

- **North Facing:** Shaded Riverbank
- **South:** Maximum Sunlight
- **East:** Morning Sunlight
- **West:** Afternoon/Evening Sunlight

Note:
The uses described are explored as a guide for developers, a variety of Ground floor activities may be explored in all Character Areas

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River Frome Key Section:

■ **North Facing Banks: Shaded**

- Peel Street & Eugene Street Character Areas** encourage night time activity and positively engage with the River Frome. Restaurants, cafés and community uses. Wildlife corridor should be preserved with emphasis on appropriate lighting and noise levels to support ecology
- **Tanneries Character Area** opportunity to encourage evening & night time activity potential for music venues/bars/restaurants in the industrial heart of the regeneration area
 - **Peel St. Open Space** the park space may offer north facing habitats for ecology including darker spaces for bats, nesting birds and small mammals

■ **East facing banks: Morning Sunlight**

- **Elton St. Character Area** cafés, restaurants and spaces to dwell that engage with the river. Pocket parks with green open space for dog walkers and playgrounds for children
- **Riverside Park** may provide sport amenity, green and blue infrastructure for dog walkers, playgrounds and places to rest while actively engaging with the river

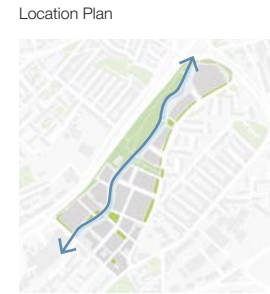
■ **South facing banks: Maximum Sunlight**

- **Elton St. Character Area** opportunity for pocket parks and green/blue amenity promoting the River Frome wildlife corridor. Significant opportunity for substantial landscaping and habitat creation for a variety of species.

- **Riverside Park** opportunity to deliver significant green and blue infrastructure. Potential to step down to the river and create spaces to dwell for long periods of time that engage with the wildlife corridor and River Frome. May also provide community grow spaces, sport amenity, playgrounds, wildlife conservation habitats and green open space for play/rest/socialising.

■ **West facing banks: Afternoon Sunlight**

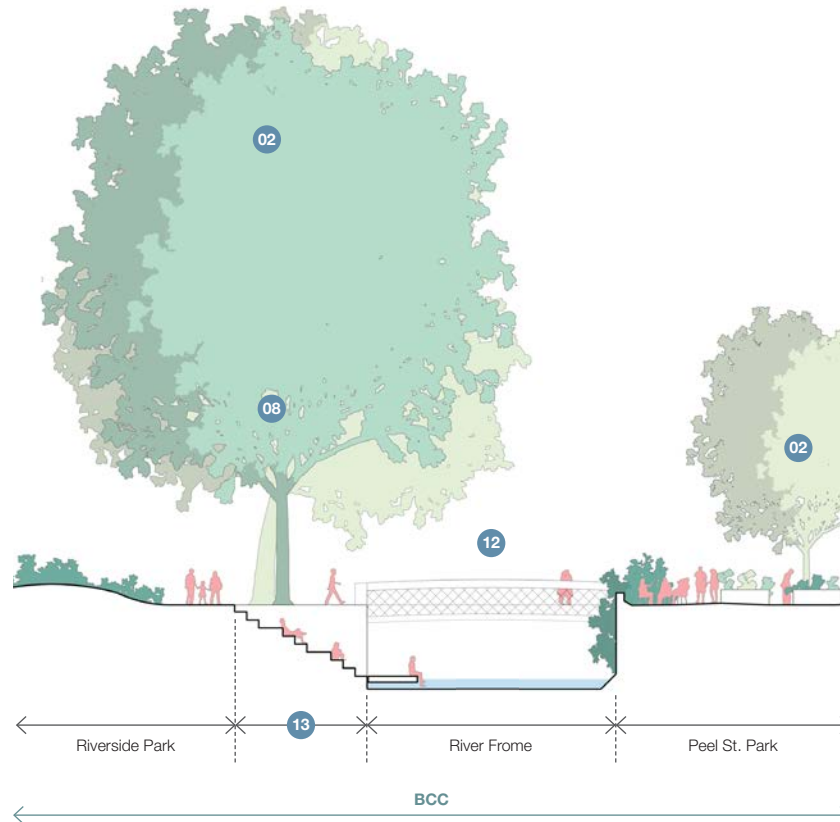
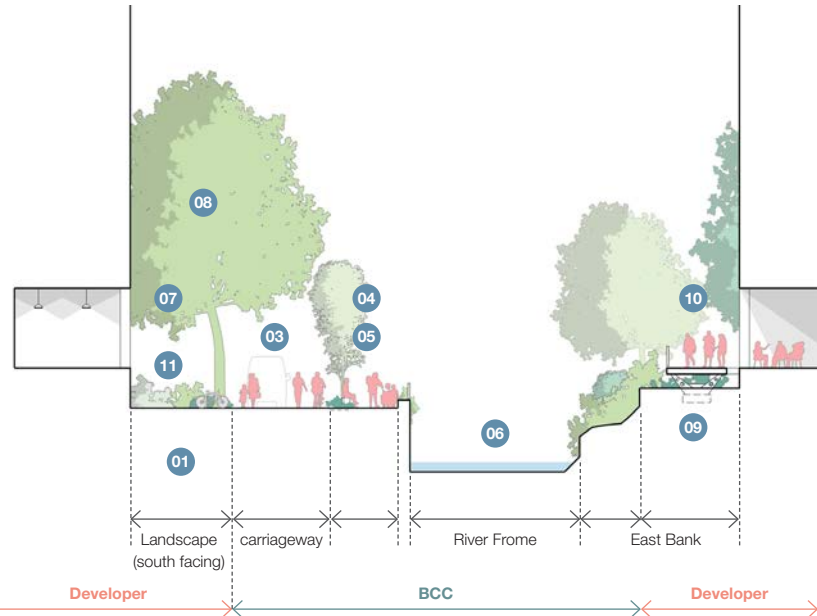
- **Peel St. & Tanneries Character Areas** opportunity for pocket parks, green infrastructure for dog walkers, sports amenity, playgrounds, restaurants, cafés, bars.



Strategic Routes

Riverside Walk: Sections

Page 543



Design Principles

1. Wellington Road Development Set-Back Area

The southern portion of Wellington Road must be a generous and accessible piece of public realm that invites people into Frome Gateway. New buildings should set back from their boundary to accommodate defensible space, balcony overhang areas and landscape contributions to the public realm including SuDS, tree planting and highways infrastructure such as taxi drop-off areas

2. A Green Gateway Use public realm, green and blue infrastructure interventions to aid way finding

3. Shared Route A combined shared vehicular and active travel route with materials and details that promote slower speed vehicle movements such as cobbles, stone or brick

4. Pedestrian Route Footway buffer will integrate trees, SuDS, landscaped sections and short stay cycle/scooter parking to be integrated as a buffer between shared route and footway. 2m minimum clear footway. This surface should be smooth to provide minimal disruption to push-chairs, wheelchairs and other mobility aids

5. River Promenade The edge will be recalibrated to enhance the

visual and physical connection to the water while enhancing and protecting the wildlife corridor

6. River Frome Enhance ecological recovery in the River Frome by nurturing and diversifying habitats.

7. Urban Street Greening Incidental spaces should seek to maximise street greening in addition to more meaningful interventions. This will help create a variety of biophilic interventions that help build diversity and resilience in the local ecosystem. Tree planting will provide clear legibility and way finding for all users with a variety of tree types and sizes used to

achieve simple understanding of the public realm

8. Mature Street Trees Must be preserved wherever possible throughout the regeneration area

9. Riverside Boardwalk Promotes public engagement with river. If elevated may provide flood evacuation routes for several development plots. However, developers are not limited to a boardwalk solution and should explore a range of flood mitigation strategies (see pages 55-58)

10. River Frome Wildlife Walk The southern bank of the Frome is home to diverse and established

habitats that contribute to the sense of tranquillity along the river corridor. This must be preserved and should be made publicly accessible with development being set back from the bank by between 5-10m subject to site specific conditions and constraints

11. Sustainable Drainage Climate resilient interventions through a series of SuDS such as rain gardens, connected tree pits for storm water storage and possible attenuation features will form an integral part of the function and aesthetics of the public realm and green infrastructure strategies

12. Peel Street Bridge Footbridge to be retained and enhanced as a key destination and way finding marker at the confluence to two primary movement routes

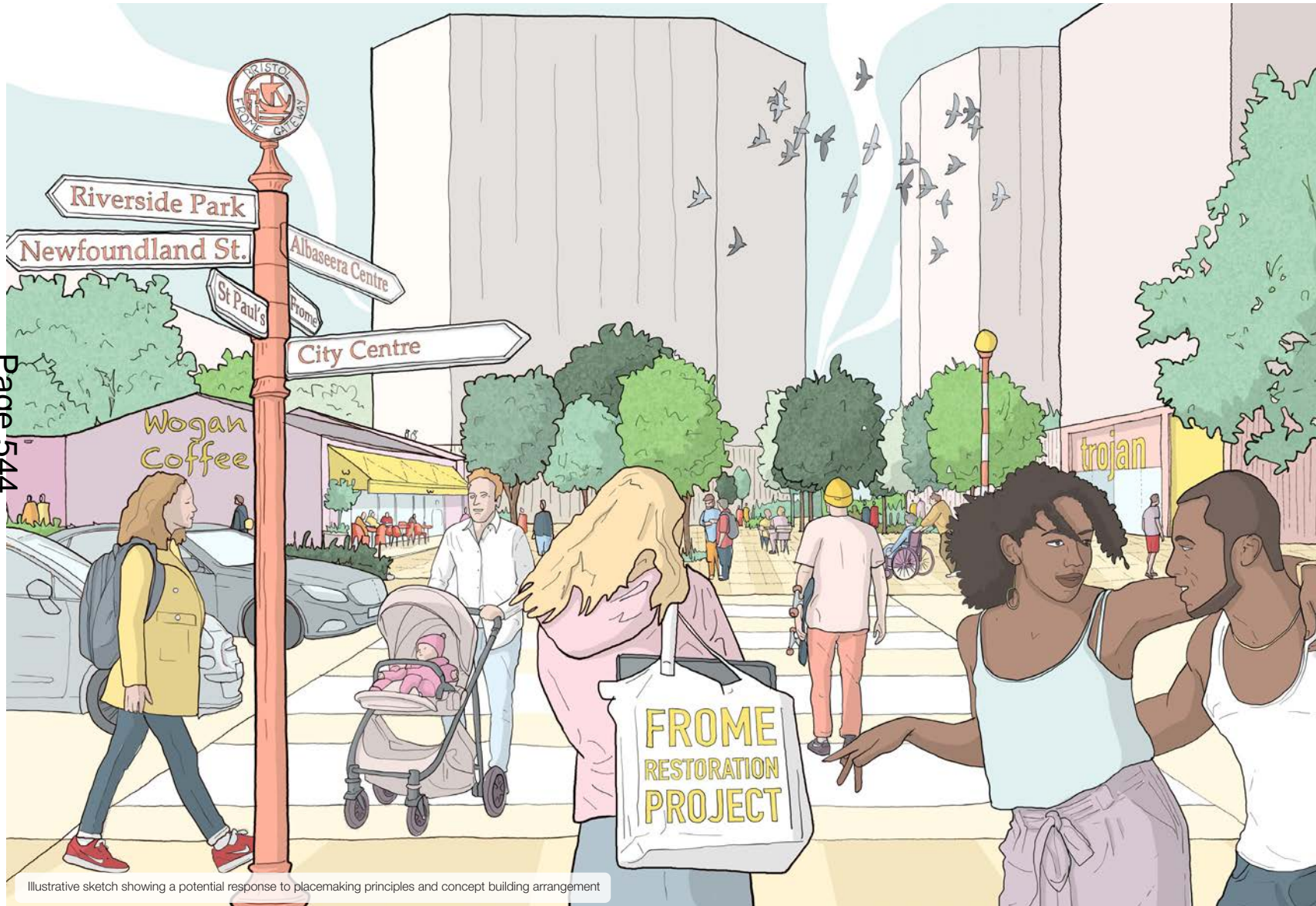
13. Engaging with the River Frome Potential for street furniture / placemaking features to increase accessibility to water. South facing aspect creates an attractive destination to engage with and observe the wildlife corridor for longer periods of time. Offers potential for water activities subject to separate studies

Location Plan



Strategic Routes

Newfoundland Way



Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Newfoundland Way Crossing

This sketch looks east across the re-imagined Newfoundland Way towards a new arrival point overlooked by the existing Wogan Coffee Roastery and Café. This new pedestrian and cycle crossing for Newfoundland Way will provide much needed east/west permeability and connections to St. Paul's and St Jude's. Newfoundland Way is now considered a street to be activated with ground floor uses and reanimated by landscape and planting.

As a green gateway to the regeneration area this space provides the public with places to rest, eat, work and play. Hard landscaping will create a more formal public square but will also be softened by tree coverage and planting to reduce urban heat island effect. The green amenity will act as a branch to the wildlife corridor of the River Frome bringing people into the heart of the regeneration area to re-engage or discover the river for the first time.

Location Plan



Strategic Routes

Newfoundland Way: Plan

Page 545



1. Potential relocation of local community assets
 2. Existing Mixed Use Games Area (MUGA) must be enhanced to support health benefits for local communities. Participating in sport aids social cohesion for local population
 3. Community uses at ground floor
 4. Affordable workspace in existing buildings

Diverse and inclusive communities

5. No residential development at ground floor
 6. High density residential development close to city centre increases active travel and positively impacts sustainability goals

New homes, community space and leisure

7. Placemaking opportunity: Locally listed & historic buildings should be retained and celebrated
 8. Historic river wall should be maintained and repaired

Establishing and celebrating identity and place

9. Natural surveillance from active frontage and residential development reduces risk of crime and anti-social behaviour in public spaces
 10. Enhanced lighting along key routes increases footfall and therefore safety. More residents using green spaces will positively impact health outcomes

Friendly streets and spaces for all

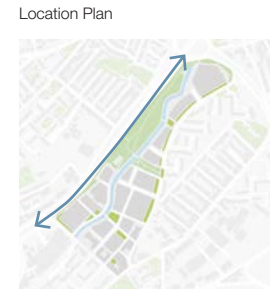
11. Green infrastructure creates barrier to noise and air pollution from major vehicular routes
 12. Enhance Riverside Park to encourage landscape for play, socialising, growing and exercise
 13. Must retain mature trees in Riverside Park
 14. Street greening reduces urban heat island effect
 15. Sustainable drainage proposed for key routes
 16. Potential Location for new DHN Energy Centre

Environmentally sustainable and healthy neighbourhood

17. Existing at grade crossing enhanced
 18. Pedestrian focused area
 19. Enhanced at grade Pedestrian & Cycle crossing
 20. New active bridge to improve pedestrian and cycle movement
 21. Enhanced Subway Crossing
 22. Threshold between pedestrian and cycle routes must be carefully considered to reduce conflict

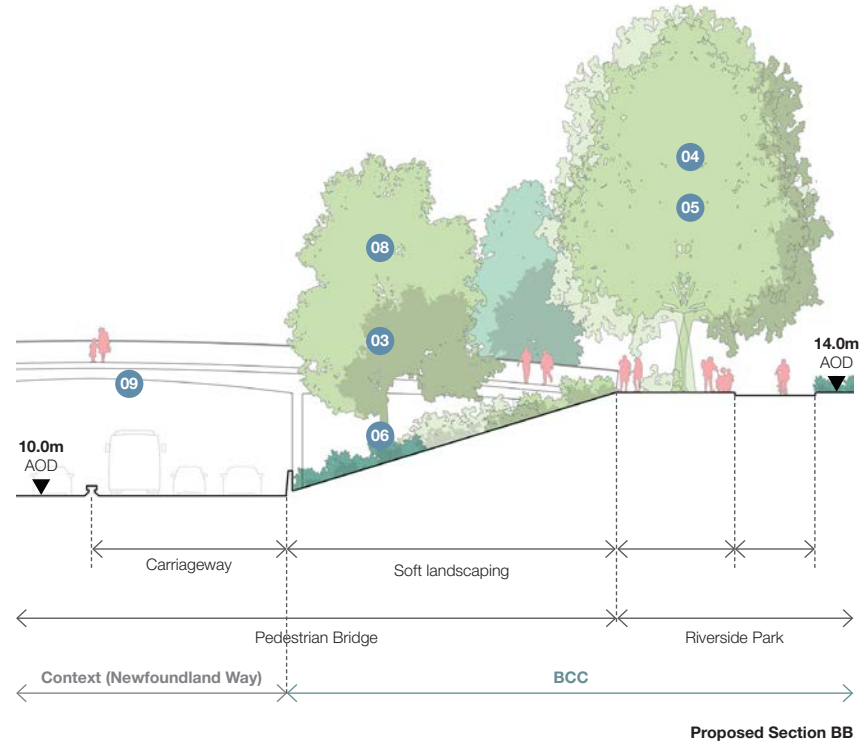
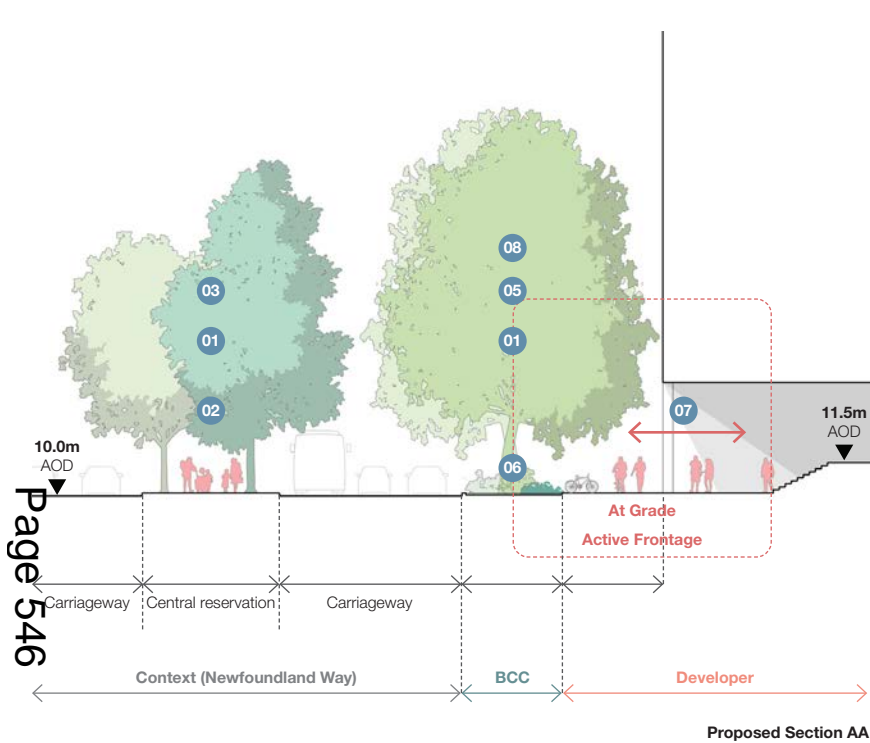
Better Connectivity and Transport

- Key**
- Active Frontage
 - Primary Active Frontage
 - Secondary Active Frontage
 - Residential Active Frontage
 - Key Active Edges
 - Green Public Space
 - Existing Private Green Space
 - Enhanced existing public space
 - Proposed pocket parks
 - Movement
 - Newfoundland Way + Easton Way Vehicular Route
 - Primary movement Routes (Wider arrows indicate heavily trafficked route)
 - Secondary Movement Routes
 - Segregated Cycle Corridor
 - Modal filter to restrict HGV/ Service vehicle access to Pennywell Road
 - Public Space
 - 01 Newfoundland Linear Park
 - 02 Riverside Park
 - 03 Junction 3 Subway Landscape
 - 04 Clement St. Pedestrian Area



Strategic Routes

Newfoundland Way: Sections



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Design Principles

1. Re-Greening of the Highways

While technically outside of the Frome Gateway study area the future ambition for Newfoundland Way is to reduce vehicle numbers, reduce the carriageway widths and introduce street greening to create a more inviting route into the city

2. Enhanced Pedestrian Crossing

A new at grade crossing across a reduced Newfoundland Way linking to St Paul's would dramatically improve connectivity to Frome Gateway linking it more closely to neighbouring communities and amenities

3. Urban Street Greening

Incidental spaces should seek to maximise street greening in addition to more meaningful interventions. This will help create a variety of biophilic interventions that help build diversity and resilience in the local ecosystem. Tree planting will provide clear legibility and way finding for all users with a variety of tree types and sizes used to achieve simple understanding of the public realm

4. Mature Street Trees

Must be preserved wherever possible throughout the regeneration area

5. A Tree Lined Promenade

Existing and new trees run parallel to Newfoundland Way creating a natural buffer between the carriageway and development plots. This creates a set back, attractive corridor that should be animated with active frontages and public amenity

6. Sustainable Drainage

Climate resilient interventions through a series of SUDS such as rain gardens, connected tree pits for storm water storage and possible attenuation features will form an integral part of the function and aesthetics of the public realm and green infrastructure strategies

7. Active Edges

Buildings in this location sit in Flood Zone 3. Flood mitigation measures will be required in accordance with building use, Local Authority and Environment Agency review. However active street edges are desirable to create dynamic, attractive and accessible buildings that contribute to the public realm. Where possible buildings should provide at grade access from the street

8. Newfoundland Way Ecological Buffer

The interface between Riverside Park and Newfoundland Way is defined by a dense and well established ecological area comprised of mature trees and well established shrubs and grasses. This area provides vital habitat for numerous species and helps protect Riverside Park from noise and air pollution generated on Newfoundland Way. This area should be made more inviting and accessible with better maintained foot and cycle paths and improved wayfinding

9. Newfoundland Way Active Travel Bridge

New active travel bridge to make it easier for pedestrians and cyclists to cross Newfoundland Way and better connect Frome Gateway to St Paul's and St Agnes. This should include segregated space for pedestrians and cyclists. A new bridge provides the opportunity to redefine the experience of people arriving into the city via Newfoundland Way

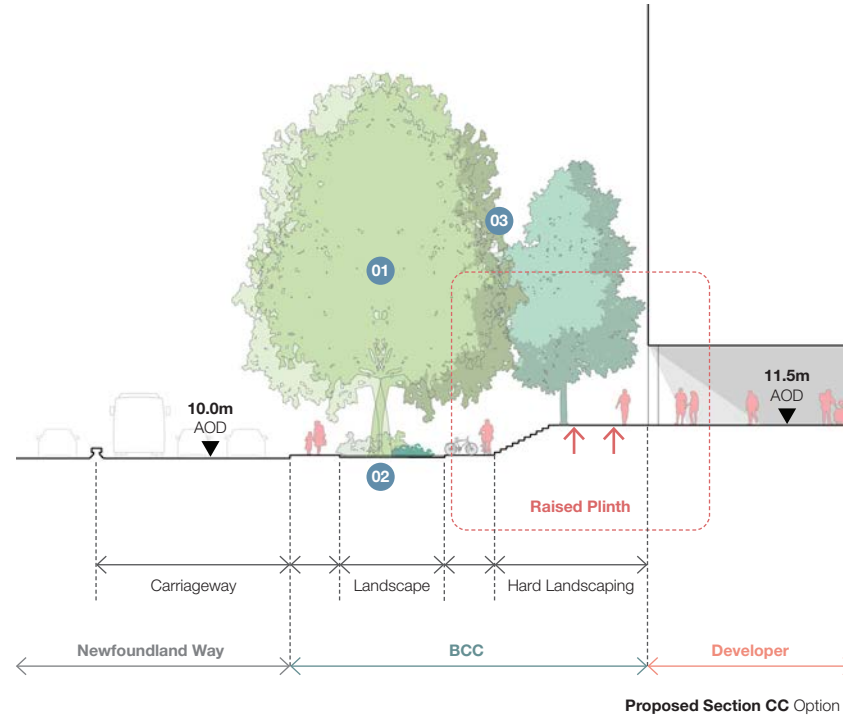
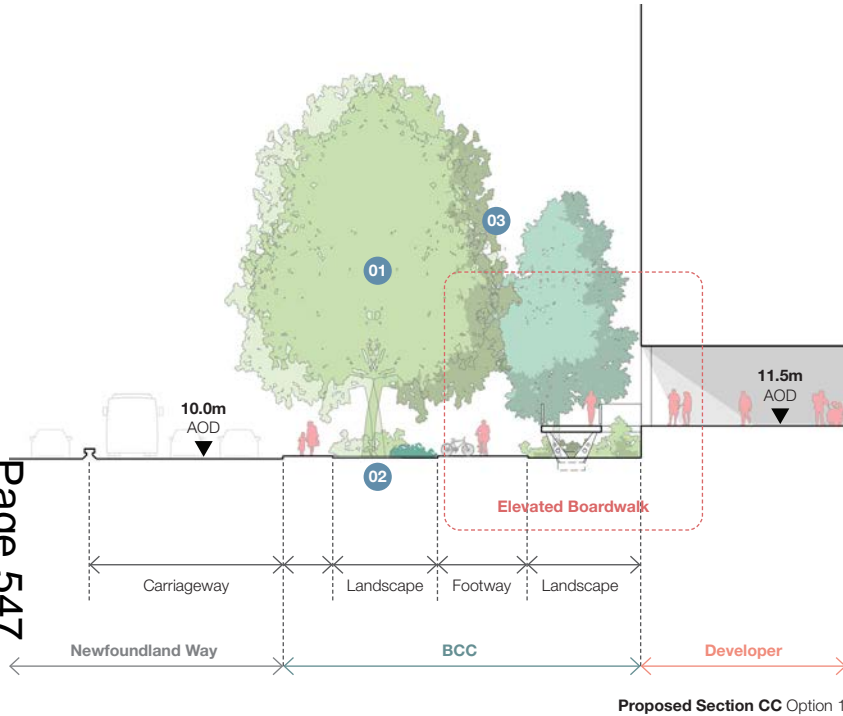
Location Plan



Strategic Routes

Newfoundland Way: Sections

Page 547



Design Principles

The section drawings above show two approaches to flood infrastructure that may be applied to Frome Gateway.

Option 01 shows an approach that proposes a lightweight designed elevated boardwalk solution.

Pros:

- Placemaking opportunities to incorporate play
- Provides safe egress in a flood event (smaller footfall capacity than opt. 02)
- Lightweight solution - less intervention required

- Cheaper solution compared to option 2

Cons:

- Less active frontage for development limits placemaking opportunities and reduces natural surveillance over public space
- Creates a barrier to movement
- Perceived as a more significant level change in the landscape



Option 02 shows an approach that would raise the landscape surrounding development above flood level.

Pros:

- More active frontage
- Fewer barriers to movement
- Perceived as a smoother transition across level changes
- Placemaking opportunities in raised landscape (planting, stepped seating etc.)
- Provides safe egress in a flood event (significantly more footfall capacity than opt. 01)

Cons:

- More expensive solution
- Greater intervention required
- Potential to disturb more polluted ground

Landscape Design Principles

- 1. Urban Street Greening** To comprise a variety of biophilic interventions within the highway boundary. Tree planting will provide clear eligibility and way-finding for all users using a variety of tree types and sizes to achieve simple understanding of the public realm.
- 2. Sustainable Drainage** Climate resilient interventions through a series of SuDs such as rain gardens, connected tree pits for storm water storage and possible attenuation features will form an integral part of the function and aesthetics of the public realm and green infrastructure strategies
- 3. Newfoundland Linear Park** Urban greening, informal planting, rewilding and tree planting must be considered to create a barrier to noise and air pollution from major vehicular routes

Location Plan



Elton Street Character Area

A Marker of Urban Regeneration

This prominent corner of the Frome Gateway area has a direct connection to the City Centre and signposts the regeneration area.

There is significant opportunity to create a new 'front door' to Bristol that demonstrates how higher density residential buildings can contribute to a dynamic, inclusive public realm.

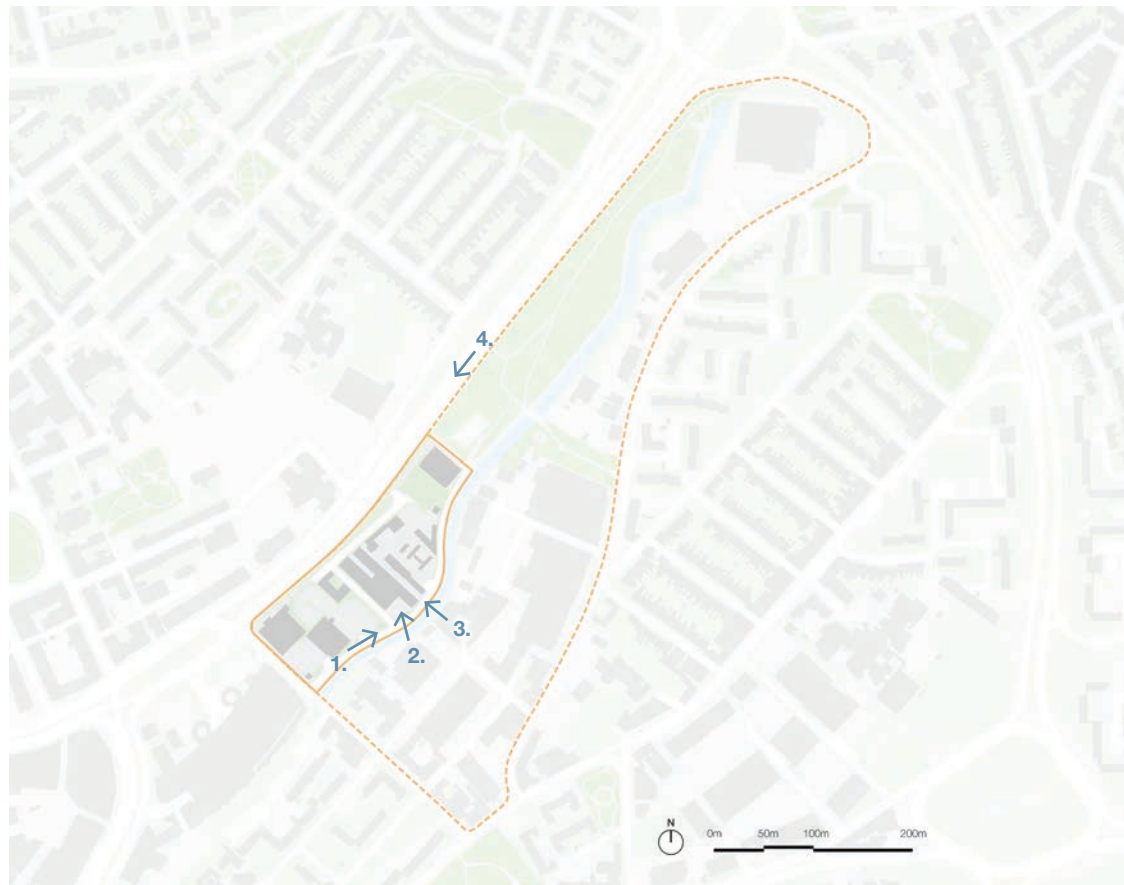
The Depot site provides an important development opportunity for BCC to deliver against the regeneration objectives, but there are locally listed buildings on a small portion of the site which provide the opportunity to retain and enhance local character and identity.



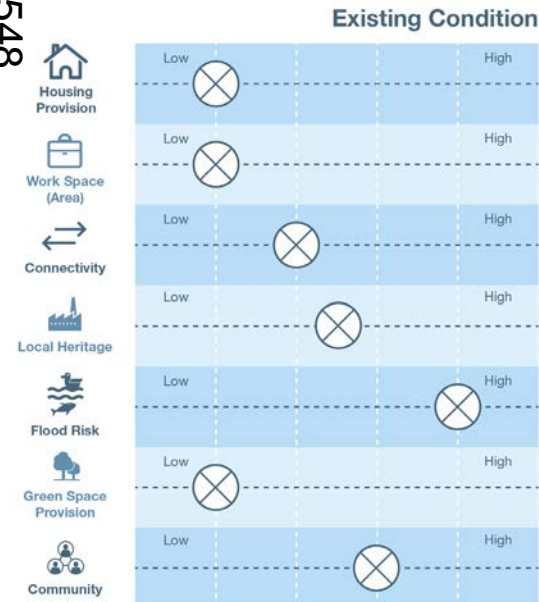
Key Points

- River Frome
- Existing enhanced public space
- Green Space (Other)
- Existing Buildings
- Character Area
- - - Regeneration Area

1. The River Frome - improve access to the river as a key piece of public amenity
2. Wogan Coffee - retain & enhance local businesses and community assets
3. Heritage & Identity - retention and refurbishment is encouraged on Depot site
4. Newfoundland Way - an opportunity to redefine a gateway to the city



Elton St. Character Area, 'Sliding Scale Diagram'



"This is a lovely addition to the space - I like to walk past the Frome smelling the coffee roasting here"

Place Principle:
Diverse and inclusive communities



Note:
The sliding scale diagram represents the existing condition of the character area. The topics focus on important themes for future development to consider. The sliding scales should be used to compare the existing condition across the character areas.

Elton Street Character Area

Defining the Urban Block

This page sets out the key features of the Elton Street Character Area. All design proposals are linked to one or more Community Place Principles (more info p.30). The sketch is not true to scale and should be considered an artist impression of the regeneration vision.

1. Community Use at Ground Floor

Community amenities should be appropriately sized and well located in prominent positions with good outlook and aspect.

2. Higher Density Living The Elton St. Character Area area is suitable for higher density living. Key considerations should include:

- Dual aspect living
- Architectural design response to mitigate impact of air/noise pollution from Newfoundland Way

Views to Riverside Park and the River Frome

- Inset balconies on all buildings over 30m
- Maximum public and community benefit at ground floor
- Sensitivity to overshadowing and heritage views
- Significant biodiversity and building performance targets

3. Improve Site Accessibility

Enhance all routes into and across the site to address issues of severance. These improvements should include:

- New at grade crossing on Newfoundland Way.
- New pedestrian/cycle bridges at appropriate locations over River Frome.

- Upgrade/replacement of Newfoundland Way footbridge

4. Engage with Heritage & Identity Work with existing characterful buildings to create a sense of place and identity.

- Existing buildings in this location are well suited to being retained and/or re-purposed as community and employment spaces

- No listed buildings in the regeneration - opportunity to innovatively extend and reinvent existing structures

5. River Frome Promenade

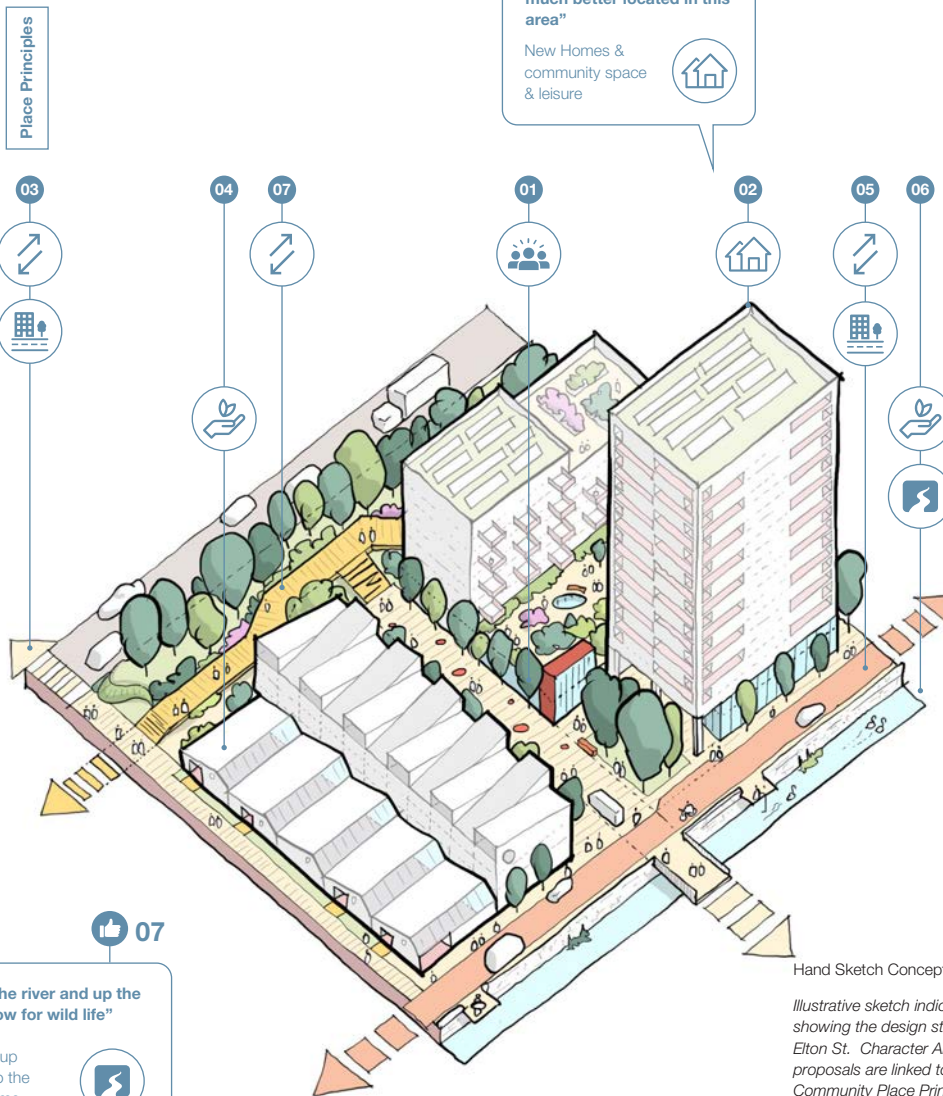
Wellington Road to be opened up as a key public promenade that contributes to wayfinding, pedestrian and cycle movement, servicing and access to the River Frome.

- Wellington Rd. to support higher volumes of pedestrian and cycle traffic while also accommodating vehicular movements and servicing

- Public spaces should be well located, appropriately sized and take into consideration aspect, outlook and emerging developments

6. River Restoration All schemes should contribute positively to the wider improvement of the waterway as a vital ecological corridor and major piece of public amenity.

7. The Boardwalk This potential elevated pedestrian route would provide a generous walkway with pockets of landscaping, play space and habitat areas in the existing 'green buffer' between the site and Newfoundland Way. The Boardwalk would provide a strategic flood evacuation route connecting to Riverside Park. Residential developments would provide a direct access to this potential piece of infrastructure.



"Clean the river and up the water flow for wild life"

Opening up access to the River Frome

"High rise buildings are much better located in this area"

New Homes & community space & leisure

Key Points

Community Place Principles:

- New homes, community space and leisure
- Diverse and inclusive communities
- Friendly streets and spaces for all
- Establishing and celebrating identity and place
- Environmentally sustainable and healthy neighbourhood
- Opening up access to the River Frome
- Better connectivity and transport

"The M32 is like a tunnel - please connect the communities across it better. I don't want to lose the green space and I actually like the industrial structures close-by - they are part of the fabric, identity and character of the place"

'wishing Penny well'
Project Report 2022

Location Plan



Hand Sketch Concept Tile

Illustrative sketch indicatively showing the design strategy for the Elton St. Character Area. All design proposals are linked to one or more Community Place Principle (more info p.30). The sketch is not true to scale and must be considered an artist impression of the regeneration vision.

Elton Street Character Area

Strategic Maps

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Animated, fully accessible riverside



Inviting public realm and street



Accommodate community assets



Green Space

As an area with the potential for a higher density greater emphasis should be given to maximising the enhancement to green space. This should be done in the wider urban realm to increase public benefit as well as within individual development plots.

A minimum biodiversity net gain of 10% on all development plots will be required to address key community and environmental targets.

Particular enhancements to the Elton St. Character Area should address the River Frome and Newfoundland Way frontages primarily. The opportunity to redefine the relationship with Riverside Park will also be of vital importance

Development will be expected to contribute additional public, communal and private external amenity

Key

- **Elton Street Character Area** Residentially led mixed use with commercial and community accommodation
- River Frome
- New public green space
- Existing enhanced public space
- Development Footprint
- Maximum greening: Green infrastructure priority over parking, service bays etc.
- - - Base level greening: Planting Corridors, Rain Gardens, SuDS, Street Trees
- ▨ Development Offset
- ▨ Key River Junction
- ➔ Primary Route
- ➔ Secondary Route
- ♥ Placemaking Opportunity



Wellington Rd. - Existing Trees



Engage with and improve the river



Re-greening of post industrial sites

6. Redefine edge condition along Houlton Street working with existing trees to establish a more generous footway
7. Create offset from River Frome working with existing trees to create new south facing public space overlooking the river
8. Enhance green buffer along Newfoundland Way to mitigate noise and air pollution
9. Integrate high quality potential raised boardwalk as key piece of public amenity and potential strategic flood evacuation infrastructure
10. Enhance overlooking and interface with play space



"I like the trees that were planted in the carriageway of the dead-end part of Wellington Road - they tell a story of road use changing and improving with time"

Place Principle:
Establishing and celebrating identity and place

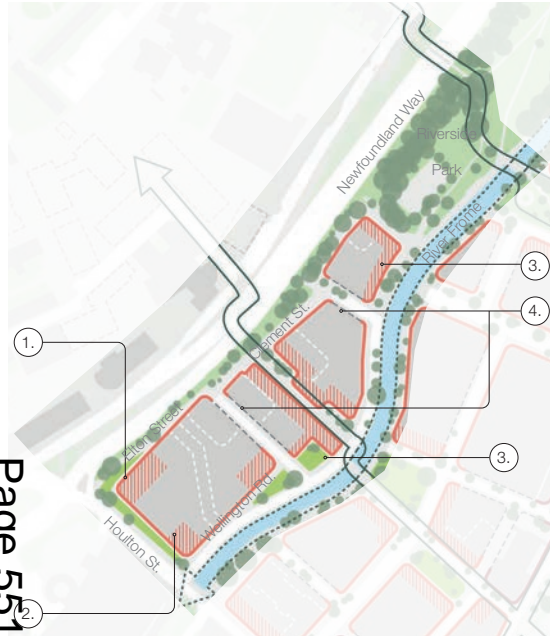


Location Plan



Elton Street Character Area

Strategic Maps



Page 551

Active Frontage

The Elton Street Character Area should accommodate a high proportion of residents and will be an important destination within the regeneration area and the wider city.

Active building edges should engage with primary and secondary streets to contribute to a vibrant public realm that is well used throughout the day and evenings.

Level access to buildings should be provided with level changes required by flooding to be accommodated as part of the landscaping approach where possible.

Servicing should be considered with neighbouring developments in mind to minimise impact on public realm.



Active uses that enliven the streets



Building entrances meet the ground

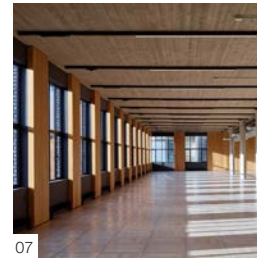


Level changes in landscape

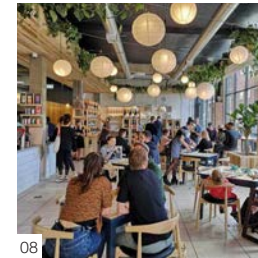
1. At grade access to buildings to be provided where possible to maximise activity and access
2. Sacrificial ground floor uses should be considered in some areas to manage flood risk
3. Active building edges should address areas and aspect with the greatest placemaking potential
4. Building servicing areas should be logically located to serve numerous developments to limit impact on wider public realm and infrastructure



05



07



08



06

Employment

With a direct connection to Bristol's commercial centre the Elton St. Character Area has the potential to extend this economic area.

The residential accommodation that is suggested here could be complemented by a range of employment spaces ranging from lightly refurbished, lower cost creative workspaces, businesses incubator space and typical office space for smaller local companies to grow into as their business evolves.

The new residents will also need new community infrastructure and should include an amount of hospitality and amenity uses with their associated employment needs.

5. Wiper & True Brewery, Adaptive re-use of heritage buildings in St. Wherburgh's, Bristol
6. Cafe Kino. Stokes Croft, Bristol - F&B active frontage at Ground floor of office building
7. Typical office accommodation
8. Bristol Loaf, Bedminster Cafe

Key

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Active Frontage
- Servicing Area
- Key Active Frontage Area

Location Plan



Elton Street Character Area

Strategic Maps

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Integrated modes of travel

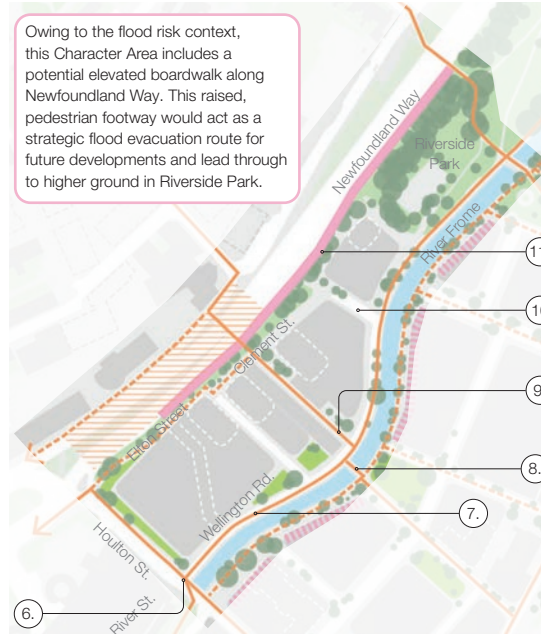


Responds to street hierarchy



Innovative new road crossing

1. Proposed location for at-grade crossing over Newfoundland Way
2. River Street to Wellington Rd. - important pedestrian and vehicular threshold leading to the Riverside Promenade
3. Wellington Rd. provides service access to development plots
4. Generous public space with integrated taxi drop-off and other active travel facilities
5. Active travel route - no public vehicular access



Movement: Pedestrian & Cyclist

Wellington Road will become a shared pedestrian promenade that encourages engagement with the River Frome as a vital piece of public amenity and biodiversity corridor. Primacy will be given to pedestrian and cycle movement along this route. This routes forms part of the strategic cycle route running from Easton & St. Werburgh's to the City Centre.

The at-grade crossing on Newfoundland Way will be enhanced along with a new active travel bridge over Newfoundland Way (to replace the existing pedestrian bridge) to improve links between Frome Gateway and St. Paul's. A new pedestrian and cycle bridge over the River Frome here would increase east-west permeability however care must be taken to minimise conflict between pedestrians and cyclists at this junction.

Key

- Development Footprint
 - River Frome
 - Proposed Public Space
 - Existing enhanced public space
 - Road**
 - Primary Street**
 - Secondary Street**
- For full road/street definitions see vehicular movement map p.45*
- Primary Ped. Route
 - Secondary Ped. Route
 - Potential Elevated Boardwalk (Flood Evacuation Route)
 - Proposed at grade crossing
 - Development Offset



Elevated pedestrian boardwalk



Potential new bridge links



Waterside cycle & pedestrian route

6. River Street to Wellington Rd. - important pedestrian and cycle threshold leading to the Riverside Promenade
7. Southern portion of Riverside Promenade (Elton St. section) to combine vehicular, cycle and pedestrian movement with low speeds and shared carriageway measures
8. Potential new pedestrian bridge location
9. Secondary pedestrian/cycle route through active public area
10. Tertiary link
11. Potential elevated boardwalk through green landscaped buffer

Location Plan



Elton Street Character Area

Riverside Walk Looking North

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Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Wellington Road

This sketch looks North along Wellington Road to the Riverside Promenade. The central corridor of ecology, movement, and amenity runs through the whole site linking Easton to the City Centre.

This area is a true gateway into the regeneration area and could offer a fantastic array of active ground floor uses with a south facing aspect over the River Frome.

New buildings could be arranged to maximise views and sunlight onto the river corridor with opportunities to increase site access by creating new crossing points at key locations.

Sections of the river wall could be strategically removed to improve visual access to the water and wildlife.

Location Plan



Eugene Street Character Area

Stitching into Old Market

The Eugene Street Character Area, more than any other areas, retains a strong sense of the Georgian industrial and residential street pattern. A number of characterful heritage buildings such as Globe House and the former Malthouse contribute to the identity and heritage of the area.

This area is proposed as a residentially led, mixed-use area with an emphasis on ground floor community and cultural uses and smaller scale employment and workshop spaces.

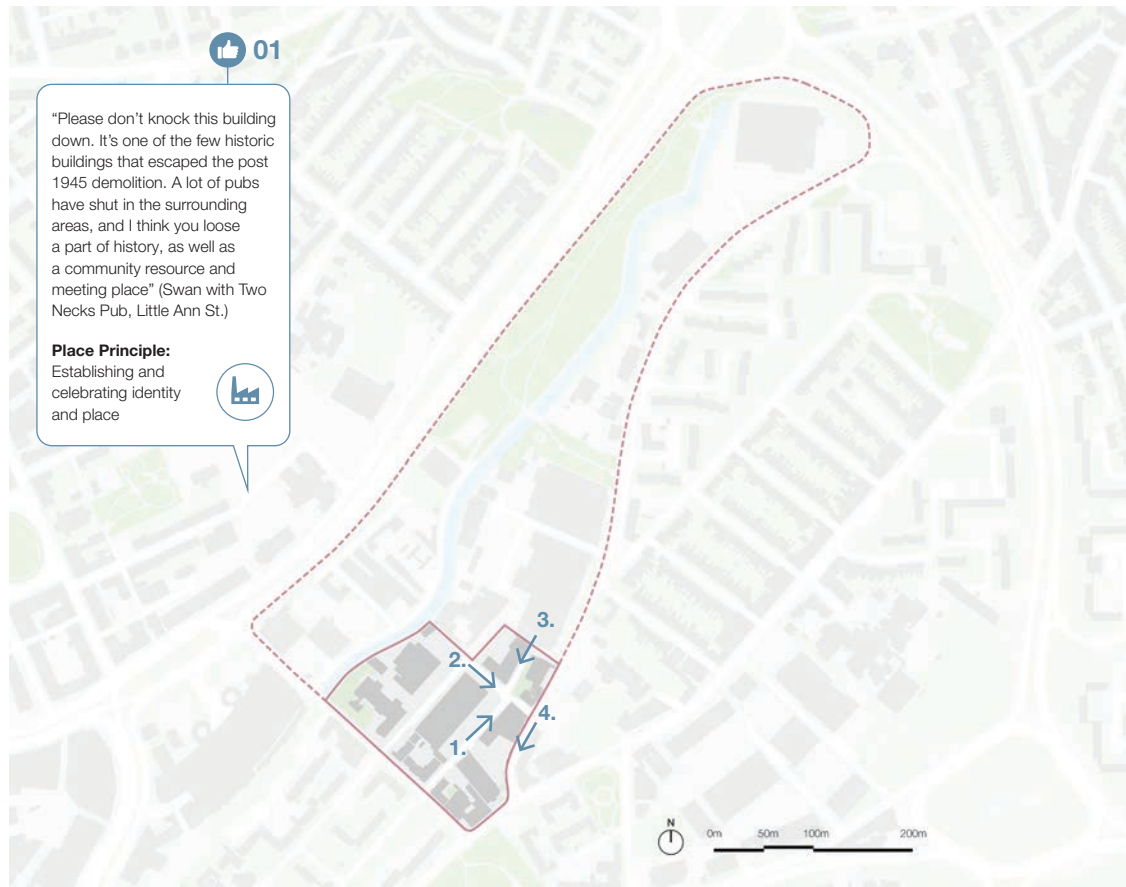


Key Points

- River Frome
- Existing enhanced public space
- Green Space (Other)
- Existing Buildings
- Character Area
- Regeneration Area

1. Globe House & The Vestry - characterful buildings on Eugene Street
2. Eugene St. - Jam Jar Independent Music and Arts Space & former Malthouse
3. Vestry Lane. - view to Little Anne St.
4. Pennywell Rd. - view south

Eugene Street Character Area, 'Sliding Scale Diagram'



Note:

The sliding scale diagram represents the existing condition of the character area. The topics focus on important themes for future development to consider. The sliding scales should be used to compare the existing condition across the character areas.

Eugene Street Character Area

Defining the Urban Block

1. Community, Cultural & Employment Spaces

Generous ground floor volumes could accommodate a range of community, cultural and employment spaces to address and animate the streets.

Key routes are identified to provide flexible servicing to a range of building uses while also contributing to the public realm and green infrastructure. At ground floor key aims include:

- Creating active frontage to key routes that positively impact the public realm and contribute to passive surveillance
- Provide logical service routes that are integrated into the wider public realm and blue/green infrastructure without negatively affecting the pedestrian experience

Integrate significant street trees and SuDS to help manage microclimate effect and promote biodiversity

Engage with Heritage & Identity

Work with existing characterful buildings to create a sense of place and identity.

- Existing buildings and street pattern establish a more intimate urban grain - opportunity to tighten building facing distances where buildings mass does not negatively impact public realm and daylighting
- Some existing buildings in this location are well suited to being retained and/or re-purposed
- No listed buildings in the regeneration area - opportunity to innovatively extend and reinvent existing structures

3. Friendly Streets & Improved Site Permeability

Enhance all existing pedestrian routes into and across the site to address issues of severance. Create

pedestrian focused edge to the site by softening Pennywell Rd. Improvements should include:

- Widening of footways
- Use existing building lines to redefine local street pattern
- Traffic calming measures and improved integration of mixed modes of transport
- Improve frequency and quality of pedestrian crossings
- Encourage through routes to enhance access to the River Frome and beyond

4. A Variety of Accommodation

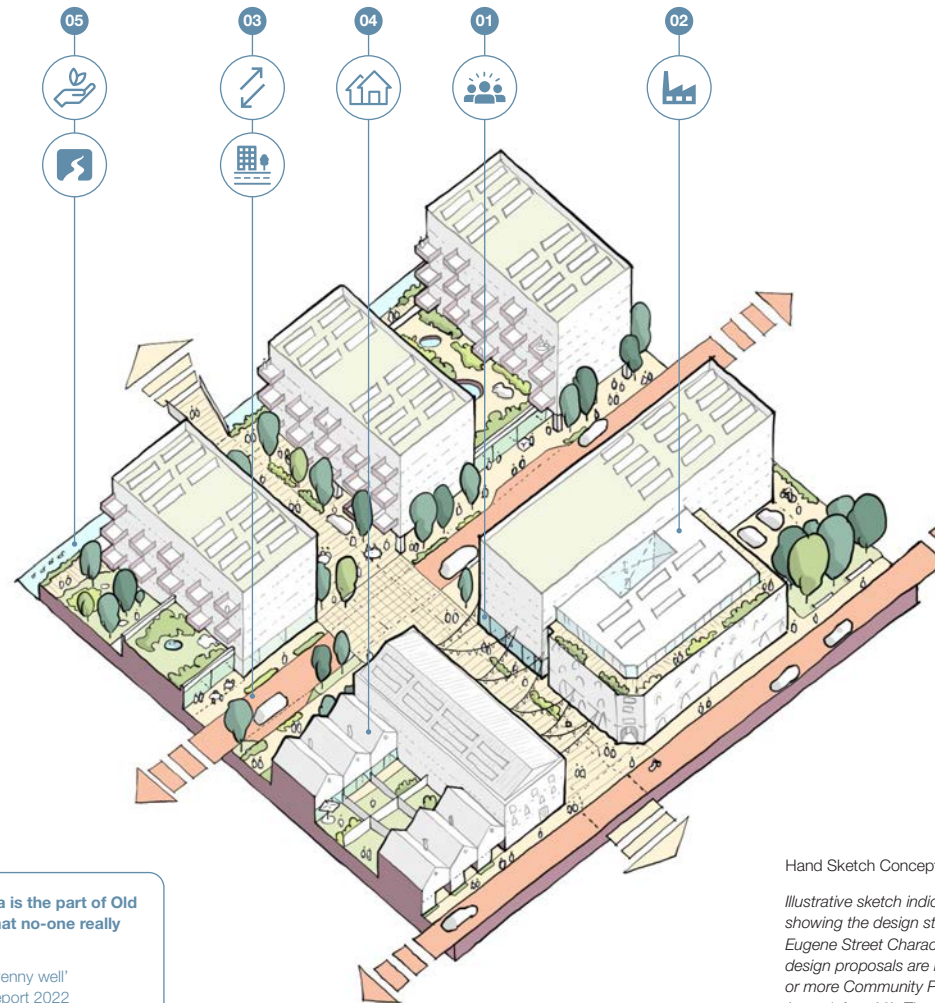
This area is suitable for lower rise, medium density accommodation types that complement the existing character and scale of existing buildings. Less affected by flood risk, there is opportunity for accommodation to meet the ground and contribute to street activity.

- Dual aspect living
- Maximum public and community benefit at ground floor
- Sensitivity to overshadowing and heritage views
- Significant biodiversity and building performance targets
- Accommodation must be designed to mitigate the acoustic effects of existing cultural and music venues

5. River Frome Nature Walk

Integrate more intimate, publicly accessible riverside walk on southern bank of River Frome. This route should:

- Provide unbroken public access to the river linking building plots
- Accommodate new pedestrian river crossing at appropriate locations
- Establish a minimum 5m building offset from the river bank
- Work with existing established trees to reinforce ecology corridor



"This area is the part of Old Market that no-one really knows..."
 'wishing Penny well' Project Report 2022

Key Points

Community Place Principles

- New homes, community space and leisure
- Diverse and inclusive communities
- Friendly streets and spaces for all
- Establishing and celebrating identity and place
- Environmentally sustainable and healthy neighbourhood
- Opening up access to the River Frome
- Better connectivity and transport

"More places to eat and to drink and to grab a cup of coffee would be really good."
 'wishing Penny well' Project Report 2022

"I treasure the corrugated industrial buildings over there."
 'wishing Penny well' Project Report 2022



Location Plan



Hand Sketch Concept Tile

Illustrative sketch indicatively showing the design strategy for the Eugene Street Character Area. All design proposals are linked to one or more Community Place Principle (more info p.30). The sketch is not true to scale and must be considered an artist impression of the regeneration vision.

Eugene Street Character Area

Strategic Maps



Mid-rise, high density housing



Adapt and reuse heritage buildings



Well proportioned public spaces



River ecology corridor



Integrated community play space



Regreening of urban space

Key Points

- Eugene St. Character Area**
Residential and community focused mixed use in area of heritage interest
- River Frome
- Proposed public space
- Existing enhanced public space
- Development Footprint
- Maximum greening: Green infrastructure priority over parking, service bays etc.
- Base level greening: Planting Corridors, Rain Gardens, SuDS, Street Trees
- Development Offset
- Key River Junction
- Primary Route
- Secondary Route
- Key Placemaking Opportunity

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Land Use

The Eugene Street Character Area is proposed as a residentially led mixed use area with a community and cultural emphasis.

Acting as an extension of the existing Old Market neighbourhood this area must respond to the character of the existing Georgian street pattern and the scale of prevailing buildings.

There are no listed buildings in the Eugene Street Character Area however characterful heritage buildings are encouraged to be retained, adapted and enhanced. These existing buildings and streets would support a more intimate street scape that is animated by community uses, workspace and residential accommodation at ground floor.

1. Buildings on Little Anne Street contribute to more intimate street atmosphere with active community uses
2. Corner plots to engage with wider neighbourhoods and accommodate active uses and building frontages
3. Buildings overlooking River Frome to offset from river to allow for active uses and pedestrian access
4. Residential accommodation to meet the ground floor in areas outside of Flood Zone 2 & 3
5. Promote adaptive reuse of heritage buildings

Green Space

There is potential to recalibrate the current hard, utilitarian streets that serve the local businesses and small number of residents by introducing pockets of green space, play space and street planting. This approach will help to soften the urban environment bringing much need biodiversity to the area and contributing to health and well being

The positive impacts of these moves would be significant and will help with managing the urban heat island effect, surface water run-off and improve air quality.

Development proposals adjacent to the riverside should preserve and enhance this setting for ecological and placemaking value including increasing visibility of the river, creating space for wildlife and opportunities to stop and dwell.

6. Preserve and enhance existing riverside ecology corridor
7. Little George Street integrate street trees and SuDS - represents 'base level' greening approach
8. Opportunities for residual sites and land parcels to provide significant uplift of biodiversity and amenity in small areas
9. Maximise green corridors in strategic locations to improve residential outlook
10. Focused community green space with integrated play facilities in well overlooked residential area

Location Plan



Eugene Street Character Area

Strategic Maps



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Active Frontage

The more intimate urban grain of the Eugene Street Character Area should allow for an intense, vibrant array of streets with a diverse range of uses and frontages.

Little George is a broader street which could focus activity on the south facing units. Little Anne Street could be more reflective of the original Georgian street pattern and promote a tighter street pattern with focus on pedestrian movement and smaller, active uses that can spill out into the street.

The perimeter of the Character Area should respond to the immediate context such as the accessible river corridor, the residential Wade Street and Pennywell Rd. south.



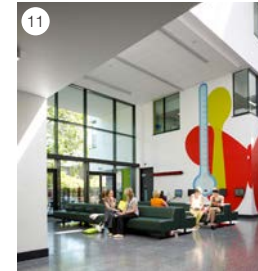
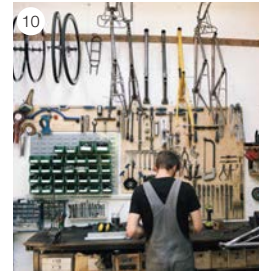
Buildings that enliven the street



Frontages engage with landscape



Intimate, active streets



Employment

A broad range of existing business, cultural and community assets are located in the Eugene Street Character Area. These users would be encouraged to stay in the area with opportunities to relocate or enhance their premises.

The scale of the proposed streets and developments support smaller, workshop/retail type units with a reduced vehicular servicing load - this will help support a more pedestrian focused public realm and streetscape.

The area is already rich with existing community and cultural infrastructure. Proposed community assets may also be accommodated in historic existing buildings with cheaper rents.



Key Points

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Residential Frontage
- Active Frontage
- Servicing Area
- Key Active Frontage Area

7. Affordable office spaces for SMEs
8. Jam Jar Independent Music and Arts Space - culture focused employment opportunities
9. Swan with Two Necks - existing pub that contributes to the character of the area
10. Smaller maker/workshop spaces with lower servicing requirements
11. Potential for community infrastructure
12. Watershed Cafe, Co Working & Theatre Space, Bristol.

Location Plan



Eugene Street Character Area

Strategic Maps



Primary Street - Pennywell Road



Parking integrated with landscape



Intimate street grain, shared surfaces



Movement: Pedestrian & Cycle

This area is a pedestrian and cycle dominated area with main transport movements being kept primarily to the perimeter. This is suggested to help retain the more intimate urban grain and support an active streetscape and ground floor uses.

A key pedestrian and cycle route is Eugene Street which will be extended with a new bridge link to the north bank of the river and the Elton St. Character Area via the river ecology corridor.

Higher speed cycle movements should be focused on Pennywell Road and Wade Street.

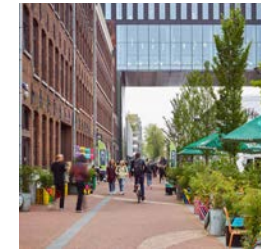
1. Primary street provides service access to central development plots. Opportunities to integrate an amount of on street parking and other ancillary uses as part of a coherent landscape approach
2. Little Anne Street - principle pedestrian and cycle focused street. Slow speed movement vehicle movements for servicing
3. Pennywell Road south, primary street and vehicular movement corridor - allows for servicing of perimeter development plots
4. 'Car-free' central community space - Eugene Street Square
5. New pedestrian/cycle bridge linking to Elton St. Character Area

Key Points

- Development Footprint
- River Frome
- Proposed Public Space
- Existing enhanced public space
- Primary Street**
- Secondary Street**
- For full road/street definitions see vehicular movement map p.45*
- Primary Ped. & Cycle Route
- Secondary Ped. & Cycle Route *note: river ecology corridor is not intended as a cycle route*
- Development Offset



Pedestrian priority streets



Inhabited, shared surface public realm

6. Publicly accessible river ecology corridor
7. Little Anne Street - intimate pedestrian priority street to support inhabitation of the street
8. Higher speed cycle movements to use perimeter roads
9. Eugene Street creates a key strategic link connecting north and south sides of the river (with new link bridge)
10. Enhancements to the movement network in the Eugene St Character Area should take into account the onward connections via the Lawford's Gate area and recognise opportunities to enhance the setting for all users

Location Plan



Eugene Street Character Area

Eugene Street Looking West

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Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Eugene Street Square

This sketch shows how Eugene Street could become a key active travel link connecting the Elton St. Character Area to the Eugene Street Character Area across the River Frome. This vibrant movement corridor could be highly animated with small businesses and community spaces arranged around the new Eugene Street Square.

Heritage buildings such as Globe House could be reinvented to contribute to the local character and define an appropriate scale of new development.

The network of original Georgian streets and newer strategic links give priority to pedestrians and promotes low speed vehicular movements. This should help to make the public realm feel safe and inviting - a place where the community feel they belong.

Location Plan

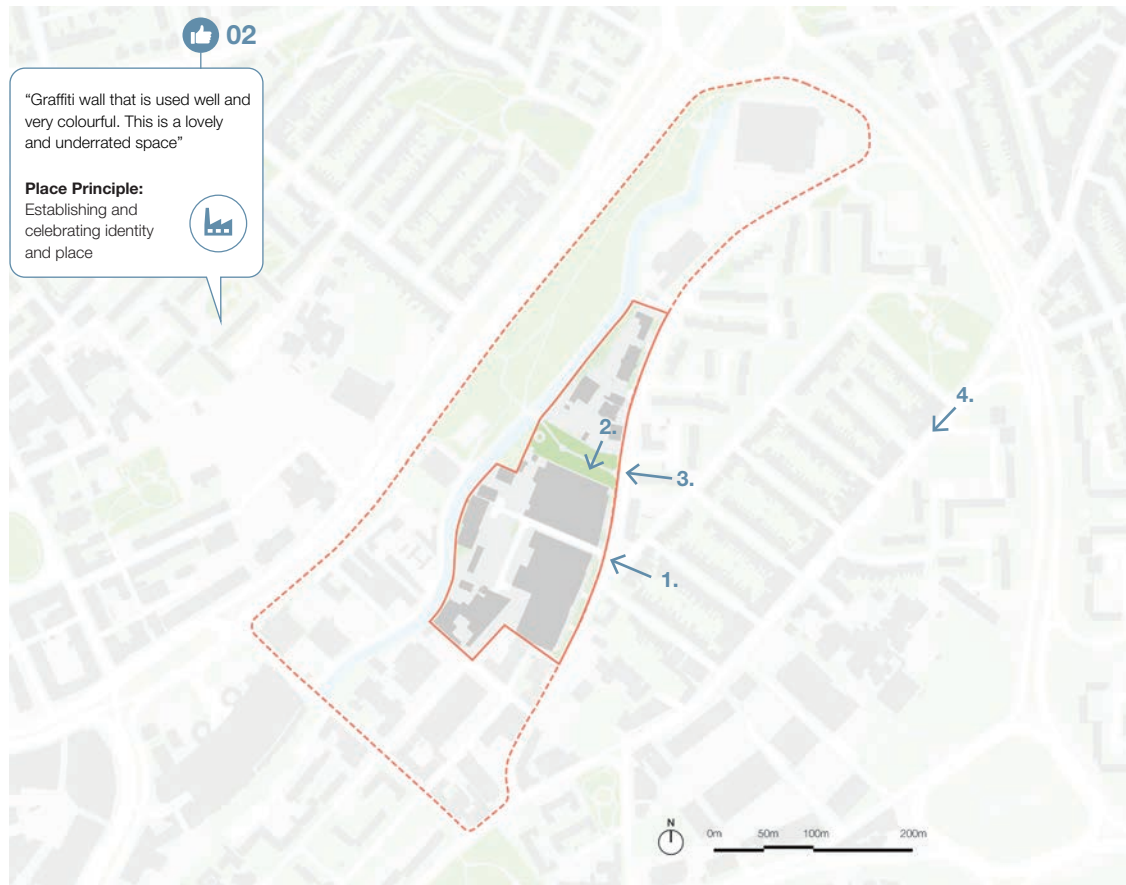


Peel Street Character Area

Live, Work, Make & Play

Located in the heart of the regeneration area the Peel Street Character Area is proposed as a high density, mixed use area with an emphasis on ground floor employment space and activity.

This area is intended to house an array of small to medium sized businesses with a focus on creative and light industrial processes that serve to animate the streets and enhance the economic productivity of the wider area. This will be co-located with residential accommodation above ground floor to provide a dynamic mix of uses that brings vibrancy to the area.



Key Points

- River Frome
- Existing enhanced public space
- Green Space (Other)
- Existing Buildings
- Character Area
- - - Regeneration Area

1. Document (formerly Pennywell Studios) & Safestore - Principal Industrial Warehouse Area
2. Industrial warehouse frontage onto Peel St. open space
3. Peel St. open space
4. Stapleton Rd. - successful existing high street 2 min. walk from site

02

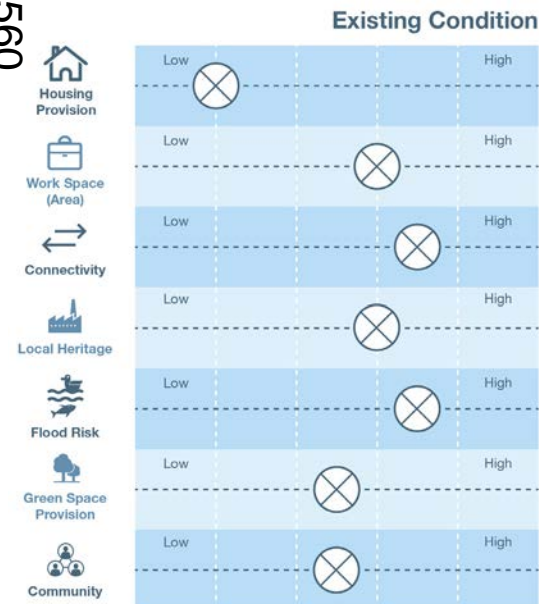
"Beautiful magnolia trees and crocuses in spring, shrubs recently planted that give a bit of summer colour"

Place Principle:
Environmentally sustainable and healthy neighbourhood

Note:

The sliding scale diagram represents the existing condition of the character area. The topics focus on important themes for future development to consider. The sliding scales should be used to compare the existing condition across the character areas.

Peel Street Character Area, 'Sliding Scale Diagram'



Peel Street Character Area

Defining the Urban Block

1. Maker Spaces, Employment and Active Streets

This area should accommodate a dynamic mix of uses that promote active frontages, maker spaces and employment uses at ground floor with a range of accommodation above.

Residential blocks should be orientated to maximise views and access to the River Frome and provide naturally well day lit living spaces. Key considerations should include:

- Right sizing flexible, generous employment spaces that are suitable for small start-up, creative businesses to help stimulate and sustain the local economy

Help to up-skill local people

Positively effect the public realm by promoting active, safe streets that encourage use throughout the day and evenings

Improve physical and visual links to the River Frome

2. Pennywell Road - a Community Street

Pennywell Road should be reverted back to a community focused, residential street. There is sufficient space to accommodate a significant linear green park that runs parallel to the road with a set-back building line that maximises available public realm and green infrastructure.

There is additional scope to create a public gateway into the site via Peel Street Open Space and enhance green amenity beyond the site. Key aims include:

- Enhanced pedestrian and cycle experience - friendly streets
- Pennywell linear park to integrate existing mature trees
- Provision of community play spaces

- Integrated SuDS
- Residential frontages to overlook Pennywell Rd.
- Traffic modal filter to significantly reduce vehicular moments

3. Community Amenity Space

External amenity spaces for the immediate and surrounding community should be well sized and appropriately located on key desire lines and overlooked by animated building frontages. These community spaces should:

- Be well overlooked and located in areas that benefit from good sun lighting with access to the River Frome
- Encourage access and engagement with the water
- Be sensitive to the existing ecological corridor and promote habitat retention and creation

4. Smart Servicing & Ancillary Spaces

Employment and maker spaces may require deeper plan ground floor space. These should be well designed and:

- Provide servicing for multi tenanted employment and residential accommodation
- Reduce the need for on street servicing
- Maximise potential active frontages on key routes

5. River Frome Nature Walk

Integrate publicly accessible riverside walk on southern bank of River Frome as promoted in neighbouring Character Areas.

6. A Variety of Accommodation

This area is suitable for low/mid rise, medium density accommodation.

- Dual aspect living
- Sensitivity to overshadowing
- Significant biodiversity and building performance targets



Key Points

Community Place Principles

- New homes, community space and leisure
- Diverse and inclusive communities
- Friendly streets and spaces for all
- Establishing and celebrating identity and place
- Environmentally sustainable and healthy neighbourhood
- Opening up access to the River Frome
- Better connectivity and transport

"I hope that the air quality gets better and nature is allowed to run wild. I want to see a clean river that the children can play in and a city without cars. The space should be given back to children and taken away from adults"

'wishing Penny well'
Project Report 2022



Location Plan

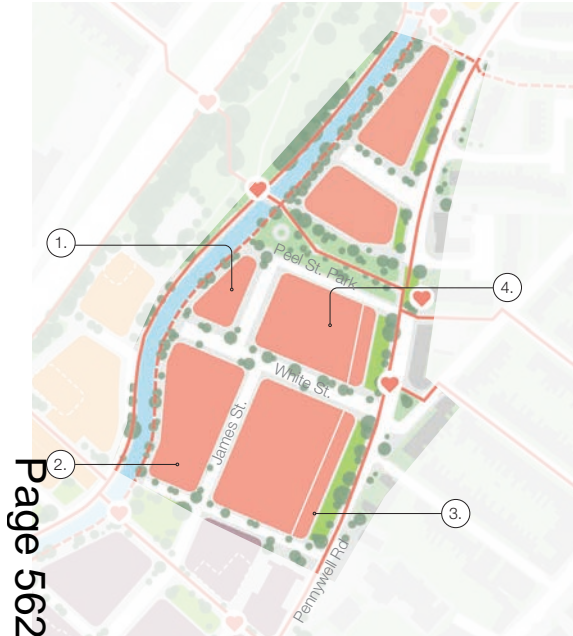


Hand Sketch Concept Tile

Illustrative sketch indicatively showing the design strategy for the Peel Street Character Area. All design proposals are linked to one or more Community Place Principle (more info p.30). The sketch is not true to scale and must be considered an artist impression of the regeneration vision.

Peel Street Character Area

Strategic Maps



Large ground floors - homes above



Workshops and businesses at street



Green Space

Public green space is focused along Pennywell Road as a means of softening the urban environment and recalibrating this edge of the site as a community focus street. This linear park should use the existing, established trees and enhance the frontage with additional planting, SuDS, play-on-the-way children's amenity and other valuable ecological assets.

Peel Street Open Space should be upgraded and has the potential to provide early phase local amenity, play space additional tree planting and community growing opportunities.

New public amenity should also be provided adjacent to the River Frome in a well overlooked, prominent area on a key movement route. Development expected to contribute additional public, communal and private external amenity.



Public space connecting to river



Opportunity for community growing



Intensive urban greening

Key Points

- **Peel St. Character Area**
Residentially led mixed use with maker space and community focus
- River Frome
- Proposed public space
- Existing enhanced public space
- Development Footprint
- Maximum greening: Green infrastructure priority over parking, service bays etc.
- - Base level greening: Planting Corridors, Rain Gardens, SuDS, Street Trees
- ▨ Development Offset
- ▨ Key River Junction
- ➔ Primary Route
- ➔ Secondary Route
- ♥ Key Placemaking Opportunity

Page 562

Land Use

Co-location of residential accommodation above commercial ground floor uses is suggested as an innovative way of supplying much needed employment space and addressing the housing supply shortage. This approach helps to mitigate flooding issues in areas of high risk.

Larger building footprints in this area could be used to house larger ground floor spaces required for commercial spaces, servicing and associated back of house functions.

1. Smaller footprint development plots could be more suited to smaller maker/co-working space or more community focused use where there is a direct relationship with green space
2. Large ground floor footprints could provide residential accommodation above with podium gardens
3. Plots fronting onto Pennywell Road would be encouraged to have residential and retail/community uses at ground floor (subject to flood risk)
4. Regular efficient footprints can be effectively subdivided

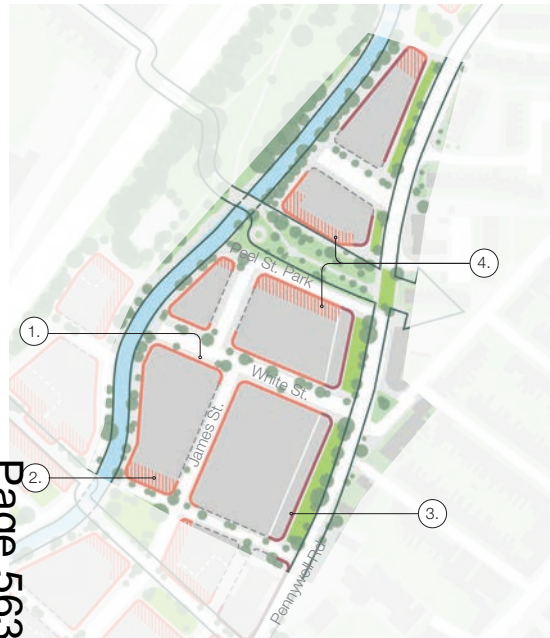
5. Engage with the river ecology corridor providing connections and view points
6. Functional 'Maker Streets' should include tree planting and SuDS
7. New public green spaces should be located in prominent positions overlooking the river
8. Potential to create Pennywell Road linear park using existing trees and new landscaping to improve the public realm and build resilient green infrastructure
9. Enhancements to Peels Street Park could turn this into a major community asset with scope for food growing and play-space

Location Plan



Peel Street Character Area

Strategic Maps



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Active Frontage

Key commercial frontages should line the streets that run perpendicular to Pennywell Road. These should draw people into the site and lead on to new connections. Peel Street Open Space should accommodate active uses at ground floor to help animate the park and offer passive surveillance over the green space.

Visually active uses should overlook the riverside pedestrian walkway with opportunities for access to green spaces providing relief to the building edges. Where possible residential frontages should overlook Pennywell Road to contribute to a more community, residential focused public realm that sits naturally with the existing residences on the street.



Shop fronts and workshops



Residential frontage on key streets



Active uses inhabit the street

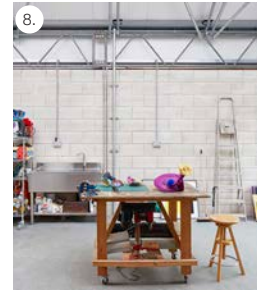
1. Active frontages running perpendicular to the river to encourage views and movement to the River Frome
2. Primary active frontages to engage with public realm and green spaces
3. Residential frontages are encouraged to overlook Pennywell Road and to meet the ground where possible - this could contribute to creating a more community focused street and piece of public realm
4. Key active frontage to overlook Peel Street Open Space



5.



6.



8.



9.

Employment

This Character Area is envisioned as the creative commercial heart of Frome Gateway. Larger, more flexible ground floor spaces could be provided to attract a diverse range of occupiers to the area. Existing local businesses could be accommodated as well as any number of newer start up business who need robust commercial premises close to the city centre.

More generous commercial volumes could be provided to allow for maximum flexibility such as the introduction of mezzanine accommodation for more co-working type industries. More industrial/maker type occupiers would benefit from an increased servicing area.



7.

5. Bristol Hackspace, creative workshop. Electronics bays, laser cutters, CNC router, 3D printers, tools etc.
6. Temple Cycles hand build bikes in Bristol
7. Maker Workshops at ground floor of mixed use development, Caxton Works, London
8. Larger maker/workshop spaces with higher servicing requirements
9. Left Handed Giant Brewery Industrial Unit, Newtown Park, Bristol

Key Points

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Residential Frontage
- Active Frontage
- Servicing Area
- Key Active Frontage Area

Location Plan



Peel Street Character Area

Strategic Maps

Page 564



Controls to limit HGV movements



Servicing/parking and landscape



Primary street



Movement: Pedestrian & Cycle

The south portion of Pennywell Road could accommodate in-lane cycle routes that provide a higher speed strategic route connecting the northeast of Bristol to the city centre. A reduction in the quantity of larger service vehicles using this road should make this movement corridor more inviting to cyclists and pedestrians.

The centre of the Peel Street Character Area would create an attractive, safe public realm that is welcoming to cyclists and pedestrians with generous footways lining active building edges. Low speed walking and cycling routes intersect the development plots connecting to the river and various pieces of public amenity.



Generous and flexible streets



Friendly streets encourage activity



Cycle, walking and vehicle routes

Key Points

- Development Footprint
 - River Frome
 - Proposed Public Space
 - Existing enhanced public space
 - Primary Street**
 - Secondary Street**
- For full road/street definitions see vehicular movement map p.45*
- Primary Ped. & Cycle Route
 - Secondary Ped. & Cycle Route
note: river ecology corridor is not intended as a cycle route
 - Development Offset

Location Plan



Movement: Vehicular

Increased street widths are suggested to accommodate a higher volume of vehicle movements associated with the more commercial ground floor uses and increased residential densities. James Street is proposed to link through to Little George Street to create a consistent service spine with access to all development plots. Secondary streets connect to key movement corridors and allow for limited servicing and building access.

A modal filter is proposed on Pennywell Road. This would prevent the through movement of vehicles to the northern extents of Frome Gateway. This should create a safer street condition that is less dominated by vehicles and more focused on community requirements.

1. Service spine allowing for low speed, two way traffic to access all development plots - creates service loop with Pennywell Rd.
2. Linking secondary streets allow controlled, low speed vehicular access
3. Pennywell Road could be made one-way vehicular traffic to accommodate sufficient provision for pedestrians and cyclist
4. Modal filter proposed at the northern extent of Peel Street Character Area to prevent vehicles using Pennywell Road as a through route - ambition to create a slower speed, low traffic community street

Peel Street Character Area

White Street Looking West



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Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Pennywell Linear Park

This sketch shows how the view from Pennywell Road to White Street could feel. White Street runs perpendicular to the River Frome and Pennywell Road and could be one of the vibrant 'Maker Streets' lined with small creative business, workshops and amenity spaces.

Sit above this employment focused ground floor area could be residential apartments that have great views of the newly greened and landscaped Pennywell Road Linear Park. Working with existing established trees and enhancing them with additional tree planting, rain gardens, play spaces and areas for sitting and relaxing. This new public space could completely redefine how people engage with Frome Gateway and the wider area of St Jude's.

Location Plan



Tanneries Character Area

Making Resilient Communities

The Tanneries Character Area is the northernmost part of the regeneration area this area has potential to provide a high level of consolidated light industrial space in an accessible part of the inner city.

The Tanneries Character Area has the benefit of direct access to the primary road network (Newfoundland Way & M32) making it well suited for industrial intensification and logistics uses. The area has capacity for significant change and to make a strategic contribution to Bristol's evolving economic and industrial needs.

More isolated from the existing and future residential zones this area is well suited to accommodate a range of uses that compliment employment with activity and possibly contribute to the night-time economy of the area.



Key Points

- River Frome
- Existing enhanced public space
- Green Space (Other)
- Existing Buildings
- Character Area
- - - Regeneration Area

- 1.** Existing, low density housing set back from street. Low levels of streets greening and wide carriageway
- 2.** Northern Site Boundary showing Cycle & Pedestrian Subway entrance
- 3.** Car dealerships and a car dominated streets with narrow footways

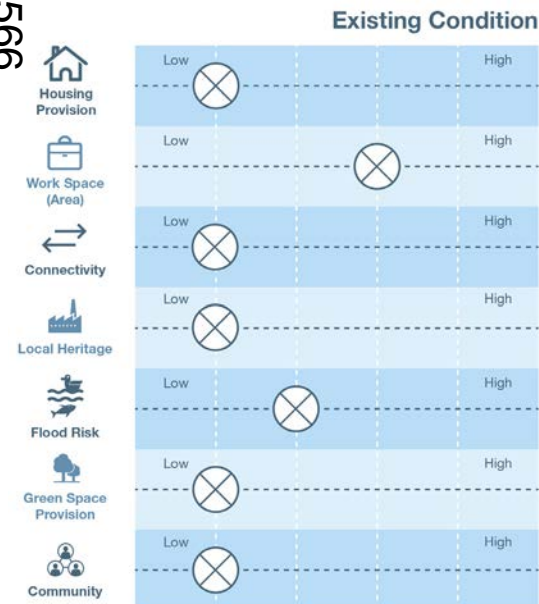
"Let's have more space for play, more biodiversity - a proper green ribbon - and better access to the river. Make Riverside less of a thoroughfare and more of a destination"

'wishing Penny well'
Project Report 2022

Note:

The sliding scale diagram represents the existing condition of the character area. The topics focus on important themes for future development to consider. The sliding scales should be used to compare the existing condition across the character areas.

Tanneries Character Area, 'Sliding Scale Diagram'



Tanneries Character Area

Defining the Urban Block

1. Industrial Spaces & Logistic Hubs

The types of uses proposed in this Character Area could require large internal spaces with high floor to ceiling heights to accommodate diverse range of light industrial and logistics functions. Development plots in this area are generous and have the potential to be broken into a series of buildings or single volume.

To maximise the efficiency of land in this inner-city location service yards could be shared between development plots. This would reduce the amount of service vehicles crossing footways and increase the overall productivity of the site.

Key considerations include:

Optimal floor to ceiling heights – can additional mezzanine storage/office accommodation be provided in the future

Well located front doors

How can the buildings help to animate the streetscape

- How waste heat from industrial processes be used in neighbouring commercial or residential accommodation

2. Industrial Intensification

This area is well suited to innovative models of industrial intensification that seek to maximise plot efficiencies. This can be done through the stacking of traditionally large footprint industrial units and providing shared servicing and access provisions. This model can support a diverse blend of light industrial, workshop and maker spaces.

Other light industrial and commercial workspaces can be supported in this area to create a flexible and complimentary user group who add vibrancy and animation to the area.

Greater intensity of use would also support a range of other

amenity uses that contribute to the streetscape and bring activity to the ground floors.

This approach would:

- Increase the productivity of the area by providing a higher density of employment opportunities
- Locate light industrial spaces close to primary vehicular infrastructure with minimal impact on the existing and new residents
- Contribute to wider placemaking objectives such as creating active, ground floor uses and natural surveillance of Pennywell Road and Riverside Park.

3. Pennywell Road - Increase Urban Greening

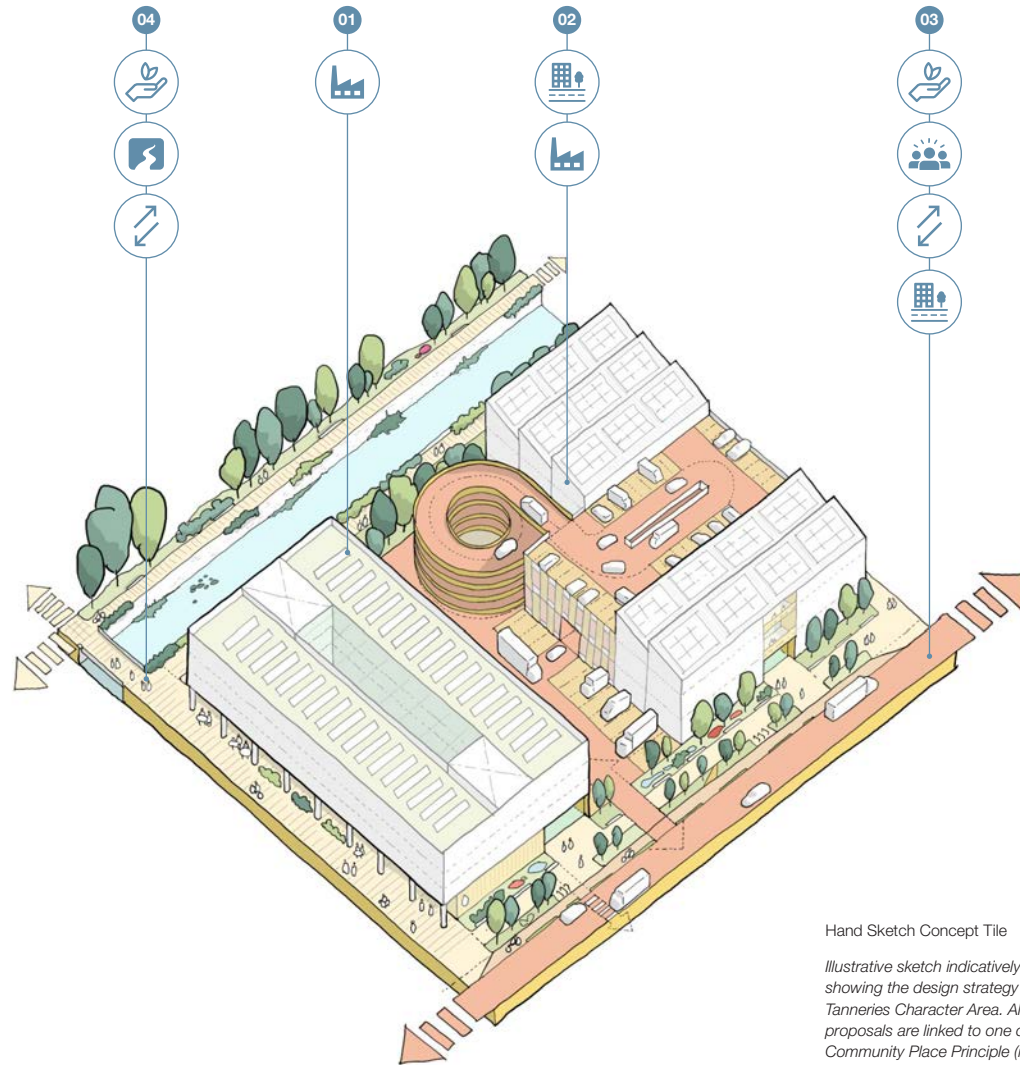
Key considerations should include:

- Enhanced pedestrian and cycle experience - potential to segregate cycle routes at northern end of Pennywell Road to minimise conflict between service vehicles and cyclists
- Integrated SuDS into public and private green space
- Meaningful building offsets from Pennywell Road to allow for increased street greening and defensible space for building frontages
- Consider providing green spaces in areas of high flood risk as a passive, low intervention means of mitigation

4. River Frome Nature Walk & Better Connections

Integrate publicly accessible riverside walk on southern bank of River Frome as promoted in neighbouring Character Areas. Opportunity to improve connectivity with new bridge link to Riverside Park

Active frontages that engage with the river edge will contribute to passive surveillance and safety through the day and night.



Key Points

Community Place Principles

- Diverse and inclusive communities
- Friendly streets and spaces for all
- Establishing and celebrating identity and place
- Environmentally sustainable and healthy neighbourhood
- Opening up access to the River Frome
- Better connectivity and transport

“Make Pennywell Road more welcoming and safer and more pedestrian-friendly”

‘wishing Penny well’
Project Report 2022

Location Plan



Hand Sketch Concept Title

Illustrative sketch indicatively showing the design strategy for the Tanneries Character Area. All design proposals are linked to one or more Community Place Principle (more info p.30). The sketch is not true to scale and must be considered an artist impression of the regeneration vision.

Tanneries Character Area

Strategic Maps



High quality industrial buildings



Flexible, adaptable spaces



High quality green space



Green Space

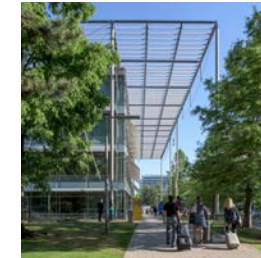
The re-greening of Pennywell road as an extension of the Pennywell Road linear park is required to soften the urban environment and create safer, friendlier streets. The river corridor should be safeguarded with further enhancements made to increase the visibility of the riverside.

Meeting the Natural England Urban Greening Factor standard is the baseline requirement for all development. Proposals will provide enhanced on-plot tree planting, biodiverse roofs and contributions to SuDs.

New public green space on Pennywell Road should be located adjacent key frontages or links and should contribute to the targeted 1ha uplift in green space across the area. Development will be expected to contribute additional public, communal and private external amenity.

Key Points

- **Tanneries Character Area**
Light Industrially led mixed use in strategic location with good access to road network. Co-location of smaller industrial/commercial units at ground floor
- River Frome
- Proposed public space
- Existing enhanced public space
- Development Footprint
- Maximum greening: Green infrastructure priority over parking, service bays etc.
- - - Base level greening: Planting Corridors, Rain Gardens, SuDS, Street Trees
- - - Development Offset
- Key River Junction
- Service Yard
- Proposed at grade crossing
- ➔ Primary Route
- - - Secondary Route
- ♥ Key Placemaking Opportunity



Softening the street edge



Retain and enhance river corridor



Pocket park linking green spaces

4. Protect and enhance existing river biodiversity corridor during construction and use - no further contamination of the river through industrial processes
5. New Pennywell Road pocket park to provide additional public green amenity space. This could link to Riverside Park enhancing the current level of connectivity and access to green space
6. Improvements to Pennywell Road could include widened footways, integrated SuDS and street trees

Location Plan



Land Use

The re-provision of modern and fit-for-purpose light industrial employment spaces and low carbon logistics will be prioritised in the Tanneries Character Area in order to:

1. Safeguard and enhance the stock of industrial, warehousing and logistics space across the city;
2. Take advantage of its location at the end of the M32 and on the edge of the City Centre and Clean Air Zone which lends itself to providing an important economic role and function of strategic city importance, such as last mile logistics; and
3. Provide opportunities for existing businesses to be retained in the area where appropriate.

Industrial intensification would be supported to optimise the provision and efficiency of industrial space in this location.

Tanneries Character Area

Strategic Maps



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Active Frontage

Active frontages are required across the regeneration area to contribute to wider placemaking objectives.

New development in the Tanneries Character Area should seek to integrate smaller industrial, commercial and community spaces at the ground floor which maximise engagement with and natural surveillance over Pennywell Road, the riverside walkway, and Easton Way. Co-locating night-time venues here could help to bring vibrancy and activity during the evening, helping to increase safety.

Active edges on the river edge should be focused on community/night-time frontages, with industrial and employment on the Pennywell Road side.



Well located and designed entrances



Visually active industrial frontages



Activity around industrial spaces

1. Areas of prominent frontage should create activity, engagement and visual connection to key routes and spaces.
2. Frontages facing the River Frome should provide visual connection and overlooking of the riverside walkway.
3. Active uses which facilitate direct engagement with key routes and spaces should be provided in these locations.
4. Active frontages and visual connection create natural surveillance of key routes such as Pennywell Road, enhancing feelings of safety.
5. Creative production workshops, large flexible volumes

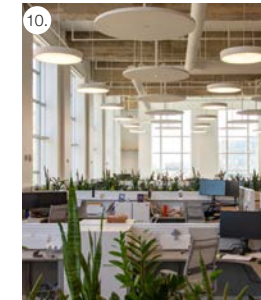


Employment

The employment offer of the Tanneries Character Area will focus on light manufacturing and logistics. This area lends itself to larger footprint employment uses which require a central city location and/or easy access to the road network for servicing and distribution. Smaller industrial spaces could sit alongside larger space as part of co-located schemes.

The quantum of potential employment that could be provided has the potential to generate a high level of new employment opportunities for local residents which should seek to maximise opportunities for apprenticeships and training.

Bristol City Council will be exploring the delivery of a Low Carbon Logistics Hub in this area as part of a wider sustainable last mile logistics and distribution network.



Key Points

- Development Footprint
- River Frome
- Proposed public space
- Existing enhanced public space
- Active Frontage
- Servicing Area
- Key Active Frontage Area
- Service Yard

6. Filwood Green, Bristol: 'Green Keratin' Business Tenant
7. Wiper & True, Industrial Tap Room, Old Market, Bristol
8. Industrial Storage Unit/Last mile delivery logistics hub
9. Propyard: Industrial Event Space in Bristol
10. Office space could also be accommodated in this area to diversify the overall employment mix as part of co-located schemes.

Location Plan



Tanneries Character Area

Strategic Maps



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Movement: Vehicular

Light industrial uses tend to have high servicing demands which necessitates larger highways capacity capable of dealing with heavy goods vehicle traffic. The northern end of Pennywell Road lends itself to this purpose and provides good access to Easton Way and the M32.

A modal filter will be introduced along Pennywell Road, meaning vehicular access will only be possible from Easton Way. This will significantly reduce vehicular traffic along Pennywell Road and create a calmer, safer street for local residents.

Shared service yards are proposed between industrial plots to make efficient use of land and help reduce the number of turning points across footways.



Two way primary street for servicing



Shared service areas



Secondary streets for service access

1. Vehicular access to the Industrial Character Area from Easton Way only (junction upgrades required)
2. Public green space activates building edges and leads to new pedestrian river crossing
3. Modal filter will prevent through-traffic along Pennywell Road, reducing vehicle movements and improving safety
4. Shared service areas reduce instances of service vehicles crossing footways
5. Primary street for two-way traffic to include SuDS, tree planting and parking as appropriate



Movement: Pedestrian & Cycle

Improvements to Pennywell Road include footway widening and reduced service vehicular traffic. Pennywell Road is a key cycle route leading to the city centre from Easton and segregated cycle provision should be accommodated to separate cyclists from heavy traffic.

Primary pedestrian movement corridors are Pennywell Road and the Riverside Promenade on the north bank of the river. Additionally the ecology corridor on the south bank of the river will provide a slower speed nature walk.

A new bridge link could help to improve site permeability and access to Riverside Park.



Generous in-carriageway cycle route



Low car public realm off main street



Wide footways with a green buffer

6. Strategic active travel route parallel with the river linking Easton to the City Centre
7. Ecology walkway will provide continuous pedestrian access to the river
8. Potential new link bridge to enhance connectivity between green spaces
9. Key active travel route with provision for cyclists, generous footways and a planted green buffer to soften the urban environment
10. Potential new at grade pedestrian crossing over Easton Way to improve accessibility to the north

Key Points

- Development Footprint
 - River Frome
 - Proposed Public Space
 - Existing enhanced public space
 - Road
 - Primary Street
 - Secondary Street
- For full road/street definitions see vehicular movement map p.45*
- Service Yard
 - Primary Ped. & Cycle Route
 - Secondary Ped. & Cycle Route
note: river ecology corridor is not intended as a cycle route
 - Proposed at grade crossing
 - Development Offset

Location Plan



Tanneries Character Area

Pennywell Road Looking West

Page 571



Illustrative sketch showing a potential response to placemaking principles and concept building arrangement

Tanneries Character Area

This sketch shows how the Tanneries Character Area could include moments of relief in the buildings by creating a public green space that signposts a new bridge link to Riverside Park.

This shows how the busy employment and light industrial area could still function as a dynamic and attractive community focused street. This could be achieved through smart building servicing tactics, generous landscaping and public realm enhancements and new crossing places that would help to manage traffic speeds.

Exciting industrial processes could be on show in the public realm to demonstrate what is being made in this part of the city. Other amenities could also be located around key public spaces to cater for the new and existing residents, workers and visitors.

Location Plan



Implementation & Delivery

Strategic Overview

05

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WARNING
CYCLISTS
AHEAD

Implementation & Delivery

Strategy Overview

Introduction

Frome Gateway has been identified in the emerging Local Plan as one of Bristol's core areas for growth and regeneration, recognising the area's potential, space for growth, need for investment to reduce inequality, and sustainable central location. The principle of a change in land use and regeneration in this area is supported by BCC. While this framework is not formal planning policy, it will be endorsed by BCC Cabinet to become a 'material consideration' for assessing future planning applications and BCC investment decisions in the area.

The Role of the Public Sector

Regeneration projects are long-term and complex. At Frome Gateway, the challenges of fragmented land ownership, financial viability and need for coordinated infrastructure means that the outcomes in this framework are unlikely to be realised through the market alone. As such, BCC has a leading role to play in promoting and facilitating the vision set out in this framework and coordinating the delivery of site-wide infrastructure (such as enhancements to the streets and movement network).

To realise this vision, BCC will:

- Promote widely the aspirations and strategic narrative for sustainable, inclusive transformation
- Work collaboratively with all stakeholders in the Frome Gateway area to champion new development that aligns with this framework
- Involve communities in the development of more detailed proposals in the area
- Work with other public sector bodies to identify and secure funding opportunities to deliver the aspirations for Frome Gateway
- Use its role as landowner to influence the type of development and sustainability performance on specific sites within BCC ownership

The Role of the Private Sector

Effective collaboration and active engagement between the private sector, public sector and communities is pivotal to the future success of Frome Gateway. While much of the land is within private ownership, this framework represents a 'call to action' for prospective developers to embed high-quality place principles and a broader mix of uses that will benefit existing and new residents and users of the area. To maximise their chances of planning success, developers should pursue early and ongoing engagement with the BCC and local communities to incorporate the vision and Community Place Principles at all stages of the design and planning process.

Affordable Housing

Housing is a multi-faceted issue and there is significant and locally specific need in the Frome Gateway area. Developers are highly encouraged to engage with the council at an early stage to maximise opportunities for alignment with local needs and deliver the right mix at pace.

The council will work with a range of partners to deliver new affordable homes including direct delivery of new council homes, housing delivery through council-owned housing companies, and working with Registered Providers to secure funding for affordable housing delivery. To ensure local community benefit from regeneration at Frome Gateway, the council will explore a Local Lettings Policy, as described on page 39.

Developers are expected to meet minimum requirements for affordable housing provision and are invited to work positively and collaboratively with the council to explore ways to further increase the delivery of affordable housing above the minimum provision.



Implementation & Delivery

Strategy Overview

Infrastructure delivery

This framework outlines principles and opportunities for coordinated physical and social infrastructure to achieve benefits for new and existing communities. This has been informed by extensive engagement, the Community Place Principles and technical evidence.

Each development will be required to contribute financially to local infrastructure improvements, such as through Section 106 and Section 278 agreements and Community Infrastructure Levy (CIL), in accordance with planning policy. The total cost of infrastructure proposed in this framework is substantial and will require a degree of public sector funding to implement in full.

It is recognised that coordinated infrastructure introduces complexities for funding, delivery and phasing, especially where adjacent sites are in different ownerships. Early engagement and collaboration with Bristol City Council is highly encouraged to find shared opportunities and realise this vision together

Phasing

Phasing and timescales for delivery will depend on individual landowners, businesses, leases, and the wider residential and workplace property market. However, there are key infrastructure moves that would be logical and desirable for early phasing to set a precedent for quality and drive early place-making outcomes.

Priority projects and interventions to kickstart regeneration at Frome Gateway have been set out in the following pages.

Social Infrastructure

Increased population resulting from new development in the Frome Gateway Regeneration Area may put pressure on the local services and facilities such schools and healthcare. A Health Impact Assessment has been undertaken to inform our understanding of local public health priorities including the potential impact of the

regeneration project on local services, and what additional steps and mitigations may be needed to successfully accommodate growth in this area. Bristol City Council will be liaising with the local NHS Integrated Care Board and education providers and organisations to inform them of planned growth in Bristol, to assist in planning future healthcare and educational provision across the city.

Health Impact Assessment

A Health Impact Assessment has been undertaken to inform our understanding of local public health priorities including the potential impact of the regeneration project on local services, and what additional steps and mitigations may be needed to successfully accommodate growth in this area. This has been used to directly inform the development of this framework and will be published alongside it to help inform site-specific development proposals. It is expected that new development positively embraces this as a tool to maximise positive health outcomes through regeneration and minimise negative ones. Early engagement with BCC is encouraged to maximise this.

Temporary & 'Meanwhile' Uses

Potentially effective means of testing new forms of employment spaces and uses while providing opportunities for community and cultural development (e.g. night-time economy spaces and community arts spaces). Temporary uses help manage and co-ordinate change in the area as various sites come forward over a long time period. Developers should engage with BCC about any possible temporary uses which could be made of vacant sites.

Open Space Maintenance

The council will work with the local community to ensure the effective management and maintenance of green and open spaces so that they meet the needs of the community and deliver their intended placemaking, public health and ecological benefits. This will include bespoke partnerships to integrate opportunities for social value generation such as education, skills and training. Developers will be expected to contribute to the long-term management and maintenance of local green and open spaces within the regeneration area.



Implementation & Delivery

Early Interventions & Initiatives

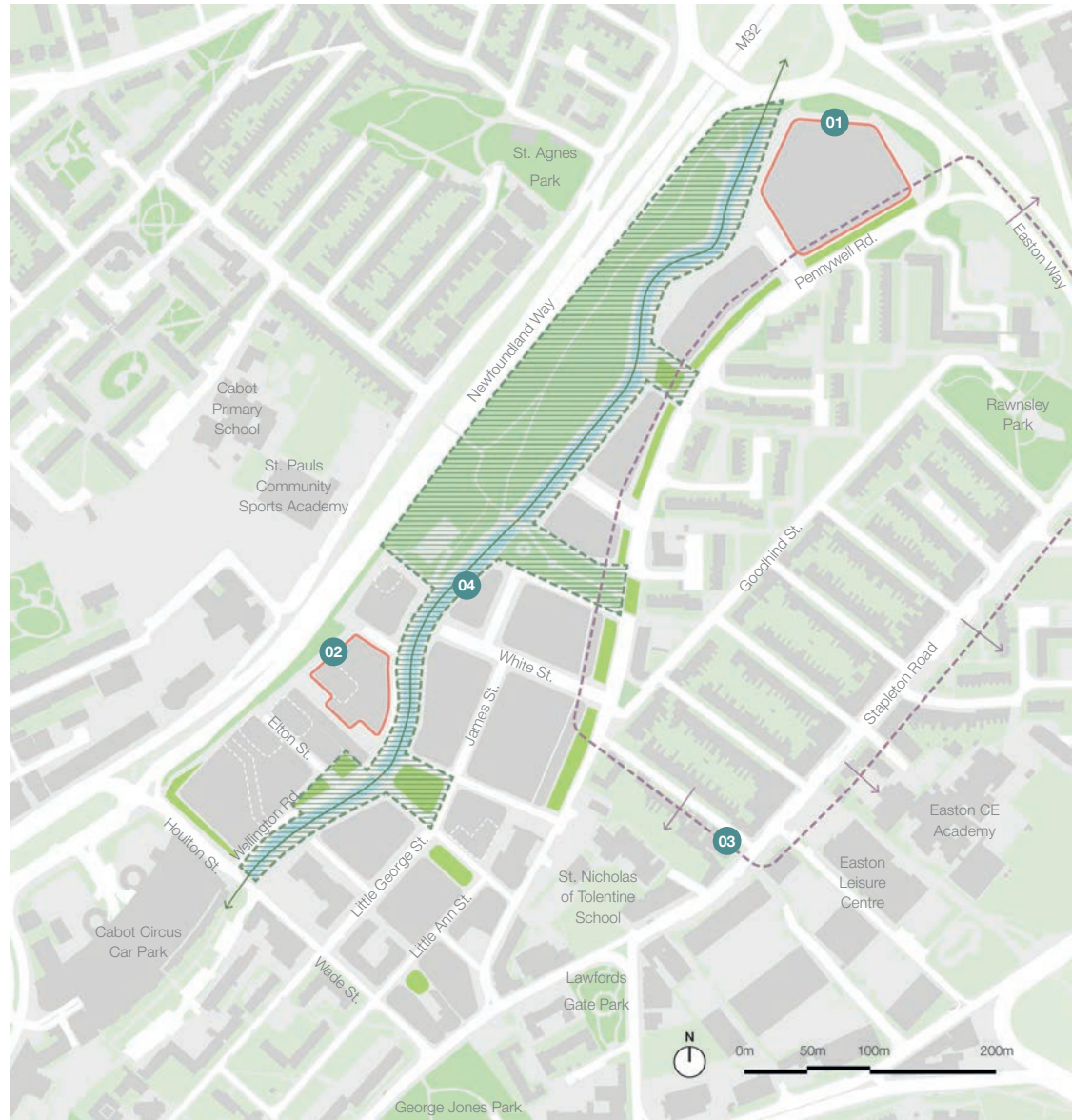
Early physical interventions and infrastructure would give early benefits to the community and provide the market with sufficient confidence to deliver on the Community Place Principles and wider placemaking ambition in this framework. To enhance and accompany these, non-physical processes and initiatives will also help to prepare for and pave the way for regeneration.

At the time of writing, the council intend to pursue the following key interventions and initiatives to kick-start regeneration and demonstrate their ongoing commitment to the future of the area.

Non-Spatial Interventions/ Initiatives

Page 575

- **Continued community engagement**, working with existing community groups to support them in their objectives and embed them in the future proposals
- **Undertake community co-design** for the open spaces, public realm, landscape and river restoration
- **Produce a Social value Strategy for Frome Gateway**, aligned to Bristol Council's Social Value Policy and Framework for reducing poverty and inequality, enhancing community economic and social wellbeing and increase resilience and environmental sustainability
- **Work with existing businesses to better understand their needs and aspirations** and best manage change in the area to support business continuity.
- **Work collaboratively with landowners and developers** to ensure development proposals are aligned with the vision and principles set out in this framework
- **Continue work to embed health and wellbeing**, such as incorporating these principles into more detailed project briefs and processes
- **Explore a Frome Gateway Local Lettings Policy** to maximise opportunities for local people to access new affordable housing options.
- **Produce a Frome Gateway Cultural Strategy** in collaboration with the community, cultural stakeholders and developers. Positive social impact would be at the core, as well as economic and environmental impact.
- **Explore a ground floor affordable lettings / workspace strategy** and approach for Frome Gateway to help ensure inclusivity of employment and community spaces.
- **Produce a Business Retention & Relocation Strategy** (including community organisations) to better understand how existing businesses can be retained within the area or relocated where necessary



Key

- River Frome
- Proposed Public Space
- Existing enhanced public space
- Development Plot/Building Footprint

Spatial Interventions/Initiatives

- 1. Redevelop Universal House as a Low Carbon Logistics Hub.** This site, at the north end of Frome Gateway, is Bristol City Council owned and has great potential to support 'last mile logistics' into the Broadmead/City Centre area via cargo bike or smaller electric vehicles. The associated infrastructure will include an upgrade to the strategic cycle route running through Frome Gateway
- 2. Redevelop Wellington Road Depot as a District Heating Network Energy Centre.** This is a Bristol City Council owned site and has great potential to act as a 'proof of concept' for innovative design that co-locates with other uses, such as residential. The early delivery of this energy centre and an associated district heat network of pipes will reduce the carbon impact of new development in the area
- 3. Carry out a detailed movement study** to better understand the implications of introducing a modal filter on Pennywell Road to improve safety and create a more community-focussed street. This take account of the impact on local residents, businesses and the wider transport network such as Stapleton Road and will be undertaken with engagement with the local community, emergency services and disability groups.
- 4. Deliver a river restoration project** as part of the Resilient Frome programme to enhance wildlife and deliver early placemaking benefits.

Statement of Intentions

Compiled in recognition of the community's aspirations, this co-created 'Statement of Intentions' is presented here as a work in progress. The thoughtful and thought-provoking words articulated here are meant to be aspirational for ALL parties (including BCC, developers, local residents, businesses, community organisations, and others. They should not be used as a list of absolutes or demands.

It is hereby declared that

the area known as the Frome Gateway, in St Jude's, in Bristol,

will now,

and

into the future,

aspire to become

a neighbourhood

that always:

1. Is authentically and continuously co-created on common ground.

2. Recognises the necessity for positive change and allows for growth, dwelling, flourishing and flow of all individuals, the community and visitors.

3. Nurtures diversity, creativity, human connection, resilience, learning together and the exchange of ideas and aspirations.

4. Values and celebrates the flourishing of all life and living things and continuously enhances an enriching (human) connection with nature.

5. Acknowledges the presence of the River Frome as a key local (and global) asset and seeks to better integrate it into the daily experiences of residents, park users and passers-by.

6. Offers and encourages a sustaining and meaningful variety of play opportunities and playfulness for everyone in the community.

7. Is a distinctive, well planned and co-produced architectural expression of enduring empathy, kindness, peace, pride, productivity and generosity.

8. Is a welcoming place for meeting, co-operation, creativity, thriving and growth and actively encourages respect, openness and spontaneity.

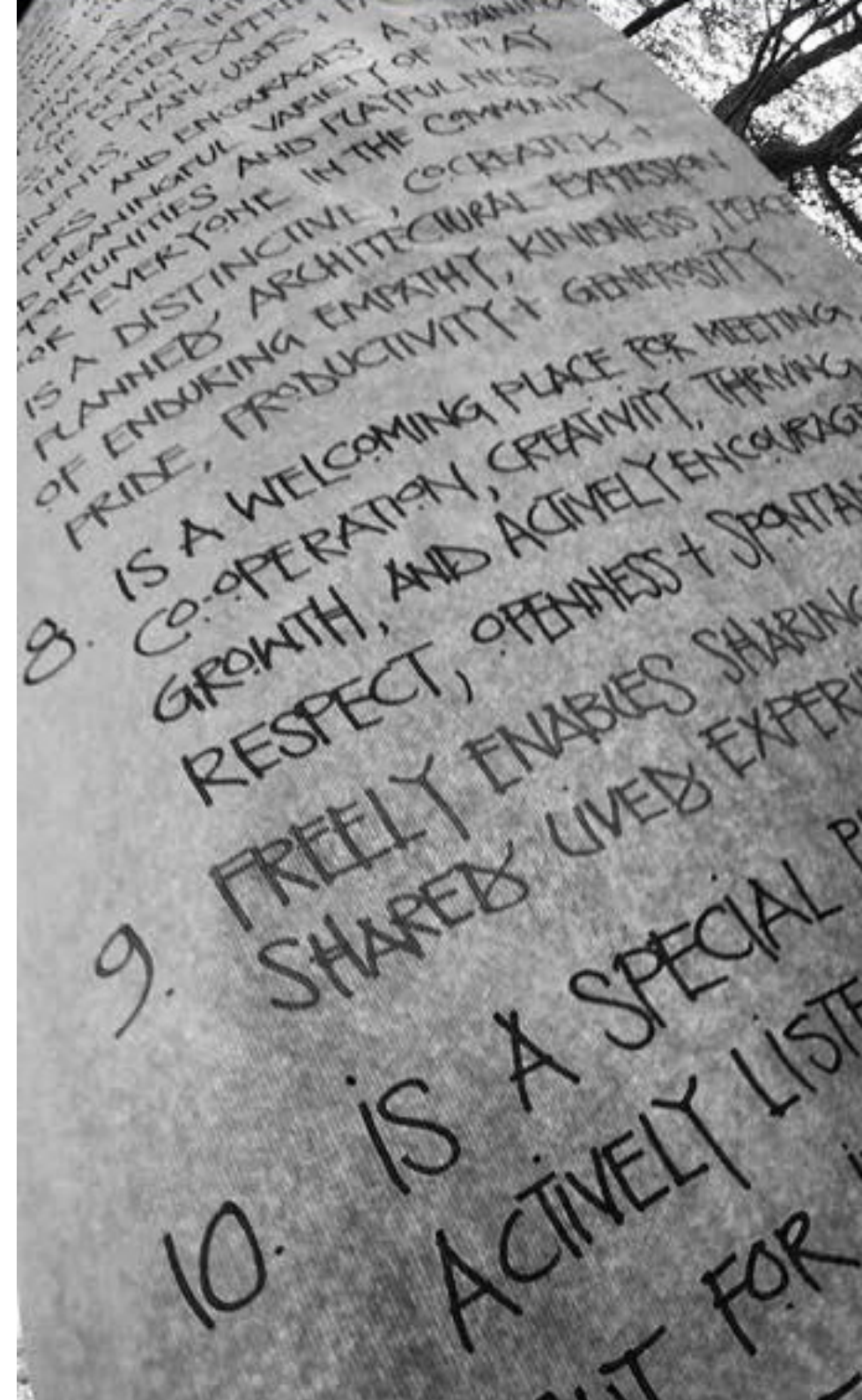
9. Freely enables positive sharing and shared lived experiences.

10. Is a special place that actively listens to, and speaks out for itself, its citizens, nature and the wider world.

In wishing Penny well

We trust that this will be so. Good growth is profoundly important here.

16th August 2022.



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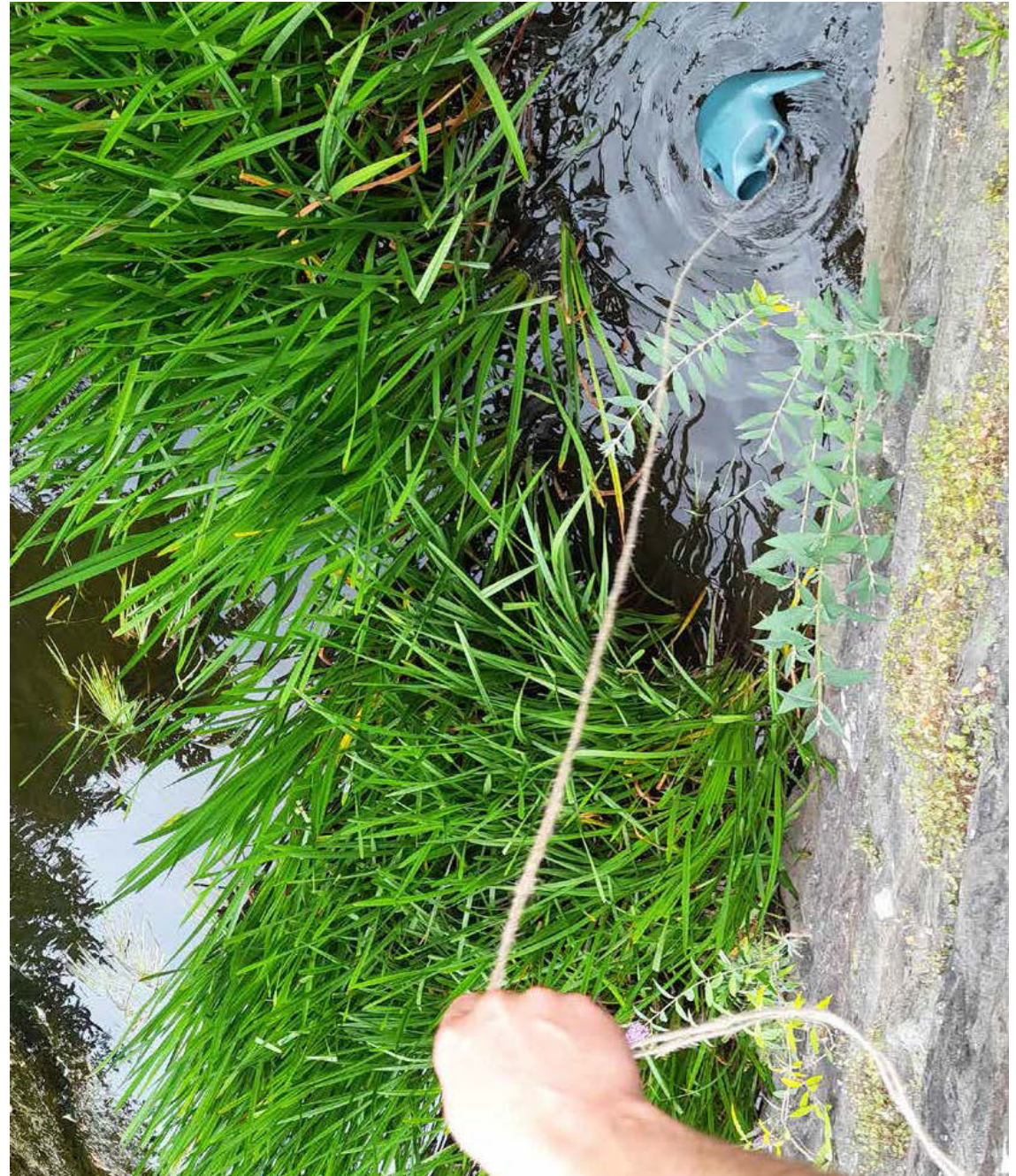
References

A Poem for the People and this Place

A Poem for the People and this Place

A
resonant song
in our city.
Beating
to the tune
of the rhythm of life,
a part
of the bigger picture,
beautiful in itself,
with floating ghosts, gentle spirits,
and the river,
humming in
its own gentle time,
murmuring for
and against
the traffic,
the motion and the movement then
a pause
in the pulse
for a moment,
the ebb and the flow, a kingfisher flash,
the people, the breeze
through the trees
as they all come and go
Passing through,
pausing
and forever breathing in
new voices
calling out
for a new
interweaving
imagining
illuminating
the
rich
forever
future
flow
.....

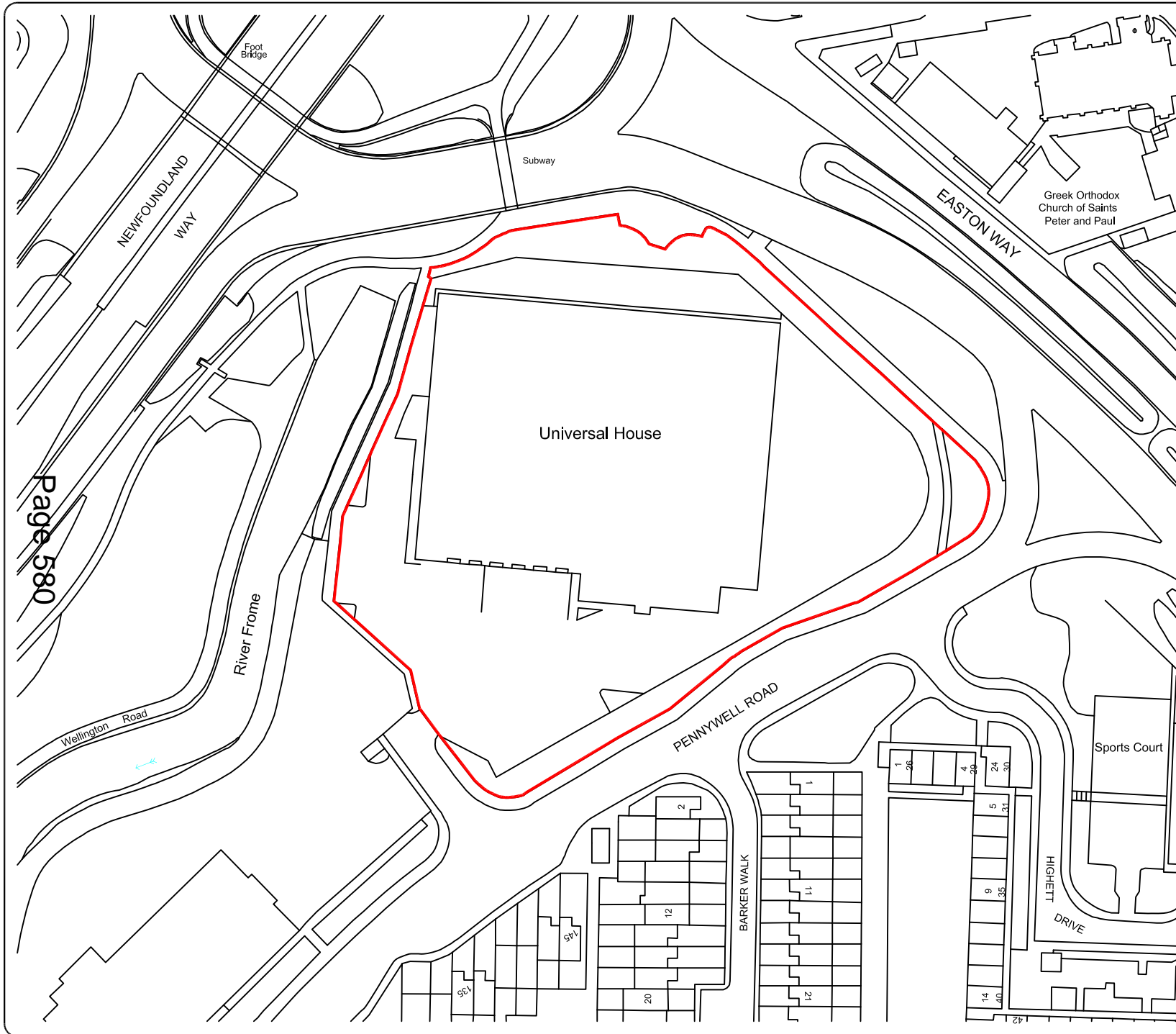
*Scott Farlow artist poet an evolving, ever-changing work summer 2022.
Source: wishing Penny well, Project Report 2022*





Working with






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**Universal House,
Pennywell Road,
Easton,
Bristol.
BS5 0ER**

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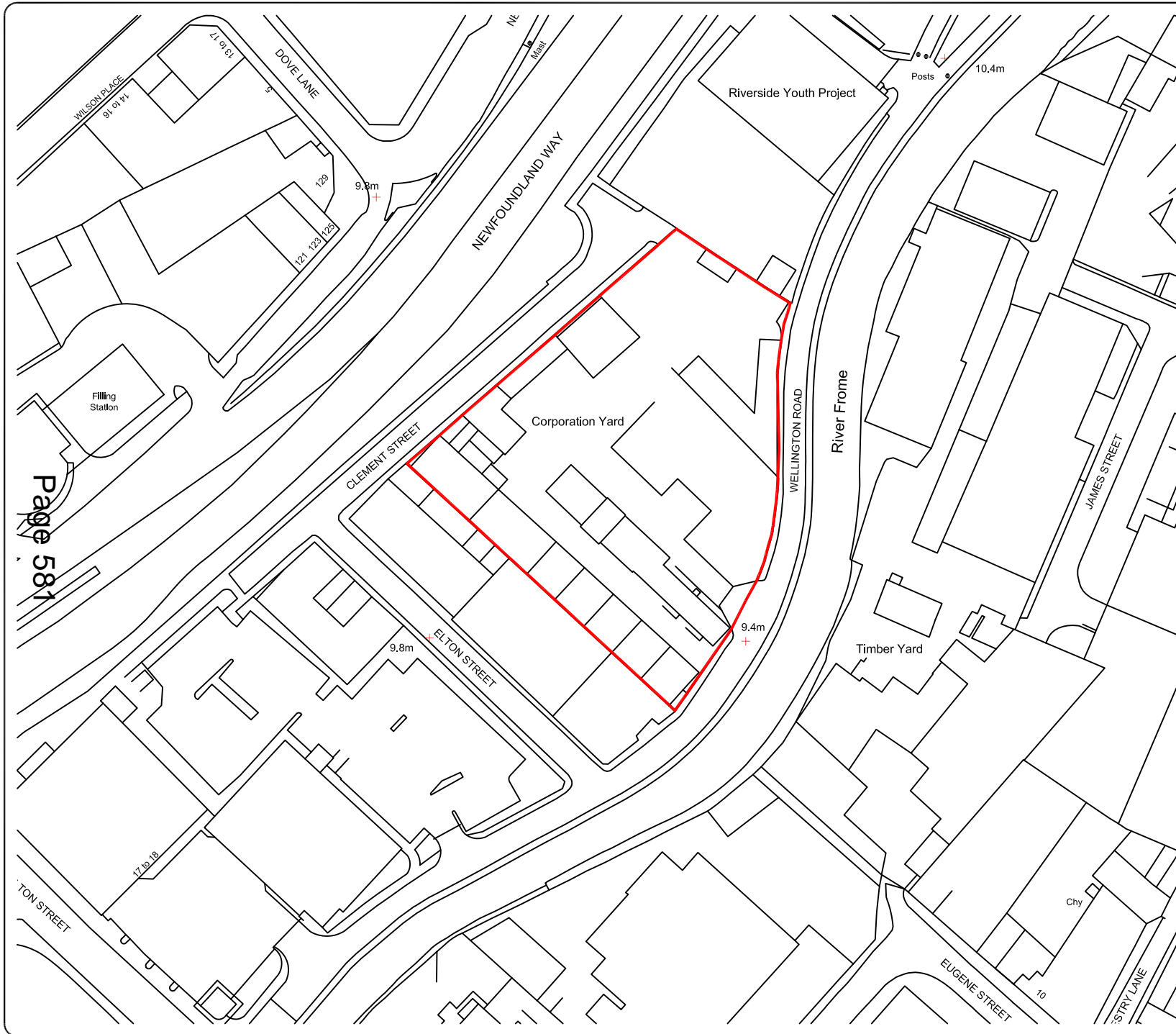
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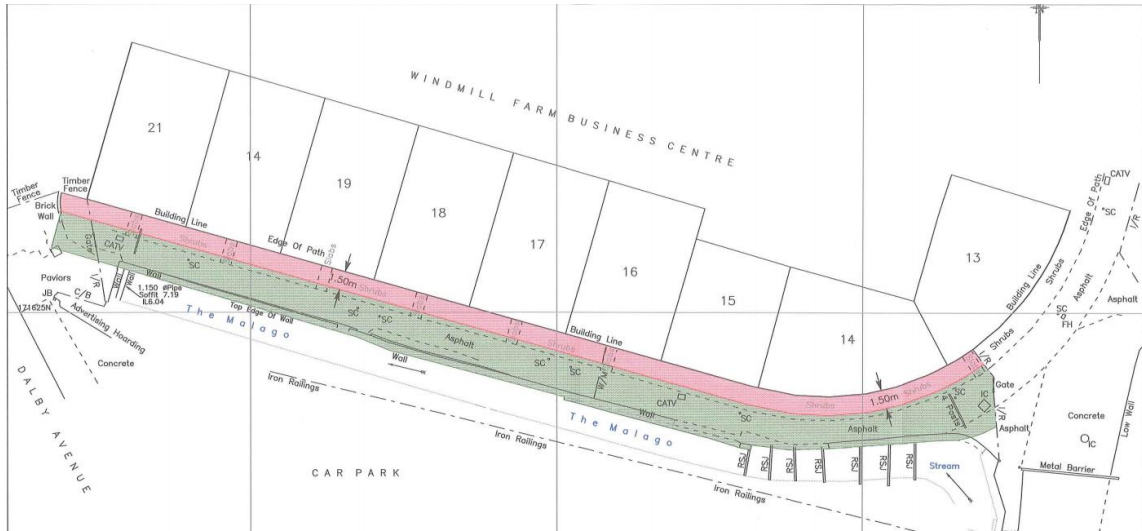


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Appendix iii

Bedminster Green Site Acquisition



land to the north of Bedminster Green Plot 3



The Frome Gateway Regeneration Framework

Formal Consultation Report

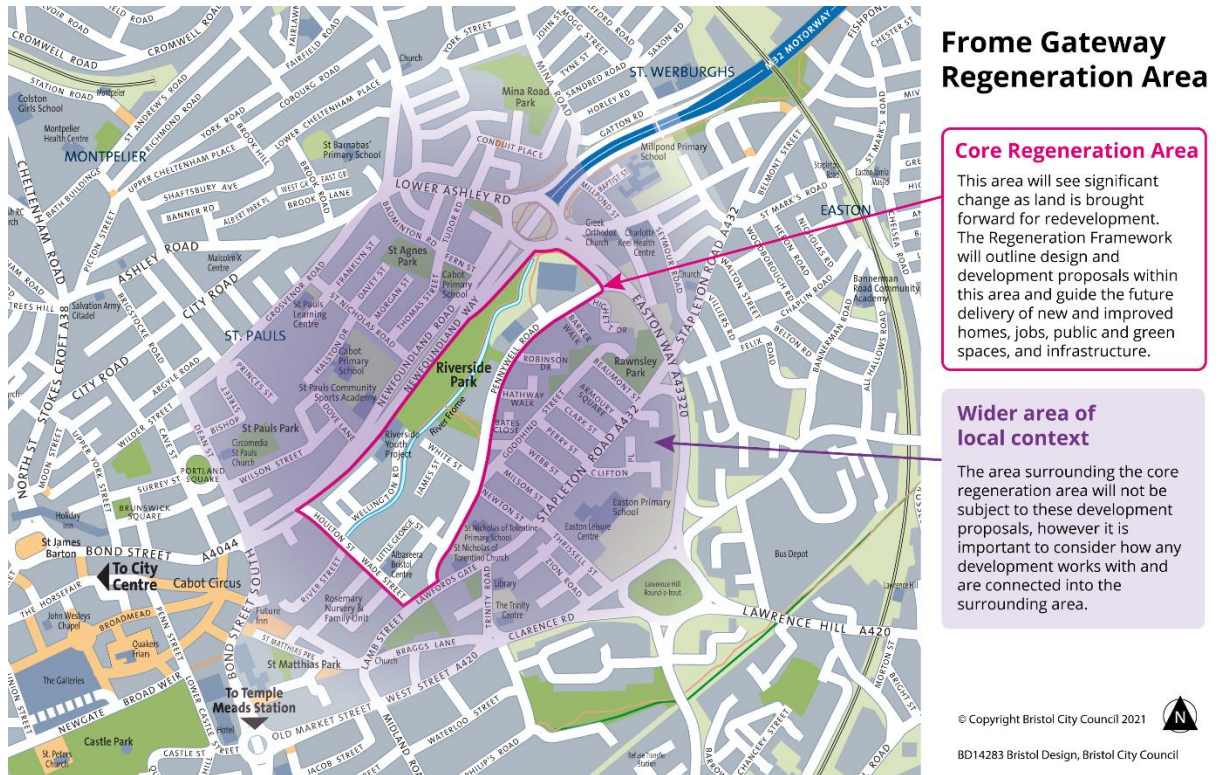
January 2024

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1.0 Executive Summary

The Frome Gateway Regeneration Framework was developed by Bristol City Council and sets out a long-term vision and principles for the redevelopment of the Frome Gateway Regeneration Area, located within St Jude's, directly north-east of Bristol's city centre. This area is set to change from predominantly industrial and warehousing uses into a residential-led, mixed-use neighbourhood as a result of being identified as an Area of Growth and Regeneration in Bristol's new draft Local Plan.



The framework was created with extensive input from the local community and wider stakeholders. Engagement began in 2019 and full details of the Frome Gateway engagement programme can be found within the Frome Gateway Statement of Community Involvement. The framework was also greatly informed by a range of specialist technical studies.

The formal consultation on the draft Frome Gateway Regeneration Framework ran for six weeks from Monday 23rd October 2023 until Monday 4th December 2023. A programme of 24 engagement activities were delivered as part of the consultation and were attended by 343 people. A variety of 'open to all' events for the general public were run across a range of formats and at various times to maximise opportunities for participation. In addition, bespoke events with targeted stakeholders were also conducted to promote accessibility and inclusivity along with other means such as using translators and an Easy Read version of the consultation survey.

The consultation survey was the primary means of data collection and asked the public for the extent of their agreement across key aspects of the draft Frome Gateway Regeneration Framework. The survey also provided opportunities for comments via free text. 327 survey responses were received along with 11 formal representations by letter from a variety of organisations. A full breakdown of consultation participants is found in section 5 of this report.

The consultation findings demonstrated substantial and broad support for almost all key elements within the framework:

- 39.41% of survey responses in agreement and 39.74% in strong agreement with the vision
- The objectives all received over 36.54% of responses in agreement and 40.06% in strong agreement
- 44.30% of responses in agreement and 21.48% in strong agreement with the spatial concept
- The key approaches and main ambitions of all four character areas each received over 45.48% of responses in agreement and over 22.48% in strong agreement
- The approaches to employment all received over 35.44% of responses in agreement and over 32.07% in strong agreement
- All but one of the housing approaches received over 32.16% of responses in agreement and over 45.20% in strong agreement
- Approaches to community and culture all received over 34.28% of responses in agreement and over 48.60% in strong agreement
- Approaches to pedestrian, cycle and vehicle routes all receiving over 28.57% of responses in agreement and 41.55% in strong agreement
- All four approaches to height and massing received each over 25.81% of responses in agreement and over 27.17% in strong agreement
- 44.20% of responses are in agreement and 37.32% in strong agreement with the approach to active frontage and streets
- Over 29.15% of responses to green and blue infrastructure approaches are in agreement and over 51.11% in strong agreement
- 37.78 % of responses in agreement and 32.96% in strong agreement with green space 'big move' concept
- Approaches to sustainability and climate change each received over 29.63% of responses in agreement and 52.22% in strong agreement
- The approach to flood risk received 82.42% of responses agreeing or strongly agreeing
- Approach to health and wellbeing received over 25.00% of responses in agreement and over 30.88% in strong agreement

Aspects of the framework that were supported to a lesser degree are:

- Provide up to 500 student bed spaces as part of the overall mix, mainly in the south of the site (in addition to the 1,000 new homes)
- Potentially allow buildings that are significantly taller (than the most commonly occurring height of existing buildings) at the north and southern gateways to the site and Newfoundland Way crossing
- Potentially allow buildings of amplified height (modestly higher than the most commonly occurring height of existing buildings) overlooking the Riverside Park and in the centre of the site
- Avoid new hot food takeaways

476 comments were received via free text and provided great insight into the rationale for the levels of agreement to the elements within the framework. They also provided valuable details that greatly informed this report's recommendations, which are listed below.

1. Consider amending vision to include references to inclusivity and accessibility
2. Evidence base for housing need in the area to be further highlighted

3. Reconsider Industrial Quarter with regard to size, mix of uses and enhancing connection with the rest of the regeneration area
4. Further detail required to set out how the council will seek to retain businesses and jobs
5. Explore whether there is scope to reconsider student bed allocation
6. Strengthen wording around affordable housing within the framework to make it clear BCC expects developers to use grant and other means to secure policy compliant affordable housing allocation
7. Explore whether there is scope to strengthen commitment to the Local Lettings Policy
8. Need for larger family homes to be further highlighted
9. Further detail required to set out how the council will seek to retain and support community groups, noting Albaseera Mosque and Trojan Free Fighters in particular
10. Make clear that disability groups and local residents will be involved in future consultations around a new modal filter on Pennywell Road to ensure that people with limited mobility are not restricted from travel, and consider other modal filter concerns (impact on residents and businesses, emergency services, traffic on Stapleton Road)
11. Consider amends to increase commitment to segregated pedestrian and cyclist movement to reduce possible conflict
12. Explore possibility of more detailed response to address issues associated with the M32/Easton Way underpass
13. Consider amends to respond to parking concerns
14. Review the height and massing strategy in light of reduced support for taller buildings
15. Consider including greater reference to design and build quality of taller buildings to address quality of life concerns
16. Explore possibility of strengthening commitments to enhance and protect biodiversity and nature
17. Highlight efforts made in the framework to promote safety
18. Provide further evidence of the public benefit of the green space 'big move' to support the rationale
19. Consider amends to make the concept of the green space 'big move' more discernible
20. Further detail required to address flooding concerns
21. Rephrase the text about no hot food takeaways to instead be about promotion of healthy food choices

2.0 About the Frome Gateway Regeneration Framework

The Frome Gateway Regeneration Area is located within St Jude's, directly north-east of Bristol's city centre. At present it is designated as a Principle Industrial and Warehousing Area. Bristol City Council is currently preparing a new draft of the Local Plan to guide future development decisions. The emerging Local Plan identifies Frome Gateway as an Area of Growth and Regeneration which could support significant new development as a new, mixed-use neighbourhood.

Since 2019 Bristol City Council has been producing the Frome Gateway Regeneration Framework, a draft of which was finalised for public consultation in October 2023. The regeneration framework was created with extensive input from the local community and wider stakeholders and sets out a long-term vision and principles for the redevelopment of Frome Gateway. It integrates the area and community's needs with city planning, transport and design thinking to inform future planning applications and projects.

Ensuring the community and other stakeholders were involved in the development of the regeneration framework was a key focus from the outset, with engagement underpinned by:

- Building on the strengths, needs and identity of the existing community
- Understanding the area's history and listen to those who know it best
- Being transparent about the scope of community influence and the wider influencing factors on projects of this scale aside from community aspirations.

Engagement began in 2019 by working with the local community to create a set of Community Place Principles. These principles were established prior to any design work and set out local priorities for growth. The Community Place Principles were refined during the process of producing the regeneration framework and directly guided its development.

In addition to the production of the Community Place Principles, a comprehensive programme of engagement ran alongside the design process targeted at the local community, businesses, landowners and developers, and wider stakeholders. Engagement activities included:

- Community walkarounds and door-to-door conversations
- An online interactive map and survey
- Workshops, exhibitions and presentations
- Focussed session with cultural venues
- 1-1 business engagement
- Bespoke engagement with specific stakeholder groups (such as Al-Baseera Mosque, St Nicholas of Tolentine Primary School and local youth organisations)
- 1-1 landowner / developer engagement and via a bespoke Landowner & Developer Forum
- Design Review Panels with Design West
- Artist in residence
- An Access Audit and further engagement with the West of England Centre for Inclusive Living (WECIL)
- Engagement with the Environment Agency

Alongside the engagement programme, a range of specialist technical studies were undertaken covering areas such as housing, employment, transport, health, flooding and infrastructure. This work greatly informed the production of the regeneration framework.

3.0 About the Frome Gateway Regeneration Framework formal consultation

3.1 Overview

The formal consultation on the draft Frome Gateway Regeneration Framework ran for six weeks from Monday 23rd October 2023 until Monday 4th December 2023. A consultation survey was used to ask the public for the extent of their agreement across key aspects of the draft Frome Gateway Regeneration Framework. The survey also provided opportunities for comments via free text. The survey was available online on Bristol City Council's Consultation Hub and via the project website (www.fromeagateway.co.uk). Paper versions of the survey and free post envelopes were available at Junction 3 Library, St Paul's Learning Centre, The Trinity Centre and St Paul's Academy Sport Centre. Paper surveys were also taken to consultation events and available via post upon request. In addition to survey responses, 11 representations were received via formal letter.

A fully accessible summary version of the draft Frome Gateway Regeneration Framework was published alongside the full framework. The Frome Gateway Health Impact Assessment was also published with the survey as a supporting document.

The consultation was widely publicised across a variety of media and formats to communicate to the public and key stakeholders that their views were sought on the regeneration framework. Full details of consultation marketing and promotion are found in Appendix A of this report.

A programme of 24 engagement activities were delivered as part of the consultation and attended by 343 people. A variety of 'open to all' events for the general public were run across a range of formats and at various times to maximise opportunities for participation. These events are set out below. In addition, bespoke events with targeted stakeholders were also conducted. Targeted events are described in subsequent sections of this report.

Riverside Park pop-up

Council officers spent a number of hours in Riverside Park in the afternoon of November 6th speaking to passers-by about the Frome Gateway regeneration and consultation.

16th November 2023 (2-4pm). Riverside Park pop-up. 14 attendees.

Public exhibition

A suite of information boards and videos were on display at Lost Horizon between 12-6pm on November 8th and a large team of council officers from a variety of departments were present including Regeneration, Economic Development, Culture, Flood Risk and Community Development.

8th November 2023 (12-6pm). Project exhibition at Lost Horizon. 31 attendees.

Walking tours

Three lunchtime walking tours were held over the course of the consultation during which council officers took members of the public around key parts of the regeneration area to discuss the proposed changes in situ and answer questions.

1st November 2023 (12.30-2pm). Regeneration area walking tour. 4 attendees.

1st November 2023 (12.30-2pm). Regeneration area walking tour. 5 attendees.

1st November 2023 (12.30-2pm). Regeneration area walking tour. 1 attendee.

Webinar

An online webinar was held to present the draft framework, answer questions and encourage those present to participate in the consultation survey.

15th November 2023 (1-2pm). Public webinar. 15 attendees.

3.2 Inclusivity

The Frome Gateway area, part of the Lawrence Hill ward, is highly diverse, with large African (specifically Somali), Caribbean, Polish and Pakistani communities. 63.5% of local school pupils have a first language other than English, and the main language is not English for 23.4% of residents. The Lawrence Hill ward is also young, with a higher proportion of children (0-15 years) than the city average and significantly lower proportion of people older than 65. The area is home to multiple community initiatives, many of which focus on specific groups (e.g. women, migrant populations, young people, the Muslim community). The consultation was designed with this context in mind and great care was taken to promote accessibility and inclusivity.

Three local 'Community Champions' were engaged in the consultation: one Somali speaking, one Arabic speaking and one Polish speaking. Community Champions are well trusted and respected residents within their communities who are willing to work with the council to engage those who experience barriers to engagement, often using different community languages. Community Champions identified members of their local communities with more limited English and worked with them to complete the consultation survey, translating where necessary. 69 surveys were completed this way.

A mid-point review was conducted to ascertain the level of participation amongst those with protected characteristics. This review identified under-representation from young people, females and those identifying as disabled. Youth engagement was undertaken in the second half of the consultation, hence the lack of young people at the mid-point review. Once delivered, the planned sessions with young people addressed their under-representation. Social media adverts targeted at women and girls were bought and ran for one week resulting in higher proportion of female survey respondents than at the mid-point review. Equalities organisations agreed to further promote the consultation raising the proportion of respondents identifying as disabled.

In a further effort to promote accessibility, the survey was produced in Easy Read format and used with specific groups, such as children and those whose main language is not English. 30 surveys were completed using the Easy Read version.

A broad range of targeted events were held with key stakeholder groups (set out below). Sessions were held in the stakeholder groups' own setting where possible.

Young people

Two walking tours of the Frome Gateway Regeneration Area were conducted, one with members of Horn Youth Concern, a local youth group, and one with year six students at St Nicholas of Tolentine Primary School. Following the walking tours, group discussions were held with the young people who were then supported to complete the consultation survey. An information session was held at Trojan Free Fighters with children and their parents. Council officers also met a trustee from Riverside Youth Project and briefed on the framework.

24th October 2023 (3-5pm). Walking tour with Horn Youth Concern. 22 attendees.

23rd November 2023 (1.30-3.30pm). Walking tour with St Nicholas of Tolentine Primary School students. 23 attendees.

Albaseera Bristol Centre

An exhibition was held at Albaseera mosque on Friday 3rd November in between Friday prayers to maximise participation. A suite of information boards and videos were on display. Videos contained Somali subtitles and Somali translators were present during the exhibition. Council officers from a range of departments were present: Regeneration, Economic Development, Planning, Flood Risk, Community Development. The council funded food and refreshments for exhibition attendees.

3rd November (1-3pm). Albaseera Bristol Centre. 103 attendees.

St Jude's Women's Group

Council officers from Regeneration and Community Development attended the St Jude's Women's Group meeting on Friday 3rd November. This group is made up of mostly Somali women whose main language is not English, and so a Community Champion was also available to translate to the group as needed. The session involved an informal roundtable discussion about the Framework and the consultation, with opportunities for free discussion and to ask questions. Council officers supported the women in completing Easy Read versions of the consultation survey.

3rd November (11-1pm). Bristol Central Quaker Meeting House. 22 attendees.

Health and homelessness

Council officers visited both Lawrence Hill Health Centre and Logos House (Salvation Army's supported homeless housing located within the regeneration area). During visits, briefings were given on key aspects of the regeneration framework and questions answered. Paper copies of the framework and survey were left with both facilities to encourage participation in the consultation.

24th October 2023 (11-11.30am). Salvation Army. 1 attendee.

16th November 2023 (11-12pm). Lawrence Hill Health Centre. 5 attendees.

Special interest group webinar

An online webinar was held for special interest and placemaking groups including active and sustainable travel, placemaking and design advocacy groups and organisations, and equalities groups. This included a presentation on the draft framework and consultation with time for free discussion and questions.

22nd November 2023 (4-5pm). Special Interest Webinar. 6 attendees.

3.3 Businesses, landowners, politicians and neighbourhood planning

A range of engagement was undertaken with businesses, landowners, politicians and Old Market Community Association:

Businesses

Three activities were targeted at business. Firstly, council officers went door to door to speak to businesses within the core regeneration area, provided paper copies of the framework summary and survey and encouraged their participation in the consultation. A business-focused webinar was held one lunchtime to present the framework and provide further opportunities for questions to be asked of council officers. Finally, the regeneration framework was presented to Business West's Planning Transport and Climate Group. All businesses were also free to join any of the 'open to all' events listed above.

2nd November 2023 (9-3pm). Door-to-door to speak to businesses.

9th November 2023 (1-2pm). Online webinar for businesses. 6 attendees.

21st November 2023 (8.30-9.30am). Online webinar for Business West. 32 attendees.

Landowners and developers

Two online events were held specifically for landowners and developers, the first of which was a webinar to present the regeneration framework. The second event took the format of a question-and-answer session after landowners and developers had had time to consider the proposals within the regeneration framework. Landowner and developers were also free to join any of the 'open to all' events listed above.

25th October 2023 (11-12pm) – online. 12 attendees.

22nd November 2023 (11-12pm) – online. 10 attendees.

Politicians

Three online briefings were held for local Ward Councillors and Cabinet members. A further online briefing was held for Bristol City Council's Development Control Committee and the Growth and Regeneration Scrutiny Commission.

- *31st October 2023 (12.30-1.30pm). Briefing for local ward counsellors and Cabinet Holders (online). 1 attendee.*
- *2nd November 2023 (5-6pm). Briefing for local ward counsellors and Cabinet Holders (online). 1 attendee.*
- *22nd November 2023 (2-3pm). Briefing for local ward counsellors and Cabinet Holders (online). 1 attendee.*
- *29th November 2023 (11-12pm). Briefing for Development Control Committee and the Growth and Regeneration Scrutiny Commission (online). 11 attendees.*

Old Market Community Association

A two-hour session was arranged with Old Market Neighbourhood Association to provide an opportunity to discuss the Framework and their thoughts and feedback.

30th November 2023 (10-12pm). 3 attendees.

4.0 Data collection and analysis

The primary means of data collection was via a consultation survey with secondary means being representation via formal letter. The consultation survey was structured across seven sections making up the core components of the regeneration framework:

- Vision and objectives
- Spatial concept and character areas
- Employment, housing, community and culture
- Pedestrian, cycle, and vehicle routes
- Height, massing, active frontages and streets
- Green/blue infrastructure and open space
- Sustainability, climate resilience, flood risk and health

The survey asked to what extent participants agreed or disagreed with key aspects within each section. Where relevant and necessary, diagrams were presented, and respondents were also signposted to pages within the regeneration framework for full details on each aspect they were being asked about (e.g character areas, employment etc). These questions provided quantitative data and the degree of agreement or disagreement for each question was then totalled and converted into percentages with all blank answers removed.

The survey also provided opportunities for free text and 185 respondents made 476 comments. The free text comments were analysed via a categorising and counting method. Comments were split (recognising that each free text entry may include multiple comments or reference multiple topics) categorised and grouped in order to provide an approximate count of the number of times each comment or topic was raised. Categories were designed to reflect the content of the comments (rather than being pre-determined), the sentiment and to align broadly with the sections of the regeneration framework. This has allowed comments to be presented as a series of key themes, albeit with narrative to explain the more specific issues and concerns. In cases where respondents mentioned issues that were not relevant to the question being answered these were manually reallocated to the correct question to avoid duplication.

The letters were analysed similarly. Comments within each letter were allocated to the corresponding survey questions and then categorised and counted. Summaries of the lengthy responses provided by letter were combined with the points raised in the survey. The process of categorising and summarising comments has been undertaken thoroughly but it should be noted that this process is subjective. The counts should therefore be considered indicative. It must also be noted that where there were a significant number of unrelated comments, these were categorised as miscellaneous 'other'.

5.0 Consultation participants

327 survey responses were received along with 11 formal representations by letter from the following organisations: National Highways, Bristol Cycling Forum, Bristol Parks Forum, The Coal Authority, Environment Agency, Bristol Walking Alliance, Natural England, Avon and Somerset Police, Royal Society for the Protection of Birds, Wessex Water, Young Bristol.

The majority of respondents were Bristol residents, with 49% of residents reporting to come from BS2 and BS5 postcodes (local to the Frome Gateway area) and 13% from other postcodes (38% of respondents did not provide postcode information).

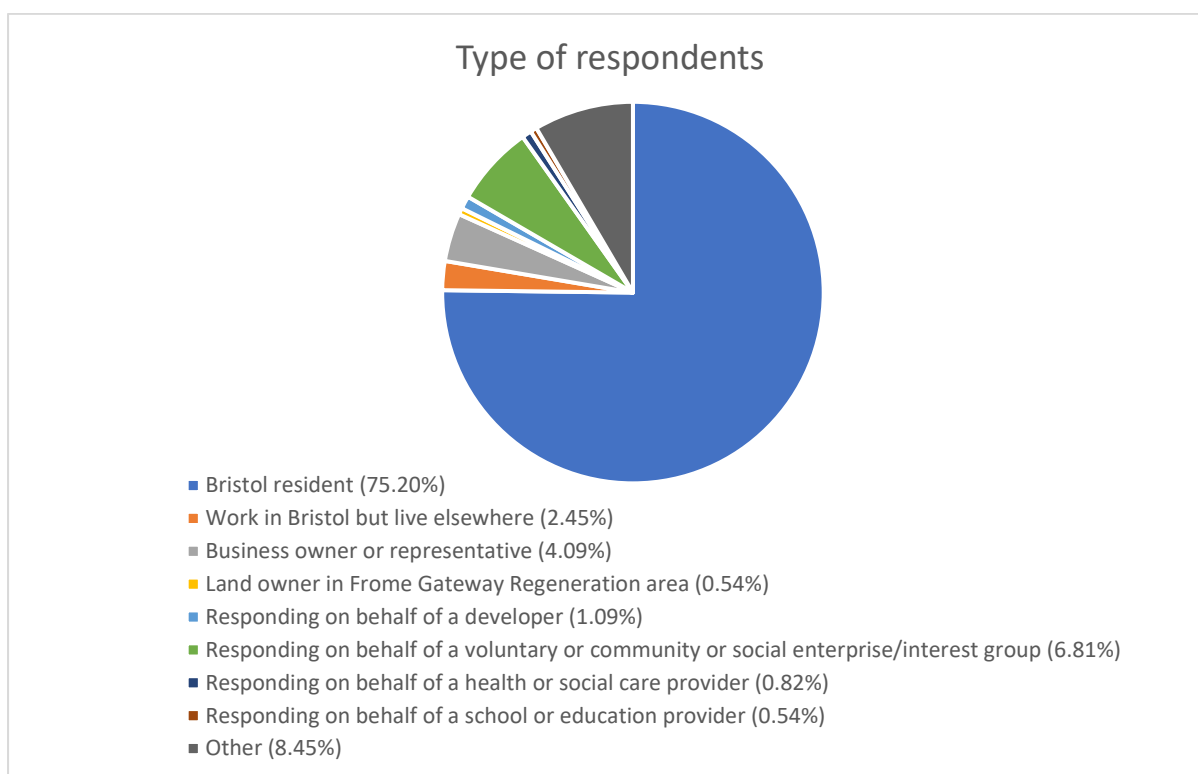


Figure 1: Type of respondents

5.1 Age

Of those respondents who provided their age, the largest groups were age 45-54 (22.18%), followed by 35-44 (20.36%) and 25-34 (16%), reflecting the young demographics of the area.

Barton Hill MSOA¹ has a high percentage of children age 0-15 (30%). 10% of survey respondents who provided their age were 0-15; 3% were 16-17.

¹ 'Middle layer Super Output Areas' (MSOAs) are one level of census statistical geography alongside 'Output Areas' (OAs) and Lower Super Output Areas (LSOAs). MSOAs are made up of usually four or five LSOAs and typically comprise of between 2,000 and 6,000 households and have a usually resident population between 5,000 and 15,000 persons. More information about census geographies can be found at <https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeographies/census2021geographies>

Barton Hill and Temple Meads MSOAs have low proportions of people older than 65 (7.2% and 3.8%). This is similar to the response rate of 5% for age 65-84.

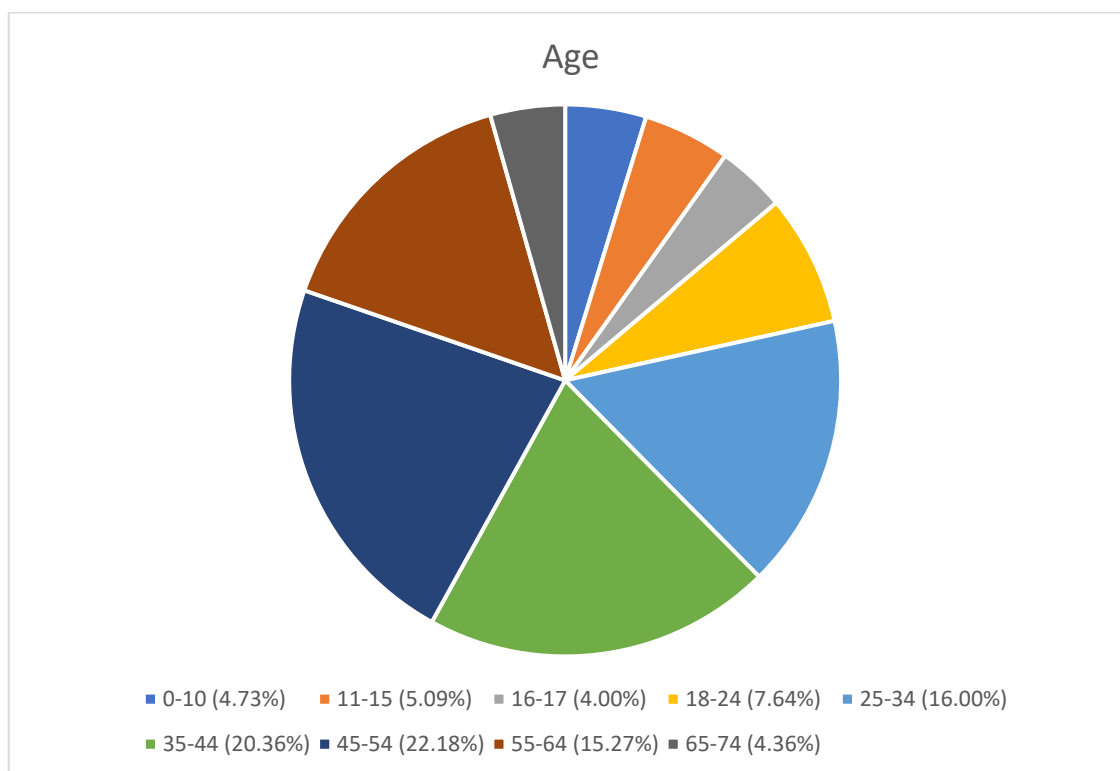


Figure 2: Age of survey respondents

5.2 Disability

5.8% of survey respondents identified as disabled which is lower than Lawrence Hill ward (16%) and the Bristol average (17.2%), however 22% did not provide a response to this question.

5.3 Sex

49.5% of respondents identified as male and 32.4% as female (15% did not answer this question and 3.1% chose 'prefer not to say').

5.4 Gender reassignment

0.3% of respondents reported having a gender identity different from their sex recorded at birth (4.6% preferred not to say; 19.6% did not answer this question). This is similar to Bristol overall, as reported in the 2021 census (0.8%).

5.5 Sexual orientation

5.5% of respondents identified as LGBT+, which is similar to the Bristol average of 6.1% (34.6% did not provide information).

5.6 Ethnicity

37.00% of respondents identified as Black, Black British, Caribbean or African and 26.91% as White British. This is similar to overall in Lawrence Hill ward: the 2021 census identified the largest ethnic groups in Lawrence Hill as White British, 33.6%, Black African, 20.2%, Other Black, 10.4%, Black Caribbean, 6.6%, Mixed, 6.5%, Other White, 6%, and Pakistani, 5.8%.

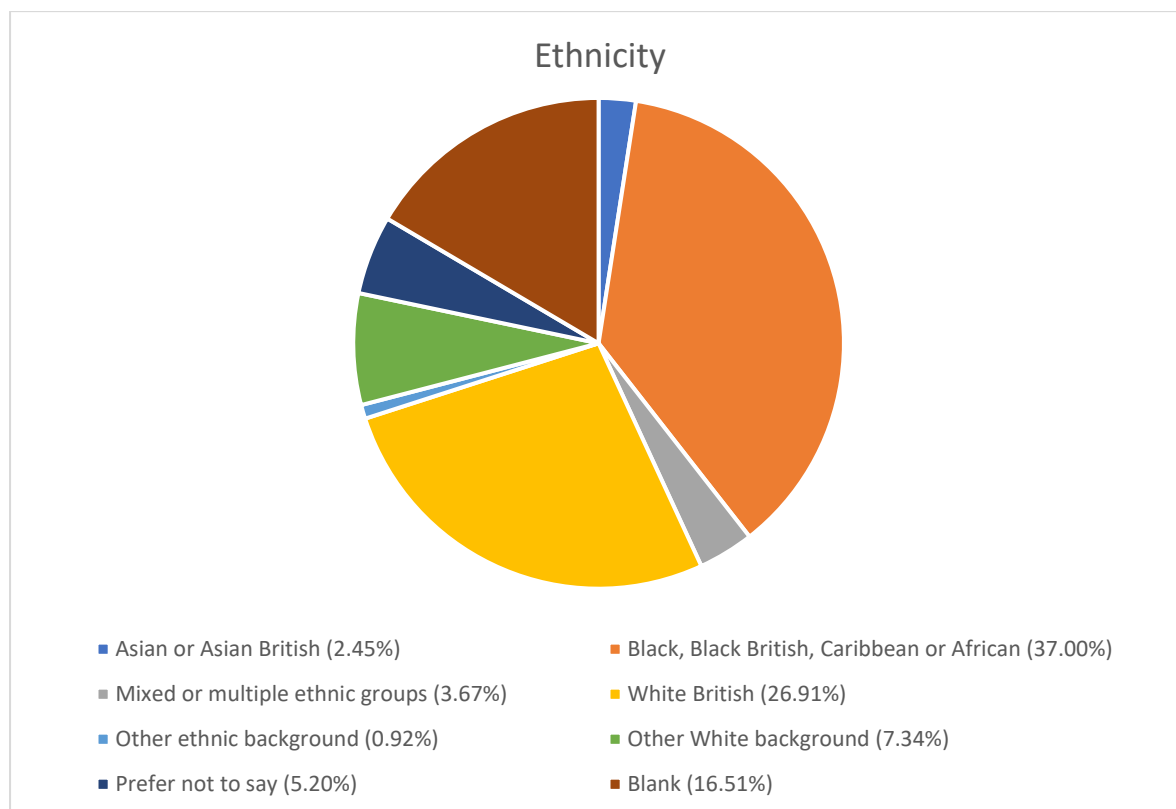


Figure 3: Ethnicity of survey respondents

5.7 Religion/faith

39% identified as Muslim, 14% as Christian and 27% as having no religion. This is similar to the population in Lawrence Hill ward where 37% of people are Muslim, 19.7% Christian and 32.5% have no religion. 20% did not respond to this question and 1% identified as Jewish. These percentages reflect the bespoke consultation sessions with the local mosque within the Frome Gateway area.

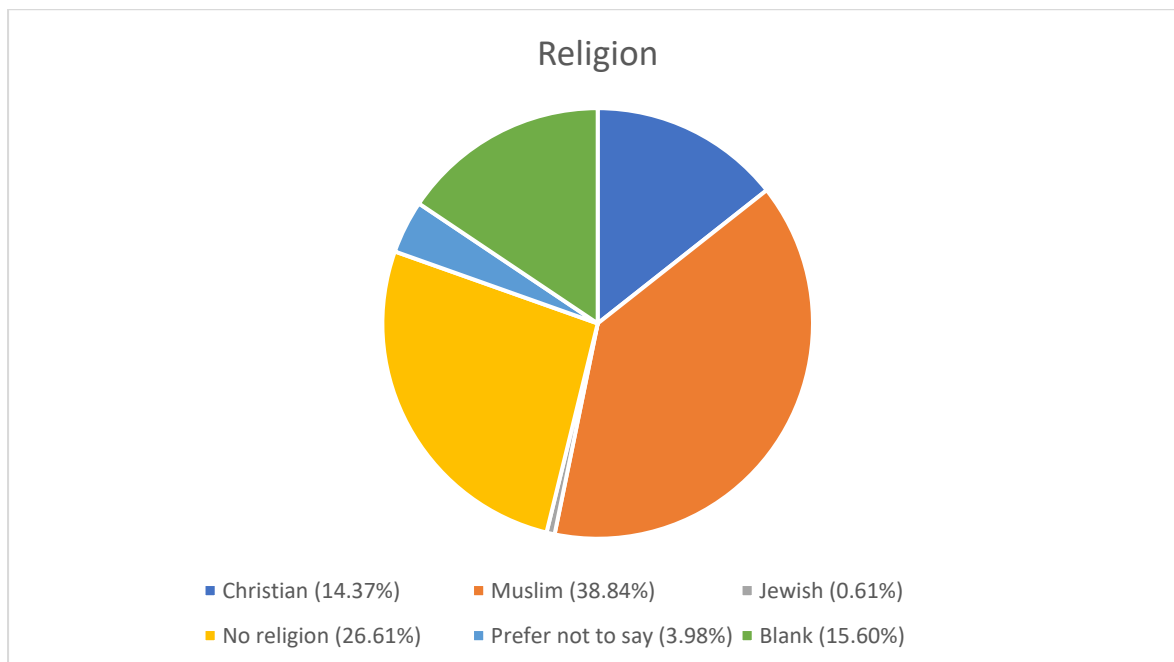


Figure 4: Religion of survey respondents

5.8 Pregnant or given birth in the last 26 weeks

4 respondents reported being pregnant or gave birth within 26 weeks of completing the consultation survey (1.2%). 22% did not answer this question or chose 'prefer not to say'.

5.9 Refugee or asylum seeker

5 respondents reported being a refugee or asylum seeker (1.5%). 23% did not answer this question or chose 'prefer not to say'.

5.10 Carer

8.6% reported being a carer. This is slightly higher than for Lawrence Hill (5.9%) and Bristol overall (7.6%).

5.11 Effect proposals may have on protected characteristics

32% of respondents did not think that the proposals would have any effect on their protected characteristics. 6% thought they may have negative effects and 8% thought they may have positive effects. 54% of survey respondents did not answer this question.

6.0 Consultation findings and recommendations

6.1 Vision and objectives

Findings

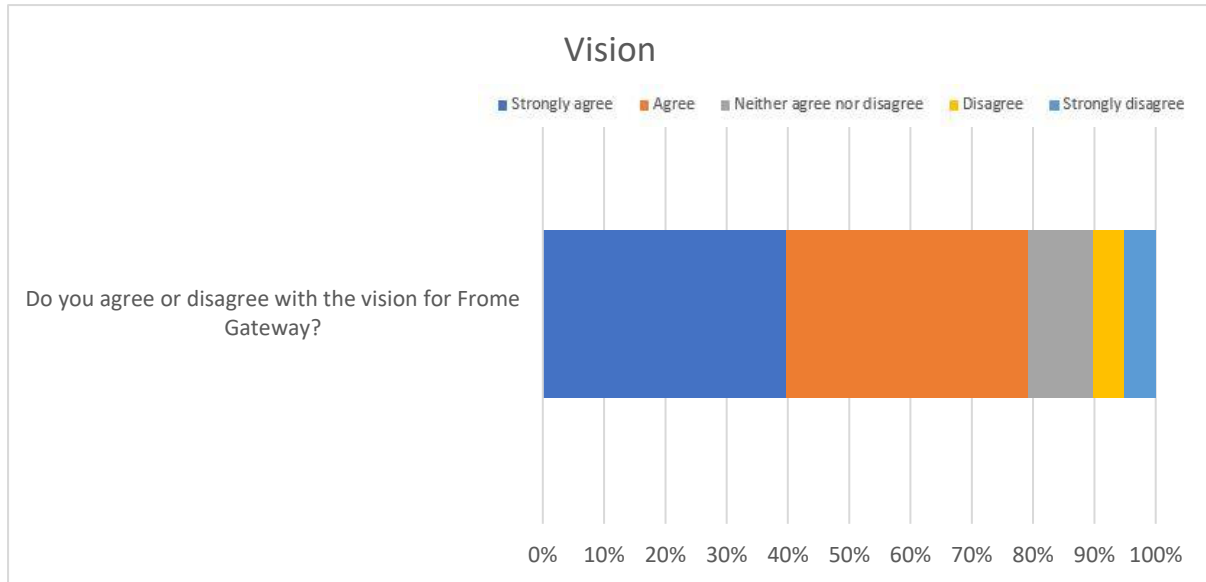


Figure 5: Agreement/disagreement with the vision

Support for the vision is significant with 39.41% of responses in agreement and 39.74% in strong agreement. There was little disagreement (4.89%) or strong disagreement (5.21%) towards the vision however those identifying as disabled were slightly less supportive (35.29% in agreement and 35.29% in strong agreement) and those identifying as female were more disagreeing (6.12%) and strongly disagreeing (8.16%).

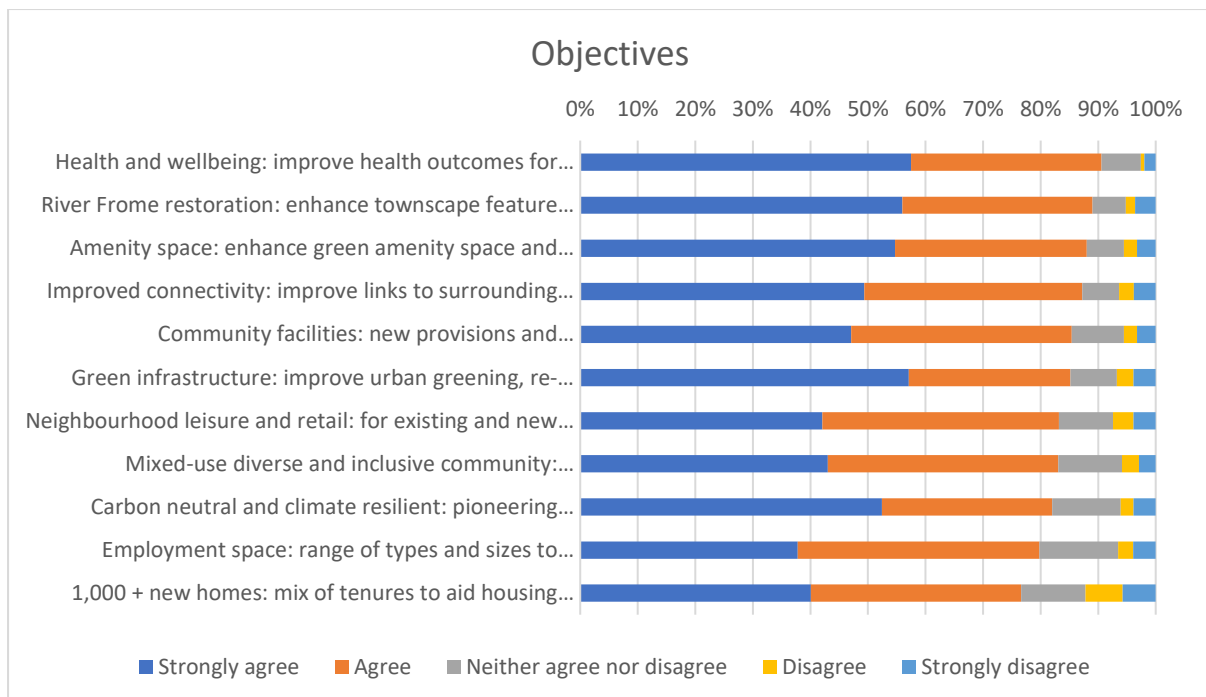


Figure 6: Agreement/disagreement with the objectives

The objectives are well supported with all receiving over 36.54% of responses in agreement and 40.06% in strong agreement. Almost all objectives received less than 3.56% of responses in disagreement and less than 3.91% in strong disagreement. Of the 11 regeneration objectives, the one which secured the least support was ‘1,000 + new homes: mix of tenures to aid housing supply and meet local housing need’ (6.41% disagree/ 5.77% strongly disagree). Those residing locally (BS2 and BS5 postcodes) were more negative about this objective with 7.64% in disagreement and 7.01% in strong disagreement.

Recommendations

1. Consider amending vision to include references to inclusivity and accessibility
2. Evidence base for housing need in the area to be further highlighted

6.2 Spatial concept and character areas

Findings

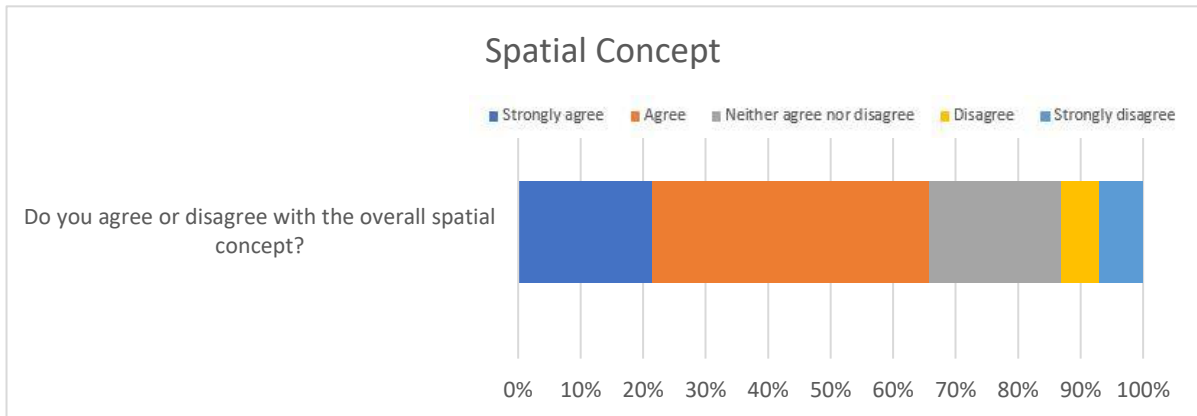


Figure 7: Agreement/disagreement with the spatial concept

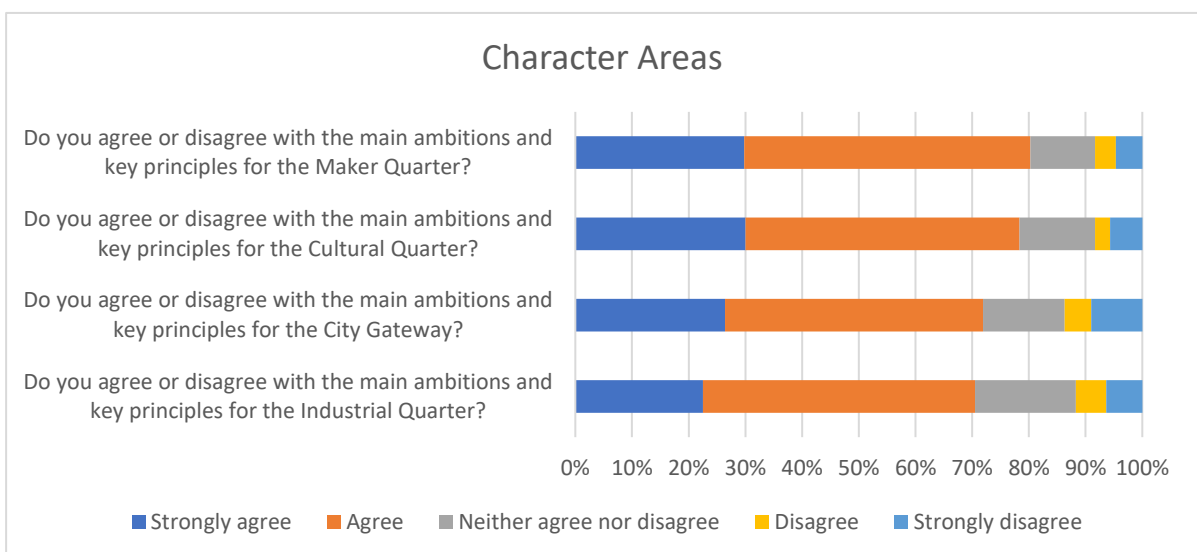


Figure 8: Agreement/disagreement with the character areas

Spatial Concept and Character Areas Free Text Comments

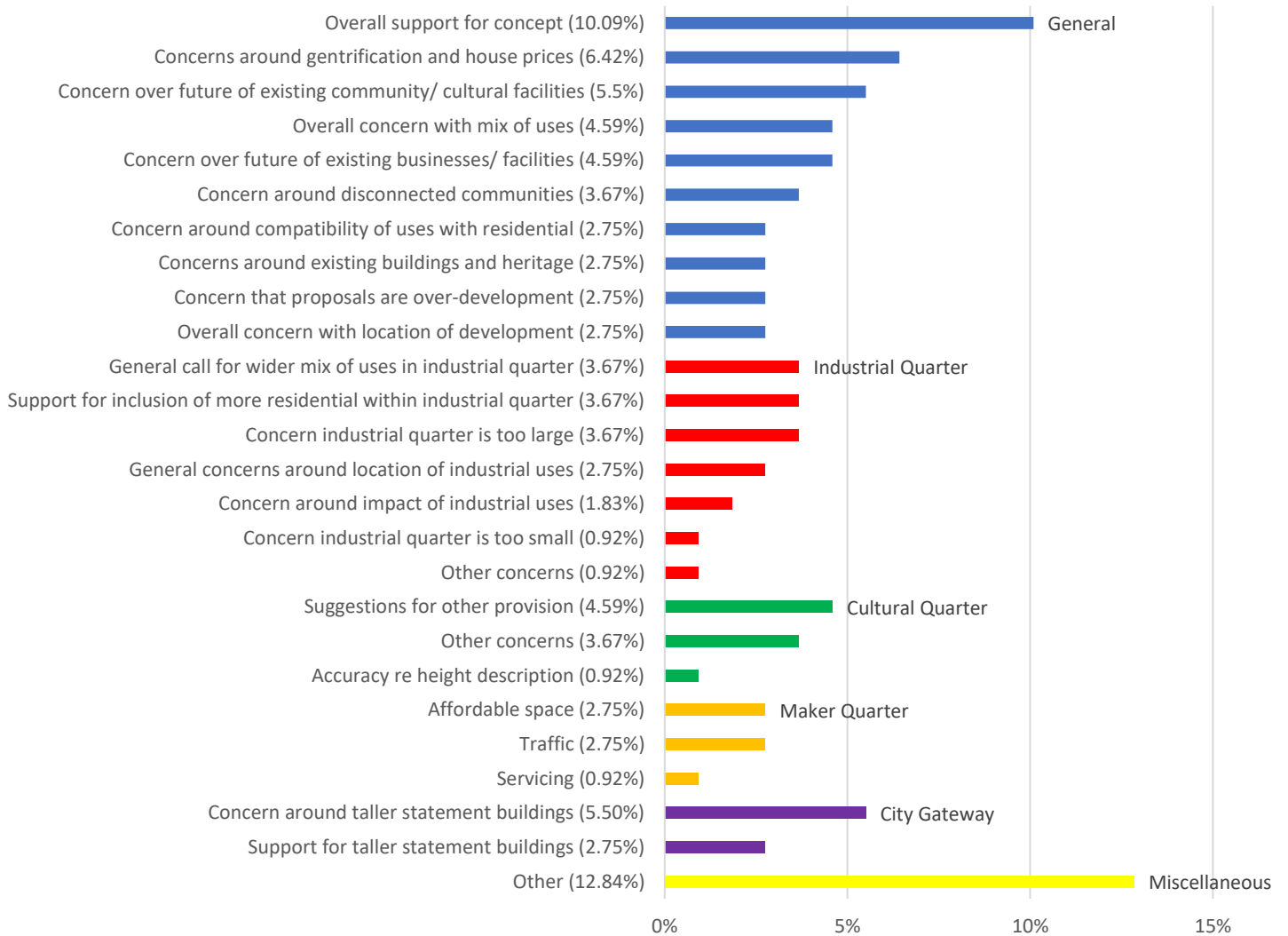


Figure 9: Spatial and character areas free text analysis

The spatial concept and proposed distribution of uses is supported with 44.30% of responses in agreement and 21.48% in strong agreement. This sentiment is emphasised through free text comments (10.09%).

15.09% of respondents either disagreed (6.04%) or strongly disagreed (7.05%) with the overall spatial concept. Levels of disagreement were higher amongst those living locally (8.00% disagree / 10.00% strongly disagree) and those identifying as female (8.08% disagree / 9.09% strongly disagree). A significant proportion of free text comments received (5.50%) express concern about the future of existing businesses, and community and cultural organisations. These aspects are covered in more detail in the 'Employment, housing, community and culture' section of this report. Concern is also expressed towards building height, which is explored further in 'Height, massing, active frontage and streets'. Just over one fifth of responses (21.14%) neither agree nor disagree with the spatial concept and proposed distribution of uses which is significant, although no rationale is easily drawn for this.

The key approaches and main ambitions across all four character areas are supported. All received over 45.48 % in agreement and over 22.48% in strong agreement. The level of disagreement with the Maker and Cultural Quarters is low with less than 3.68% in disagreement and less than 5.67% in

strong disagreement. However, the proportion of responses in disagreement towards the Industrial Quarter and City Gateway is higher.

5.37% disagree and 6.38% strongly disagree with the key approaches and main ambitions for the Industrial quarter. Free text comments relating to the Industrial Quarter express concern about locating industrial uses (2.75%) in the area and that the size of the industrial area is too large (3.67%). There are a notable number of comments expressing concern about the Industrial Quarter being almost exclusively focused on industrial provision (3.67%) with many stating there should be a wider mix of uses including more residential. There are also a number of comments suggesting the lack of a mix of uses in this area is not in-keeping with the approach across the rest of the regeneration area resulting in a sense of disconnection (3.67%). With regards to the City Gateway, 4.68% disagree and 9.03% strongly disagree with the proposals. The main area of concern expressed via free text related to heights of the buildings (see 'Height, massing, active frontage and streets').

Concern about increase in house prices and housing affordability is also expressed strongly through free text comments. This issue is covered within the 'Employment, housing, community and culture' section below.

Recommendations

3. Reconsider Industrial Quarter with regard to size, mix of uses and enhancing connection with the rest of the regeneration area

6.3 Employment, housing, community and culture

Findings

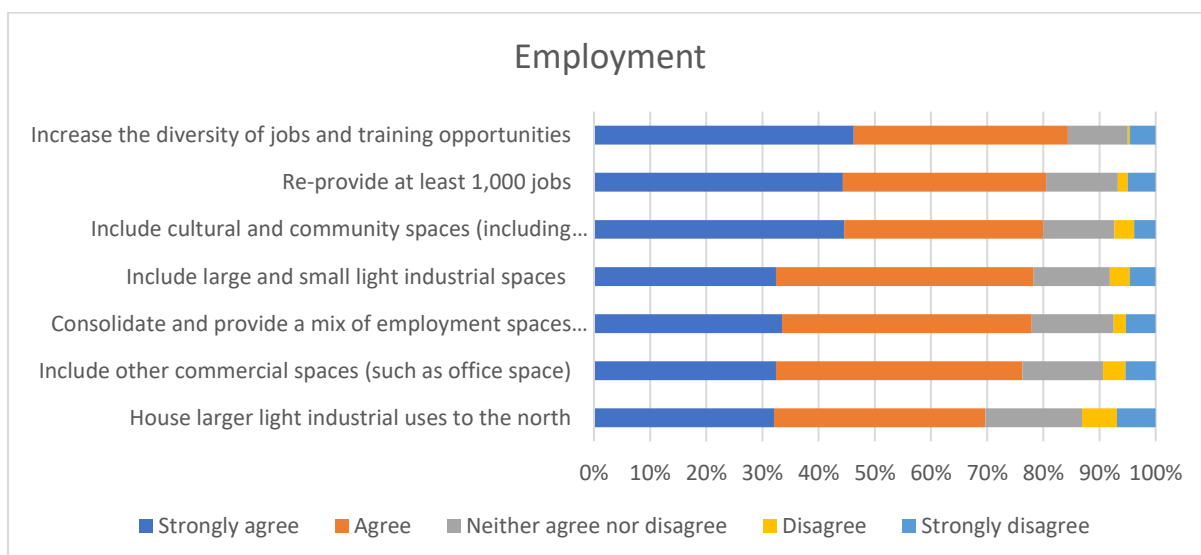


Figure 10: Agreement/disagreement with employment approaches

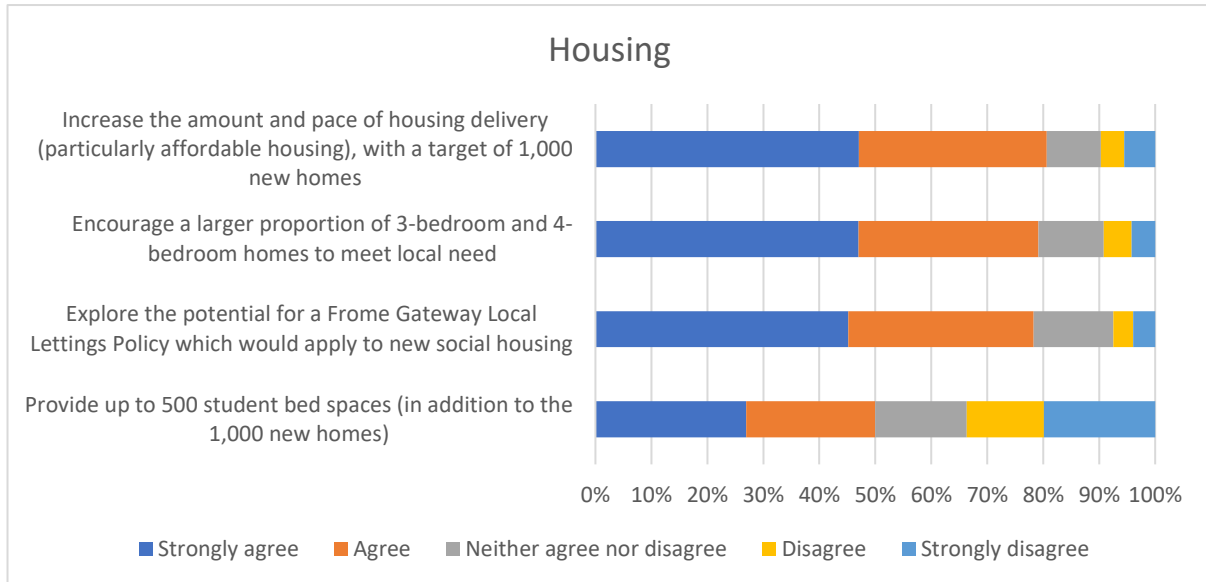


Figure 11: Agreement/disagreement with housing approaches

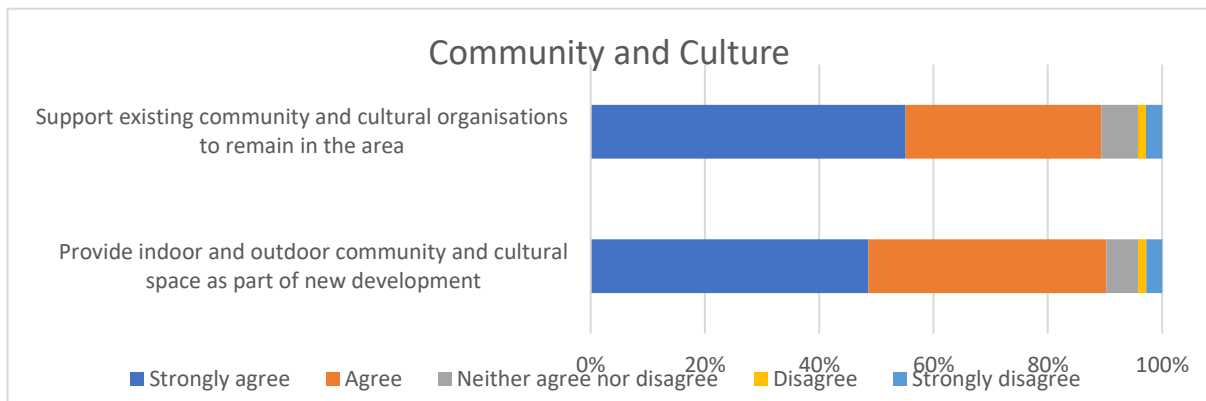


Figure 12: Agreement/disagreement with community and culture approaches

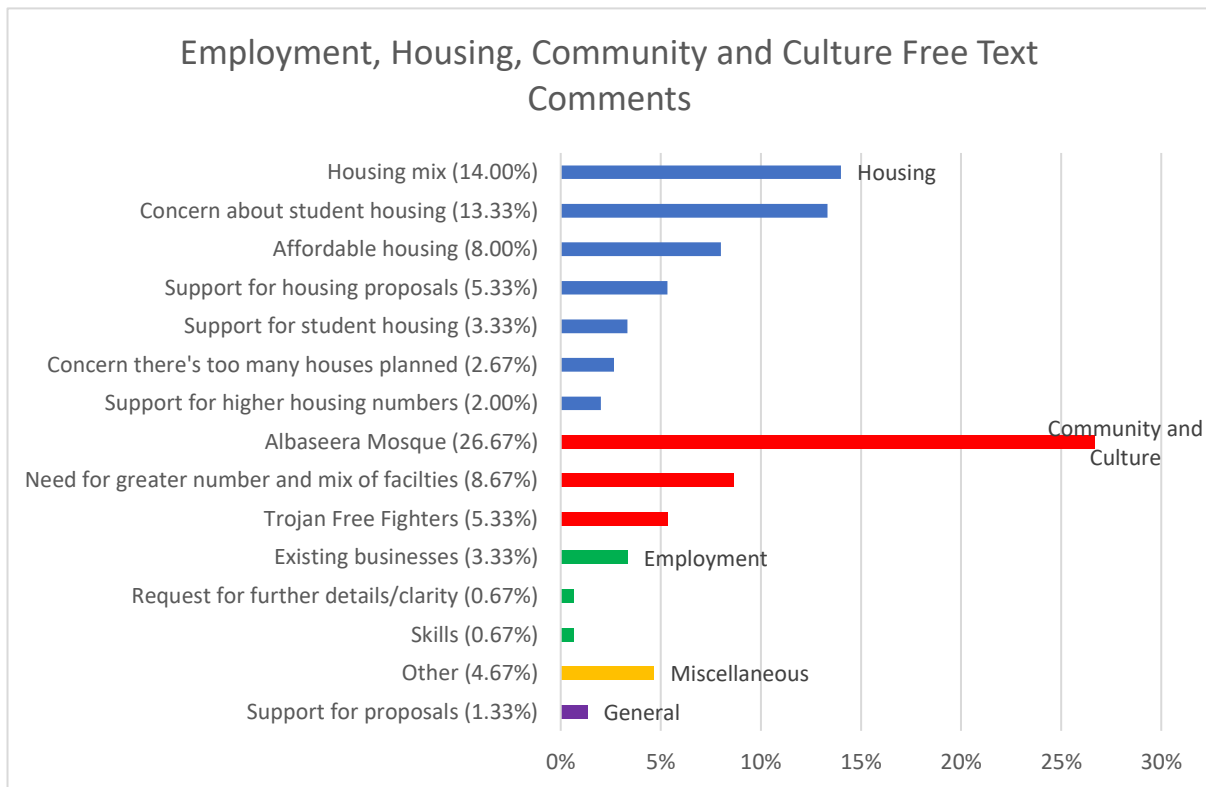


Figure 13: Employment, housing, community and culture free text analysis

Employment

The approaches to employment were supported with all receiving over 35.44% of responses in agreement and over 32.07% in strong agreement. Almost all received less than 3.96% of responses in disagreement and 5.40% in strong disagreement with the exception being 'House larger light industrial uses to the north of the regeneration area (in the Industrial Quarter)' receiving 6.21% of responses in disagreement and 6.90% in strong disagreement. This aligns with the sentiment expressed in the previous section of this report. The majority of free text comments (3.33%) expressed the importance of retaining existing businesses and jobs, again a sentiment expressed in the previous section.

Housing

Strong support is demonstrated for almost all the housing approaches with three of the four presented receiving over 32.16% of responses in agreement and over 45.20% in strong agreement. This is reflected in free text comments with 5.33% expressing support for the proposals and 2.00% even stating more than 1,000 homes should be accommodated. Disagreement with the housing approaches was low with three of the four receiving less than 4.95% of responses in disagreement and less than 5.54% in strong disagreement. Responses neither agreeing nor disagreeing was consistent across three of four housing approaches (between 9.69% and 16.31 %).

The outlier amongst the housing approaches is 'Provide up to 500 student bed spaces as part of the overall mix, mainly in the south of the site (in addition to the 1,000 new homes)' which received far less support. Responses to this approach were mixed with 23.05% in agreement and 26.95% in strong agreement and 13.83% in disagreement and 19.86% in strong disagreement. This is a significant difference with the other three housing approaches which were more supported and is reflected in free text comments. 13.33% of comments express concern about student housing stating it would change the character of the area, that a transient population would leave housing empty for periods and that provision of homes for local people is more important. A small number of free text comments from developers are in support of students housing (3.33%) stating the 500 bed cap feels arbitrary and comes from the draft Local Plan which may change and that the location is geographically well suited for students. It must also be noted that the degree of support for student beds was substantially higher amongst young people. Survey responses of those under 25 years old express strong support for student housing with 24.05% in agreement and 49.54% in strong agreement.

Other significant housing themes drawn from free text comments relate to affordable housing (8.00%) which express concern about affordability and state that social and affordable housing for the local community should be prioritised, that house prices should not price out the local community and that firmer commitment on the Local Lettings Policy is needed (the framework states this will be 'explored'). This concern regarding affordability echoes the comments received in the 'Spatial Concept and Character Areas' section. 14% of comments relate to housing mix and express a need for larger homes and state the guidance in the framework is too low.

Community and Culture

Approaches to community and culture received significant support with over 34.28% of survey responses in agreement and over 48.60% in strong agreement, and less than 1.41% in disagreement

and less than 2.83% strong disagreement. Free text comments overwhelmingly concern the need for retaining community and cultural facilities, with two particular organisations receiving notable mention. 26.67% of responses relate to Al Baseera Mosque recognising it as an important community facility, request for it to stay in the locality, express its need for larger premises and state concern about the impact of the regeneration on the mosque with parking a particular issue. The other community organisation to receive notable mention is Trojan Free Fighters (5.33% of comments). Comments state how important Trojan Free Fighters is for young people in particular and that it should be retained, and express concern for its future worrying that it may be lost.

Recommendations

4. Further detail required to set out how the council will seek to retain businesses and jobs
5. Explore whether there is scope to reconsider student bed allocation
6. Strengthen wording around affordable housing within the framework to make it clear BCC expects developers to use grant and other means to secure policy compliant affordable housing allocation
7. Explore whether there is scope to strengthen commitment to the Local Lettings Policy
8. Need for larger family homes to be further highlighted
9. Further detail required to set out how the council will seek to retain and support community groups, noting Albaseera Mosque and Trojan Free Fighters in particular

6.4 Pedestrian, cycle and vehicle routes

Findings

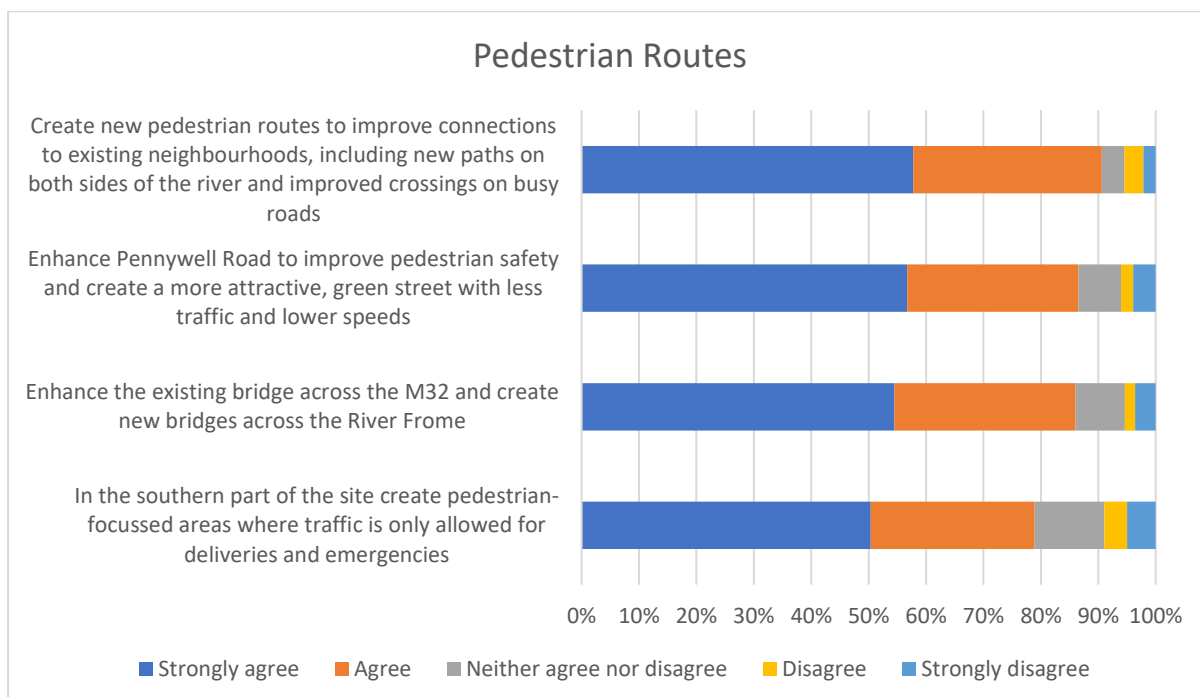


Figure 14: Agreement/disagreement with pedestrian routes approaches

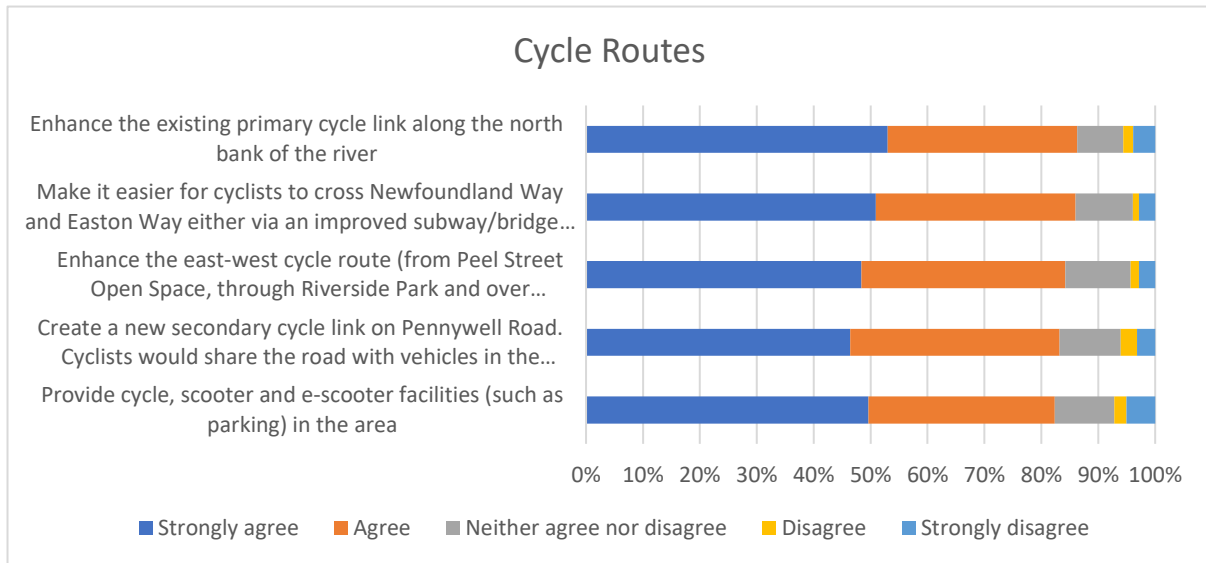


Figure 15: Agreement/disagreement with cycle routes approaches

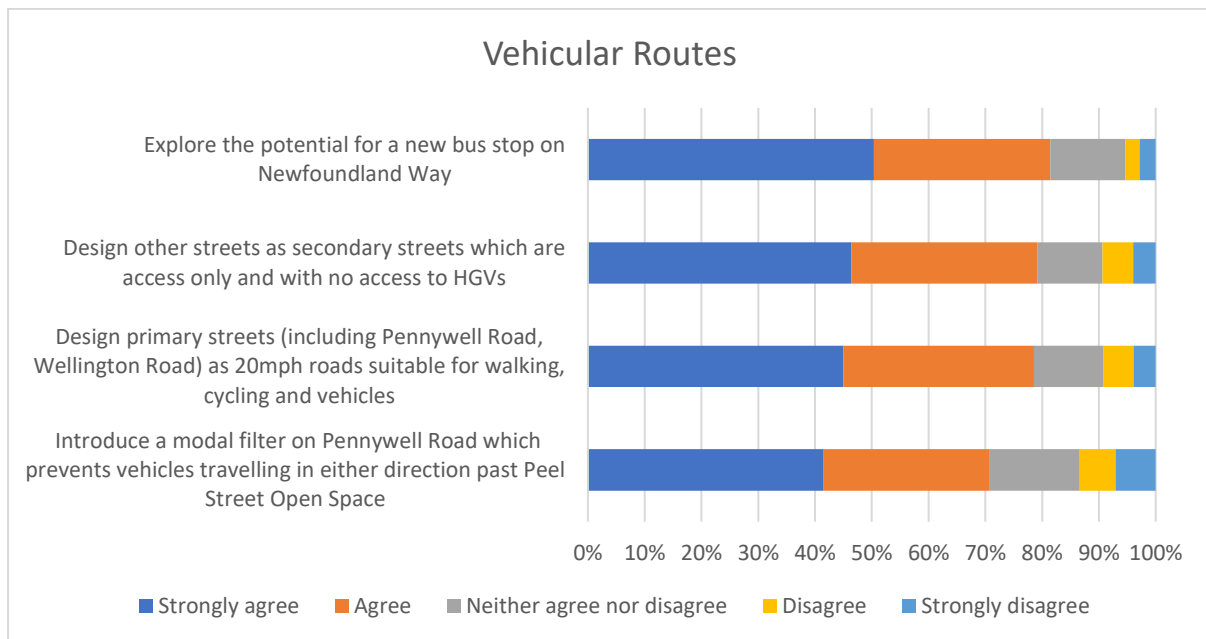


Figure 16: Agreement/disagreement with vehicular routes approaches

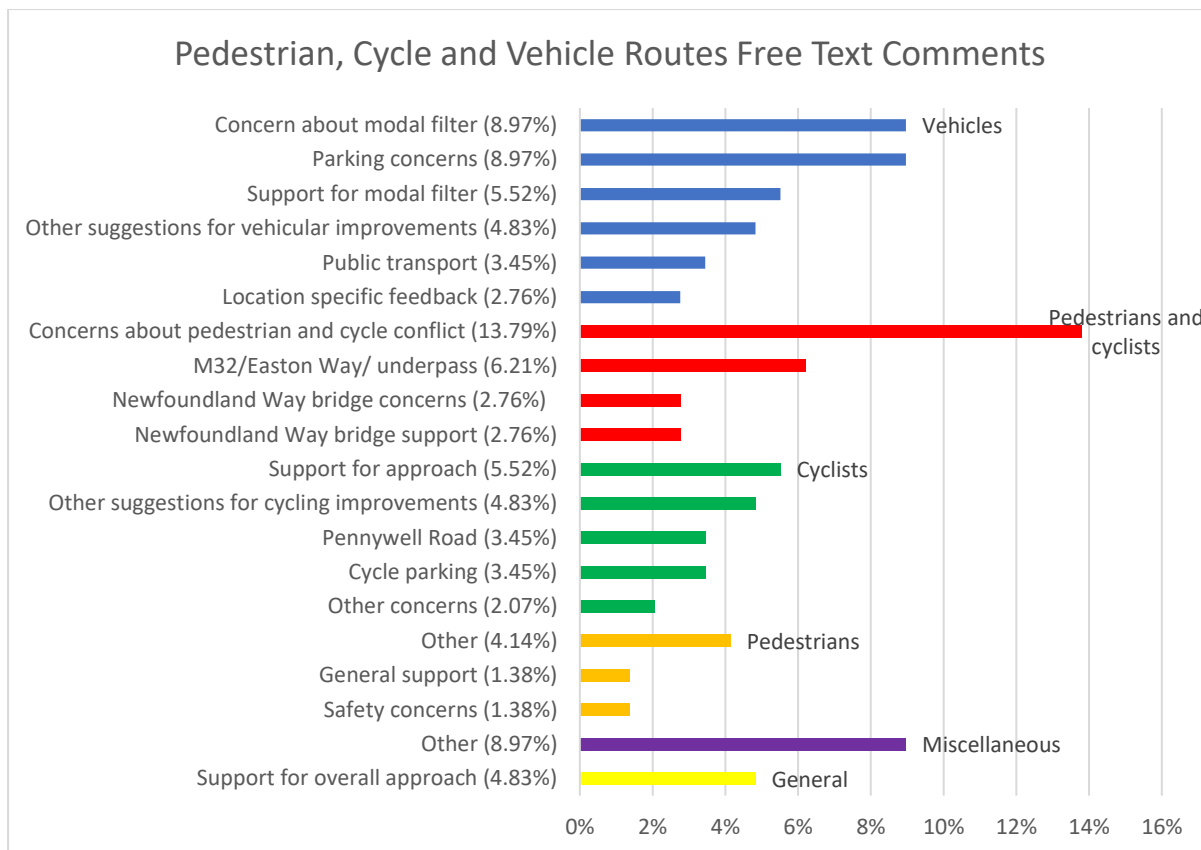


Figure 17: Pedestrian, cycle and vehicular routes free text analysis

Approaches to pedestrian, cycle and vehicle routes are well supported with all receiving over 28.57% of responses in agreement and 41.55% in strong agreement. Approaches to vehicle routes received slightly lower levels of agreement compared to the pedestrian and cycling responses. 5.52% of free text comments demonstrate support for the approaches to cycling specifically and 4.83% express support for all approaches more generally. Disagreement with approaches is low with all but one receiving less than 5.40% in disagreement and less than 3.96% in strong disagreement. The approach with slightly higher levels of disagreement (6.34%) and strong disagreement (7.04%) is ‘Introduce a modal filter on Pennywell Road which prevents vehicles travelling in either direction past Peel Street Open Space, effectively making a no through road for all motor traffic and creating a more community focussed and calmer street’. There was a higher level of disagreement with the introduction of the modal filter among Disabled and older respondents, (disabled: 12.40% disagree 6.15% strongly disagree; 55+: 13.46% disagree 7.02% strongly disagree) compared to all respondents. A significant proportion of free text comments (8.97%) express concern about the impact of the modal filter on local residents, businesses, emergency services and increased traffic on Stapleton Road. It must be noted however that 5.52% of free text comments are in support for the model filter and measures to calm and minimise traffic.

A substantial proportion (13.79%) of free text comments relate to pedestrian and cyclist conflict and express the need for segregating cyclists and pedestrians. Particular areas of concern are along Riverside Walk and the intersection of Peel Street and Riverside Walk within Riverside Park.

6.21% of free text comments are about the M32/Easton Way underpass at the northern end of the regeneration area and state that it requires improvement as it is not fit for purpose and is a significant barrier to movement.

Numerous comments express concern about parking (8.97%) and request more provision for parking given the influx of new residents.

Recommendations

10. Make clear that disability groups and local residents will be involved in future consultations around a new modal filter on Pennywell Road to ensure that people with limited mobility are not restricted from travel, and consider other modal filter concerns (impact on residents and businesses, emergency services, traffic on Stapleton Road)
11. Consider amends to reduce pedestrian and cyclist conflict
12. Explore possibility of more detailed response to address issues associated with the M32/Easton Way underpass
13. Consider amends to respond to parking concerns

6.5 Height, massing, active frontages and streets

Findings

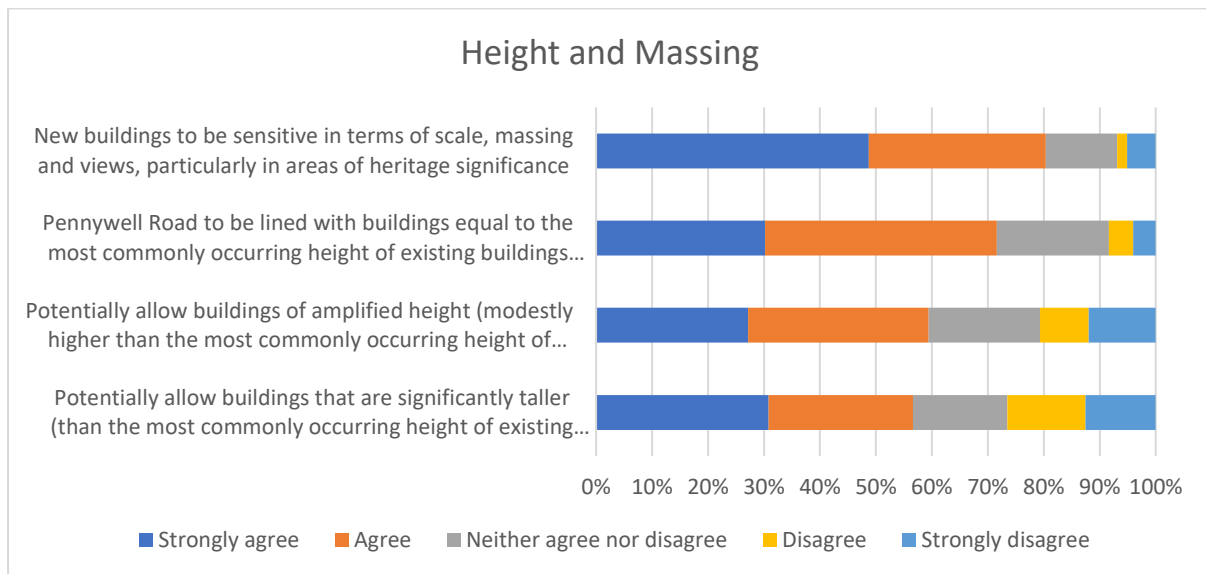


Figure 18: Agreement/disagreement with height and massing approaches

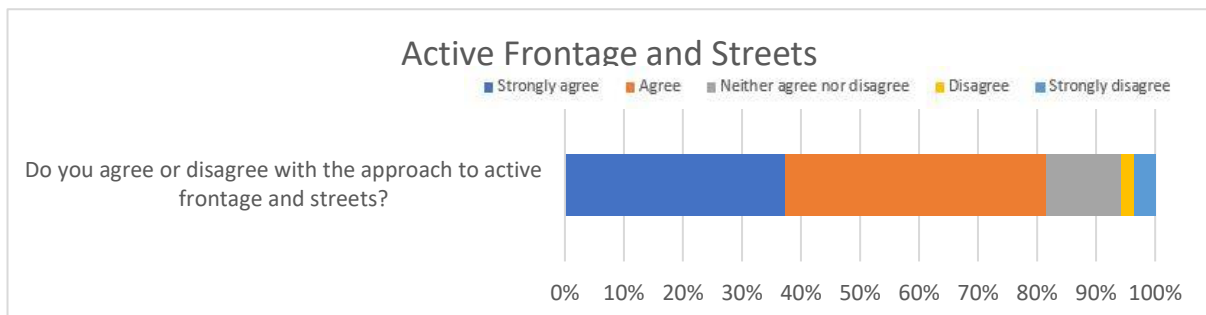


Figure 19: Agreement/disagreement with active frontage and streets approach

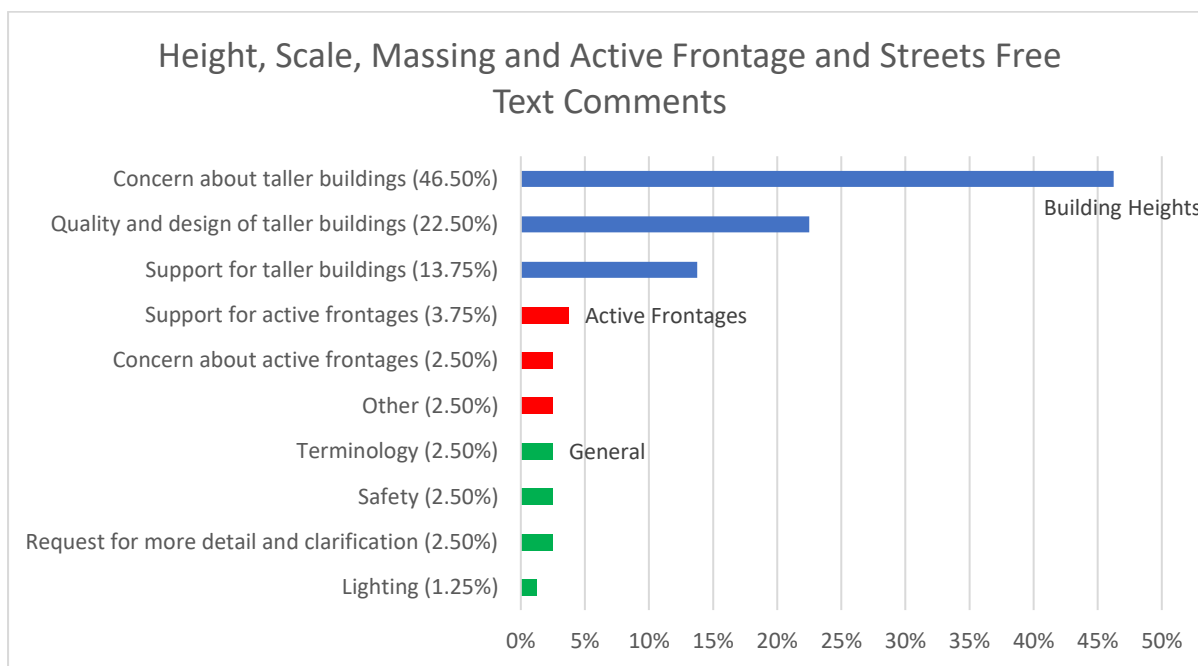


Figure 20: Height, scale, massing and active frontage and streets free text analysis

All four approaches to height and massing are supported with all receiving over 25.81% of responses in agreement and over 27.17% in strong agreement. Two of the four particularly well supported: ‘Pennywell Road to be lined with buildings equal to the most commonly occurring height of existing buildings to create a community street feel’ and ‘New buildings to be sensitive in terms of scale, massing and views, particularly in areas of heritage significance’. Both received over 31.64% of responses in agreement and over 30.18% in strong agreement and less than 4.36% in disagreement and less than 5.09% in strong disagreement.

The remaining two approaches supported to a less degree are ‘Potentially allow buildings that are significantly taller (than the most commonly occurring height of existing buildings) at the north and southern gateways to the site and Newfoundland Way crossing’ received 25.81% of responses in agreement and 30.82% in strong agreement and ‘Potentially allow buildings of amplified height (modestly higher than the most commonly occurring height of existing buildings) overlooking the Riverside Park and in the centre of the site’ received 32.25% of responses in agreement and 27.17% in strong agreement.

Free text comments echoed the sentiments indicated through qualitative data with 46.5% expressing concern about tall buildings in general stating there should be a limit to the number of storeys, that taller buildings are unsuitable for certain groups such as families and negatively impact the wellbeing of those living in them and express concern about taller building being near the park and river. 22.50% of comments express the need for taller buildings to be high quality in terms of design, provide private external space and require particularly considered ground floor use. 13.75% of comments express support for taller buildings recognising the role they can play in addressing the housing crisis and that they are appropriate in certain locations within the regeneration area.

There is strong support for the approach to active frontages and streets with 44.20% of responses in agreement and 37.32% in strong agreement.

Recommendations

- 14. Review the height and massing strategy in light of reduced support for taller buildings
- 15. Consider including greater reference to design and build quality of taller buildings to address quality of life concerns

6.5 Green/blue infrastructure and open space

Findings

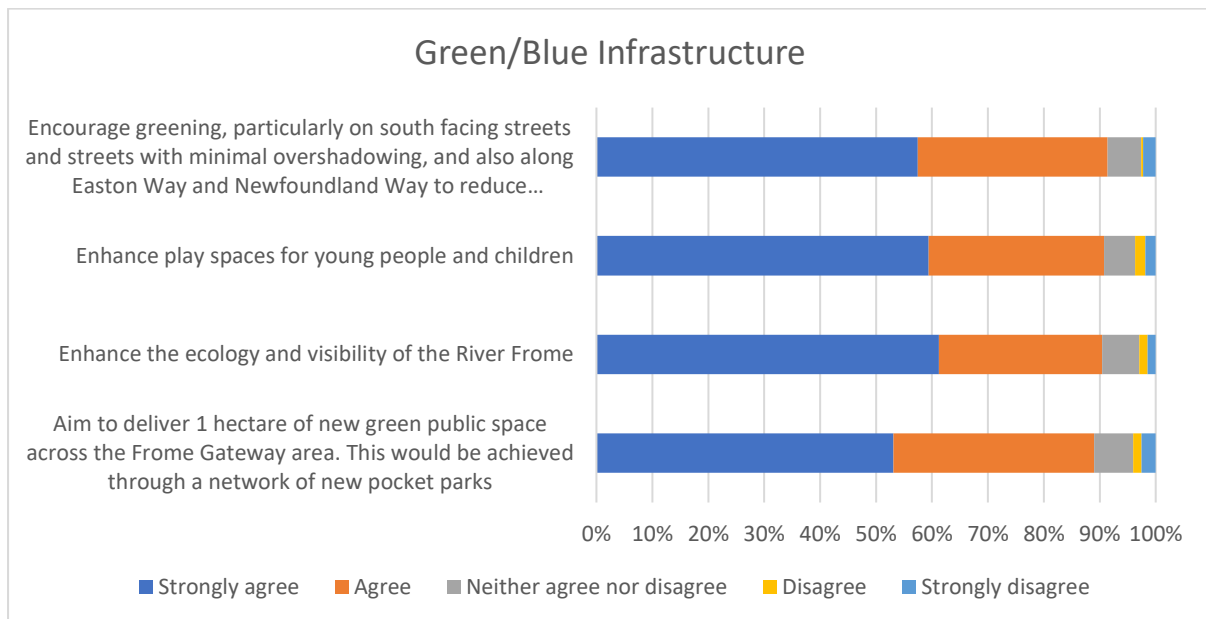


Figure 21: Agreement/disagreement with green/blue infrastructure approaches

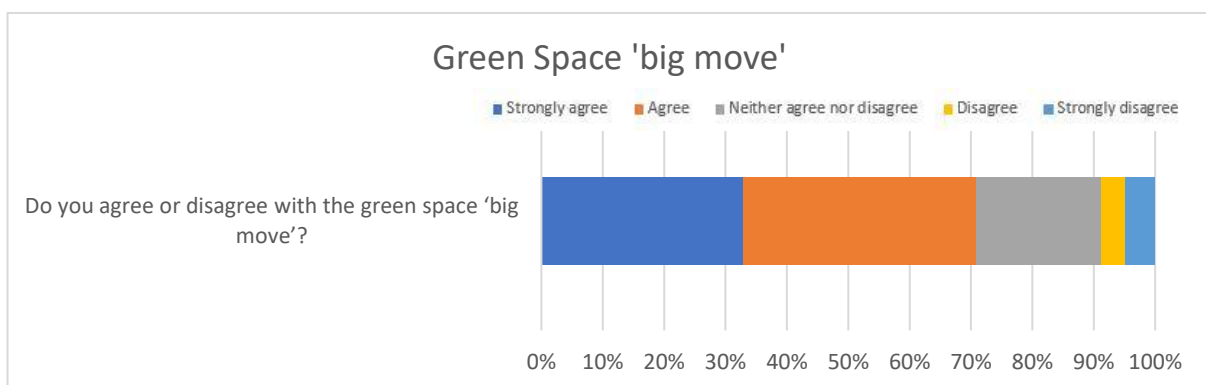


Figure 22: Agreement/disagreement with green space 'big move'

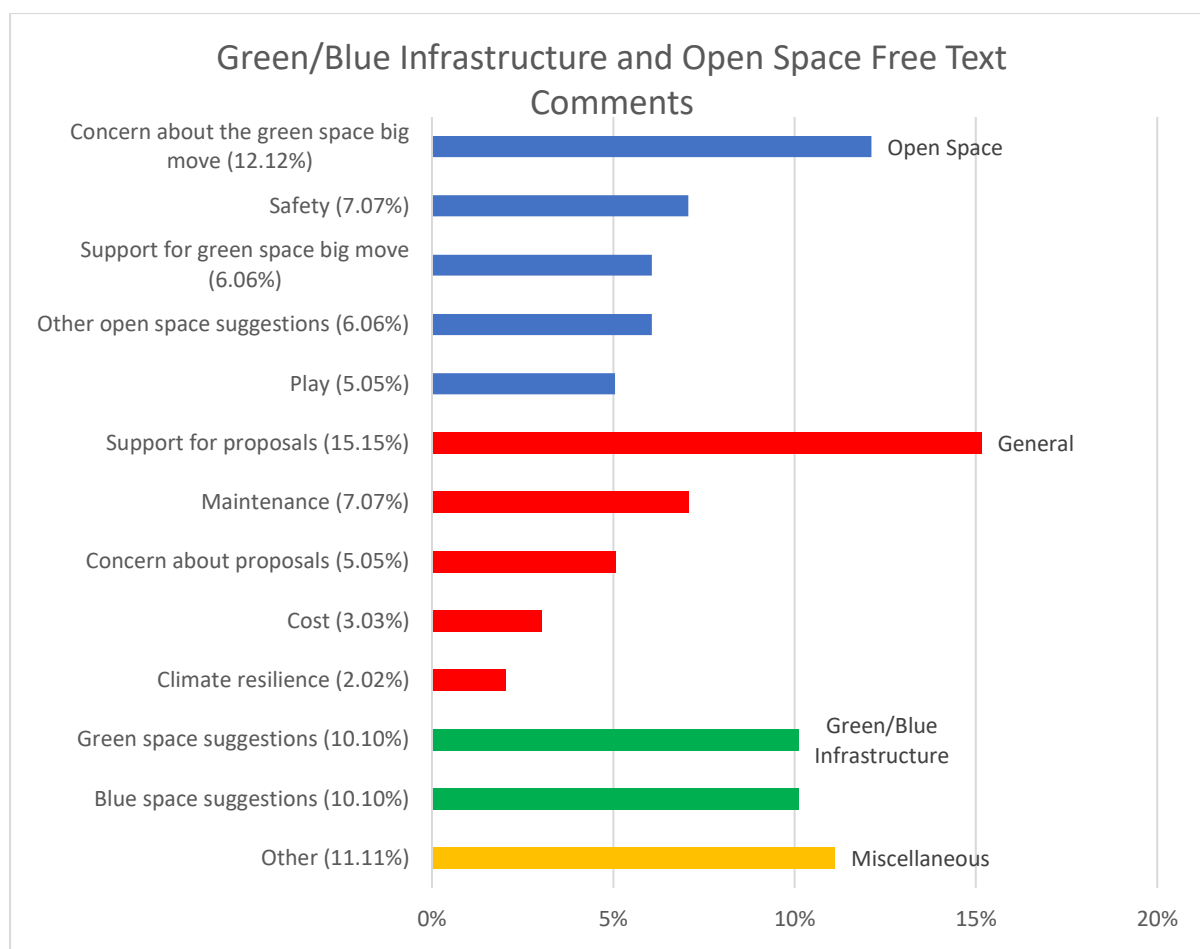


Figure 23: Green/blue infrastructure and open space free text analysis

There is considerable support for all the approaches to green and blue infrastructure with over 29.15% of responses in agreement and over 51.11% strong agreement. All approaches received less than 1.85% of responses in disagreement and 2.56% in strong disagreement. There were very few (between 5.54% and 6.96%) responses neither agreeing nor disagreeing. A substantial proportion of free text comments (15.15%) also expressed support for the green and blue infrastructure approaches.

10.10% of comments make green space suggestions and the same proportion making blue space comments with many relating to biodiversity and nature, and request greater regard should be taken to protect nature and create and connect natural habitats. The proportion of comments expressing concern about safety, crime and anti-social behaviour within Riverside Park is noteworthy (7.07%).

Whilst there is considerable support for approaches to green and blue infrastructure, responses to the green space 'big move' were more ambiguous. The green space 'big move' proposes to create a new park in the regeneration area via land swap agreements. Although there is notable support for the concept overall with 37.78 % of responses in agreement and 32.96% in strong agreement 12.12% free text comments are in disagreement with the concept of the green space 'big move'. These comments expressed scepticism and a lack of trust of the council, suggesting the motive is to create more viable plots elsewhere in the regeneration area for the benefit of developers. Included within these comments are a number stating that the green space 'big move' was unclear or there was

insufficient information about it. This may explain why one fifth of survey responses (20.37%) neither agreed nor disagreed with the green space ‘big move’.

Recommendations

- 16. Explore possibility of strengthening commitments to enhance and protect bio-diversity and nature
- 17. Highlight efforts made in the framework to promote safety
- 18. Provide further evidence of the public benefit of the green space ‘big move’ to support the rationale
- 19. Consider amends to make the concept of the green space ‘big move’ more discernible

6.6 Sustainability, flood and health

Findings

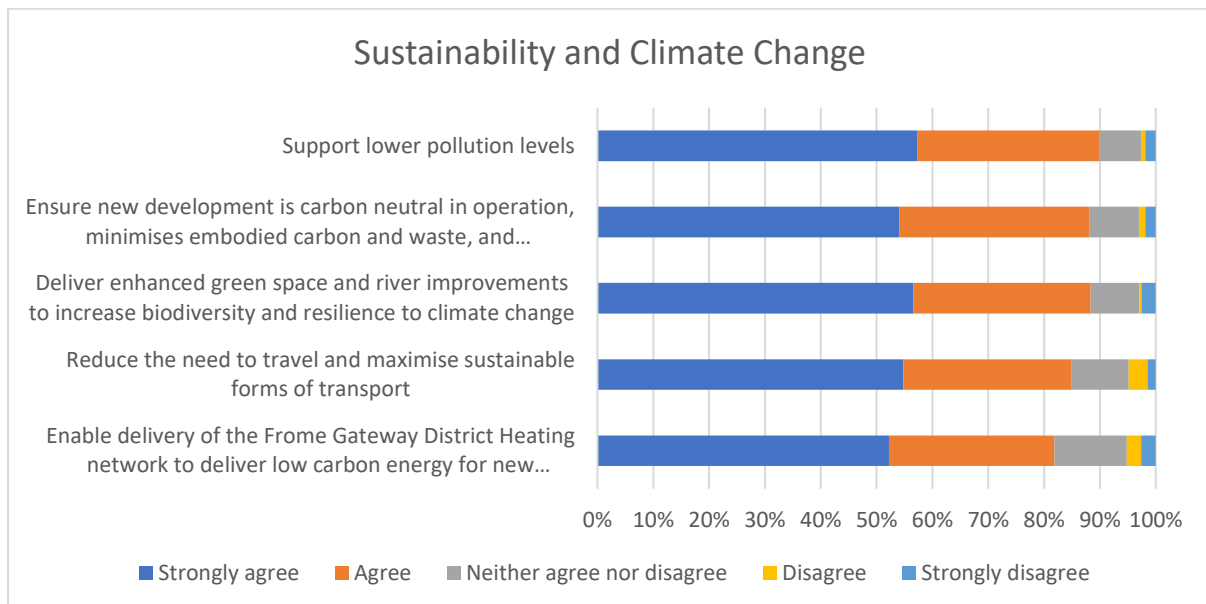


Figure 24: Agreement/disagreement with sustainability and climate change approaches

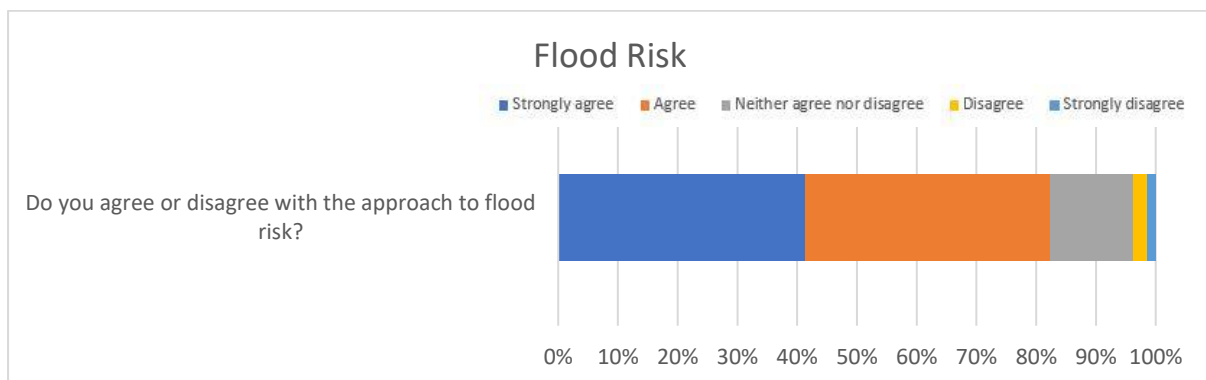


Figure 25: Agreement/disagreement with flood risk approach

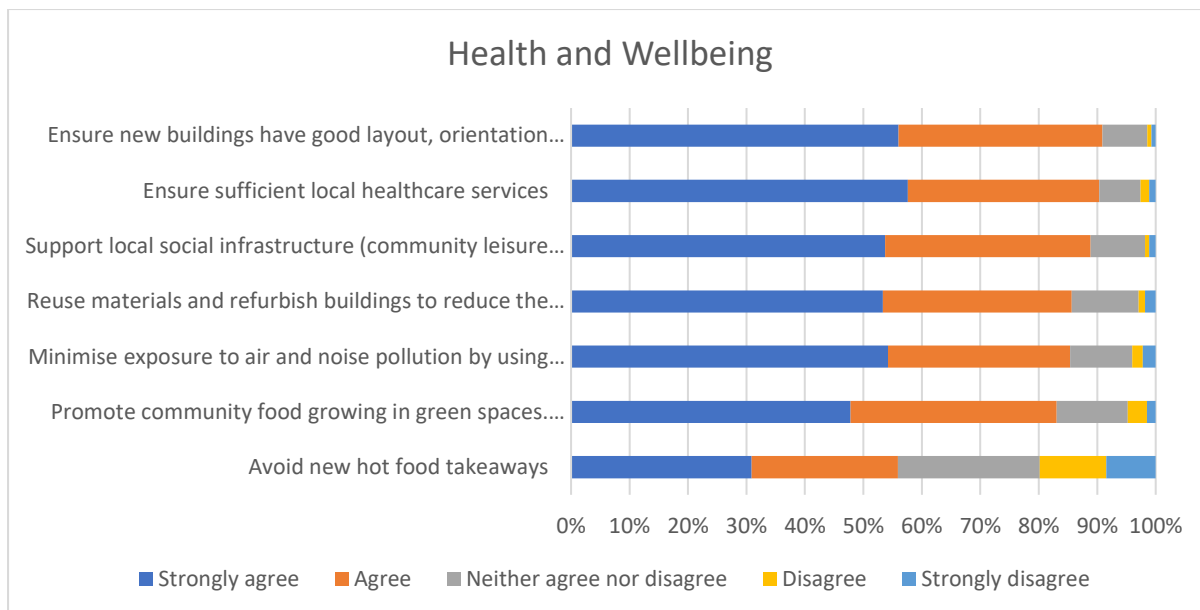


Figure 26: Agreement/disagreement with health and wellbeing approaches

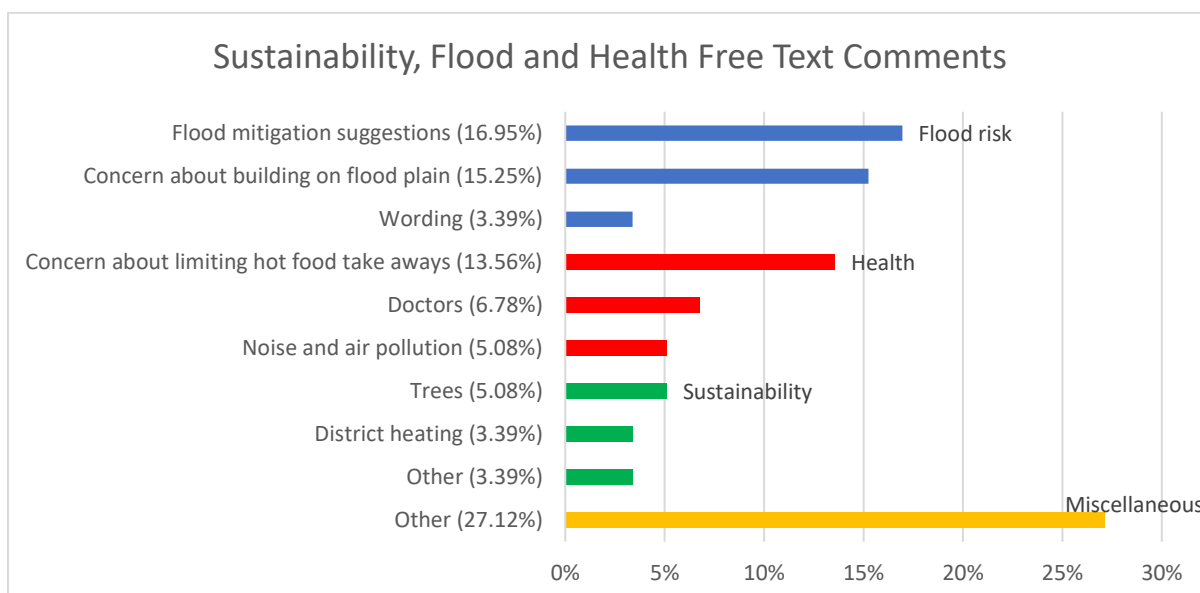


Figure 27: Sustainability, flood and health free text analysis

Approaches to sustainability and climate change are well supported with over 29.63% of responses in agreement and 52.22% in strong agreement. There are extremely low levels of negativity towards these approaches with less than 3.37% in disagreement and less than 2.59% in strong disagreement. The approach to flood risk also received good support: 82.42% of responses agree or strongly agree, with less than 3.67% of responses disagreeing or strongly disagreeing. A substantial proportion of free text comments relate to flooding with 15.25% expressing concern about building in the flood plain stating the proposals do not take a sequential approach to the location of new development with residential proposed in higher risk area and industrial in lower risk, that there is a lack of a strategic flood management solution and that restoring the River Frome is unlikely to reduce flood risk. 16.95% of comments suggested other solutions for flood mitigation such as maintenance of the river channel and local drainage system, and the use of sustainable urban drainage.

There is good support for the health and wellbeing approaches with all but one receiving over 31.14% of responses in agreement and 47.79% in strong agreement. The principle of avoiding new hot food takeaways received more mixed responses. 25.00% agreed and 30.88% strongly agreed with the approach of avoiding new hot food takeaways and a greater degree of negativity is expressed towards this approach with 11.50% disagreeing and 8.46% strongly disagreeing with this approach. This sentiment is reflected in 15.36% of free text comments. Young people (under 18) were most likely to oppose this approach (3.58% agree/23.63% strongly agree; 26.32% disagree/25.00% strongly disagree) whereas adults were more supportive (35.61% agree/26.03% strongly agree; 10.28% disagree/5.06% strongly disagree).

There is a relatively high degree of 'neither agree nor disagree' responses, ranging from 7.06% to 24.26%. Those with higher levels may reflect the broad phrasing of the question, or the technical nature of the proposals, such as for the approach to flood risk (13.92%).

Recommendations

20. Further detail required to address flooding concerns
21. Rephrase the text about no hot food takeaways to instead be about promotion of healthy food choices

6.6 Other comments

The final survey question asked for any other comments. The majority of 'any other comments' received relate to topics already covered in this report so have been reallocated and covered in the appropriate sections. The only area to receive notable mention was the engagement process with comments stating that engagement needs to be continue and must be inclusive.

8.0 How will this report be used?

The consultation feedback in this report is taken into account by officers in developing the final Frome Gateway Regeneration Framework. A Consultation Response Report will be produced to clearly document how this feedback has been used to finalise the framework.

The Frome Gateway Regeneration Framework, together with this consultation report and other supporting documentation, will be considered by Bristol City Council's Cabinet on 6 February 2024.

If Cabinet endorse the final framework, it will become a 'material consideration' in the planning process – meaning that the council's planning department will use the Frome Gateway Regeneration Framework to support determination of planning applications within the regeneration area, based on the extent to which planning applications contribute towards the overall vision and principles for change set out in the framework.

9.0 How can I keep track?

Visit the project website (www.fromegateway.co.uk) for further information about the Frome Gateway Regeneration and sign up to our email list to be kept informed and engaged.

You can find the latest consultation and engagement surveys online on the council's Consultation and Engagement Hub (www.ask.bristol.gov.uk). You can also sign up to receive automated email notifications about consultations and engagement at www.bristol.gov.uk/askbristolnewsletter.

Decisions related to the proposals in this consultation will be made publicly at the February Cabinet meeting on 6 February 2024. You can find forthcoming meetings and their agendas at www.democracy.bristol.gov.uk. Any decisions made by Full Council and Cabinet will also be shared at www.democracy.bristol.gov.uk.

10.0 Appendix

A - Marketing and promotion

The consultation was widely publicised across a variety of media and formats as detailed below.

Item	Format	Delivery
Website publication	Project website	https://fromegateway.co.uk
	Bristol City Council website	Frome Gateway regeneration (bristol.gov.uk)
News release	Bristol City Council newsroom	Frome Gateway – Have Your Say on the future of St Jude’s (bristol.gov.uk)
	Mayor’s blog	https://thebristolmayor.com/2023/10/23/frome-gateway/
Mayor’s promotional videos	YouTube	01 the ask and why: The future of Frome Gateway in St Jude's - YouTube 02 why and how: Frome Gateway Regeneration – Have your say on the future of St Jude’s - YouTube 03 the ask and how: Frome Gateway Regeneration Framework: Come forward and share your views - YouTube
Briefing with Mayor	On site with Planet Radio	Consultation begins on development vision near M32 (planetradio.co.uk)
Postal advert	A5 postcard	Sent to 1,500 local residents and businesses
Posters and banner	A3 lamppost posters	20 lamppost posters in the locality
	A3 and A4 paper posters	40 paper posters distributed
	PVC banner	One 5x1m banner on Peel St bridge
Newsletters	We are Bristol (Citizens newsletter)	Over 9,000 recipients in total
	Ask Bristol (consultation newsletter)	
	Business newsletter	
	Head teacher’s briefing	
	Bristol Nights (night time economy newsletter)	
	Bristol City Council internal newsletter	
Project partner blog	TRUUD website	Highlighting the health and wellbeing impacts of urban development. Frome Gateway regeneration framework consultation launched – TRUUD

Project mailing list	Regular email notifications	Over 100 recipients on list
Local radio	Ujima Radio	Promotional advert played out for two weeks
Social media	Bristol City Council Facebook, X (Twitter), LinkedIn, Nextdoor, Instagram	32 posts in total
Paid for social media adverts	Facebook	Ran for one week from Saturday 25 th November
Media coverage	Planet Radio	Consultation begins on development vision near M32 (planetradio.co.uk)
	Business Live	Bristol City Council sets out plans for Frome riverside development - Business Live (business-live.co.uk)
	Bristol 24/7	Vision laid out for land around River Frome (bristol247.com)
	Bristol Post	New regeneration project plans to build 1,000 homes in area behind Cabot Circus - Bristol Live (bristolpost.co.uk)
	Bristol World	New regeneration project plans to build 1,000 homes in area behind Cabot Circus (bristolworld.com)
	MSN	New regeneration project plans to build 1,000 homes in area behind Cabot Circus (msn.com)
	The Business Desk	Consultation launched on major redevelopment in Bristol - South West (thebusinessdesk.com)



The Frome Gateway Regeneration Framework

Consultation Response Report

January 2024

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Introduction

The formal consultation on the draft Frome Gateway Regeneration Framework ran from Monday 23rd October 2023 until Monday 4th December 2023. 327 consultation survey responses were received along with 11 formal representations by letter from a variety of organisations. This data was then analysed, the findings of which are presented in The Frome Gateway Regeneration Framework Formal Consultation Report. The consultation report also provided a number of recommendations arising from the consultation findings. This report sets out Bristol City Council's response to each recommendation. In doing so, further signposting, context and detail is given.

Recommendation 1: Consider amending vision to include references to inclusivity and accessibility

In response to Recommendation 1 the vision now states 'The diversity *and inclusivity* of Frome Gateway's community and mix of activities, and re-connection with the river Frome, are celebrated as the area's greatest strengths and represent the foundations of its unique character and identity ... New buildings, public spaces and infrastructure have been designed with sustainability and a changing climate in mind, creating more attractive and comfortable streets and more space for wildlife to recover and thrive. *Physical accessibility has been integrated into all projects ensuring the area is inclusive for all.*'

Read the amended vision in full on page 4 of the Frome Gateway Regeneration Framework.

Additionally, a new 'Physical Accessibility' page has been created (p46) which brings together physical accessibility considerations and opportunities to inform future detailed design proposals. A set of key outcomes has been included, which were informed by an accessibility audit undertaken during the framework production process.

Recommendation 2: Evidence base for housing need in the area to be further highlighted

Bristol's emerging Local Plan (Draft Policy H1) states that 'there is a clear need for new homes in Bristol: the population is rising; house prices are high; and waiting lists for affordable housing are growing' and 'taking into account the land that can come forward for housing development and the places which are reserved for other necessary land uses, the level of housing development which can be accommodated in Bristol is assessed to be 1,925 homes per year on average up to 2040.'

A housing strategy was undertaken during the development of the Frome Gateway Regeneration Framework and provided an evidence base upon which the approach to housing has been developed as well as what we have heard from the community. The Frome Gateway Housing Strategy notes a report done by Black South West Network (Housing BAME Communities in Bristol, 2020), which 'sets out some of the problems and challenges that people in the study area face in terms of accessing appropriate housing. The report had a special focus on the wards of Ashley, Easton, Southmead, Knowle West and Lawrence Hill which makes it very relevant for the Frome Gateway study area. Overcrowding was cited as the most prevalent problem by 26% of the respondents. A key finding from this report is the unmet demand for larger affordable family homes within the study area.'

The evidence base for housing is summarised on p16 of the framework, and referenced below:

'There is an acute need for affordable housing in the area, despite a steady increase in affordable housing delivery in the city over the past few years. In March 2022, the lower quartile price paid for a home in the Inner East Area of Bristol was £258,879 which is substantially higher than the lower quartile price paid for England and Wales at £175,000. This is also reflected in the demand for social

housing, with new build social housing properties in the Inner East Area receiving 100+ bids when advertised in 2021-22.

There are also high levels of overcrowded homes in Lawrence Hill ward – 17%, compared to 5% overall in Bristol. Due to far lower availability of larger affordable homes (both in terms of existing supply and new development), people requiring larger accommodation are likely to wait for longer than other groups to be re-homed. As such, there is a need for a mix of types, sizes and tenures to satisfy needs. There are also significant needs for adaptable and accessible homes to meet the needs of residents, including wheelchair users. Currently, 12% of households on the housing register have a need for accessible and adaptable housing.’

Recommendation 3: Reconsider Industrial Quarter with regard to size, mix of uses and enhancing connection with the rest of the regeneration area

In response to Recommendation 3 the Industrial Quarter has been reduced in size and now includes only the two most northern plots of the regeneration area (see spatial concept plan on p36 of the framework). For these two most northern plots in the Industrial Quarter, greater emphasis has been placed on consolidation and intensification of industrial space, so that the overall amount of industrial space to be provided remains the same (6,000sqm). This also better aligns with emerging planning policy ambitions to intensify and make more efficient use of industrial employment space in the city.

Reference has also been made to the suitability of co-locating night-time venues here which could have active frontages on the riverside to bring about a greater mix of activity in the evening, responding to concerns that this area could feel unsafe at night-time. By bringing the two sites north of Peel Street Open Space into the Maker Quarter with co-location of residential uses above ground floor maker/workshop space, this change in Character Area boundaries makes the approach to co-location of residential uses in this part of the regeneration area much clearer. It also makes the most of the placemaking potential of the area by enabling residential uses to overlook Peel Street Open Space. These changes can be found on pages 92-103 of the Framework.

Recommendation 4: Further detail required to set out how the council will seek to retain businesses and jobs

The Framework published for public consultation noted that existing businesses should be retained and relocated within the regeneration area wherever appropriate to do so when considered against the wider placemaking and regeneration objectives. For example, while it is considered that most businesses are suitable to be retained within the regeneration area, there may be instances where they are not appropriate to be co-located within a residential neighbourhood due to the nature of their operations. Bristol City Council is very much committed to supporting as many businesses as

possible to remain in the area and be part of change at Frome Gateway, and we have therefore sought to make this clearer in the Framework. Bristol City Council has secured funding to produce a Frome Gateway Business Retention and Relocation Strategy (including community and cultural organisations) to help us better understand how existing businesses and community organisations can be supported to remain and grow in the area or be relocated where necessary. This workstream has been added to the Implementation and Delivery section of the framework (p107). The council has appointed a team to conduct this work which is set to be complete in Spring 2024. The findings from this strategy will inform the next phase of project delivery.

Recommendation 5: Explore whether there is scope to reconsider student bed allocation

Following the consultation, the Frome Gateway project team discussed the findings with planning policy and housing delivery colleagues and discussed the student allocation in Draft Policy DS5. The outcome of this conversation was:

- Bristol's emerging Local Plan (Draft Policy DS5: Frome Gateway) states that 'development will include up to 500 student bedspaces in addition to the new homes in accordance with Policy H7 'Managing the development of purpose-built student accommodation'.
- The inclusion of 500 student bedspaces in the framework was directly taken from this planning policy, which is a strategic allocation of the citywide number of student bedspaces.
- Purpose Built Student Accommodation is an important form of housing to ensure students are able to live in suitable accommodation during their studies. Not providing enough student housing means students would need to use traditional housing which would place a further strain on the city's housing stock. Bristol's Local Plan sets out the appropriate distribution of student housing across the city and Frome Gateway is deemed a suitable location for a student allocation given its designation as an Area of Growth and Regeneration and its proximity to the city centre and transport links.

It was therefore agreed that the student bed space number of 500 in Policy DS5 and in the Frome Gateway Framework would not be changed. Whilst the 500 allocation is unable to be reconsidered, further emphasis has been placed on the 500 allocation being a maximum limit in order to prioritise local housing and other needs:

'This Framework re-confirms the upper cap of 500 bed spaces at Frome Gateway and student bed spaces above this limit will not be supported. Development counting towards the bed space limits for defined areas includes all development completed, started or that has gained planning permission since March 2019.

The justification for this is ensuring the provision of purpose-built student accommodation is balanced with the needs of the wider community. These include a choice of housing including affordable housing, new employment workspace, a range of services and facilities to serve the needs of the whole community and appropriate standards of residential amenity. These needs may not be met where an imbalance in the provision of purpose-built student accommodation occurs.' (p40).

Recommendation 6: Strengthen wording around affordable housing within the framework to make it clear BCC expects developers to use grant and other means to secure policy compliant affordable housing allocation

In response to Recommendation 6 a new paragraph on affordable housing has been added which reads 'Affordable Housing is expected in accordance with planning policy requirements and the council's Affordable Housing Practice Note. Developers are expected to meet minimum requirements for affordable housing provision and are invited to work collaboratively with the council to explore ways to further increase the amount and pace of delivery of affordable housing above the minimum provision.' The new paragraph has been added to the housing section of the framework and can be found on p39.

In addition, the wording of the affordable housing component of the Implementation and Delivery section (p105) has been amended and now reads 'housing is a multi-faceted issue and there is significant and locally specific need in the Frome Gateway area. Developers are highly encouraged to engage with the council at an early stage to maximise opportunities for alignment with local needs and deliver the right mix at pace.'

The council will work with a range of partners to deliver new affordable homes including direct delivery of new council homes, housing delivery through council-owned housing companies, and working with Registered Providers to secure funding for affordable housing delivery. To ensure local community benefit from regeneration at Frome Gateway, the council will explore a Local Lettings Policy, as described on page 38.

Developers are expected to meet minimum requirements for affordable housing provision and are invited to work positively and collaboratively with the council to explore ways to further increase the delivery of affordable housing above the minimum provision' (p105).

Recommendation 7: Explore whether there is scope to strengthen commitment to the Local Lettings Policy

BCC is very much committed to making the most of opportunities to ensure the local community can take up new housing options and opportunities at Frome Gateway, including through the implementation of a Local Lettings Policy. To date, we have focussed our resource on the creation of the vision and objectives for regeneration at Frome Gateway (as set out in the Framework). We can now turn our attention to delivering against these objectives and have set out the exploration of a Frome Gateway Local Lettings Policy as an early initiative on page 107 of the framework.

In response to Recommendation 7 the following has been included as a recommendation in the Frome Gateway Cabinet report for Cabinet approval: 'To note / authorise the Executive Director of Growth and Regeneration, to implement a local lettings policy in the Frome Gateway Regeneration area.'

This will give the Frome Gateway project team the authorisation to progress this workstream.

Recommendation 8: Need for larger family homes to be further highlighted

As noted in the response to Recommendation 2, the framework states ‘there are also high levels of overcrowded homes in Lawrence Hill ward – 17%, compared to 5% overall in Bristol. Due to far lower availability of larger affordable homes (both in terms of existing supply and new development), people requiring larger accommodation are likely to wait for longer than other groups to be rehomed. As such, there is a need for a mix of types, sizes and tenures to satisfy needs. There are also significant needs for adaptable and accessible homes to meet the needs of residents, including wheelchair users. Currently, 12% of households on the housing register have a need for accessible and adaptable housing.’

The Frome Gateway Housing Strategy additionally states that ‘a report done by Black South West Network, Housing BAME Communities in Bristol (2020), sets out some of the problems and challenges that people in the study area face in terms of accessing appropriate housing. The report had a special focus on the wards of Ashley, Easton, Southmead, Knowle West and Lawrence Hill which makes it very relevant for the Frome Gateway study area. Overcrowding was cited as the most prevalent problem by 26% of the respondents. A key finding from this report is the unmet demand for larger affordable family homes within the study area.’

The ‘housing’ page of the framework has been amended to make the delivery of larger family homes a clearer priority with the following text added: ‘In response to evidenced localised housing need, the delivery of affordable, larger, and well-designed homes which enhance the health and wellbeing of residents is a strategic priority of this Framework.’ (p39)

Recommendation 9: Further detail required to set out how the council will seek to retain and support community groups, noting Albaseera Mosque and Trojan Free Fighters in particular

Bristol City Council has committed in the Framework to working with all community and cultural organisations to support them to remain in the area. The framework states that Bristol City Council ‘strongly supports and encourages the retention of these organisations within the area and commits to working with them and other stakeholders to help them realise their ambitions through regeneration. The provision of indoor and outdoor community and cultural space will be expected as part of new development. Spaces must be designed to meet the needs of the end users, and work towards increasing opportunities for people to be able to come together and participate in public life, with Frome Gateway acting as a new focal point for the community via its spaces and support initiatives. Where necessary, priority focus will be placed on working with landowners and developers from an early stage to support the retention of existing cultural and community organisations, should they wish to remain in the area’ (p41).

To inform the approach to this work, Bristol City Council is producing a Business Retention and Relocation Strategy (noted in the response to Recommendation 4). Community and cultural organisations are included in the scope of this work which will help better understand how they can

be supported to remain in the area, which is the next step in the process. This has been added to page 107 of the Framework which sets out early intervention and initiatives.

With regards to Albaseera Mosque in particular, Bristol City Council has been closely liaising with them throughout the production of the framework. In 2023, council officers met with mosque representatives four times and additionally conducted a youth engagement session with them and held an exhibition of the draft framework at the mosque during the formal consultation. The council understands Albaseera Mosque's desire to increase its capacity and is working closely with them to this end. Bristol City Council is supporting them to explore how the capacity of their current facility can be increased. Bristol's Cabinet approved the sale of a parcel of council land adjacent to the mosque to facilitate this. Council officers are also connecting representative of Albaseera Mosque with private landowners and agents to explore the possibility of acquiring alternative sites within the regeneration area, or taking a lease on new ground floor space that is made available through new development at Frome Gateway.

The council has been meeting Trojan Free Fighters representatives during the production of the framework and their needs and aspirations have been heard and articulated in the framework. Bristol City Council will be working with landowners and developers in the area to explore how Trojan Free Fighters can be incorporated in future development plans. This work will continue as we move into the delivery phase of the Frome Gateway regeneration.

Recommendation 10: Make clear that disability groups and local residents will be involved in future consultations around a new modal filter on Pennywell Road to ensure that people with limited mobility are not restricted from travel, and consider other modal filter concerns (impact on residents and businesses, emergency services, traffic on Stapleton Road)

The Framework published for public consultation already set out the need to deliver an additional movement study to understand the impact of the modal filter before any changes are made. In response to Recommendation 10, we have added explicit reference to ensuring that this more detailed movement study to better understand the implications of introducing a modal filter on Pennywell Road will take account of the impact on local residents, businesses and the wider transport network such as Stapleton Road and will be undertaken with engagement with the local community emergency services and disability groups' (p107).

It must also be noted that the exact location of the modal filter will be determined through this more detailed movement study. The location had been assumed to be adjacent to Peel Street Open Space which was a natural break between the Industrial Quarter and the rest of the regeneration area. With the changes to the Character Areas (described in Recommendation 2), the indicative location has been moved further north of Pennywell Road at the bottom of the revised Industrial Quarter.

Vehicular Route Key Outcome 1 has also been amended and now reads 'Modal filter to prevent through-traffic travelling north/south beyond this point significantly reducing the number of vehicle movements, allowing for narrower carriageway and turning Pennywell Road into a community-focused street with generous pavements and urban greening. Further testing of the proposed modal filter (including exact location) is required to better understand the impact of this on neighbouring residents, businesses and the wider road network including Stapleton Road.' (p45).

The framework additionally states that the modal filter 'is anticipated to be a medium term (5-10 years) intervention and engagement with the local community, businesses, disability groups and emergency services will be undertaken before any changes are implemented' (p45).

Recommendation 11: Consider amends to increase commitment to segregated pedestrian and cyclist movement to reduce possible conflict

A number of amendments have been made to the framework in response to Recommendation 11 as set out below.

Pedestrian route key outcome 5 (p43) now reads 'new active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space'.

The cycle route key outcomes (p44) have been updated as follows:

- Outcome 1 now reads 'Primary commuter link connecting city centre to Easton and St Agnes. Well considered cycle route that reduce pedestrian and cyclist conflict subject to site constraints - this will be explored fully during detailed design.'
- Outcome 2 now reads 'Subject to site constraints, future re-design of this cycle route must be sensitive to the aspiration to create more opportunities for pedestrians to stop and dwell at the riverside and avoiding conflict with pedestrians and cyclists.'
- Outcome 3 now reads 'The southern end of Pennywell Road is narrower and will be made safer and calmer as a result of the modal filter. Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict.'
- A new outcome has been added which reads 'New active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space.'

The strategic route plan of Pennywell Road (p70) now includes:

- 'Cycle routes in the northern end of Pennywell Road should be segregated in order to separate cyclists from heavy vehicles.'

Principle 2 of the Pennywell Road carriageway section plans (p71) now reads: 'Domestic traffic and limited servicing and delivery access. In areas of constrained street widths cyclist and vehicles may share a carriageway (20mph area).' Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict.'

Design principle 9 of the Newfoundland Way section plan (p79) now states 'New active travel bridge to make it easier for pedestrians and cyclists to cross Newfoundland Way and better connect Frome Gateway to St Paul's and St Agnes. This should include segregated space for pedestrians and cyclists' A new bridge provides the opportunity to redefine the arrival experience of people arriving into the city via Newfoundland Way.'

The first paragraph on pedestrian and cycle movement within the Industrial Quarter strategic map (p102) now states 'Improvements to Pennywell Road include footway widening and reduced service vehicular traffic. Pennywell Road is a key cycle route leading to the city centre from Easton and segregated cycle provision should be accommodated to separate cyclists from heavy traffic.'

Recommendation 12: Explore possibility of more detailed response to address issues associated with the M32/Easton Way underpass

Given the strategic nature of the Frome Gateway Regeneration Framework it is unable to provide a detailed design response to resolving issues associated with the Easton Way underpass. The framework has however been amended to further highlight the need for improvements, the details of which will then follow in the Frome Gateway implementation and delivery phase.

In response to Recommendation 12, pedestrian route key outcome 4 (p43) now reads 'Improved connections through traffic infrastructure and public realm improvements including enhanced Junction 3 subway to improve safety and legibility'. Cycle route key outcome 5 (p44) has been amended to 'Junction 3 and Easton Way subway to undergo enhancements to improve usability, public safety and placemaking'.

Recommendation 13: Consider amends to respond to parking concerns

In response to Recommendation 13, the position on parking has been further clarified in the framework: 'This framework does not prescribe parking provision requirements as this will be dealt with through the planning process and policy. However, given the proximity of Frome Gateway to the City Centre and easy access to public transport links, this framework advocates for lower parking requirements than planning policy to create no/low car neighbourhoods' (p45).

Parking provision is something that is dealt with through planning policy. The role of the Framework is bringing many different elements (including planning policy and wider strategic city objectives) into a cohesive and coherent vision for an area, and it is important that the framework aligns with and supports wider strategic citywide objectives to improve public health and wellbeing, reduce car dependency, support sustainable and active travel, and respond to the climate emergency.

As set out in the engagement summary (p27), a Scope of Influence was created at project inception to be upfront and honest about all the different influences that the framework must balance.

‘Movement and connections’, which includes parking, is identified in the Scope of Influence as an aspect ‘which the community will help to shape alongside other factors.’

Recommendation 14: Review the height and massing strategy in light of reduced support for taller buildings

Because of their long-term and strategic nature, regeneration frameworks are intended to be flexible and set a vision and design and development objectives for an area. They are often criticised or found unhelpful when they are overly prescriptive on specific matters which are largely outside of their control. One such matter is buildings heights, which is principally influenced by individual site opportunities/constraints, site specific assessments, the design process, and the financial viability of development proposals.

Bristol City Council believes well designed and well-located taller buildings have a role in meeting the challenge of the housing crisis and advocates a design-led approach to the determination of suitable building heights on a site-by-site basis which optimises (not maximises) building height and density and enhances urban liveability. To support this approach, the council has produced the Urban Living SPD to provide guidance on this.

To ensure the Frome Gateway Framework remains a flexible and helpful guide which helps developers get the best out of individual development sites for their residents and the city, the Frome Gateway Framework refers developers to this guidance and sets out broad locations which are considered appropriate for taller buildings based on strategic design analysis of the area’s attributes. This has also been informed by Bristol Central Area Plan Policy BCAP39: Newfoundland Way which has been in place since March 2015. This policy covers the southwest corner of the regeneration area (the City Gateway Character Area) and states its suitability to deliver high density development.

Whilst the height strategy, will remain unchanged the concerns regarding building height are noted. Liveability and quality of life concerns have been recognised in particular, as per the response to Recommendation 15.

Recommendation 15: Consider including greater reference to design and build quality of taller buildings to address quality of life concerns

A number of changes have been made in response to Recommendation 15. Firstly, a ‘liveability and wellbeing’ section has been added to the housing component of the Urban Design Framework part of the framework (p40). Included within this next text is reference to an ‘Urban Family Living Design Guide’ which the council is developing to provide guidance on how new homes will support healthy, family living at higher densities.

Secondly, the 'Height and Massing' section (p47) has been changed to 'Height, Massing and Liveability' and includes the following updated text:

'National and local design guidance including The Urban Living SPD sets out guidance on the successful creation of compact, characterful, and healthy urban areas at higher densities. It is expected that this guidance is used proactively and from an early stage to support a design-led approach to optimising (not maximising) density at Frome Gateway to deliver high quality and well-designed homes which meet local needs and respond to local opportunities and constraints. An optimal density is one that balances the efficient use of land, with aspirations for positive response to context, successful placemaking and liveability.

The proposed scale of buildings has been developed to inform applicants of site-specific constraints and opportunities when undertaking preliminary design studies.

New developments will be expected to demonstrate:

- Detailed contextual analysis to establish a design narrative including approach to height and response to local constraints and opportunities
- Qualitative and quantitative micro-climate analysis to ensure maximum public benefit and minimise negative impact on neighbouring site e.g. overshadowing
- The provision of private outdoor amenity space for all homes
- The integration of play and amenity spaces for children and young people
- An active ground floor with a positive relationship with the street
- The integration of health and wellbeing considerations (see the Frome Gateway Health Impact Assessment for further guidance)
- Analysis of local and strategic views with a sensitivity towards heritage assets'

Recommendation 16: Highlight efforts made to enhance and protect biodiversity and nature

The framework makes considerable effort to enhance and protect biodiversity and nature. Throughout the framework, biodiversity is referenced 24 times and wildlife mentioned on 46 occasions. Areas of particular note are set out below:

- The restoration of the river Frome is a key initiative that is set out in the framework. It will provide myriad benefits to the regeneration, a key one being improvements to biodiversity and connecting local communities to the river. This [project video](#) provides more insight and information.
- The vision states that 'new buildings, public spaces and infrastructure have been designed with sustainability and a changing climate in mind, creating more attractive and comfortable streets and more space for wildlife to recover and thrive' and 'The quality of green spaces has been improved and the river Frome has been restored as a thriving wildlife corridor and opportunities for the community to enjoy the riverside have been integrated' (p4)
- 'Improving parks and wildlife' is a key strategic move (p35)

- In setting out the existing sustainability and public health context, the framework states that ‘the design of our built environment directly influences the health and wellbeing of local people and wildlife. Well-designed homes, workplaces, streets and public spaces that integrate nature enhance the health and wellbeing of both local people and wildlife. Creating space for biodiversity to flourish is essential to delivering placemaking outcomes. There are valuable aspects of the area that future development should further strengthen and enhance, as well as help to protect against harm.’ (p24)
- Community Place Principle 2 (Environmentally sustainable and healthy neighbourhood) includes the following: ‘Increase green space across the site for people to dwell and connect with nature (p30)
- A key outcome of the spatial concept is to ‘encourage retention of south bank ecology while creating a public ‘nature walk’ facilitated by buildings being set back from the river edge’ (p36)
- The part of the framework that covers green and blue infrastructure sets out that ‘A fundamental and effective approach to mitigating the effects of the Climate and Ecological Crises is to dramatically increase the quantity, quality and resilience of our natural habitats. Preservation and enhancement of green and blue infrastructure in our built environment have myriad benefits to the health of our environment and our population. New development will be expected to implement principles that make a positive contribution to placemaking and green/blue infrastructure. Given the significant sustainability and health benefits, enhancements beyond minimum planning policy are highly encouraged. Developers should:
 - Design and plan for a future climate that is far hotter and more changeable than current regulations suggest
 - Early ecological assessments of all development site must be undertaken to establish an ecological baseline
 - Achieve as a minimum the Natural England Urban Green Factor standard
 - Integration of sustainable drainage systems within the landscape to achieve greenfield levels of run-off
 - Implement significant tree planting on-plot to contribute to placemaking, ecological enhancement and to manage urban heat island effect
 - Connect to and extend existing green corridors
 - Contribute to the design and delivery of ecological and placemaking enhancements to the river channel including providing space for wildlife’ (p49)
- Key green and blue infrastructure outcomes include: ‘Retain existing and develop new areas of tree planting along the riverbank to ensure good balance of shaded and unshaded reaches for the rivers’ mixed fish population’ and ‘As a sensitive wildlife corridor with nocturnal species new lighting along the river must balance improvements to access and safety with wider ecological goals’ (p49)
- A key sustainability and climate change outcomes is to ‘deliver enhanced blue and green infrastructure to increase biodiversity and climate resilience’ (p51)

Recommendation 17: Highlight efforts made in the framework to promote safety

The Frome Gateway engagement programme evidenced safety and antisocial behaviour concerns in the area currently. Addressing these concerns is of huge importance and the list below demonstrates efforts made by the framework to promote safety:

- The vision sets out 'activity throughout the daytime and evenings adds to the area's sense of vibrancy and safety' (p4)
- The summary of transport and movement issues currently affecting the area states that 'There are personal security concerns, with inadequate street lighting and passive surveillance, which discourages walking and cycling after dark' (p16)
- The outcomes and learning from public engagement highlights safety as an issue raised (p29)
- Pedestrian routes within the urban design framework section sets out that 'Streets will be made more inviting and accessible through landscaping and urban greening, increasing of pavement widths, a managed reduction in vehicle movements and the provision of active and residential frontages on key routes to bring vibrancy and *safety* to the streetscape' (p43)
- Safety included in a number of the pedestrian routes key outcomes (p43)
- Safety included within key cycle route outcome 5 (p44)
- Promoting safety is a core aspect of the approach to active frontages which states 'All streets in the regeneration area should be vibrant, safe and facilitate connectivity. To achieve this, active frontage must be promoted ... streets that require servicing must also be safe and provide natural surveillance from secondary active uses.' A key active frontage outcome is that they 'should enclose public spaces. Creating safe, friendly and animated spaces for local communities' (p48)
- Within the health and wellbeing section of the framework the following requirement is set for developers: 'Sites adjacent to green spaces must integrate ways to maximise safety and inclusivity' (p60). This section also covers crime reduction and community safety as a specific issue with associated requirements and recommendations (p61)
- The Newfoundland Way strategic routes plan includes the following: 'enhanced lighting along key routes increases footfall and therefore safety. More residents using green spaces will positively impact health outcomes' (p77)
- The use of active frontage in the Industrial Quarter in particular to promote safety is referenced on pages 100 and 101

Recommendation 18: Provide further evidence of the public benefit of the green space 'big move' to support the rationale

In response to Recommendation 18 the list of benefits below has been added to the framework (p50):

- An overall increase of 0.8ha of green space (in addition to the new network of pocket parks) for community enjoyment and wildlife.
- Significant placemaking and quality of life benefits.
- Increased resilience to climate change (flooding and rising temperatures).

- Positive public health and wellbeing outcomes for local residents.
- Enabling development to come forward in areas less constrained by flood risk (from a flood risk perspective, this has strong support from the Environment Agency).

Recommendation 19: Consider amends to make the concept of the green space ‘big move’ more discernible

The text explaining the green space ‘big move’ has been amended and now reads ‘Creating an area-wide, once in a generation vision for Frome Gateway has presented an opportunity to consider possible ‘big moves’ in response to some of the areas harder to solve challenges and opportunities such as flood risk, community access to green space and public health inequalities.

The idea of BCC exchanging land parcels with private landowners within the regeneration area has been conceptually explored (as set out in the plan opposite). Doing so would enable BCC to deliver a new publicly accessible park in an area which is at higher risk of flooding (Flood Zone 3).’

Read the amended green space ‘big move’ section in full on p50 of the Frome Gateway Regeneration Framework.

Recommendation 20: Further detail required to address flooding concerns

In response to Recommendation 20 two new ‘Flood Risk Management’ pages have been added (p53 and 54). These pages provide further context and rationale for the overall approach to flood risk management set out in the Framework. It also sets out the framework’s response to the ‘sequential test’ insofar as explaining why particular parts of the regeneration area are less suitable to residential development even though they are in areas of less flood risk, for example Riverside Park and Universal House. This page further highlights the green space ‘big move’ concept that has been included in the framework and which follows the sequential approach to flood risk management.

The third new flood risk management (p57) adds further guidance for developers on what site-specific measures they could explore and integrate as part of their flood management response.

Recommendation 21: Rephrase the text about no hot food takeaways to instead be about promotion of healthy food choices

In response to Recommendation 21 the text now reads ‘Provide opportunity for different types of food stores, particularly low cost healthy options’.

Other changes to the Frome Gateway Framework

Following the findings of the consultation, several other changes were made throughout the document and as a result of further refinement and review by the project team, including:

- The names of the character areas were changed to better reflect the heritage of the character areas which were previously thought to feel too 'exclusive' and tied to specific uses such as 'Cultural Quarter' and 'Maker Quarter':
 - The City Gateway Quarter was renamed the Elton St Character Area
 - The Cultural Quarter was renamed the Eugene Street Character Area
 - The Maker Quarter was renamed the Peel St Character Area
 - The Industrial Quarter was renamed the Tanneries Character Area
- Following insightful conversations during public consultation events, the project team thought a valuable addition to the framework would be explicit information about the context, constraints and opportunities for physical accessibility in the area. Resultingly, a Physical Accessibility Plan drawing upon the Accessibility Audit undertaken by WECIL during the production of the Framework has been added on page 46 of the Framework.
- There have been some amendments to the Active Frontages and Community Connections Plan (page 48) to better draw out the importance of the relationship between active frontages and key strategic movement routes throughout the area.
- Minor amendments have been made to pages 37-38 to further highlight the importance of skills and training provision (alongside new employment space) and emphasise that employment space requirements are a minimum requirement in order to achieve the 1,000 jobs target, and that BCC expect and support these figures to be exceeded in delivery to go beyond the 1,000 jobs target.
- As a result of representations made during the consultation, a 'wider connections' plan has been added to page 25 of the Framework to show the wider cycling network in context to the regeneration area.
- A number of minor changes have been made throughout the document relating to the river Frome and flood risk management as a result of feedback from the Environment Agency.
- Minor amendments to the descriptions of some regeneration objectives for clarity and to avoid repetition.
- Text changes and edits to improve readability of the document and address errors and typos.



Frome Gateway Regeneration Framework

Statement of Community Involvement

January 2023





Community
conversation
this way



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Introduction and Executive Summary

Introduction

Bristol City Council (BCC) has been working to develop a Regeneration Framework for the Frome Gateway Area of Growth and Regeneration in St Jude's, Bristol. The area is currently predominantly made up of light industrial businesses owing to its planning policy designation as a Principal Industrial and Warehousing Area (PIWA) in Bristol's [Core Strategy \(2011\)](#).

Increasing the supply of new homes in Bristol is a key priority for the city. Bristol has a population of c.470,000 which is predicted to grow to 550,000 by 2050. There are over 19,000 on the housing waiting list, over 1,000 in temporary accommodation and a need to deliver 33,500 new homes by 2036. All this is placing huge demand on housing, employment space, waste and resources. At the same time, we are facing climate and ecological emergencies.

BCC is managing this change through its ambitious programme of regeneration across the city, much of which is in inner city brownfield areas like Frome Gateway, which has been allocated as an Area of Growth & Regeneration in the [draft Local Plan](#).

Frome Gateway is a key site as it is within walking distance of the city centre, well connected to transport infrastructure, brownfield and in need of rejuvenation. There are opportunities to create a high-quality mixed-use neighbourhood with a minimum of 1,000 homes alongside at least 22,000m² of employment space and new community and cultural facilities. Regeneration here can also create a well-connected, healthy neighbourhood with integrated walking and cycling links, as well as high quality public spaces that feel welcoming for all, help to adapt to a changing climate and provide space for wildlife recovery.

The Regeneration Framework provides a holistic and long-term vision for the Frome Gateway area to guide future development and investment. Diversity and inclusivity, sustainability, and health and wellbeing are the heart of this vision.

The involvement of residents, business, the wider community and city interest groups has been a priority from the outset to ensure the aspirations of the Framework reflect local needs and aspirations.

Key objectives of the engagement process include:

- To set the Frome Gateway regeneration in the context of changes taking place across the city, and in line with key One City objectives.
- To engage with the community from the very start of the project to understand their needs, aspirations and concerns for the regeneration of the area, and ensure these are embedded into the design process from the outset.
- To identify and build upon existing community assets by integrating these into the future facing vision for Frome Gateway.
- To ensure engagement and consultation opportunities were widely promoted, with a focus on local audiences to ensure the regeneration vision and objectives were shaped by the local context and needs and aspirations of the local community before being opened to city-wide consultation.
- To be respectful of cultural, religious and socio-economic differences.

- To manage expectations and build understanding about the role of and limitations of a Regeneration Framework, how it will be used in practice and by who, and the timescales, complexity and likely delivery routes of the regeneration programme.
- To be open and transparent about the community's (and project team's) 'scope of influence' and wider influencing factors on the Regeneration Framework other than community and stakeholder engagement (such as planning policy, city objectives, and technical input).
- To provide varied and multiple opportunities to discuss, ask questions and provide feedback, and build understanding, in person and online.
- To enable greater and more diverse community participation by reducing barriers to engagement (such as language barriers).
- To engage with a variety of relevant organisations and groups to participate.

Measures to help facilitate this included:

- Creating a [Scope of Community Influence](#) that explains the various influencing factors over the Regeneration Framework and the degree of community influence over different aspects of the Regeneration Framework.
- Supporting the community to shape and define local priorities for the change before any design work had begun. These were captured in the [Community Place Principles](#) which were refined throughout the process and were used as a set of guiding principles for the design team. The Community Place Principles can be found in Appendix A.
- The creation of a project website to share information about the project. This included an [online interactive map](#) to help collect information about things people like or dislike about the area, local assets and change they would like to see.
- Community and stakeholder engagement being led and co-ordinated by BCC's Frome Gateway Engagement Steering Group. This was made up of officers from the Regeneration, Economic Development, Community Development, Flood Risk, Communications, City Design and Culture teams who had different lead responsibilities for different stakeholder groups. This was at time supported by the technical and design consultant teams.
- BCC's Community Development team working to remove barriers to participation through targeted outreach and support utilising a network of 'Community Champions' and 'Community Connectors'.
- The creation of online 'Story Maps' to tell the historic story of the [Frome Gateway area](#) and [River Frome](#) to help contextualise the regeneration of Frome Gateway in its evolution of time.
- An Artist in Residence commission to create a series of creative and incidental opportunities for the community and 'passers-by' to give their views and thoughts of the area and the change they would like to see.
- A 'Live Local' study undertaken by the [TRUUD research project](#) to build a better understanding of the lived experience of local residents and their perceptions of change and regeneration.
- Promoting the consultation widely to the community via letters and postcards, posters and banners, email, community newsletters, social media, and through the network of 'Community Champions' and 'Community Connectors'.
- Adopting a multi-stage approach and involving the community at each stage, hosting a series of varied events, online and in person, from introductory briefings to more traditional exhibitions. All aimed at making it as easy as possible for people to get involved.

The process has helped to establish a range of views on the regeneration vision and objectives as they were produced, and highlighted areas for consideration within the design process, to help achieve the best outcome for the site and the community. Key themes raised were around the type and affordability of housing, employment and skills opportunities, the importance of community facilities and services (particularly for young people), health and wellbeing, the protection and enhancement of spaces, sustainability and travel.

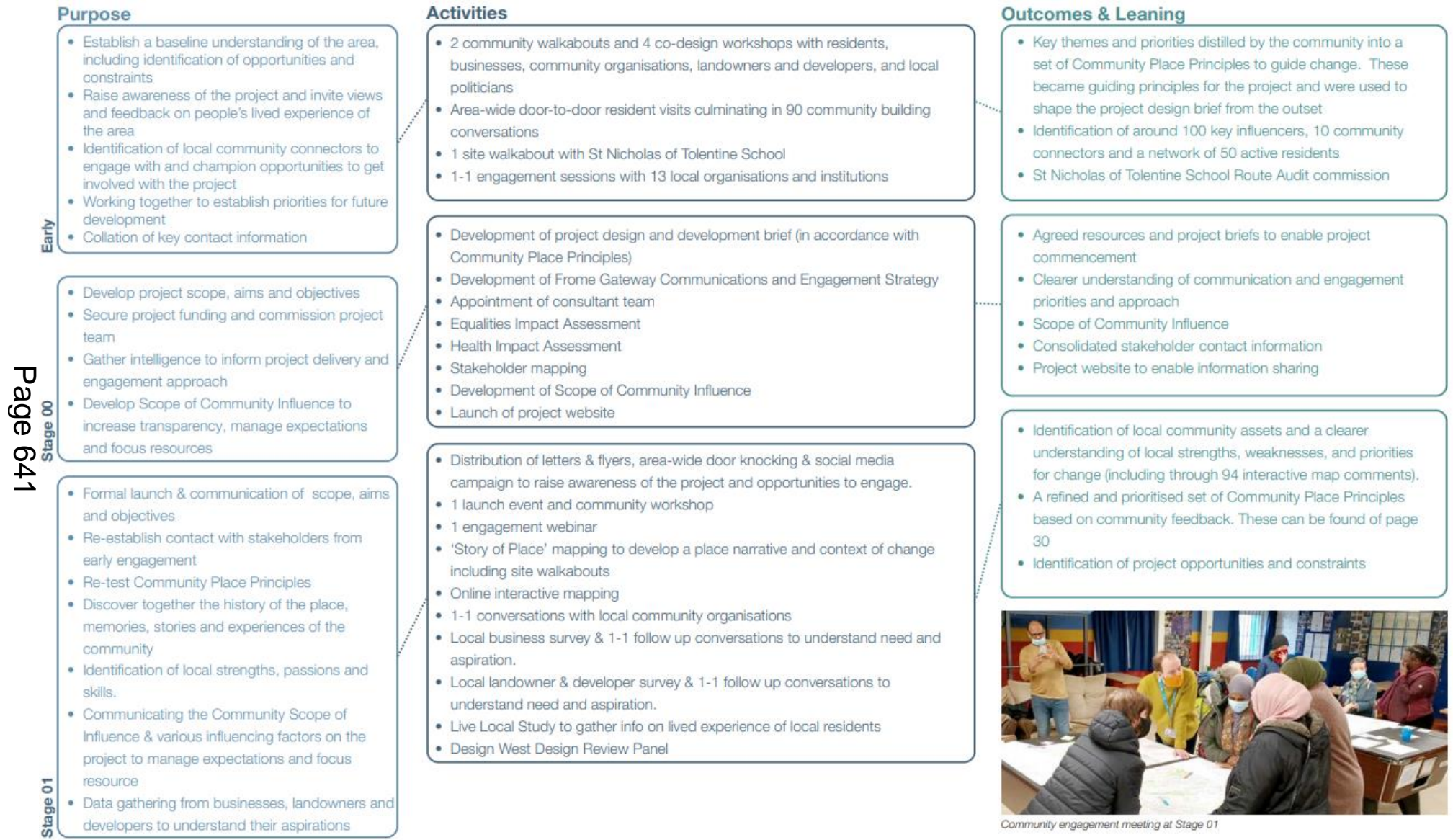
The purpose of this document is to:

- Provide details of the engagement and consultation process and detail activities undertaken to engage with local residents, businesses and community representatives.
- Provide analysis of the feedback received and the team's response to those comments.
- Detail the effort that has been made to engage with the wider community and how it has endeavoured to go above policy and planning guidance, involving a wide section of the community.

The team would like to thank everyone who has been involved in the process for their time and feedback. We hope that proposals at Frome Gateway will create the positive change the local community and city needs in order to meet the growing challenges we face now and into the future.

Overview of engagement activities

A summary of the engagement activities undertaken over the course of producing the Framework is provided below.



Community engagement meeting at Stage 01

Summary of the Frome Gateway engagement process and learnings

Purpose



Community engagement meeting at Stage 03

- Share findings from Stage 1 work to build a common understanding of work to date and direction of travel
- Provide opportunities to feedback on and shape emerging design and development proposals
- Test emerging proposals against the Community Place Principles
- Bring strategic city partners and organisations into the project

- Testing the Frome Gateway vision and initial design and development concept
- Building a common understanding of the proposals and communicating how engagement to date has influence them

- 6-week formal city-wide consultation on the full draft Framework to determine public support for the vision and objectives set out in the Spatial Regeneration Framework
- The results of the consultation were used to make final changes to the document

Activities

- Stage 2 launch event in Riverside Park to communicate findings to date with all stakeholders
- Thematic community workshops to test emerging design and development proposals
- Engagement with Old Market Neighbourhood Forum to ensure alignment with Old Market Neighbourhood Plan
- Accessibility Audit undertaken by West of England Centre for Independent Living (WECIL)
- Artist-in-Residence commission to undertake creative community engagement and further develop the Story of Place
- Cultural Infrastructure session with local creative and cultural organisations
- Design West Design Review Panel
- Establishment of a Landowner & Developer Forum
- Ongoing 1-1 business, landowner & developer sessions
- Email notification to statutory stakeholders and strategic city partners to invite them to engage in the process
- Targeted engagement with the Environment Agency on the proposed flood resilience strategy

- Streets & spaces workshop
- Frome Gateway vision and development concept webinar
- Online survey to gather feedback on Frome Gateway vision and initial design and development proposals
- Bespoke engagement sessions with:
 - West of England Centre for Independent Living (WECIL)
 - Al-Baseera Mosque
 - Local Women's Group
 - Local youth organisations
 - Ongoing 1-1 business, landowner & developer sessions

- 2 project exhibitions at Al-Baseera Mosque and Lost Horizon
- Targeted outreach with local youth groups, St Nicholas of Tolentine School, Women's Group and Old Market Neighbourhood Forum
- 3 Public Regeneration Area walking tours
- Public, business and special interest webinars
- Business West presentation
- Landowner and Developer Forum presentation
- BCC political briefings
- Riverside Park 'pop-up' exhibition

Outcomes & Learning

- Engagement in this stage reinforced key themes of importance and relevance of the Community Place Principles
- WECIL Accessibility Audit developed to inform framework and future detailed detail briefs
- Greater understanding of creative and cultural potential and appetite from local organisations to increase their capacity and reach in the area.
- Refinement of flood resilience strategy
- Outputs and learning from this stage were used to shape and inform the initial Frome Gateway Vision and Development Concept

- The results of the online survey demonstrated majority support for the regeneration vision and overall development concept for Frome Gateway
- Community feedback reinforced the importance of ensuring the regeneration benefits existing community and cultural organisations, allowing them to remain and grow in the area. The importance of key themes was once again highlighted such as identity and place, safety, connectivity, greenery and nature, health and wellbeing, and community and culture
- Feedback from youth organisations highlighted the importance of safety, antisocial behaviour, and a need for improved and new indoor and outdoor multi-functional spaces for all young people (not just boys).
- Learning from this and all other stages was used to develop the full draft framework

- 327 consultation surveys complete and 11 formal representations provided, demonstrating wide-spread support for the Regeneration Framework
- Consultation findings were used to make final changes to the document it was presented to BCC Cabinet for formal endorsement

Summary of the Frome Gateway engagement process and learnings

'You said, we did'

A summary of how the Community Place Principles were integrated into the Framework is set out below.

You said	<p>New homes, community space and leisure</p>  <ol style="list-style-type: none"> 1. Improve and increase play spaces for children 2. Need for community amenities geared towards young people 3. Local letting policy with a focus on longer tenures 4. Provide affordable social housing to meet local need, 3-4 bed family homes 	<p>Environmentally sustainable and healthy neighbourhood</p>  <ol style="list-style-type: none"> 1. Improve facilities in Riverside Park to encourage use 2. Park improvements to consider visual and acoustic screening from Newfoundland Way 3. Create a community garden 4. Improve biodiversity and ecology 5. Increase green space across the site for people to dwell and connect with nature 	<p>Diverse and inclusive communities</p>  <ol style="list-style-type: none"> 1. Youth training and apprenticeship schemes to improve skills and employment opportunities 2. Support local jobs and existing businesses by providing affordable, flexible workspace 3. Create mixed use neighbourhoods where people live and work in the same area 	<p>Better connectivity and transport</p>  <ol style="list-style-type: none"> 1. Enhance exiting and propose new crossings over Newfoundland Way 2. New bridge over the River Frome linking Eugene Street to Wellington Road 3. Improve footpath from Pennywell Road to the River Frome 4. Segregate pedestrians and cyclists 	<p>Friendly streets and spaces for all</p>  <ol style="list-style-type: none"> 1. Improve the pedestrian experience with improved street lighting, wider footways and traffic calming strategies 2. Create safer cycle infrastructure with particular focus on Pennywell Road 3. Improvements to pedestrian and cycle crossing points 4. Provide parking for residents 5. Discourage speeding and rat-running through the area 	<p>Opening up access to the River Frome</p>  <ol style="list-style-type: none"> 1. Leave the grassland in the park 2. Clean and restore the River Frome 3. Open up access to the river in a safe way, including walkways, viewing points, and opportunities for activities such as pond dipping and water sports 	<p>Establishing and celebrating identity and place</p>  <ol style="list-style-type: none"> 1. Protect cultural and music venues 2. Include space for public art 3. Support existing community uses and groups 4. Encourage pop-ups and meanwhile uses
We did	<ol style="list-style-type: none"> 1. Included provision for community space in ground floor units of new development, including dedicated space for young people 2. Included provision for new and improved children's play spaces and multi-use games areas 3. Committed to exploring Local Lettings Policy to help local residents access new social housing opportunities 4. Included target of 1,000 new homes 5. Provided further guidance on appropriate housing sizes to meet local demand (higher proportion of 3-4 bed family homes) 6. New housing delivered by the council will maximise affordable, family and accessible homes 	<ol style="list-style-type: none"> 1. Included a commitment to work with the community to develop a detailed vision for Riverside Park to encourage use and better meet the needs of the community. 2. Included need to screen noise and air pollution with trees and shrubs 3. Included provision for community growing space 4. Set requirement for enhancement of natural spaces including targets for increasing biodiversity and greening 5. Included 1 additional hectare of green space through network of new smaller 'pocket parks' 	<ol style="list-style-type: none"> 1. Set expectation that local residents are to be connected to employment and skills opportunities 2. Committed to exploring affordable workspace strategy to ensure new opportunities are accessible 3. Set a requirement for about 22,000m² of new employment space to create a wider range of training and employment opportunities. 4. Set a requirement for community and cultural space as part of new development to support community organisations to grow 	<ol style="list-style-type: none"> 1. Included provision for enhancement to existing bridge over Newfoundland Way and a new crossing 2. Included provision for two new bridges over the River Frome 3. Footpaths throughout the regeneration area will be made wider, greener and safer 4. Cycle routes will be enhanced to reduce conflict with pedestrians 5. Committed to undertaking a detailed movement study to ensure proposals have minimal impact on nearby residents and businesses 	<ol style="list-style-type: none"> 1. All streets will prioritise pedestrians, and be made safer, greener and more inviting 2. Proposed that Pennywell Rd becomes a no-through route to reduce rat-running, calm the street and improve safety 3. Parking standards are set in accordance with planning policy so will be determined through the planning process once details of specific schemes are defined 	<ol style="list-style-type: none"> 1. No building proposed on Riverside Park grassland 2. We've secured funding from central government to deliver a river restoration project to enhance the River Frome as a wildlife corridor and create more opportunities to see and enjoy the riverside 3. Included provision for a new pedestrian walking route along the riverbank opposite Riverside Park, which is currently inaccessible 	<ol style="list-style-type: none"> 1. Clearly stated the value of existing community and cultural organisations, and committed to working with them to ensure they can stay and grow in the area 2. All large-scale development will contribute to public art and we will create a cultural strategy to guide this investment 3. We'll work with landowners to take advantage of 'meanwhile use' opportunities to help trial and test new ideas

Regeneration Framework response to the Community Place Principles

Policy and planning context



The Frome Gateway area is currently predominantly made up of light industrial businesses owing to its planning policy designation as a Principal Industrial and Warehousing Area (PIWA) in Bristol's [Core Strategy \(2011\)](#). This planning policy designation is due to change to an Area of Growth and Regeneration as set out in *Policy DS5: Frome Gateway* BCC's emerging Local Plan. This change in planning policy provides the rationale for creating the Frome Gateway Regeneration Framework which seeks to set out a regeneration vision and objectives grounded in the needs and aspirations of the local community. The Framework sets out further guidance about the requirements for new development to guide and co-ordinate change over its lifetime. It is thought that it will take approximately 15 years to deliver the regeneration vision and objectives set out in the Framework. Should BCC Cabinet endorse the framework, it will become a material consideration for the individual planning applications that will follow over the coming years.

The engagement approach undertaken to inform the production of the Framework adheres to Government policy on community involvement as set out in the National Planning Policy Framework (2012, updated 2023), Planning Practice Guidance, the Localism Act (2011), and Bristol City Council's own Statement of Community Involvement (2018).

The engagement brief has sought to go beyond the expectation set out in policy, with the engagement starting before the technical work, through the establishment of a set of Community Place Principles to define local priorities for long-term change and investment in the area, and having a multi-stage engagement and consultation process to provide meaningful opportunities for the local community, businesses and stakeholders to be involved and to influence the plans.

Stakeholder audit

A stakeholder audit was undertaken to identify interested parties, including neighbours, interest groups and community representatives. This community mapping exercise was supported by BCC's internal Frome Gateway Engagement Steering Group. Identified interest groups included:

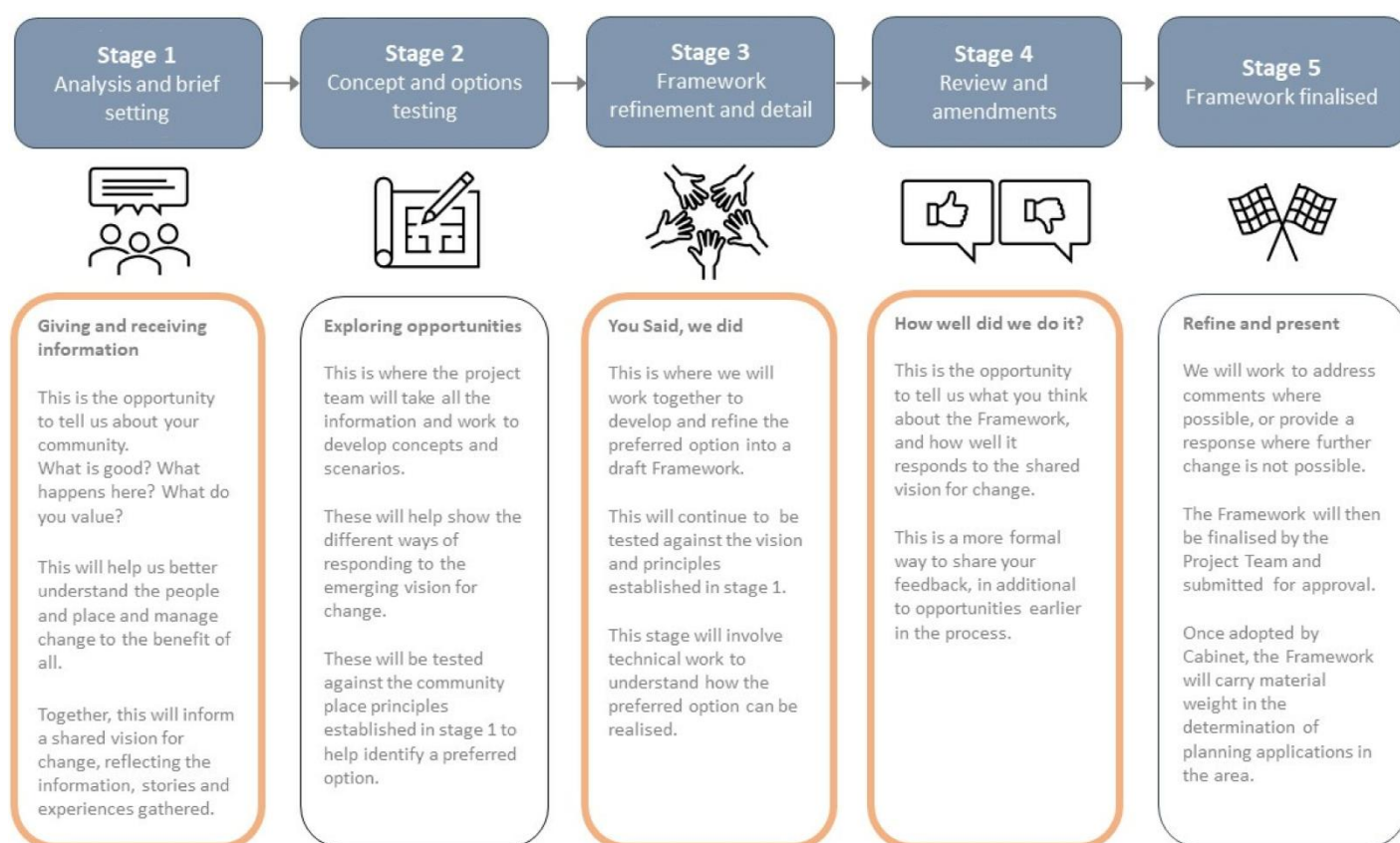
Audience	Details
<p>Residents living nearby</p>	<ul style="list-style-type: none"> Residents living nearby the regeneration area were notified via posted letters and postcards. 
<p>Businesses</p>	<ul style="list-style-type: none"> All businesses within and surrounding the regeneration area shown below. 
<p>Community and cultural organisations</p>	<ul style="list-style-type: none"> Al-Baseera Bristol Centre (mosque) Trojan's Free Fighters Jam Jar Collective (night-time venue and community arts space)

	<ul style="list-style-type: none"> • Lost Horizon (night-time venue and arts centre) • Riverside Youth Project • Pink Kitten Dance School • The Swan with Two Necks (pub) • Document (night-time venue, creative studios and co-working space)
Local interest groups	<ul style="list-style-type: none"> • Old Market Neighbourhood Forum • St Jude’s Women’s Group
City interest groups	<ul style="list-style-type: none"> • Business West
Young people and families	<ul style="list-style-type: none"> • Trojan’s Free Fighters • Horn Youth Concern • Riverside Youth Project (Young Bristol) • St Nicholas of Tolentine Catholic Primary School • Andalusia Academy
Landowners and developers	<ul style="list-style-type: none"> • There are approximately 30 landowners and developers active in the Frome Gateway area
Design, planning, transport and ecology groups	<ul style="list-style-type: none"> • Design West • Frome Reconnected • Bristol Walking Alliance • Bristol Cycling Forum • Sustrans • Bristol Civic Society • Local planning groups (such as Easton Planning Group)
Statutory and strategic stakeholder groups	<ul style="list-style-type: none"> • Statutory consultees as set out in UK planning legislation. Of particular importance to this project was continuous engagement with the Environment Agency due to the flood risk context of the site. • Strategic city stakeholders • Vattenfall (delivering and operating District Heat Networks across Bristol) • Bristol One City office • West of England Combined Authority • Avon & Somerset Police
Politicians	<ul style="list-style-type: none"> • BCC Mayor / Mayor’s Office (Planning/Regeneration Portfolio Holder) • BCC Cabinet • Local ward councillors for Lawrence Hill, Central, Ashley, and Easton wards. • Thangam Debbonaire MP (Bristol West)
Equalities and disability groups	<ul style="list-style-type: none"> • West of England Centre for Inclusive Living (WECIL) • A wide range of other equalities and disability groups
BCC officers	<ul style="list-style-type: none"> • Input across all BCC services via an internal Frome Gateway Regeneration Working Group including Housing, Economic Development, Flood Risk, Transport, Community Development, Employment, Skills and Learning, Public Health and Sustainable City and Climate Change (co-ordinated by BCC Regeneration).
Media	<ul style="list-style-type: none"> • BCC Press Office • Up our Street • Vocalise • Social media: local groups and networks via social media posts targeted in the local area

Engagement and consultation process

Overview

Ensuring the community and other stakeholders were involved in the development of the framework was a key focus from the outset. There was a period of early engagement in September 2019 to March 2020 (pre-Covid-19) which helped to define local priorities for change ('Stage 0'). There was pause in public engagement due to the Covid-19 pandemic and this didn't recommence until February 2022. The process undertaken is set out below, starting in November 2020 and ending in December 2023 with the close of the formal consultation on the draft Framework. The period of early engagement ('Stage 0') is also described below.



There were three key elements to the engagement approach:

1. **Building upon community strengths and identity:** Emphasis was placed on identifying and understanding the strengths and needs of the existing community so that these could be built upon as a foundation for change. This was understood as being a key aspect of developing and building community and celebrating and growing local character and identity.
2. **Understanding the area's history and listening to those who know the area best:** A 'Story of Place' was developed to capture the story, history and character of Frome Gateway. This has been used as a tool to initiate and frame conversations about the area's heritage and identity as attention has turned to establish a vision for the next step in its continual change and evolution.

3. **A focus on community influence:** A Scope of Community influence was created early in the process to build transparency and understanding about the various influencing factors on large scale, long-term regeneration projects like Frome Gateway. This was used to focus engagement activity and engagement resource.

Community Place Principles

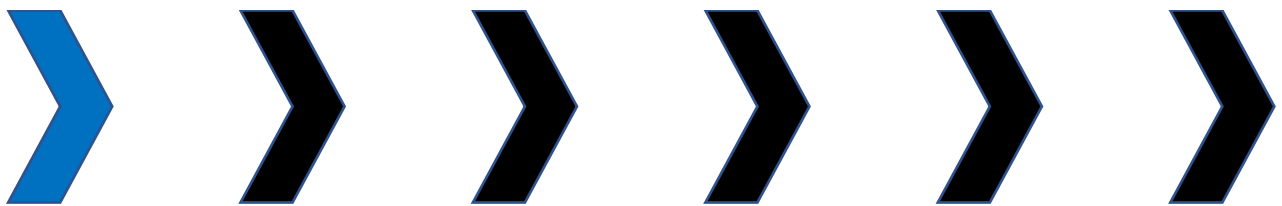
A set of seven Community Place Principles were established through direct community engagement prior to project inception to set out local priorities for growth. These were refined through the process and used as guiding principles for the development of the Regeneration Framework.



Stage 0a

Early Engagement

September 2019 – March 2022



Purpose of Stage 0a

- Establish a baseline understanding of the area, including identification of opportunities and constraints.
- Working together to establish priorities for future development.
- Raise awareness of the project with local residents and invite views and feedback on people's experiences of using / living near to the area.
- Identify key local connectors who have an interest in the area and engage them to champion the co-design process.
- Support Community Connectors in connecting with other residents and businesses to encourage engagement with the wider process.

Activities undertaken

Date	Description
August 2020	Working with Horn Youth Concern to run 4 sessions with young people to explore opportunities and share ideas
21 st & 28 th November 2019	2 community walkabouts with residents, local businesses, developers, local councillors and other relevant organisations.
21st November 2019; 25th November 2019; 25th January 2020; 12th March 2020	4 co-design workshops with residents, businesses, community organisations, landowners and developers, and local politicians
Nov 2019 – March 2020	Engagement sessions with 13 local organisations and institutions to develop regeneration principles and themes: <ul style="list-style-type: none"> • <i>Al-Baseera Mosque</i> • <i>Up Our Street</i> • <i>Riverside Youth Project</i> • <i>Black South West Network</i> • <i>St Paul's Planning group</i> • <i>St Nicholas of Tolentine Primary School</i> • <i>Easton Planning group</i> • <i>Andalusia School</i> • <i>St Jude's Women Group</i> • <i>Old Market Planning Group</i> • <i>Bristol Horn Youth Concern</i> • <i>Cognitive Paths</i> • <i>Swan with Two Necks</i>
20th January 2020; 21st January 2020; 7th February 2020; 12th February 2020	Area-wide door-to-door resident visits (300 door knockings culminating in 90 conversations) to discuss the area and ideas for the future regeneration.
Sept 2019 – Mar 2020	Identification of 10 local 'Community Connectors' to encourage participation locally with a focus on BAME and young people
July 2020	1 site walkabout with St Nicholas of Tolentine Primary School

August 2020	Working with Horn Youth Concern to organise 4 sessions with 24 young people in constructive conversations. This was made up of predominantly young men. Similar sessions were planned for young women however these had to be cancelled due to the COVID-10 pandemic.
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Community walkabouts and co-design workshops (Nov 2019)

Two walkabouts were arranged for key residents and businesses to explore the physical area proposed for regeneration and understand opportunities, challenges and constraints within the area.

Participants had the opportunity to view the physical layout of the place, current facilities, buildings and green space within the project area.

These were followed by a series of co-design workshops where residents, landowners, developers, businesses and organisation representatives attended and worked together to explore opportunities, share ideas about the area and establish some information for further conversations.

A final engagement meeting was held for a first review of the Community Place Principles.

Purpose:

- Establish a baseline understanding of the area, including identification of opportunities and constraints.
- Working together to establish priorities for future development

Key information:

The events were well attended by local community groups and organisations, residents, businesses and developers (55 attendees across our events).

Events were promoted to 100 key community influencers and connectors with the area and adjacent neighbourhoods through direct contact from BCC Community Development.



Community walkabouts and co-design workshops

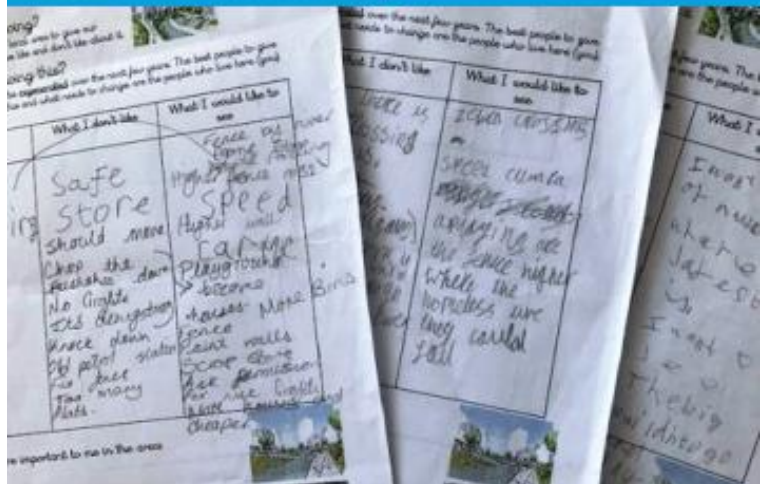
St Nicholas of Tolentine Primary School walkabout (July 2020)

During July 2020, while St Nicholas of Tolentine Primary School was open to children of key workers, BCC Community Development arranged a site walkaround.

The children walked the Frome Gateway area and were asked to note what they liked in the area, and what they might change.

Some of the key concerns from the children focussed on getting across Pennywell Road safely, and obstructions on narrow parts of pavements – forcing them out onto the road. They also commented on some of the surrounding buildings suggesting they could be housing or community buildings, and that the park could have more to do in it including improvements to cutback the scrubby the Multi-Use Games Area (MUGA).

A school route audit was commissioned following this event, and comments from the school and children contributed to evidenced provided to secure funding for Pennywell Road safety features.



Walkaround with St Nicholas of Tolentine Primary School

Stage 0a outcomes and learning

We had hundreds of conversations with local residents via walkabouts, co-design workshops and door knockings. Around 100 key influencers, 10 community connectors and a network of 50 active residents were identified to champion and encourage engagement with the project.

An online [news article](#) was published setting out the aspirations of young people in the area.

Through these many conversations, a strong picture of what is important to the community, both at a wider neighbourhood level, as well as those related to the development area, emerged. These included several key themes, ideas and suggestions for future development of Frome Gateway.

These themes and ideas were distilled by the community into a series of Community Place Principles, which set out the aspiration for change in this area and became guiding principles for the project and were used to shape the project design brief from the outset. These themes and principles are set out on the following pages:

Key themes and ideas – pages 20-26

Community Place Principles – page 27

CHILDREN, YOUNG PEOPLE & FAMILIES

Elderly people with no families

Maintained youth provision

**Factor in nursery facilities for families
that are moving into housing**

Get to a decent school

**Make this more of a 'place'. More
facilities for families and children**

**Positive impact of sport brings people
together from Easton and St Pauls**

**More spaces shops/cafes and art for
women + children - most locally are for
men**

**Need community space - children and
elderly**

**Broadplain and Riverside Youth Project
major, well-used youth resource**

Children's health - asthma

Basketball court

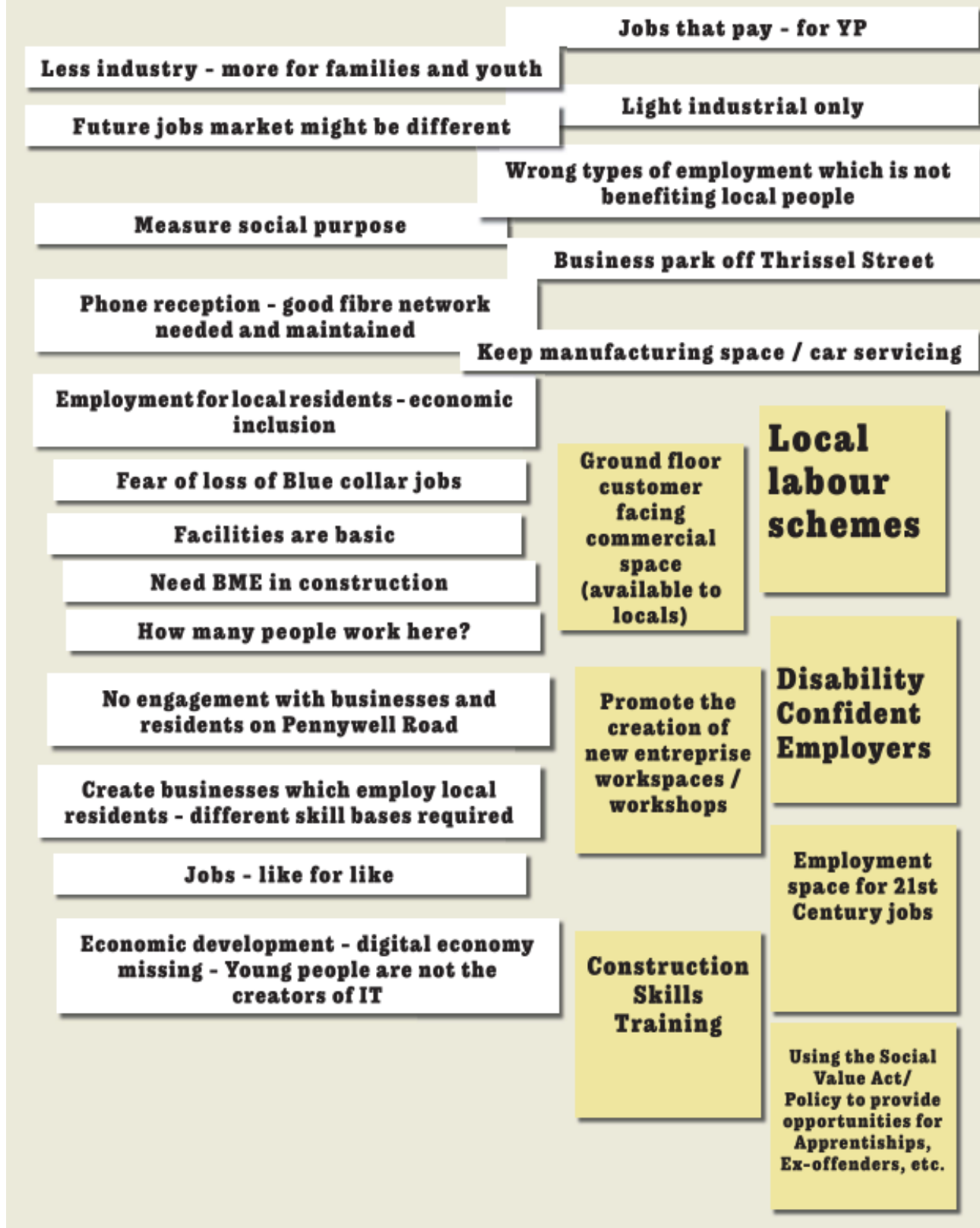
**Young people are meeting up and
organising themselves - how do we
support?**

Need after school space

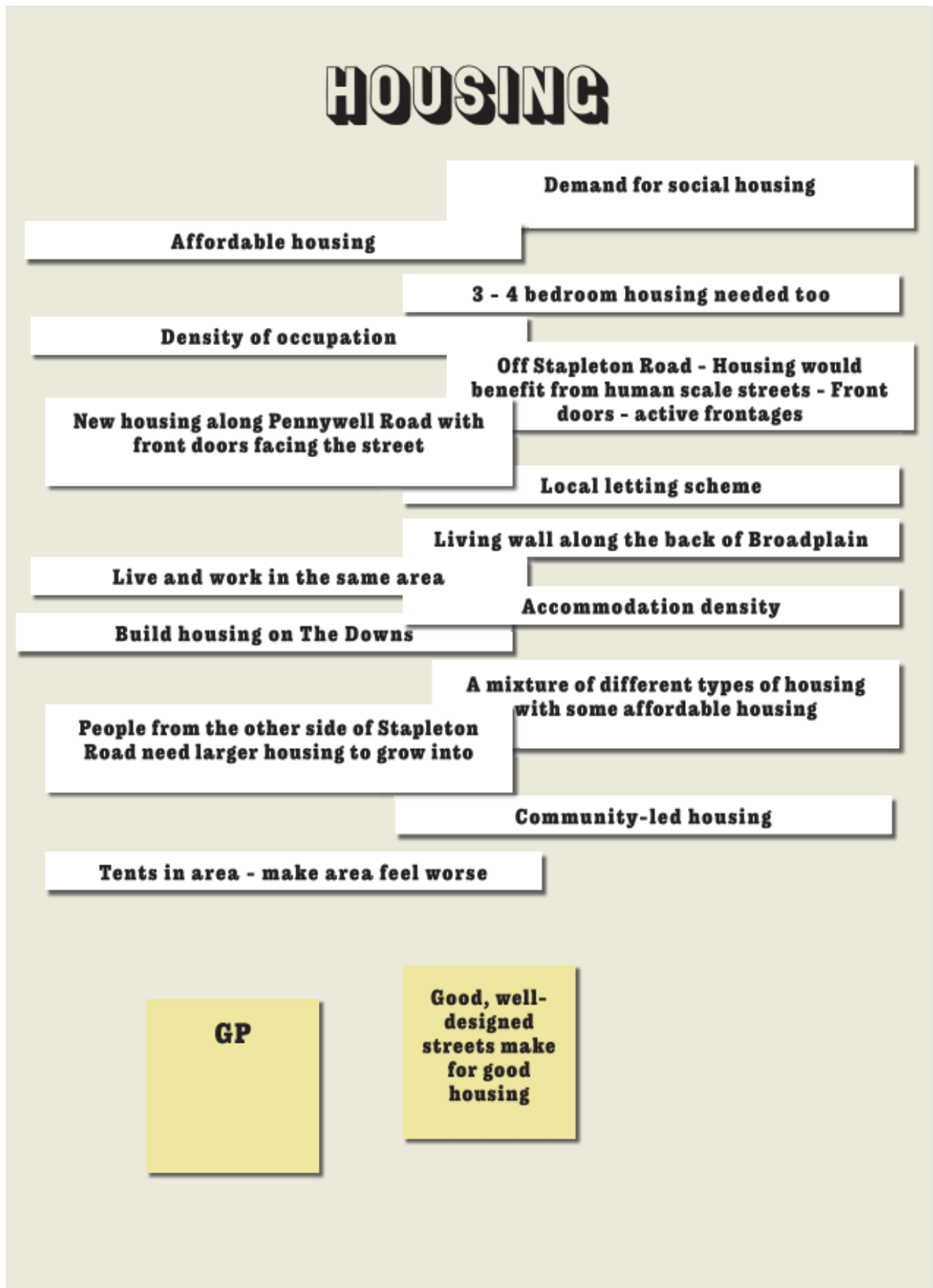
**Basketball - Floor uneven and people
stop using it**

Stage 0 key themes and ideas expressed by the community

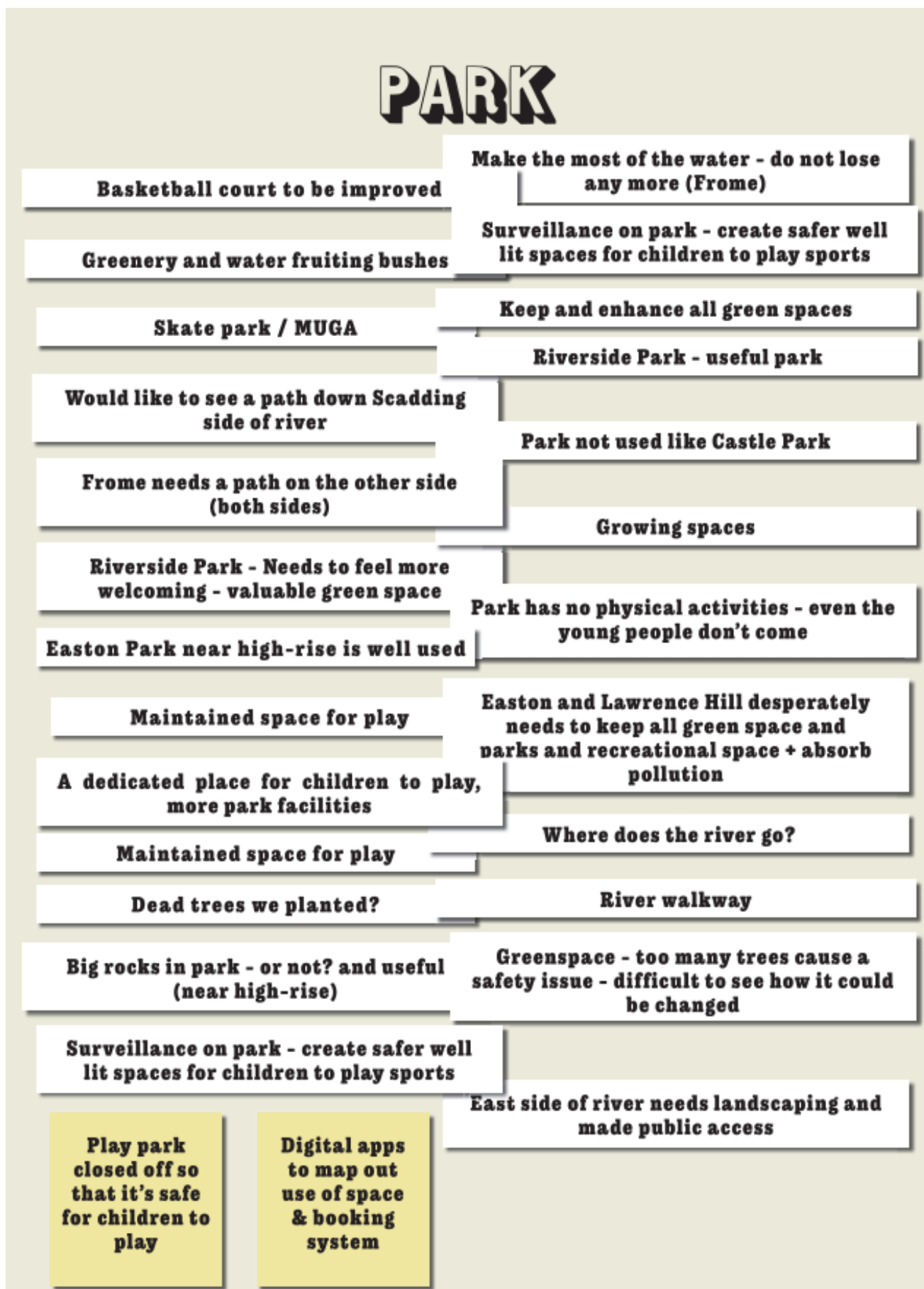
EMPLOYMENT



Stage 0 key themes and ideas expressed by the community



Stage 0 key themes and ideas expressed by the community



Stage 0 key themes and ideas expressed by the community

SPACE & PLACES

Neighbourhood plan for the area is in people's thoughts

Places in which people can develop their skills / evening classes

More lighting and friendlier

Designated parking for residents of new housing

Could do with a shared community space

Multi-use space / intergenerational space

We should be looking at how the area works with neighbouring areas

Litter issues

Air quality in relation to increased density

Look at reinstating old street patterns

Put infrastructure in first (River)

Scadding is beautifully industrial - would like to see some characteristics maintained

What was that heritage? (Past Pennywell)

A place to come together

Keep the pub

Open space improvements

More places to site and cafe Hub

Boundary - Wade Street / Stapleton Road

Vestry Hall

Praying space

Mixed-use development Commercial on ground plots with residential above

Stage 0 key themes and ideas expressed by the community

TRANSPORT

Pennywell Road - is the road too wide?

More connections from St Pauls across the M32

Make area as pedestrianised as possible, slow traffic down, particularly on Pennywell Road and Wade Street

Transport links to work

Keep the cycle / walking access

At-grade crossing of M32 (as well as existing bridge)

Pennywell Road - if pedestrianised will more traffic onto Stapleton Road

Narrow Pennywell Road

More parking spaces - free / low-cost

Could we close Pennywell Road? Stop barriers

Cycle Path for the area - should not be like Railway Path where cyclists speed

Two schools nearby - why parents don't use these paths?

Easton Way? Disabled and pram owners - difficult to cross

Pennywell Road a block to communities and businesses

Would like a zebra crossing nearer the mosque

Housten Road / Wellington Road / Wade Street - Poor connection at the moment

There should be a better connection between St Pauls and St Judes

More parking / less traffic

No MetroBus stop

No lights on cycle path and basketball

A dedicated cycle path and walking path

Need to manage the commute needs

No good cycle route to Barton Hill / Lidl

Stage 0 key themes and ideas expressed by the community

TRANSPORT

Only 1 bridge - Pennywell Road

Improving quality of routes through to Barton Hill

Developers prefer to keep river access closed

Pennywell Road road too wide

Bridges

Lorries block entrance to disabled parking

Block off level of pollution from motorway

More connections across the river i.e. bridges

Stage 0 key themes and ideas expressed by the community

New homes, community space and leisure

- Meeting local housing needs- affordable, families, young people and older generations
- Open to alternative, community and eco housing
- Protecting and providing new youth, community and cultural assets, including healthcare/ child care

Opening up access to the River Frome

- Create paths to provide waterside access and enjoyment of nature
- Access to a long walking and cycling route to Eastville Park and Snuff Mills (Frome Valley walkway)

Environmentally sustainable and healthy neighbourhood

- Retain, enhance and increase open green spaces
- Create a community garden
- Climate and flood resilient, improve air quality, carbon neutral

An attractive Entrance to Bristol

Mixing old and new

- Communities
- Jobs
- Protecting and reusing historic assets

Friendly Streets and Spaces For All

- Clean and safe streets, destination spaces and better lighting
- Better use of roads around the area, especially Pennywell Road

Better connectivity and transport

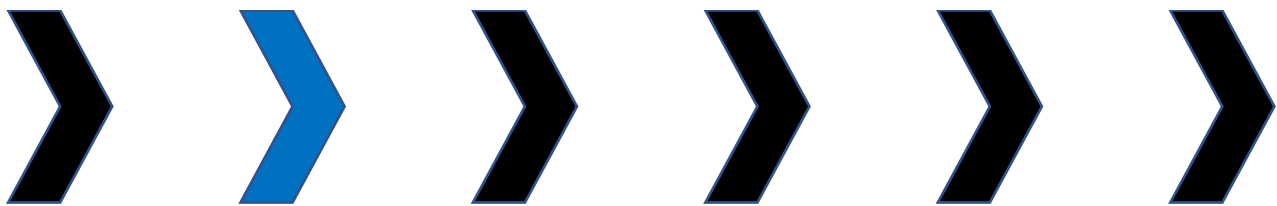
- Connecting the communities of St Pauls and St Judes
- Better walking, cycling routes, access to public transport

Community Place Principles

Stage 0b

Preparatory Work

August 2021 – January 2022



Purpose of Stage 0b

- Develop project scope, aims and objectives.
- Secure project funding and commission project team.
- Gather intelligence to inform project delivery and engagement approach.
- Develop Scope of Community Influence to increase transparency, manage expectations and focus resources.

Activities undertaken

- Development of project design and development brief (in accordance with Community Place Principles).
- Development of Frome Gateway Communications and Engagement Strategy
- Appointment of consultant team.
- Equalities Impact Assessment
- Health Impact Assessment
- Stakeholder mapping
- Development of [Scope of Community Influence](#)
- Launch of [project website](#)

Stage 0b outcomes and learning

- Agreed resources and project briefs to enable project commencement.
- Clearer understanding of communication and engagement priorities and approach.
- Scope of Community Influence
- Consolidated stakeholder contact information
- Project website to enable information sharing
- The Equalities Impact Assessment identified that the Frome Gateway area:
 - Has a young demographic with a higher proportion of young people than the city average;
 - Has a high percentage of community from Black and Ethnic Minority (BAME) groups.
 - Has a much higher percentage of residents who speak English as a Second language.

FROME GATEWAY – SCOPE OF COMMUNITY INFLUENCE

1 Parts of the framework which the community will be invited to develop and deliver solutions with us include:	
a. Character and identity How the place looks and feels through definition of the existing character and identity.	Explanation: The community's views will be a strong influencing factor over these design elements and opportunities will be made available during and after the development of the framework for the community to get involved in developing and delivering solutions on these aspects as much of possible
b. Public art Art in any media whose form, function and meaning are created for the general public through a public process. Public art is visually and physically accessible to the public; it is installed in public space in both outdoor and indoor settings.	
c. The name of the area How the area the area is known, what it is called, the name of any new streets or public spaces.	
d. Community and cultural assets The use, design and location of any new community and cultural spaces delivered by the project.	
e. The design and long-term management of public spaces How spaces look, what their function is and how the community uses them.	

2 Parts of the framework which the community will help to shape alongside other factors include:	
a. Overall vision, objectives and identity of the future area What the place could be and how that relates to the existing character and identity.	Explanation: The community's views will have some influence over these design elements; however, they will need to be balanced against a range of other influencing factors. Other influencing factors include: <ul style="list-style-type: none"> - Existing and emerging national and local planning policy (most notably Draft Policy D55: Frome Gateway in BCC's Local Plan Review and the Urban Living Supplementary Planning Document). - Long-term city objectives such as those set out in the One City Plan and associated strategies including the Climate Strategy and Ecological Emergency Strategy. - Local/best practice design guidance including neighbouring Conservation Area guidance, as well as neighbouring masterplan designs (e.g. City Centre Framework and Old Market Neighbourhood Plan). - Landowner objectives and constraints for their sites. - City transport objectives (such as encouraging sustainable travel) - Urban design analysis including ensuring design proposals contribute to enhancing networks beyond the immediate site boundary (such as transport and ecological networks). - Land values, commercial market assessments and development viability. - Technical, engineering and safety requirements. - Cost and maintenance considerations.
b. Streets and highways design The qualities and characteristics of new and existing streets.	
c. Land use What type and mix of uses will be in the area for example businesses, new homes, workspace.	
d. Building types and mixes The size and uniformity of buildings. Large buildings may occupy an entire block, whereas the same area could be developed with a variety of smaller buildings.	
e. Approach to density including building heights Density is a way of measuring the quantity of people or things in each area or space. Building heights express how tall a building will be.	
f. Movement and connections How people move through the space in various ways including, walking, cycling, public transport or private vehicle.	
g. Healthy living strategy	

How regeneration enables communities to thrive and supports mental and physical health and wellbeing.	(Continued from previous table)
h. Climate emergency response In November 2018 Bristol City Council declared a climate emergency. This included a pledge to make the city of Bristol carbon neutral by 2030. In 2020 the council released the One City Climate Strategy which sets out how we will work to achieve this goal.	
i. Ecological emergency response and strategy In February 2020, Bristol City Council and One City partners declared an ecological emergency in response to the decline in wildlife in Bristol. In September 2020, the One City Ecological Strategy was published which sets out how we will work to address this.	
j. Flood mitigation Reducing the severity and seriousness of flooding using physical measures including defences, Sustainable Urban Drainage system design, public realm and landscape design.	

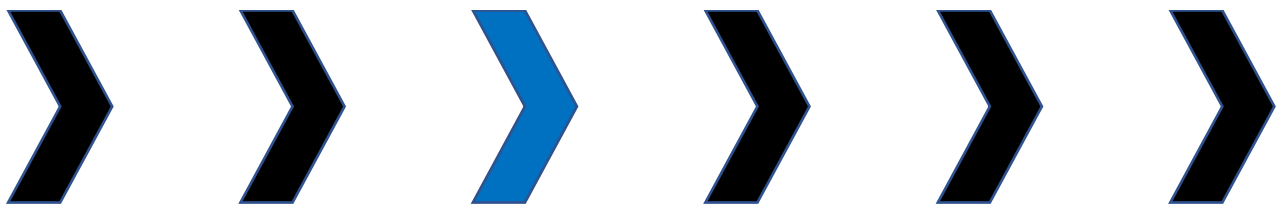
3 Parts of the framework which the community will be informed about, but have little influence over, include:	
a. Flood risk management The process of dealing with flood risk from a range of sources using measures such as defences, strategy and planning.	Explanation: Some elements of the framework are driven primarily by specialist, technical or legal considerations or requirements, and are therefore largely outside of the control of the community (e.g., flood risk management) and/or the project team (e.g., land values). These elements can be considered as "fixed", and the community will be informed of the outcome of these elements of the framework.
b. Land values, development viability and the overall quantum of development Land values refer to the cost of buying land for development. Development viability is a measure of how deliverable a development is when the overall costs and returns are weighed up against each other. The quantum is the amount of development proposed for a site, often decided by development viability.	
c. Phasing of future development	
d. Land ownership issues and site boundaries The person/ company/ trust that owns the land. This can be public (the council or other public body) or private (individuals, businesses, developers etc). Site boundaries are defined by landownership and are often fixed.	
e. Critical infrastructure and utilities The services which are required to make a site developable. This might include flood risk measures to protect the area from flooding, utilities to support new uses, and increased capacity of existing services (for example electric and energy networks).	
f. Amount of affordable housing The amount of affordable housing that is provided in a development is guided by planning policy and determined through the planning application and negotiation process (where affordable housing contributions need to be considered alongside developer contributions to local infrastructure for example).	

Frome Gateway Scope of Community Influence

Stage 1

Analysis and brief setting

February – April 2022



Purpose of Stage 1

- Formal launch of the project and communication of its scope, aims and objectives.
- Re-establish contact with stakeholders from early engagement.
- Re-testing of the Community Place Principles (after a prolonged pause in engagement activities due to the COVID-19 pandemic).
- Discover together the history of the place, memories, stories and lived experience of the community.
- Identification of local strengths, passions and skills.
- Communicating project scope, aims and objectives.
- Building transparency in the process and decision making by communicating the Community Scope of Influence and various influencing factors on the project to manage expectations and focus resource.
- Data gathering from businesses, landowners and developers to understand their aspirations for the future.
- Gather information from a broad range of stakeholders including focussed engaged with groups identified through the Equalities Impact Assessment.

Activities undertaken

Date	Description
Jan – March 2022	Distribution of letters and flyers, area-wide door knocking and social media campaign to raise awareness of the project and opportunities to engage. Letters were posted to 930 homes, 90 businesses, and 40 landowners and developers. 200 flyers were also handed out on site.
17 th Feb 2022	1 launch event and community workshop
4 th Feb 2022	Targeted engagement with the Environment Agency
March 2022	'Story of Place' mapping to develop a place narrative and context of change including site walkabouts (3 events)
Feb – Mar 2022	Online interactive mapping
Jan – March 2022	Local business survey + 1-1 follow up conversations to understand need and aspiration
Jan – March 2022	Local landowner & developer survey + 1-1 follow up conversations to understand need and aspiration
27 th April 2022	1 engagement webinar
5 th April 2022	Engagement event with St Nicholas of Tolentine Primary School
April – June 2022	Live Local Study to gather information on the lived experience of local residents
April 2022	Targeted conversations with local social housing blocks to raise awareness
23 rd April 2022	Targeted engagement with Al-Baseera Bristol Centre
Throughout	1-1 landowner and engagement sessions (facilitated by AHMM Architects)

Stage 1 launch event

The aim of these sessions was to re-introduce the project and continue conversations with the community and stakeholders, rebuilding relationships and identifying other stakeholders.

The event was planned as an interactive workshop, with an introductory presentation, themed activities, and a Story of Place talk.

The workshop activities were designed to set out and test out engagement approach and gather information about the area and peoples experience of living, working or moving through the area. We also displayed outputs from previous engagement, including the Community Place Principles.

The event was planned to maximise accessibility to encourage attendance and involvement from a range of participants, including translation during the event.

Key information:

Thursday 17th February 3 – 5.30pm
Saturday 19th February 10 – 1pm

@ Riverside Youth Project

36 attendees across both events

The event was well attended by local community groups and organisations, residents, and some businesses. There was no landowner / developer representation.

The event was promoted in local social media (Facebook and Next Door), letter drop to residents, businesses and landowners, flyers and direct contact by BCC Community Development team.



Stage 1 launch event

Story of Place Mapping (March 2022)

The aim of this workshop was to use the 'Our Place' methodology to enable the community to identify and map the character of their local area.

Building on the information gathered from the launch event, the workshop focussed on mapping routes, spaces, and community assets.

The end product represents a community derived map of the area that defines the strengths weaknesses and opportunities.

Attendees worked in two groups, with facilitating officers, covering either the north or south of the regeneration area, coming together at the end of share findings and discuss key themes / issues identified.

Key information:

Thursday 3rd March 2022 9.30 – 12pm

@Peel Street Open Space

8 attendees (+facilitating officers)

The event was promoted in local social media (Facebook and Next Door), letter drop to residents, businesses and landowners, flyers and direct contact by BCC Community Development team.



Story of Place Mapping

Story of Place – workshop agenda

- Welcome, introductory presentation and questions.
- Interactive activities
- Story of Place presentation

Activities:

1. Scope of Influence

Participants were invited to engage with a facilitator to place theme / topic cards into the relevant level of influence category.

2. Asset Mapping

Participants were invited to identify assets on a of Frome Gateway that they cherished or wished to change.

3. Opportunities and Constraints Mapping

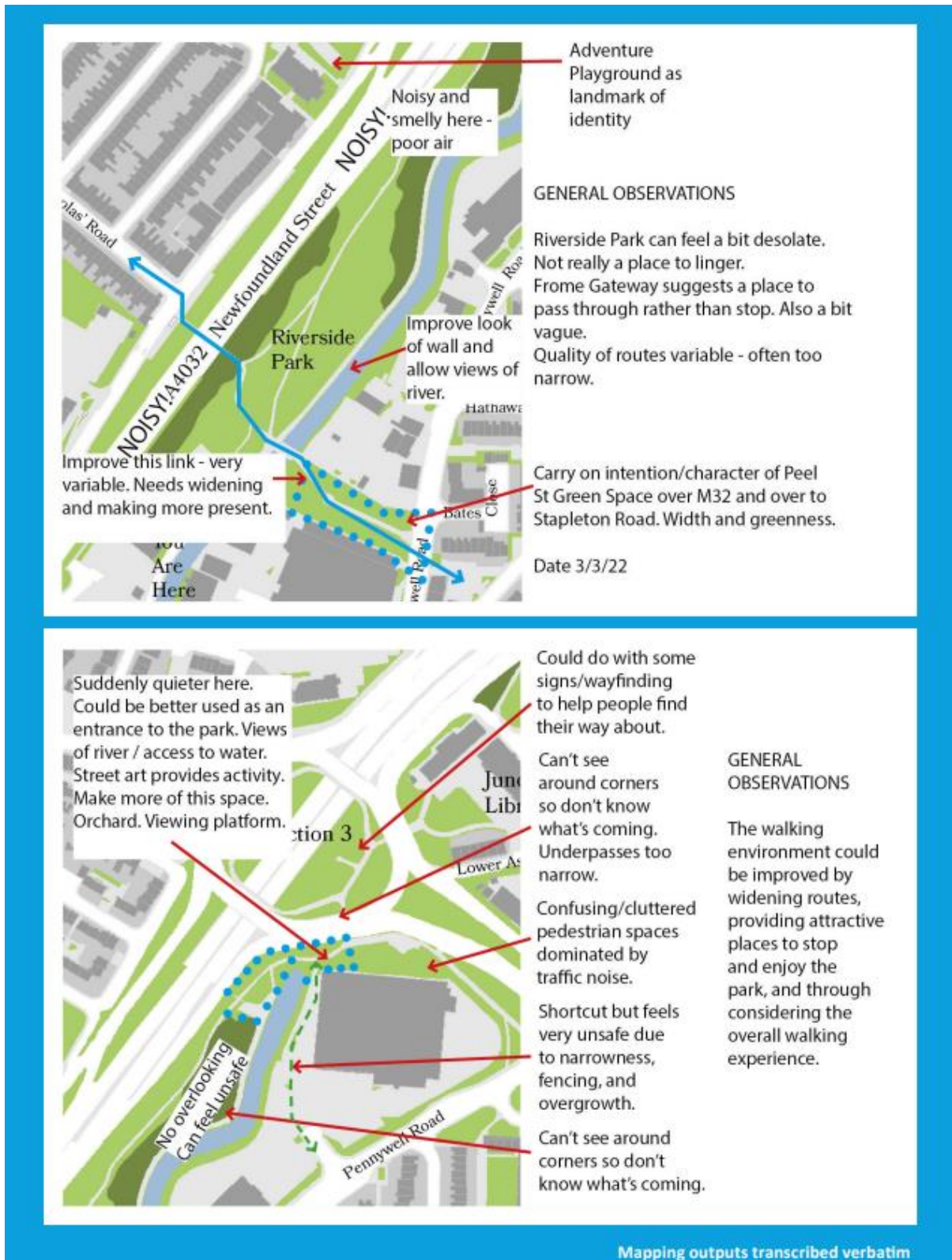
Participants were invited to mark on the maps what opportunities there were the Frome Gateway area, and what issues exist that might limit what can be achieved.

4. Community Place Principles

Participants were invited to vote for their 3 top priority Community Place Principles and add comments or suggestions.



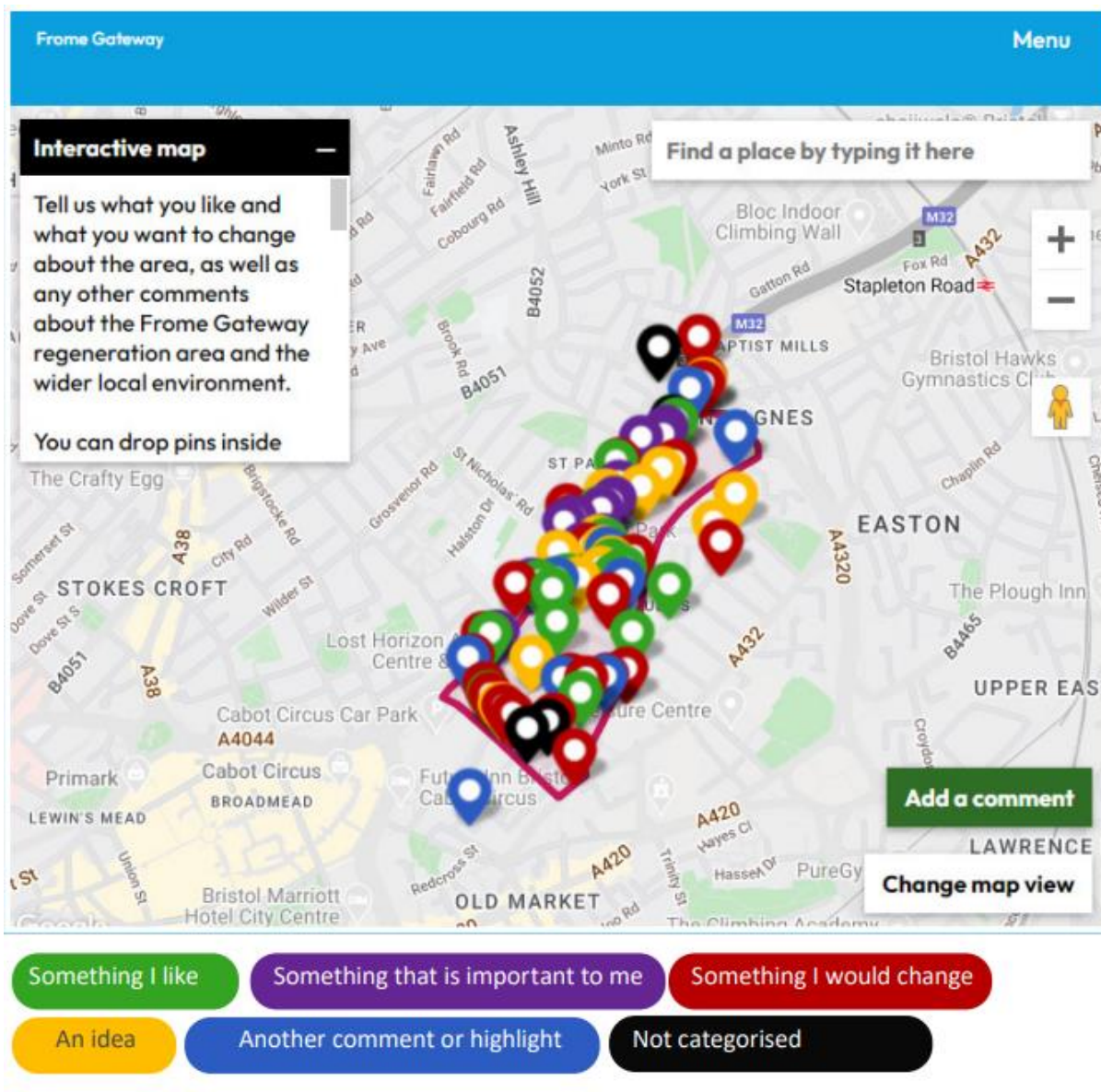
Opportunities and constraints mapping with community stakeholders



Story of Place outputs

Project website and interactive map

A project website at www.FromeGateway.co.uk was launched in January 2022 to provide project information and updates. This included through a mailing list function which has allowed us to update and invite users to engagement events. The website also hosted an interactive map during Stage 1 which allowed people to pin location and photographs with comments about that they cherish about the area and what change they would like to see. 94 comments made on the interactive map and were used to inform early identification of opportunities and constraints.



Online Interactive Map available at www.FromeGateway.co.uk

Girls and young women from Horn Youth Concern (23rd May 2022)

Following a session with the boys and young men from the Horn Youth Project in the early stages of engagement (2019-2020), BCC Community Development attended a site walkabout with the group, enabling them to add their voice to the conversation about regeneration the area.

Many of their comments focussed on the park, bins and rubbish, graffiti, safety, lighting, pedestrian and cycle movement through the park, benches, play spaces, and maintenance green and public spaces.



Site walkabout with Horn Youth Concern

St Nicholas of Tolentine Primary School (5th April 2022)

BCC Community Development and City Design attended a dedicated workshop with the Year 6 school children. This built on work done with the school in 2019, which ultimately led to a living streets school audit.

The children were given an overview of the historic development of the area and then taken on an accompanied walkabout along Pennywell Road to Peel Street open space and Riverside Park.

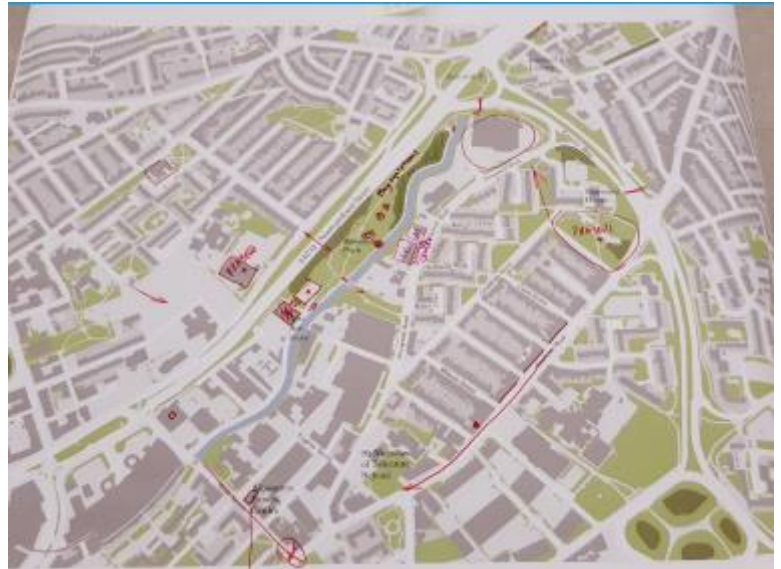


Output from engagement with St Nicholas of Tolentine Primary School

Key assets identified by the children included the river and the grass mound in Peel Street open space. Constraints and safety concerns of the walking environment along Pennywell Road were highlighted again and seen as a barrier by the children.

Al-Baseera Mosque Workshop (23rd May 2022)

BCC Community Development, Regeneration and City Design attended a dedicated workshop with members of the Al-Baseera Mosque. This followed on from 1-1 conversations with BCC Economic Development team and was intended to provide an opportunity for people to discuss the project and emerging place principles as well as the role of the Mosque in the community, and aspirations for the facility going forward.



Output from workshop with Al-Baseera Mosque

10+ members of the mosque attended, including elders, family members and young people. Key points were added to a project map (right).

Stage 1 outcomes and learning

- Identification of local community assets and a clearer understanding of local strengths, weaknesses, and priorities for change (including through 94 interactive map comments and 108 survey responses to the Live Local study).
- Identification of project opportunities and constraints.
- Key themes emerging from 1-1 business engagement included:
 - Businesses and organisations felt part of the community. In the case of the Al-Baseera Mosque, their location is the focus of their community and they would very much like to have expanded, enhanced facilities. There is an opportunity to greatly enhance its function as a community asset.
 - The Jam Jar Collective has a wide range of user groups in addition to its prime purpose as a music venue. They would happily extend some of these operations if more space was available, particularly the enterprise aspect, providing facilities for music production and commercialisation. Their principal concern is to maintain good relations (which they currently enjoy) in respect of sound from the venue. This is a critical design imperative.
 - The impact of the Clean Air Zone was widely mentioned with some residents with older vehicles having concerns.
 - Pennywell Studios and Safestore are both bases for a wide range of micro businesses.
- Themes emerging from 1-1 conversations with landowners and developers included:
 - Significant amount of developer interest across a number of sites, and landowners reviewing their land interests with redevelopment in mind.
 - Aspirations to diversify land use, including introducing more residential and student uses
 - intensifying development within the area given proximity to city centre.

- A refined and developed set of Community Place Principles based on community feedback. This included setting out Place Objectives and Place Ideas for each of the Community Place Principles. These are set out on the following pages (40-46).

Refinement of the Community Place Principles

Stage 1 activities and engagement feedback largely confirmed the relevance of the Community Place Principles established in Stage 0. Only 2 principles required further refinement to bring them more in line with the community outputs. These are the 'attractive entrance to Bristol' and 'mixing old and new'.

Attractive entrance to Bristol: Through analysis of the engagement outputs and comments, it became clear that people were referring more to the character and identity of place, as it currently is and what they thought it could be at a local, community level rather than setting this out as a broader 'entrance to the city'. This principle has been renamed '**Establishing and celebrating identity of place**'.

Mixing Old and New: This principle was adjusted so that the heading reflects the people and community-focussed comments which related to integrating new and existing communities and mixing land uses to achieve diverse activity and places to live and work. This principle has been renamed '**Diverse and inclusive communities**'. To reflect this focus, the reference to heritage assets was relocated to the 'Establishing and celebrating identity of place'

New homes, community space and leisure



Place Objectives

- Meeting local housing needs- affordable, families, young people and older generations
- Open to alternative, community and eco housing
- Protecting and providing new youth, community and cultural assets, including healthcare/ child care

Ideas:

- Provision of social housing to meet local need (i.e 3/4 bed houses with gardens, flats with balconies), and be genuinely affordable.
- Local lettings policy
- Social housing that encourages long term tenure
- Parking for homes
- Play areas for children
- Provide a new community centre including services and spaces for young people

Gym, music and art spaces:

"These venues are a great asset to the city and a good use of what was empty warehouse spaces. These venues should be protected as they add to the vibrancy of the area".

Interactive map comment

"People from the other side of Stapleton Road need larger housing to grow into".

"New housing along Pennywell Road with front doors facing the street".

Participants comments

Environmentally sustainable and healthy neighbourhood



Place Objectives

- Retain, enhance and increase open green spaces
- Climate and flood resilient, improve air quality, carbon neutral

Ideas:

- Improve facilities in Riverside Park to encourage more people to use it, including children's play, exercise and meeting spaces.
- Provide seating areas where the M32 isn't visible
- Screen views of the road from the park
- Increase green spaces across the site area for people to dwell and connect with nature
- Manage the impact of construction on the river ie. run off and contaminants such as concrete etc.
- Use sound barriers, such as trees, to improve the quality of the park
- Improve biodiversity and ecology
- Keep existing trees and add more, including fruit trees
- Create a community garden

Riverside Park

"This is an essential space for people's mental well-being and for the ecology of the Frome and the city".

"Its easily accessible and is one of the nicer features for those arriving into Bristol on the M32".

Interactive map comments

Peel Street Open Space

"It would be nice to have a children's play park in this area. There are a lot local children and the parks are all a bit of a walk away".

"Beautiful magnolia trees and crocuses in spring, shrubs recently planted give a bit of summer colour".

Interactive map comments

Diverse and inclusive communities



Place Objectives

- Integrating new and existing communities
- Retain and create new jobs
- Employment and skills training for all

Ideas:

- Provide a youth club and centre and community rooms for new and existing residents to use together
- Incorporate services: GP, schools, nurseries
- Youth training and employment skills for local people
- Employment opportunities for women
- Support local jobs and business opportunities
- Create small business space
- Affordable work space
- Better local mosque
- Playground and activities for young people
- Mixed use- live and work in the same area

"I like being able to see some industry working in the inner city. Gentrifying areas and pushing industrial jobs out of town makes ghettos. It would be great to see a range of jobs available in any redevelopment".

Interactive map comment

"Using the Social Value Act/ Policy to provide opportunities for Apprenticeships, ex-offenders etc."

"Create businesses which employ local residents- different skill bases required"

Participants comments

Friendly streets and spaces for all



Place Objectives

- Clean and safe streets and destination spaces
- Better use of roads around the area, especially Pennywell Road

Ideas:

- Better lighting
- Parking spaces for residents
- Create safe spaces for women
- Wider pavements
- Improve safety for cyclists on Pennywell Road
- Improve pedestrian and cyclist safety at crossing points along Wade Street and Pennywell Road
- Enforce parking restrictions
- Discourage speeding and rat-running through the area

Wade Street Bridge: "Parking on the footway on the bridge can make it difficult to use the zebra crossing".

Junction 3: "The subway under the roundabout...is too narrow for the number of pedestrians, cyclists and VOI riders to all happily co-exist and it is intimidating..".

Interactive map comment

Pennywell Road

"Barely any cars respect the 20mph speed limit on this road. The pavement is really narrow and it is terrifying to walk along there with children".

Interactive map comment

Opening up access to the River Frome



Place Objectives

- Create paths to provide waterside access and enjoyment of nature
- Access to a long walking and cycling route to Eastville Park and Snuff Mills (Frome Valley walkway)

Ideas:

- Clean the river
- Clearly mark cycle/ pedestrian pathways
- Leave grassland in the park
- Open up access to the river in a safe way- walkways, viewing points, and opportunities for activities such as pond dipping and water sports.

"It would be very nice to have a cafe overlooking the river. The river is currently largely hidden from view and it would be nice if it became a feature"

Interactive map comment

"The River Frome should be treated as the centrepiece of this re-development. It's currently attractive but also mostly obscured and inaccessible. A stepped bank on one or both sides would make a beautiful space to sit and relax, and enjoy the nature and wildlife"

Interactive map comment

Better connectivity and transport



Place Objectives

- Connecting the communities of St Pauls and St Judes
- Better walking, cycling routes, access to public transport

Ideas:

- More and wider footbridges over the M32
- Have a tram/ rail system along the M32
- New bridge over the Frome linking Eugene Street to Wellington Road
- Improve footpath from Pennywell Road to River Frome (between Bristol Novelty and Mazda)
- Connect into the Dove Lane development, extending the St Pauls green link
- Don't forget access by private cars- residents, carers etc.
- Improve public transport accessibility
- Segregate cyclists and pedestrians
- Improve signage and wayfinding through the area

Newfoundland Street bridge

"When going from St Pauls to Easton and Laurence Hill this is a key through-route for walking and cycling. It needs to be preserved and enhanced"

Interactive map comment

Junction 3

"It would be very useful to have signage above the tunnels and in the roundabout so people would know where to exit. I often have to help people out because they are lost and not sure where to exit".

Interactive map comment

Establishing and celebrating identity of place



Place Objectives

- A place to come together
- A vibrant mixed use community
- Rediscover lost heritage
- Protecting and reusing historic assets
- Integration of art and culture



Ideas:

- More descriptive and heritage valued name of the area
- Space for public art, including positive street art and graffiti walls
- Encourage pop-ups and meanwhile uses
- Protect culture and music venues
- Support existing community uses and groups
- Support the formation of a 'Friends of Riverside Park' group

Wogan coffee

"This is a lovely addition to the space- I like to walk past the Frome smelling the coffee roasting here"

Interactive map comment

"I like the trees that were planted in the carriageway of the dead-end part of Wellington Road- they tell a story of road use changing and improving with time"

Interactive map comment

Stage 2

Concept and Option Testing

May – November 2022



Purpose of Stage 2

- Share findings from Stage 1 work to build a common understanding of work to date and direction of travel.
- Provide opportunities to feedback on and shape emerging design and development proposals.
- Test emerging proposals against the Community Place Principles.
- Bring strategic city partners and organisations into the project.

Activities undertaken

Date	Description
20 th May 2022	Targeted engagement with the Environment Agency
30 th June 2022	Stage 2 launch event in Riverside Park to communicate findings to date with all stakeholders and receive feedback
7 th July 2022	Design West site visit and Design Review Panel session #1
June - July 2022	Artist-in-Residence commission to undertake creative community engagement and further develop the Story of Place (6 events)
July 2022	Working with West of England Centre for Independent Living (WECIL) to undertake an Accessibility Audit of Frome Gateway
21 st July 2022	Targeted engagement with the Environment Agency
4 th August 2022	Targeted engagement with the Environment Agency
16 th August 2022	Thematic community workshops to test emerging design and development proposals (facilitated by AHMM Architects)
18 th August 2022	Cultural infrastructure session with local creative and cultural organisations
September 2022	Establishment of a monthly Landowner & Developer Forum
13 th September 2022	Bespoke engagement with Al-Baseera Mosque
11 th October 2022	Design West Design Review Panel session #2
18 th Oct 2022	Engagement with Old Market Neighbourhood Forum to ensure alignment with Old Market Neighbourhood Plan
Throughout	Bespoke 1-1 landowner & developer engagement sessions

Stage 2 launch event (30th June 2022)

On 30th June 2022, the Frome Gateway project team and officers from across BCC departments held a pop-up event in Riverside Park between 12-7pm.

The aim of the session was to convene all key stakeholders to allow open conversation about work to date and provide feedback on stage 1 work including:

- Engagement programme activities and what was heard from stakeholders.
- Identification of opportunities and constraints, and the development assumptions to be taken into the next stage of work.

The informal drop-in event involved topic-based discussions on key issues and conversations between stakeholders to develop a shared understanding of aspiration and priorities for change.

The event was marketed in the local area with flyers and emails to the project mailing and through social media. Businesses were invited by BCC Economic Development and landowners and developers by BCC Regeneration. A banner was also placed on Peel Street bridge marketing the event and project.

In total, it is estimated that 50-60 conversations were had with stakeholders.



Stage 2 launch event in Riverside Park

Artist in Residence (June – July 2022)

Throughout June and July 2022, BCC Culture commissioned Scott Farlow as an artist-in-residence to hold a series of creative conversations across the area and collect thoughts and ideas from local people and passers-by about the future Frome Gateway, asking key questions such as:

- What does this place mean to you?
- What stories does it hold?
- What does its future look like?

The process was intended to provide less conventional and more imaginative and creative opportunities for people to give their thoughts and reflections about the area, its importance, and its future. Activities included:

- Setting up a temporary pocket park to encourage people to stop, dwell and talk
- A walking tour (evening stroll)
- A public display of findings
- The 'artist as canvas'

The key output of the commission was a report of findings which included a 'Statement of Intentions' for the area to help decision makers and developers respond to local aspiration.

Extract from the report including emerging themes and recurring themes are set out on the following pages.



Artist in Residence

Emergent Themes

"Not to find one's way around a city does not mean much. But to lose one's way in a city, as one loses one's way in a forest, requires some schooling. Street names must speak to the urban wanderer like the snapping of dry twigs, and little streets in the heart of the city must reflect the times of day, for him, as clearly as a mountain valley."

Walter Benjamin

The creative conversations revealed 3 key themes that should be used to help guide and shape the future vision of the Frome Gateway.

These are:

1. NAVIGABILITY:

a place that is safe, easy, engaging and enriching for all users, residents, businesses and people moving and passing through.

2. LEGIBILITY:

a place that is the clear and imaginative expression of an inspiring local identity, growing cultural diversity, community connectedness and local distinctiveness.

3. CONVIVIALITY:

a place of genuine human interaction, warmth and kindness, creativity, understanding, nature connection, shared learning, celebration and neighbourliness. A place for well-being.

As a local resident told us during one of our conversations:

"This area gives me a sense of home; it is always somewhere I return to."

Extract from Artist in Residence report



images: the public display of findings. Riverside Park. 30.07.22



Extract from Artist in Residence report

During our conversations, participants shared a number of recurring ideas for inclusion within the future vision of the Frome Gateway.

These are combined and summarised as follows:

- A dedicated creative cultural centre comprising learning spaces, art spaces and communal buildings, including garden spaces for growing, making and sharing food.
- Distinctive cultural design expression and playfulness in the style, form, layout, rhythm, sequence and materials of new buildings, streets, parks and public spaces.
- Affordable family housing, including an integrated community room at the heart of all new development(s) together with dedicated, high quality communal spaces and gardens.
- Enhanced human connection to nature and wider access to wildlife habitats for personal and community wellbeing, learning and growing together.
- Long-term community food growing projects, private and communal gardens and productive landscapes; including allotments, orchards, and a city farm.
- Safer, colourful, pedestrian-friendly and playful streets; with particular attention to (slowing traffic down on) Pennywell Road to help the area become more welcoming and better connected.
- Safe, comfortable, navigable, connected and welcoming public realm.
- Acknowledge, open ('daylight') and celebrate the River Frome - make it accessible, allow people down to the water, to touch and interact with it.
- Ensure and sustain physical, cultural and social connections across the area and enhance connectivity with wider Bristol communities.
- Collective learning, openness and sustaining awareness programme to invigorate collective and personal responsibility e.g. in dealing with nuisance, anti-social behaviour, rubbish/fly-tipping, tagging etc.
- Ensure varied, accessible and better (formal and incidental) play opportunities for everyone; in Riverside Park and the streets and public spaces of new developments.
- Ensure that the neighbourhood really feels like home for everyone here such that it engenders a true sense of belonging, growth, equality and long-term connection.

Extract from Artist in Residence report

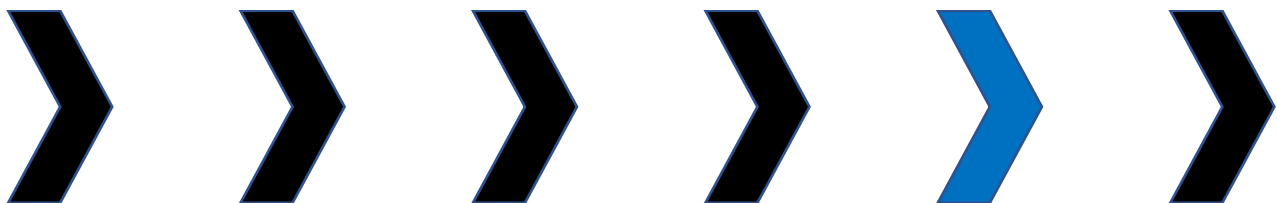
Stage 2 outcomes and learning

- Engagement in this stage reinforced key themes of importance and relevance of the Community Place Principles.
- WECIL Accessibility Audit developed to inform framework and future detailed detail briefs.
- Greater understanding of creative and cultural potential and appetite from local organisations to increase their capacity and reach in the area.
- Value of artist-led engagement in creating more creative and ad hoc opportunities for engagement.
- Refinement of flood resilience strategy
- Outputs and learning from this stage were used to shape and inform the initial Frome Gateway Vision and Development Concept.

Stage 3

Framework Refinement & Detail

December 2022 – September 2023



Purpose of Stage 3

- Testing the Frome Gateway vision and initial design and development concept.
- Building a common understanding of the proposals and communicating how engagement to date has influence them.

Activities undertaken

Date	Description
14 th February 2023	Email notification to statutory stakeholders and strategic city partners to invite them to engage in the process
15 th Feb 2023	Active travel liaison with Sustrans
18 th Feb 2023	Stage 3 launch event to communicate regeneration vision and design and development concept (open to all)
Feb 2023	Environment Agency Discretionary Service request #1
22 nd March 2023	Frome Gateway vision and development concept public webinar
March 2023	Online survey to gather feedback on Frome Gateway vision and initial design and development proposals.
10 th March 2023	Bespoke engagement sessions with St Jude’s Women’s Group
April 2023	West of England Centre for Independent Living (WECIL) review of Frome Gateway vision and design and development concept.
July 2023	Targeted youth engagement with Horn Youth Concern, Riverside Youth Project and Al-Baseera Bristol Centre (facilitated by Babassa)
28 th Feb, 12 th April & 6 th July 2023	Bespoke engagement with Al-Baseera Mosque
7 th Aug 2023	Engagement session with Old Market Neighbourhood Forum
Throughout	Bespoke 1-1 landowner & developer engagement sessions

Stage 3 launch event & Streets & Spaces workshop (18th February 2023)

On 18th February the Frome Gateway project team organised a Stage 3 launch event and design focussed workshops at Trojan's Free Fighters between 11-2pm. There were roughly 45 attendees.

The aim of the session was to provide an update on work to date and how the framework has developed since the last public event. This included sharing, for the first time, the proposed vision and illustrative spatial concept for Frome Gateway. The presentation of this work was focused on how the work has been influenced by previous engagement with the community, businesses and landowners following a 'you said, we are doing' approach.

The event was planned as an interactive workshop, with introductory presentation at the start of the session, themed activities, and communicating the project and progress so far through large display boards. Following the Scope of Influence approach, the session was particularly focussed on themes which the community have significant influence over and can help shape and deliver. These included:

- Streets and Spaces
- Riverside Park and Peel Street open space
- River Frome corridor improvements

There was significant representation of the users of Trojan's Free Fighters who were concerned about the loss of this community youth space. Main issues raised related to:

- The retention of Trojan's Free Fighters within the site (focus on exactly where it would be provided).
- How funding and support would be made available to community uses across the site.
- How community views from the engagement process were being considered, with distrust of the Council being expressed.
- What is the difference between cultural and community uses?
- General concern that the plan seemed to suggest mainly new residential development, and how this would be managed to avoid displacing important local services and facilities.



Stage 3 launch event

Youth engagement (July 2023)

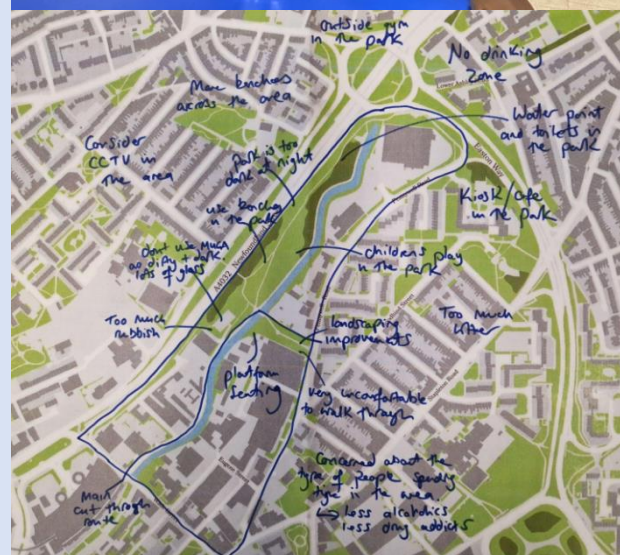
During July 2023, BCC commissioned Babassa to co-ordinate and undertake engagement with local youth organisations. The aim of these sessions were to provide young people with the opportunity to share their thoughts on the Frome Gateway area, the emerging vision for the area, and what the future of youth spaces and services in the area should look like.

A workshop with young people was hosted at Riverside Youth Project. The session was divided into sections which included an introduction before the young people were divided into groups and rotated between different facilitated activities and discussions. The session was attended by 10 boys from Bristol Horn Youth and Riverside Youth Project.

Following this event, a targeted follow up session was run with 6 girls from Al-Baseera Mosque.

Key themes raised were safety, anti-social behaviour, and the need for better quality multifunctional spaces for young people. Young people liked their multicultural community and wanted to see investment in the area so that it can be a place they feel proud to belong to. Girls from Al-Baseera Mosque noted that youth spaces in the area felt “just for boys” and that they “feel unsafe walking” around the area.

There was concern amongst the young people that the area would become gentrified and the existing community would be pushed out



Youth engagement

Direct quotes from young people:

- “When I was younger and not as covered (headscarf) I wasn’t as cautious. Now I’m not sure who would try to mug me.”
- “Riverside [Youth Project] was one of the last few places you could go to.”
- “Riverside is the only place that I see green in Bristol”
- “Are we going to feel out of place to just walk to the mosque due to gentrification?”

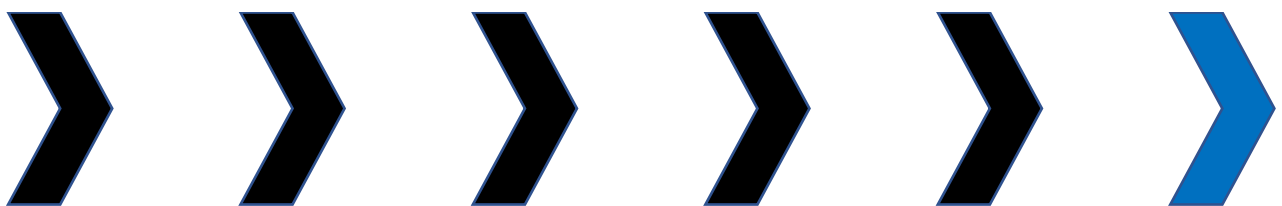
Stage 3 outcomes and learning

- The results of the online survey demonstrated majority support for the regeneration vision and overall development concept for Frome Gateway.
- Community feedback reinforced the importance of ensuring the regeneration of the area benefits existing community and cultural organisations, allowing them to remain and grow in the area. The importance of key themes was once again highlighted such as identity and place, safety, connectivity, greenery and nature, health and wellbeing, and community and culture.
- Learning from this and all other stages was used to develop the full draft framework.

Stage 4

Formal Consultation

October – December 2023



Purpose of stage engagement

- 6-week formal city-wide consultation on the full draft framework to determine public support for the vision and objectives set out in the Framework.
- The results of the consultation were used to make final changes to the document.

Activities undertaken

The formal consultation on the draft Frome Gateway Regeneration Framework ran for six weeks from Monday 23rd October 2023 until Monday 4th December 2023. A programme of 24 engagement activities were delivered as part of the consultation and were attended by 343 people. A variety of ‘open to all’ events for the general public were run across a range of formats and at various times to maximise opportunities for participation. In addition, bespoke events with targeted stakeholders were also conducted to promote accessibility and inclusively along with other means such as using translators and an Easy Read version of the consultation survey.

The consultation survey was the primary means of data collection and asked the public for the extent of their agreement across key aspects of the draft Frome Gateway Regeneration Framework.

Date	Description
23 rd Oct – 3 rd Dec 2023	Online consultation survey to gather feedback on the draft Frome Gateway Regeneration Framework (supported by activities listed below)
24 th Oct 2023	Targeted outreach: Horn Youth Concern
2 nd Nov 2023	On-site door knocking with businesses
3 rd Nov 2023	Targeted outreach: St Jude's Women's Group
3 rd Nov 2023	Targeted outreach: Public exhibition at Al-Baseera Mosque
6 th Nov 2023	Riverside Park 'pop-up'
8 th Nov 2023	Project exhibition at Lost Horizon
23 rd Nov 2023	Targeted outreach: St Nicholas of Tolentine Primary School
23 rd Nov 2023	Targeted outreach: Trojan's Free Fighters
30 th Nov 2023	Targeted outreach: Old Market Neighbourhood Forum
1 st Nov, 16 th Nov & 30 th Nov 2023	3 Public regeneration area walking tours
9 th Nov 2023	Business webinar
15 th Nov 2023	Public webinar
22 nd Nov 2023	Webinar for planning, transport, placemaking and equalities interest groups
21 st Nov 2023	Business West presentation
25 th Oct & 22 nd Nov 2023	Landowner and Developer Forum presentation
31 st Nov & 2 nd Dec 2023	BCC political briefings for Cabinet members and local ward Cllrs
Nov 2023	Environment Agency Discretionary Service request #2

Collaboration with the TRUUD research project led to creation of short videos that promoted the framework consultation on social media and explained the framework.

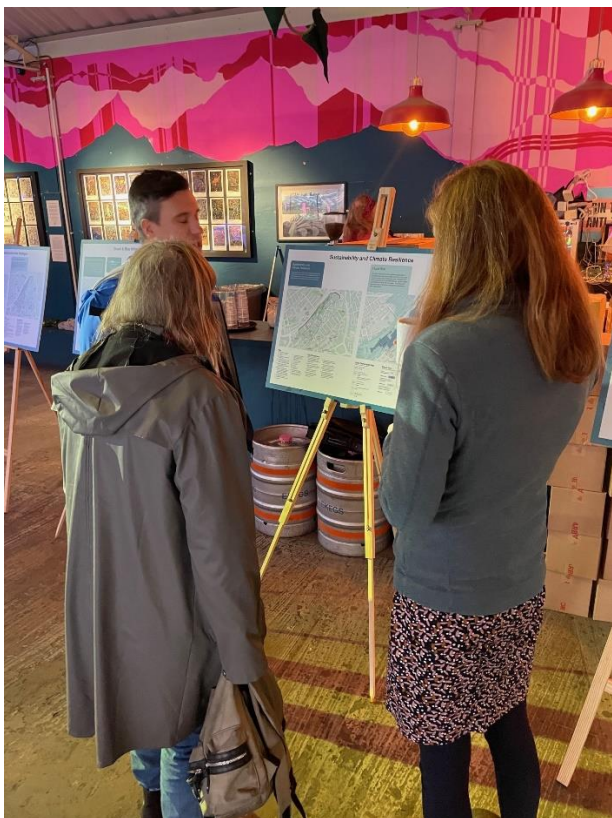
Frome Gateway Regeneration Framework: Statement of Community Involvement



Riverside Park pop-up



Exhibition at Al-Baseera Mosque



Project exhibition at Lost Horizon



Project exhibition at Lost Horizon

Stage 4 outcomes and learning

327 consultation surveys were complete during the consultation, and 11 formal representations from statutory stakeholders, landowners and developers and local organisations were received. This demonstrated wide-spread support for the Framework:

- 79% of respondents either strongly agreed or agreed with the vision for Frome Gateway.
- 77% of respondents strongly agreed or agreed with the regeneration objectives.
- 66% of respondents strongly agreed or agreed with the overall spatial concept
- 68% of respondents strongly agreed to agreed with the key approaches and main ambitions of the four character areas.
- 67.5% of respondents strongly agreed or agreed with the approach to employment.
- 77% of respondents strongly agreed or agreed with the approach to housing.
- 83% of respondents strongly agreed or agreed with the approach to community and culture.
- 70% of respondents strongly agreed or agreed with the approach to movement (pedestrian cycle and vehicular).
- 53% of respondents strongly agreed or agreed with the approach to height
- 81.5% of respondents strongly agreed or agreed with the approach to active frontages and streets.
- 80% of respondents strongly agreed or agreed with the approach to green and blue infrastructure.
- 71% of respondents strongly agreed or agreed with the 'Green Space Big Move'
- 82% of respondents strongly agreed or agreed with the approach to sustainability and climate change
- 82% of respondents strongly agreed or agreed with the approach to flood risk management.
- 55% of respondents strongly agreed or agreed with the approach to health and wellbeing (79% when the 'Avoid new hot food takeaways' principle is omitted which was changed following consultation)..

Aspects of the framework that were supported to a lesser degree were:

- Provide up to 500 student bed spaces as part of the overall mix, mainly in the south of the site (in addition to the 1,000 new homes).
- Potentially allow buildings that are significantly taller (than the most commonly occurring height of existing buildings) at the north and southern gateways to the site and Newfoundland Way crossing.
- Potentially allow buildings of amplified height (modestly higher than the most commonly occurring height of existing buildings) overlooking the Riverside Park and in the centre of the site.
- Avoid new hot food takeaways.

For full details on the findings of the formal consultation, see the **Frome Gateway Regeneration Framework: Formal Consultation Report**.

Consultation findings were used to make final changes to the document before it was presented to BCC Cabinet for formal endorsement. For full details on how the Framework was amended following the results of the formal consultation, see the Frome **Gateway Regeneration Framework: Consultation Response Report**.

Reducing barriers to engagement and participation

Frome Gateway is much more diverse than the city average with Black, Asian and minority ethnic groups making up 59.6% in Lawrence Hill and 33.5% in neighbouring Ashley ward, compared to 16% in the city overall. English is not the main language for 29.8% of the population in Lawrence Hill and 13.8% in Ashley (10.1% in Bristol overall) with the top countries of birth outside of the UK being Somalia and Jamaica.

As such, it was important from the outset to be mindful and respectful of cultural differences and commit to reducing barriers to engagement and participation in the Frome Gateway engagement programme. Throughout the process, BCC's Frome Gateway Engagement Steering Group was advised by BCC Community Development on maximising inclusivity in engagement activities.

Key measures included:

- In the early stages of the project, key information was translated into Somali (see below). In later stages of the project, the use of Community Champions was recommended as the preferred means.
- BCC's network of Community Champions was used throughout the process to encourage participation in the Frome Gateway engagement programme. Community Champions are well trusted and respected within their communities. They are willing to work with the council to engage those harder to reach, often using different community languages. Community Champions and officers from BCC Community Development were available for most engagement sessions in order to support with translation.
- A key approach throughout the engagement programme was delivering bespoke engagement activities with key stakeholder groups on a more 1-1 basis. Over the course of the project key bespoke engagement activities were focussed on:
 - **Young people:** through targeted engagement with Riverside Youth Project, Horn Youth Concern, Trojan's Free fighters and St Nicholas of Tolentine School.
 - **Al-Baseera Mosque:** including workshops, individual meetings and a project exhibition at the Mosque between Friday prayers during the public consultation.
 - **St Jude's Women's Group:** BCC Community Development and Regeneration attended these meetings on a number of occasions during the project to encourage their participation and collect their thoughts.
 - **West of England Centre for Inclusive Living (WECIL):** WECIL were engaged in stages 2 and 3 to undertake an Accessibility Audit of the regeneration area, review early concepts, and encourage participation of Disabled people through their networks.
- The methods of public engagement for '**wishing Penny Well**' (Artist in Residence) were intentionally experimental, providing imaginatively different ways of meeting people on site and in-situ that offered playful and interactive alternatives to more formal and conventional consultation exercises
- Production of a fully accessible summary version of the framework drafted with the community as the primary audience to make the framework more discernible to the public.

- During the formal consultation (stage 4), three local Community Champions were utilised (one Somali speaking, one Arabic speaking and one Polish speaking) to identify members of their local communities with more limited English and work with them to complete the consultation survey, translating where necessary. 69 surveys were completed this way.
- In a further effort to promote accessibility during the public consultation (stage 4), the survey was produced in Easy Read format and used with specific groups, such as children and those whose main language is not English. 30 surveys were completed using the Easy Read version.
- A range of engagement options were provided including in-person and online sessions.
- At the main/biggest public engagement events, children’s colouring materials were provided to encourage and enable others with young children to attend.
- We collaborated with the TRUUD research project. This involved researchers conducting focus groups with members of the public who had attended engagement events, to learn about improving public involvement in urban development projects. This led to creation of short videos to raise awareness of the framework consultation period, and explain the purpose of the framework.

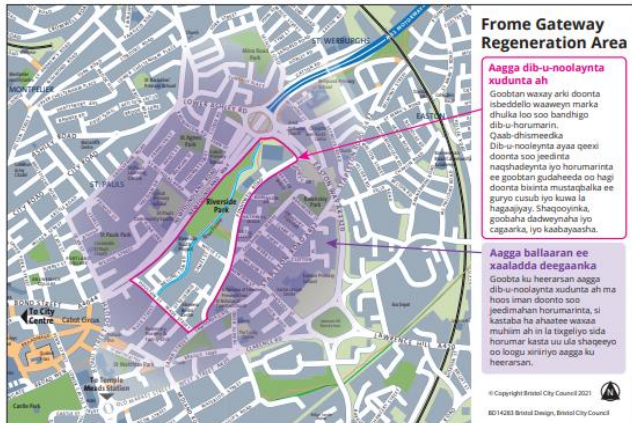


Deegaanka Qaaliga ah,

U abuurida Qaab-dhismeedka Dib-u-noolaynta ee Frome Gateway

Waxaan u qoraayaa inaan idiinku soo gudbiyo in golaha deegaanka ee Bristol uu bilaabay hawlo la iskaga kaashanayo dib-u-soo-noolaynta muddada fog ee agagaarka Wabiga Frome, ee loo yaqaano Frome Gateway, kaas oo u keeni doona isbedel la taaban karo oo mustaqbalka fog ah deegaanka. Fadlan eeg khariidaddaahoose ee aagga mashruuca.

Waxaan bilaabaynaa shaqadan annagoo ka jawaabayna dhawr arrimood, sida qalalaasaha gurayeynta, xaaladda degdegga ah ee cimilada, beddelida siyaasadda qorsheynta iyo xiisaha sii kordhaya ee lagu horumarinayo horumar cusub ee aagaan. Waxaan rabnaa inaan hubinno in isbeddelka iyo maalgashiga aaggan loo maareeyo loona habeeyo si faa'iido u leh dadka deegaanka, ganacsiyada iyo magaalada.



Waxaan la yeelanay xoogaa wada hadalo hore ah dadka deegaanka iyo kooxaha bulshada sanadkii 2020 si aan u dhageysano waxa ay ka qabaan aagga, laakiin tani waa la hakiyay cudurka Covid-19 awgiis. Hadda waxaan dib u bilaabaynaa wadahadalkan.

Qof degan agagaarka ahaan, waa inoo muhiim inaad si toos ah u maqashid waxa ay hindisahani adiga kuu leeyihiin iyo inaad fursad u haysato inaad fikrad ka dhiibato.



Bristol City Council waxa ay qorsheynayaan in ay bedelaan dhulka labada dhinac ee wabiga Frome midkod ee St Jude’s, oo loo yaqaano Frome Gateway, si ay si wanagsan u daboolaan baahiyaha magaalada iyo bulshada deegaanka.

Wax badan ka ogow

Wax badan ka baro waxa ku saaban mashruuca oo ra'yigaaga ka dhiibo adiga oo ku biiraaya dhacdo bulsho oo aaggaaga ah.

- Aqoon-is-weydaarsiga bulshada, Khamiista 17-ka Febraayo 3:00 galabnimo - 5:30 galabnimo, Riverside Youth Centre.
- Aqoon-is-weydaarsiga bulshada, Sabtida 19-ka Febraayo 10:00 subaxnimo – 1:00 galabnimo, Riverside Youth Centre.
- Socodka, Khamiista 3-da Maajo 9:30 subaxnimo – 11:30 subaxnimo, ku kulmida Peel Street Bridge. Nagula soo biir socodka si aan gacan uga geysanno khariidaddayso waxa u gaarka ka ah aagga.
- Aqoon-is-weydaarsiga bulshada, Khamiista 10-ka Maajo, Thursday 10 March 3:00 galabnimo – 5:30 galabnimo, (goobta Waa la Xaqiijin Doonaa). Nagu soo biir si aan gacan uga geysanno qeexida ruuxa aagga oo aan u abuurno aragti ee mustaqbalka.

Isu diwaangeli dhacdooyinkan, iyo sidoo kale liistigeena boostada mashruuca ee fursadaha mustaqbalka, xaga www.fromegateway.co.uk Waxaad sidoo kale wici kartaa 07810 506964 si aad u diiwaan geliso xiisayntaada. Warbixiino kasta ee dhacdada ah (sida isbedelada iyadoo ugu wacan tahay COVID-19) waxa lagu dhejin doonaa shabakada mashruuca. Haddii aad leedahay baahiyaha gaarka ah ee gelitaanka ama isgaarsiinta, fadlan horay noogu soo sheeg.

Waxaad sidoo kale wax ku biirin kartaa onlaynka adiga oo ku daraaya faallooyinka khariidaadeena is dhaxgalka: www.fromegateway.co.uk

Example of translated communications. This letter was translated into Somali.

Responses to the community feedback

This section looks at the feedback received over the last two years and provides a response from the project team. It has been structured around the Community Place Principles to provide a direct response to the community’s priorities for growth and investment in the Frome Gateway area.

Community Place Principle 1: New homes community space, places for work and leisure

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Provide affordable social housing to meet local need, 3-4 bed family homes. • Local letting policy with a focus on longer tenures. • Improve and increase play spaces for children. • Need for community amenities geared towards young people. • Provide parking for homes.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Includes target of 1,000 new homes including a requirement for affordable housing to be delivered in line with planning policy. • Provides further guidance on appropriate housing sizes to meet local demand (higher proportion of 3-4 bed family homes). • Commits to exploring Local Lettings Policy to help local residents access new social housing opportunities. • Includes the requirement for community space in ground floor units of new development, including dedicated space for young people. • Includes the requirement for new and improved children’s play spaces and multi-use games areas. • Sets out that parking provision will be determined on a case-by-case basis in line with planning policy. <p>More generally:</p> <ul style="list-style-type: none"> • The community will be invited to shape proposals for the design of new public spaces when spaces and funding is secured through the planning process. • The council will use the Framework to secure new and improved community spaces through the planning process, including facilities for young people. • The council will explore funding opportunities and work with developers to secure enhanced play facilities through the planning process. • New housing delivered by the council will maximise affordable, family and accessible homes. • The council will work to explore the implementation of a From Gateway Local Lettings Policy.

Community Place Principle 2: Environmentally sustainable and healthy neighbourhood

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Improve facilities in Riverside Park to encourage use and improve safety. • Park improvements to consider visual and acoustic screening from Newfoundland Way. • Create a community garden. • Improve biodiversity and ecology. • Keep existing trees and add more. • Increase green space across the site for people to dwell and connect with nature. • Manage the impact of construction on the river i.e. run off and contaminants such as concrete etc.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Includes a commitment to work with the community to develop a detailed vision for Riverside Park to encourage use and better meet the needs of the community. • Includes need to screen noise and air pollution with trees and shrubs. • Includes provision for community growing space. • Sets requirement for enhancement of natural spaces including targets for increasing biodiversity and greening. The framework will require development plots to make a minimum of 10% 'Biodiversity Net Gain'. • Includes 1 additional hectare of green space through network of new smaller 'pocket parks' as well as greener street, to increase space for the community and wildlife. <p>More generally:</p> <ul style="list-style-type: none"> • The community will be invited to shape more detailed proposals for green and public spaces when funding is secured for enhancements. • We have secured funding from central government to deliver a river restoration project to enhance the river Frome as a wildlife corridor. This will be delivered by the end of 2027. • Construction management is a key part of successfully delivering development in a socially and environmentally conscious way. Construction Management Plans are agreed after planning permission has been granted. • The Health Impact Assessment that was published alongside the framework includes recommendations for developers and other stakeholders to enable creation of healthy neighbourhoods.

Community Place Principle 3: Diverse and Inclusive communities

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Provide a youth club, centre and community rooms for new and existing residents to use together. • Provide training and employment opportunities for young people and women. • Improve local Mosque facilities. • Provide playground and activities for young people. • Support local jobs and existing businesses by providing affordable, flexible workspace. • Provide a range of affordable workspaces including small business space. • Create a mixed-use neighbourhood where people live and work in the same area. • Incorporate services: GPs, schools, nurseries.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Includes the requirement for community space in ground floor units of new development, including dedicated space for young people. • Sets out an approach to employment and skills to connect residents to employment and skills opportunities. • Sets a requirement for community and cultural spaces as part of new development to support community organisations to grow. • Notes Al-Baseera Mosque as an important community and cultural asset and sets out a commitment for BCC to work with the Mosque and landowners and developers to work together to help them achieve their aspirations. • Includes the requirement for new and improved children’s play spaces and multi-use games areas. • Sets out a requirement for 22,000sqm of new employment space at Frome Gateway, mostly across the ground floor of new development, to provide a more diverse range of workspaces in the area. • Commits to exploring affordable workspace strategy to ensure new opportunities are accessible. • Sets out a vision for mixed-use neighbourhood including new homes, workspaces, community facilities and wider infrastructure. <p>More generally:</p> <ul style="list-style-type: none"> • The council will produce a Frome Gateway Implementation Plan to provide further guidance on workspace typologies and design codes, affordability and an approach to business retention and relocation. • The council will work with landowners, developers and community and cultural organisations to enable collaboration and connect the dots between organisations who need space and new space that is being made available through new development.

	<ul style="list-style-type: none"> The council will work with local NHS Integrated Care Board and education providers and organisations to inform them of planned growth in Bristol, to assist in planning future healthcare and educational provision across the city.
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Community Place Principle 4: Better connectivity and transport

Comments received	<p>You said:</p> <ul style="list-style-type: none"> Improve signage and wayfinding through the area. Enhance exiting and propose new crossings over Newfoundland Way. Provide a new bridge over the River Frome linking Eugene Street to Wellington Road. Improve the footpath from Pennywell Road to the River Frome. Connect into the Dove Lane development, extending the St Paul’s green link. Segregate pedestrians and cyclists. Improve public transport accessibility. Retain private car access, considering the Clean Air Zone. Have a tram/ rail system along the M32.
Our response	<p>The Framework:</p> <ul style="list-style-type: none"> Includes the aspiration to replace the existing bridge over Newfoundland Way with one better for pedestrians and cyclists. Includes aspirations to enhance crossings over Newfoundland Way and Easton Way. Includes provision for two new bridges over the River Frome. Requires that footpaths throughout the regeneration area will be made wider, greener and safer. Commits to segregated cycle routes wherever possible to reduce conflict with pedestrians (though there are technical and design considerations which may mean this is not possible in all cases). Commits to undertaking a detailed movement study to ensure movement proposals including the modal filter have minimal impact on nearby residents and businesses. <p>More generally:</p> <ul style="list-style-type: none"> The council will be scoping opportunities to improve wayfinding and signage in the area. As part of a longer-term re-visioning of Newfoundland Way, the council will be exploring the potential for a new bus stop on Newfoundland Way to improve public transport connectivity for St Jude’s and St Paul’s communities.

Community Place Principle 5: Friendly and safe streets and spaces for all

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Improve pedestrian and cyclist experience and safety with improved street lighting, wider footways, better crossing points and traffic calming strategies. • Discourage speeding and rat-running through the area. • Create safe spaces for women. • Provide parking for residents. • Enforce parking restrictions. • Provide parking for residents.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Sets out a vision to re-prioritise the movement network to make it easier to walk and cycle while maintaining servicing access for businesses and homes. Streets will prioritise pedestrians and cyclists, and be made safer, greener and more inviting. • Across much of the regeneration area, the Framework will be requiring ‘active’ ground floor uses (such as employment and community spaces) to increase street activity to help create vibrant and safer streets. • Proposes that Pennywell Rd becomes a no-through route to reduce rat-running, calm the street and improve safety. <p>More generally:</p> <ul style="list-style-type: none"> • The framework will re-prioritise the movement network to make it easier to walk and cycle while maintaining servicing access for businesses and homes. • Parking standards are set in accordance with planning policy so will be determined through the planning process once details of specific schemes are defined.

Community Place Principle 6: Opening up access to the River Frome

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Leave the grassland in the park. • Clean and restore the river Frome. • Clearly mark cycle/ pedestrian pathways. • Open up access to the river in a safe way, including walkways, viewing points, and opportunities for activities such as pond dipping and water sports.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Protects Riverside Park as a public park with no development proposed here (except in the case of the ‘green space big move’ being delivered, in which case a small portion of Riverside Park would be built on in exchange for the delivery of a new publicly accessible park elsewhere in the regeneration area). • Sets out a vision to enhance the river Frome as a wildlife corridor and create more opportunities to see and enjoy the riverside. • Commits to segregated cycle routes wherever possible including along the riverside, to reduce conflict with pedestrians (though there are technical and design considerations which may mean this is not possible in all cases). • Includes provision for a new pedestrian walking route along the riverbank opposite Riverside Park, which is currently inaccessible. <p>More generally:</p> <ul style="list-style-type: none"> • As part of the Resilient Frome project, we have secured funding from central government to make the river Frome more attractive and visible and improve it as a wildlife corridor and community asset. • The council are undertaking feasibility and design work to upgrade the cycle route along the riverside.

Community Place Principle 7: Establishing and celebrating identity of place

<p>Comments received</p>	<p>You said:</p> <ul style="list-style-type: none"> • Protect cultural and music venues. • Include space for public art. • Support existing community uses and groups. • Encourage pop-ups and meanwhile uses. • Support formation of a 'Friends of Riverside Park' group. • Adopt a more descriptive and heritage valued name of the area.
<p>Our response</p>	<p>The Framework:</p> <ul style="list-style-type: none"> • Clearly states the value of existing community and cultural organisations, and commits to working with them to ensure they can stay and grow in the area. • Sets out a commitment for BCC to produce a Frome Gateway Cultural Strategy to guide investment in public art across the area. <p>More generally:</p> <ul style="list-style-type: none"> • Through further and more detailed engagement on the future of Riverside Park, the council will support the formation of a 'Friends of Riverside Park' group. • We will work with landowners to take advantage of 'meanwhile use' opportunities to help trial and test new ideas.

What happens next

The Frome Gateway Framework sets out a long-term and overarching vision and objectives to guide change in the area as sites come forward for redevelopment, and as funding is secured to deliver new projects and initiatives in the area.

Change will be delivered by multiple stakeholders. Only about 20% of the developable land at Frome Gateway is owned by Bristol City Council so most new development will be brought forward by the private sector, with the council taking a lead on enhancements to public spaces such as Riverside Park.

With the overarching vision and objectives for the whole area being established in the Framework, moving forward, progress and change will be more focussed on individual projects and initiatives within the regeneration area. There will be opportunities for the community to get involved in more detailed engagement associated with individual projects as funding is secured to move these forwards, such as a more detailed vision and design for Riverside Park, for example.

It is expected to take roughly 15 years to deliver the vision and objectives set in the Frome Gateway Framework.

Conclusion

Thanks to the extensive four and half year (albeit with a significant pause in activity due to the COVID-19 pandemic) multi-stage engagement process that was embedded at the outset and prioritised local involvement, the project team built up a good understanding of the needs of the community and wider city, and how to address them.

Many voices have fed into the engagement process. Whilst everyone's vision for the area may be slightly different, and not all feedback can be acted upon, the project team has been determined to ensure that the various resident, community and business groups have been able to raise their concerns and identify their priorities for the regeneration of Frome Gateway. The extensive feedback received throughout the process to date has helped to shape the creation of the regeneration framework.

As is set out on page 27 of the Framework, "As detailed design and development proposals are prepared for Frome Gateway, all stakeholders working in the Frome Gateway area will be expected to demonstrate how they are responding to the Community Place Principles in their proposals and projects. The local community are best placed to advise on how the Community Place Principles can be delivered in practice and it is expected that they will be given meaningful opportunities to shape detailed design and development proposals from an early stage and throughout the development process."

Overall, we were able to use the Community Place Principles and engagement feedback to create a regeneration framework that reflects the aspirations of the community.

Frome Gateway Regeneration Framework Risk Register

Negative Risks that offer a threat to the Frome Gateway Framework and its Aims (Aim - Reduce Level of Risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Direction of travel	Current Risk Level			Monetary Impact of Risk £k	Risk Tolerance			
										Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	Date
1	Flood Risk Management and securing planning permission	37% of the Frome Gateway area falls with Flood Zone 3. This presents a significant constraint on development and will include increased oversight of the Environment Agency as a statutory consultee in the planning application process.	It may prove difficult for developers to secure planning permission in Flood Zone 3 areas. This could reduce the ability to deliver the vision and objectives set out in the Frome Gateway Regeneration including the proposed mix and quantum of uses.	Open		Reputation	Marc Cooper	The Framework has been influenced by engagement with the Environment Agency and flooding and planning consultants. The Framework sets out guidance on multiple routes enabling growth in this area including site-specific approaches and strategic infrastructure interventions. The Framework advocates collaboration between developers and BCC to explore appropriate responses based on local context.		2	5	10		2	5	10	Jan-24
2	Impact of regeneration on existing businesses	The Frome Gateway area is currently mostly an area of employment made up of predominantly industrial and warehousing businesses. The regeneration of Frome Gateway seeks to bring about a much more diverse range of uses in this area including circa 1,000 new homes and a more diverse range of workspace.	Potential loss / displacement of businesses in the area	Open		Reputation; Communities	Marc Cooper	The Framework has been informed by the Frome Gateway Inclusive Economy Strategy which included employment land analysis. The Framework sets out an aspiration to retain and as many existing businesses as possible, however this may not be possible in all cases based on suitability with wider regeneration and placemaking objectives. BCC is commissioning a Frome Gateway Business Implementation Plan to further explore this issue and will include a Business Retention and Relocation Strategy. While some displacement of businesses may result, the overall approach to employment space at Frome Gateway is to re-provide a range of workspaces to build upon and grow the existing business ecosystem at Frome Gateway in order to replace the same number of jobs as existing at a minimum, and increase the pathways to new training and skills opportunities for the local community.		2	3	6		2	5	6	Jan-24
3	Site viability & deliverability of the framework vision	There is a risk that it may be difficult to realise in full the regeneration vision and objectives for Frome Gateway because of financial and development viability pressures and challenges and multiple 'asks' of the Regeneration Framework.	It may be difficult for landowners and developers to deliver against all of the regeneration objectives and require BCC to prioritise key asks and contributions towards realising the Frome Gateway vision.	Open		Reputation; Communities	Marc Cooper	The Framework has been informed by an Infrastructure Delivery Strategy which BCC will use to proactively engage and collaborate with developers in the area to maximise contributions to wider infrastructure and regeneration objectives set out in the Framework. It is recognised that public sector funding will be required in addition to developer contributions in order to deliver the regeneration objectives of the Framework, and BCC will seek to utilise external funding opportunities as appropriate in order to do so.		3	5	15		3	5	15	Jan-24

Equality Impact Assessment [version 2.9]



Title: Frome Gateway Regeneration Framework	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Economy of Place	Lead Officer name: Marc Cooper
Service Area: Regeneration	Lead Officer role: Regeneration Project Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

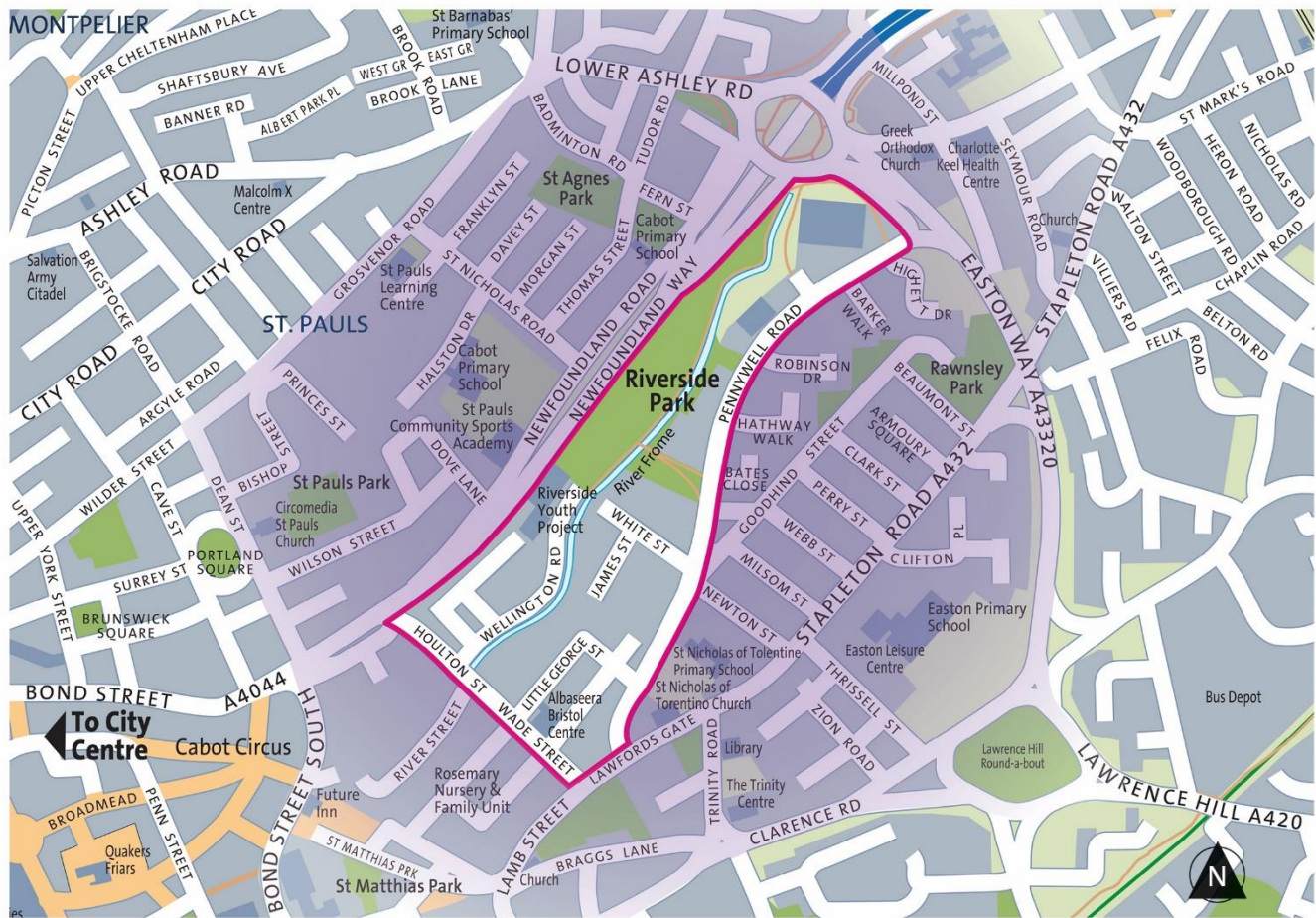
Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The Frome Gateway Regeneration Framework (“the Framework”) has been produced in response to emerging planning policy for Bristol being brought forward by Bristol City Council’s Local Plan Review. *Draft Policy DS5: Frome Gateway* in the emerging Local Plan marks a significant change in planning policy for this area aimed at transitioning this area over time from a predominantly industrial, employment-based area to a mixed-use residential neighbourhood.

Frome Gateway is one of a number of Areas of Growth and Regeneration across the city set out in the emerging Local Plan aimed at delivering new homes, workspaces and infrastructure to meet the demands of Bristol’s growing population. When Bristol’s emerging Local Plan is adopted and becomes operational, a much wider range of uses will be permissible in the Frome Gateway area, and resultingly there is a growing interest from the private sector to bring forward new development in this area.

In order to get the best out of this planning policy change for St Jude’s communities and the wider city, Bristol City Council has led the production of the Frome Gateway Regeneration Framework. The Framework seeks to provide further guidance and clarity on requirements for new development and investment within the Frome Gateway area to facilitate high-quality and comprehensive area-wide regeneration to deliver better social, environmental, and economic outcomes for local communities, and meet strategic city objectives.

Regeneration Frameworks integrate planning, transport and design thinking. They tend to be prepared for areas where there is a particular need to control, guide and promote change, such a where significant change is anticipated over a long period of time which will be brought forward by many different stakeholders, or where complex opportunities and challenges exist which would be difficult to realise and overcome without holistic co-ordination.



Core Regeneration Area

This area will see significant change as land is brought forward for redevelopment. The Regeneration Framework will outline design and development proposals within this area and guide the future delivery of new and improved homes, jobs, public and green spaces, and infrastructure.

Wider area of local context

The area surrounding the core regeneration area will not be subject to these development proposals, however it is important to consider how any development works with and are connected into the surrounding area.

A multi-disciplinary team has produced the framework:

- AHMM Architects (design lead)
- BCC (community and stakeholder engagement lead)
- Mott MacDonald (technical and infrastructure lead)
- PRD (socio-economic analysis and employment and skills vision)
- TRUUD (Health Impact Assessment)
- JLL (viability lead)

The framework sets out the following regeneration objectives to guide change in this area:

1. **Improved connectivity:** improve links to surrounding neighbourhoods
2. **1,000+ new homes:** mix of tenures to aid housing supply and meet local housing needs
3. **Employment space:** range of type and sizes to catalyse economic renewal
4. **Neighbourhood leisure and retail:** for existing and new community
5. **Community facilities:** new provisions an enhancement of existing
6. **Mixed-use/Diverse & Inclusive Community:** successfully enabling a mix of uses and communities
7. **Carbon neutral and climate resilient:** pioneering building energy performance and on-site energy creation
8. **Amenity space:** enhance green amenity space and public realm
9. **Green infrastructure:** improve urban greening, re-wilding and river restoration
10. **River Frome restoration:** enhance townscape feature and recreational resource
11. **Health & wellbeing:** Improve health outcomes for new and existing communities

This project (the development of the Frome Gateway Regeneration Framework) does not include the physical delivery of infrastructure or development, which will be subject to their own EqlAs in future, where relevant. The purpose of the Framework is to provide an over-arching vision and design and development principles and objectives to guide and shape many individual projects within the regeneration area over the next 10-15 years which will be needed to realise the vision for the area. The primary audience of the framework is built environment professionals including developers, architects, and planners both across the public and private sector. If endorsed by Bristol City Council, it will become a 'material consideration' in the planning system and will also be used by BCC's Development Control team and Development Control Committee in the determination of planning applications within the regeneration area. It will also become a key tool and resource for BCC's Regeneration team to help co-ordinate and drive change (such as securing funding to enable delivery, or progressing planning applications for BCC owned sites, for example).

Project objectives

1. Ensure the Regeneration Framework is aligned with meeting strategic city and BCC Regeneration Service objectives:
 - a. *Take a place-based approach to regeneration, promoting inclusive and sustainable growth*
 - b. *Promote a range of housing to meet local housing need, including affordable housing*
 - c. *Promote high quality developments, public realm and place making which enhances health and wellbeing outcomes and reduces health inequalities*
 - d. *Promote local employment, training and apprenticeships which reduced socio-economic inequalities (in line with BCC's Building Bristol guidance)*
 - e. *Support local businesses, high streets and the night-time economy*
 - f. *Respond to the climate and ecological emergencies by being grounded in the city's 2030 carbon neutrality and climate resilient targets.*
 - g. *Support modal shift to sustainable transport modes by improving connectivity and accessibility for all members of the community.*
 - h. *Embed the UN Sustainable Development Goals and identify strategic contributions to the One City Plan.*
 - i. *Identify and deliver the physical, social and community infrastructure required to support growth*
 - j. *Facilitating meaningful community and stakeholder participation in regeneration projects*
2. Ensure the Regeneration Framework is underpinned by a complete costed and phased Infrastructure Delivery Plan
3. Ensure the Regeneration Framework includes a robust response to existing and future flood risk.
4. Use effective engagement and communication techniques to secure stakeholder and community support for the Regeneration Framework which must be developed in accordance with a clear design vision and objectives developed with community and key stakeholders.
5. Embed cultural engagement to ensure the Regeneration Framework responds to the needs of local communities and their cultures, as well as the need to protect and enhance cultural infrastructure across the city.
6. Ensure Regeneration Framework is a practical and effective tool for relevant parties including landowners, BCC services, infrastructure providers and the community.
7. Ensure the Regeneration is formally endorsed by BCC Cabinet to secure political backing and 'material weight' in the planning process.
8. Use the Regeneration Framework to secure a funding allocation to deliver early enabling infrastructure to unlock and regeneration and demonstrate BCC leadership/commitment.

Key actions / work stages:

The production of the Frome Gateway Regeneration Framework has taken place over the following work stages:

Stage 0: Project set up	Project inception, clarification and team mobilisation
Stage 1: Site analysis and brief refinement	Area-wide analysis and data collection including early community and stakeholder engagement to distil regeneration opportunities and constraints
Stage 2: Concept and options testing	Development of the Frome Gateway regeneration vision and exploration of development and regeneration options
Stage 3: Framework refinement and detail	Development of the Regeneration Framework
Stage 4: Public consultation	Public consultation on the draft Frome Gateway Regeneration Framework
Stage 5: Framework finalisation	Final changes to the framework following public consultation
Stage 6: BCC Cabinet endorsement	Presentation of framework to BCC Cabinet for formal endorsement.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	

The delivery of the regeneration vision and objectives set out in the Regeneration Framework will directly affect the following:

- The wider community including residents and community groups / organisations located in the area
- Businesses and other lease holders located in the area
- Landowners, developers, and investors in the Frome Gateway area
- Creative and cultural organisations and providers operating in the area
- Service users (e.g. where regeneration proposals may change service provision)

Other stakeholder groups will be indirectly affected in the sense that they will be required to use the Regeneration Framework to inform future projects and investment in the area:

- BCC services and future BCC commissioned services (as we seek to develop detailed design/deliver specific elements of the regeneration framework)
- Landowners, developers, investors and built environment professionals
- City partners and stakeholder organisations e.g. One City Office.

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes **No** [please select]

n/a

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us																																			
General population (deprivation): Index of multiple deprivation 2019 and Quality of Life Survey June 2022	<ul style="list-style-type: none"> The framework area is within the 10% most deprived neighbourhoods in the country. Immediately north of the framework area, the LSOAs are in the 10-20% most deprived neighbourhoods in the country (2019 IMD). The domains of deprivation of the LSOAs of the Frome Gateway area are in the table below, showing difficulties associated with income, employment, education, skills and training, health and disability, crime and housing (1=10% most deprived; 2=10-20% most deprived etc.): <table border="1"> <thead> <tr> <th rowspan="2">LSOA</th> <th colspan="8">Decile</th> </tr> <tr> <th>IMD average</th> <th>Income</th> <th>Employment</th> <th>Education skills & training</th> <th>Health deprivation and disability</th> <th>Crime</th> <th>Barriers to housing & services</th> <th>Living environment</th> </tr> </thead> <tbody> <tr> <td>St Judes</td> <td>1</td> <td>1</td> <td>1</td> <td>2</td> <td>2</td> <td>1</td> <td>2</td> <td>4</td> </tr> <tr> <td>Cabot Circus</td> <td>1</td> <td>1</td> <td>2</td> <td>1</td> <td>1</td> <td>1</td> <td>2</td> <td>3</td> </tr> </tbody> </table> <ul style="list-style-type: none"> 15% of people in Lawrence Hill find it difficult to manage financially, compared to 9% for Bristol (8% in Ashley). Only 36.7% of people living in the 10% most deprived areas feel safe outdoors after dark (54.4% in Bristol). 	LSOA	Decile								IMD average	Income	Employment	Education skills & training	Health deprivation and disability	Crime	Barriers to housing & services	Living environment	St Judes	1	1	1	2	2	1	2	4	Cabot Circus	1	1	2	1	1	1	2	3
LSOA	Decile																																			
	IMD average	Income	Employment	Education skills & training	Health deprivation and disability	Crime	Barriers to housing & services	Living environment																												
St Judes	1	1	1	2	2	1	2	4																												
Cabot Circus	1	1	2	1	1	1	2	3																												
General population (premature mortality): Lawrence Hill Ward Profile Sept 2023	<ul style="list-style-type: none"> Premature mortality is significantly higher in Lawrence Hill (600 per 100,000 population) than Bristol overall (378 per 100,000 population) and life expectancy for males is 4.5 years less (73.6 compared to 78.5 in Bristol overall). 																																			
Age (demographics): 2021 Census	<ul style="list-style-type: none"> Barton Hill MSOA has a significantly higher proportion of children aged 0-15 years (30%) than the city average (17.5%). 																																			

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<ul style="list-style-type: none"> Barton Hill and Temple Meads MSOAs have significantly lower proportion of people older than 65 (7.2% and 3.8%) than the city average (12.9% Bristol overall).
Age (child poverty): Lawrence Hill Ward Profile Sept 2023	<ul style="list-style-type: none"> 46.6% of children live in poverty in Lawrence Hill (by far the highest ward level in the city) compared to 21.8% on average in Bristol. Lawrence Hill has a higher proportion of free school meals than the city average (48.1% compared to 27.6%) and poorer educational outcomes – only 45.8% of children reach the expected standard at Key Stage 2 (58.3% in Bristol overall).
Age (poverty): Quality of Life Survey 2022	<ul style="list-style-type: none"> Across Bristol 16-24 year olds are more likely to find it difficult to manage financially (12.5% reported this compared to 8.7% city average) and 10.6% reported experiencing moderate to severe food shortages (4.6% city average).
Age (transport accessibility): Quality of life survey 2022	<ul style="list-style-type: none"> 38.9% of young people in Bristol reported being limited by lack of transport options (city average 25.1%) and 21.6% of 16-24 year olds took the bus to work (14.1% city average).
Age (engagement): Quality of life survey 2022	<ul style="list-style-type: none"> 43.6% of people aged 16-24 in Lawrence Hill reported feeling that they lack the information to get involved in their community (city average 30.8%). 53.2% of people aged 16-24 in Lawrence Hill reported feeling like they belong to their neighbourhoods (city average 63.1%).
Age (housing): Quality of life survey 2021	<ul style="list-style-type: none"> People aged over 50 and over 65 are more likely to live alone (38.5% and 46.1% respectively compared to 25.1% overall).
Age (students) 2021 census	<ul style="list-style-type: none"> Full time students in the four census output areas (OA) that cover Frome Gateway: 9.3%, 8.4%, 9.2%, 14.5% (13.4% across Bristol)
Race (ethnicity): Ward Profile; 2021 Census	<ul style="list-style-type: none"> The ethnic mix of the area is much more diverse than the city average with Black, Asian and minority ethnic groups making up 59.6% in Lawrence Hill and 33.5% in neighbouring Ashley ward, compared to 16% in the city overall. The largest ethnic groups in Lawrence Hill are White British (33.6%), Black African (20.2%), Other Black (10.4%), Black Caribbean (6.6%), Mixed (6.5%), Other White (6%) and Pakistani (5.8%).
Race (poverty): Quality of life survey	<ul style="list-style-type: none"> 14.4% of people from Black, Asian and minority ethnic groups are in receipt of means tested benefits (city average 7.1%). 14.9% of people from Black, Asian and minority ethnic groups reported finding it difficult to manage financially (city average 8.7%) and 9.8% reported experiencing moderate to severe food shortages (4.6% city average).
Race (housing) Quality of life survey	<ul style="list-style-type: none"> 74.2% of Black, Asian and minority ethnic groups are satisfied with their current accommodation, compared to 84.2% of people overall in Bristol.
Race (language): Ward Profile; 2021 Census	<ul style="list-style-type: none"> English is not the main language for 29.8% of the population in Lawrence Hill and 13.8% in Ashley (10.1% in Bristol overall) with the top countries of birth outside of the UK being Somalia and Jamaica
Race (safety): Quality of life 2023	<ul style="list-style-type: none"> Black, Asian and minority ethnic citizens have similar feelings towards safety of being outdoors after dark as the general Bristol residents: 54.6% reported feeling safe outside after dark compared to 57.5% in Bristol overall. In Lawrence Hill ward (which has higher levels of Black, Asian and minority ethnic residents than Bristol overall) only 36.1% feel safe outdoors after dark.
Race (transport accessibility): Quality of life survey	<ul style="list-style-type: none"> 33.8% of Black, Asian and minority ethnic citizens reported being limited by transport options (city average 25.1%) and 17.4% took the bus to work (14.1% city average).
Religion or belief: Ward Profile 2023; 2021 Census	<ul style="list-style-type: none"> Lawrence Hill has a significantly higher proportion of residents who are Muslim – 37% compared to the city average of 6.7%.

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<ul style="list-style-type: none"> Other major groups are Christian (19.7%) and people who identify as having no religion (32.5%). OAs where people identify as Muslim: 57.5%, 28.5%, 16.2%, 59.1%; Christian: 15.4%, 24.5%, 31.2%, 16.5%
Sex (safety): Quality of Life	<ul style="list-style-type: none"> Females are more likely to report feeling unsafe: 48.8% of females report feeling safe outdoors after dark compared to 57.5% of people overall.
Disability (poverty): Quality of life survey 2023	<ul style="list-style-type: none"> Across the whole of Bristol Disabled people are more likely to find it difficult to manage financially (25.7%) compared to the city average (10.2%). 22% of Disabled people reported having experienced moderate to severe food insecurity (city average 8.1%).
Disability (safety): Quality of life 2023	<ul style="list-style-type: none"> Disabled people are more likely to feel unsafe: Only 42.8% reported feeling safe outdoors after dark compared to 57.5% of people overall.
Disability (community and local area): Quality of life survey	<ul style="list-style-type: none"> 67.5% of Disabled people reported feeling satisfied with their local area (city average 75.2%) 19.1% of Disabled people reported not getting involved in their community because accessibility issues stopped them from doing so (city average 2.6%). However only 33.3% of Disabled people identified a lack of time to get involved in their community (city 63.0%).
Disability (transport accessibility): Quality of life survey	<ul style="list-style-type: none"> 34.1% of Disabled people reported being limited by transport options (city average 25.1%) and 16.7% took the bus to work (14.1% city average).
Disability (social care): Ward Profile 2023	<ul style="list-style-type: none"> Lawrence Hill has a higher proportion of 65+ year old clients receiving domestic care services (43.3 per 1,000 people) than the city average (16.7 per 1,000 people).
Sexual orientation 2021 Census	<ul style="list-style-type: none"> Sexual orientation of people completing the census at MSOA area as LGB+: 5.22% (Barton Hill), 11.57% (Temple Meads) (6.07% for Bristol overall)
Sexual orientation (transport accessibility): Quality of life survey	<ul style="list-style-type: none"> 36% of lesbian, gay and bisexual people reported being limited by transport options (city average 25.1%) and 17.5% reported taking the bus to work (city average 14.1%).
Sex (Engagement preferences): Live Local Study	<ul style="list-style-type: none"> Women and men preferred to engage in different ways: Women preferred to share views about changes to their local area by survey, email or online comments. Men preferred general in person meetings or online comments. Disabled people and those with long term ill-health preferred community group in-person meetings. Online meetings were least popular overall, although more popular for people living with children.

Additional comments:

A series of inferences can be made from the above data which have been used to inform the production of the Regeneration Framework, and which should continue to be used to inform next steps in terms of ongoing engagement and project delivery:

1. There are high levels of deprivation in and around the immediate framework area. There is opportunity for the framework to have wider reach than the immediate framework area.
2. The area is very ethnically diverse with multiple different languages spoken, and a significant proportion of people do not speak English or do not have English as first language. Communications and engagement approaches should be mindful of this context and cultural differences/practices.
3. There are relatively high levels of children living in the area.
4. People with protected characteristics, such as Disabled people, may experience greater challenges relating to finances, feeling safe outdoors after dark, and accessibility.
5. Engagement programmes and regeneration should make particular effort to over-coming barriers to engagement and community participation for young people who feel a lesser extent of belonging to their

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<p>local neighbourhood. This is particularly important given the greater proportion of young people in local demographics. Particular attention should also be made to engage with Disabled people .</p> <ol style="list-style-type: none"> 6. Accessibility, both in terms of quality of the built environment (buildings, streets and public spaces) and public transport, is a key factor affecting equalities groups, particularly Disabled people, older people, Black, Asian and minority ethnic groups, young people and the LGBT+ community. Limitations due to inaccessible transport options appears to be an increasing problem. 7. Disabled people, women and people living in the most 10% deprived areas (which includes areas around Frome Gateway) are more likely to feel unsafe outdoors after dark – making these groups particularly important to engage with on this topic. 8. Disabled people consistently score significantly differently to other groups throughout the quality of life indicators, suggesting significant barriers to accessing quality life experiences and services remain. 9. Ongoing engagement programmes should make the following reasonable adjustments to foster inclusive engagement: <ol style="list-style-type: none"> a. Provide a range of engagement options including online and in-person and at different times and days to maximise participation of those who may have care responsibilities for example. b. Reduce barriers to engagement for young people by making activities more engaging and relevant. c. Possibly incentivise engagement for those who feel disenfranchised and consider specific adjustments for Disabled people e.g. accessible buildings, easy read summaries. d. Hold engagement activities in publicly accessible spaces, in daylight hours, with convenient access to public transport connections. e. Hold engagement events in cultural/community spaces that reflect the ethnic diversity of the area (go to places of community interest rather than expect them to come to us). f. Consider specific or tailored engagement events which would appeal to specific ethnic groups. g. Translation of engagement materials and use of interpreters for those whose first language is not English e.g. Somali. 10. Services designed to provide outcomes in the following would be particularly beneficial for equalities groups: <ol style="list-style-type: none"> a. Social interaction and integration b. Civic participation and engagement (particularly for Disabled people and people aged 16-24) c. Financial planning, employability and skills d. Public health e. Public safety (actual and perceptions) f. Child poverty, nutrition and food security.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There are gaps in the diversity data for some protected characteristics at a local level where this has not historically been collected for statutory reporting e.g. sexual orientation, gender reassignment, etc. In some instances, national estimates can be used to give an indication:

- Sexual orientation: 6.1% of the Bristol population aged over 16 identified as LGB+. This is higher than the national average of 3.2% in England and Wales (Census 2021).
- Gender reassignment: 0.8% of the Bristol population aged over 16 identify as trans. This is slightly higher than the national average of 0.5% in England and Wales (Census 2021).

The quality-of-life survey data does not provide specific information about gender reassignment, marriage or civil partnership status, or pregnancy and maternity and therefore there is a data gap for these groups. It is not anticipated that filling these data gaps would provide any benefit over the assumptions on impact/mitigation made in Step 3.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol’s diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

The Frome Gateway Regeneration Framework has been informed by extensive community and stakeholder engagement and consultation. An accompanying Statement of Community Involvement has been produced to evidence how the community and stakeholders have been involved in the production of the regeneration framework and how this has shaped the vision and objectives set out in the framework. A summary of the key stages of engagement and consultation is included below:

Project stage and purpose	Activities	Outcomes
Early Engagement (November 2019 – March 2020) <i>Purpose: to raise awareness of the project and establish community priorities for change</i>	<ul style="list-style-type: none"> • 2 community walkabouts and 4 co-design workshops with residents, businesses, community organisations, landowners and developers, and local politicians. • Area-wide door-to-door resident visits culminating in 90 community building conversations. • 1 site walkabout with St Nicholas of Tolentine School 	<ul style="list-style-type: none"> • Key themes and priorities distilled by the community into a set of Community Place Principles to guide change. These became guiding principles for the project and were used to shape the project design brief from the outset. • Identification of around 100 key influencers, 10 community connectors and a network of 50 active residents.

Note there was an extended pause in project delivery because of the COVID-10 pandemic

Stage 1: Formal Project Launch and Information Gathering (February – May 2022) <i>Purpose: to formally launch and raise awareness the project, re-test the</i>	<ul style="list-style-type: none"> • Area-wide door knocking and doorstep conversations • 1 launch event and community workshop • 1 engagement webinar • ‘Story of Place’ mapping to develop a place narrative and context of change including site walkabouts. • Online interactive mapping 	<ul style="list-style-type: none"> • Identification of local community assets and a clearer understanding of local strengths, weaknesses, and priorities for change (including through 94 interactive map comments). • A refined and prioritised set of Community Place Principles
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<p><i>community place principles (after extended project pause), and consolidation of opportunities and constraints</i></p>	<ul style="list-style-type: none"> • conversations with local community organisations and institutions. • Local business and landowner and developer survey + 1-1 follow up conversations to understand need and aspiration. • Live Local Study to gather information on the lived experience of local residents. • Design West Design Review Panel 	<p>based on community feedback.</p> <ul style="list-style-type: none"> • Identification of project opportunities and constraints.
<p>Stage 2: Exploring opportunities (June – December 2022) Purpose: <i>To share findings from stage 1 and test emerging design/development options and proposals</i></p>	<ul style="list-style-type: none"> • Stage 2 launch event in Riverside Park to communicate findings to date with all stakeholders. • Thematic community workshops to test emerging design and development proposals. • Engagement with Old Market Neighbourhood Forum to ensure alignment with Old Market Neighbourhood Plan • Accessibility Audit undertaken by West of England Centre for Independent Living • Artist-in-Residence commission to undertake creative community engagement and further develop the Story of Place • Cultural Infrastructure session with local creative and cultural organisations • Design West Design Review Panel • Establishment of a Landowner & Developer Forum • Ongoing 1-1 business, landowner & developer sessions • Notification of statutory stakeholders and strategic city partners 	<ul style="list-style-type: none"> • Engagement in this stage reinforced key themes of importance and relevance of the Community Place Principles. • WECIL Accessibility Audit developed to inform framework and future detailed detail briefs. • Greater understanding of creative and cultural potential and appetite from local organisations to increase their capacity and reach in the area. • Outputs and learning from this stage were used to shape and inform the initial Frome Gateway Vision and Development Concept.
<p>Stage 3: Testing the vision (February – July 2023) Purpose: <i>to test the emerging vision for Frome Gateway and initial design/development concept</i></p>	<ul style="list-style-type: none"> • Streets & spaces workshop • Frome Gateway vision and development concept webinar • Online survey to gather feedback on Frome Gateway vision and initial design and development proposals. • Bespoke engagement sessions with: <ul style="list-style-type: none"> • <i>West of England Centre for Independent Living (WECIL)</i> • <i>Al-Baseera Mosque</i> • <i>Local Women’s Group</i> • <i>Local youth organisations</i> • Ongoing 1-1 business, landowner & developer sessions 	<ul style="list-style-type: none"> • The results of the online survey demonstrated majority support for the regeneration vision and overall development concept for Frome Gateway. • Community feedback reinforced the importance of ensuring the regeneration benefits existing community and cultural organisations, allowing them to remain and grow in the area. The importance of key themes was once again highlighted such as identity and place, safety, connectivity, greenery and nature, health and wellbeing, and community and culture. • Feedback from youth organisations highlighted the importance of safety, antisocial behaviour, and a need for improved and new indoor and outdoor multi-functional

		<p>spaces for all young people (not just boys).</p> <ul style="list-style-type: none"> • Learning from this and all other stages was used to develop the full draft framework.
<p>Stage 4: formal consultation (Autumn 2023)</p> <p>Purpose: to test how much support exists across the city for the vision and regeneration objectives set out in the draft Frome Gateway Regeneration Framework, and to inform final changes to the framework before it was finalised and presented to BCC Cabinet for formal endorsement.</p>	<p>An online survey was hosted on BCC's Engagement Hub for six weeks to gather feedback on the draft Frome Gateway Framework. This included an easy read version. Alternative languages were available on request and community champions helped with translation. This was supported by a range of community and stakeholder consultation events:</p> <ul style="list-style-type: none"> • Landowner and Developer Forum presentation and Q&A session • Public Regeneration Area walking tours (X3) • Project exhibition at Lost Horizon • Business webinar • Public webinar • Briefing for Lawrence Hill and neighbouring ward Cllrs • Project exhibition at Al-Baseera Mosque • Briefing for BCC Cabinet • Consultation event at local Women's Group • Consultation event with young people at Horn Youth Concern • Riverside Park 'pop-up' • Business West presentation • Targeted consultation event at Trojan's Freefighters • Webinar for special interest groups (placemaking; movement and transport; equalities) • Briefing for BCC Development Control Committee • Consultation event with Old Market Neighbourhood Forum 	<ul style="list-style-type: none"> • The formal public consultation demonstrated overall support for the Framework. More information about the results of the public consultation can be found in the Consultation Report. • The findings of the formal consultation have been used to make final changes to the Framework. A summary of the changes can be found in the Consultation Response Report.

Formal consultation on the draft Frome Gateway Regeneration Framework

Stage 4 of the project included formal city-wide public consultation on the draft Framework. A summary of the findings of this consultation are included below including analysis of how responses from those with protected characteristics differ from the average.

Overall 74% of consultation survey respondents supported the Frome Gateway vision. Full details of the consultation survey responses are available in the Consultation report.

The demographics of respondents broadly reflected the local demographics in the area. These are summarised below:

Protected characteristic	Consultation survey respondents	Local comparison	Comment
Age:	Children 0-15: 10% Older people 65-84: 5%	Barton Hill MSOA: Children 0-15: 30% Older people >65: 7%	Bespoke engagement sessions were held with youth groups and the local Primary

			school to increase response rates from children.
Gender reassignment	0.3%	Bristol overall: 0.8%	
Married or in a civil partnership	N/A	N/A	Not expected to be impacted differently to other groups.
Pregnant or on maternity leave	1%	na	
Disabled	6%	Lawrence Hill ward: 16%	Disabled people groups were asked to promote the consultation through their networks to increase response rates by Disabled people.
Race	Largest groups: Black, Black British, Caribbean or African: 44% White British: 32% Other White: 7% Mixed or multiple ethnic groups: 4% Asian or Asian British: 2%	Lawrence Hill ward: Black African, Black Caribbean, Other Black: 37% White British: 34%, Other White, 6% Mixed: 7% Pakistani: 6%.	Similar composition to the surrounding ward.
Religion	Largest groups: Muslim: 39% Christian: 14% No religion: 27%	Lawrence Hill ward: Muslim: 37% Christian: 20% No religion: 33%	Bespoke engagement sessions were held with the local mosque.
Sex	Male: 50% Female: 32%		Bespoke engagement sessions were held with women's groups to increase response rates by women.
Sexual orientation	6% LGBT+	Bristol average: 6%	Similar to city average.

Changes made as a result of consultation with people with protected characteristics are included in section 4.1.A full breakdown of the results of the formal consultation can be found in the Consultation Report.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

- The project website (www.fromegateway.co.uk) will remain live and updated regularly as the regeneration progresses and our mailing list will remain an important communication channel.
- As the project moves into delivery phase, there will be many opportunities for the community and stakeholders to get involved and give their views. However rather than being focussed on the production of the Regeneration Framework and the overall regeneration vision / objectives, moving forward this will be focussed on specific projects or aspects of regeneration. This will allow the community to get involved in the detail of more specific projects, as per their interest. Some of the anticipated opportunities will include things such as:
 - Working with BCC to produce a more detailed vision for Riverside Park and the River Frome;
 - Commenting on individual planning applications and development proposals;

- Shaping and giving views on upgrades to local streets such as Pennywell Road; and
- How a Local Lettings Policy for social housing should/could be used in the Frome Gateway area;
- Developers of individual plots will be required to conduct their own consultation and engagement when they go through the formal planning process.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Gentrification

As with all regeneration initiatives, investment and new development brings increased land values as an area's appeal increases. This can have the unintended consequence of gentrification whereby existing communities can be priced out of the area as landlords increase rental values, or as new employment space is re-provided at a more expensive rates, for example. In the absence of tools such as rent controls, there is a limit to what can be done to prevent this; however, the following next steps have been set out in the framework to maximise community benefit and inclusive growth:

1. Produce a Frome Gateway Business and Employment Implementation Plan to provide further insight and guidance on issues such as affordable workspace strategies, business retention and relocation and workspace design codes.
2. Produce a Frome Gateway Social Value Strategy to set out how value from new development and investment will be used to deliver local social value.
3. Explore a Frome Gateway Local Lettings Policy to help prioritise the existing local communities in accessing new social housing options made available at Frome Gateway.

The scope of these following next steps is yet to be agreed will take account of how existing communities can benefit from new opportunities as a result of regeneration and investment and avoid gentrification.

Businesses and their employees

The Frome Gateway area is currently a designated Principal Industrial and Warehousing Area (PIWA) and predominantly an area of employment, made up of a diversity of businesses from light industrial businesses to night-time venues and coffee roasters. Where existing businesses are not also landowners, there is a risk of business displacement because of changing planning policy for this area and the development of the Regeneration Framework.

A Frome Gateway Inclusive Economy Strategy has been produced alongside the Framework to inform the employment vision and approach to employment land set out in the Framework. This included an analysis of existing businesses and their suitability to remain the area (albeit likely in new premises) should they wish to. The Framework sets out an approach to employment land based on 'consolidated diversification' – meaning the overall consolidation/reduction of the overall amount of employment space and diversification of the types of employment spaces to facilitate economic diversification. This approach is premised on making more efficient use of employment space to free up space for other uses (such as new homes), and maximising training and employment opportunities for the local community (to provide socio-economic opportunity). The framework includes the aspiration to retain and reaccommodate as many businesses as possible within the regeneration area where appropriate to do so. To better inform BCC's approach to this, a Frome Gateway Business and Employment Implementation Plan is due to be produced. However, it may not be possible to retain all businesses who want to remain in the area.

PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • There are a number of known uses within or near the project area which cater to the specific needs of young people e.g., St Nicholas of Tolentine Primary School, the Riverside Youth Project and Trojans. • The Frome Gateway Framework should facilitate positive outcomes for young people. There is a higher proportion of young people in the project area than the city average. • It is anticipated that regeneration and development will enable the re-provision of two new youth centres in more modern, fit-for-purpose space, providing more choice and access to better quality services and facilities. • One of the youth facilities has no security of tenure and is at risk of displacement through development of their existing site. The Framework sets out a commitment for BCC to work in collaboration with such community and cultural organisations and landowners/developers to facilitate the retention of such organisations within the regeneration area. • The Framework sets out the aspiration to enhance and upgrade public spaces including spaces such as Riverside Park and the existing multi-use games area which is run-down and in need of investment. • Upgrades to key streets and movement routes (such as Pennywell Road) and the overall intention to prioritise sustainable and active travel will mean creating calmer, greener and safer streets, which will benefit all groups but young people in particular (such as school children of St Nicholas of Tolentine Primary School).
Mitigations:	<ul style="list-style-type: none"> • Targeted engagement was conducted in developing the framework to ensure young people and organisations working with young people could influence the vision set out in the Framework. It is noted above that there is a higher prevalence of young people aged 16-24 who feel they lack the information to get involved in their community, and lower proportion of young people who feel a sense of belonging to their neighbourhood. It will be important that this targeted engagement continues as the project moves to its delivery phase to ensure regeneration meets the needs of young people and provides opportunities for young people to shape change and take ownership of elements of change, as appropriate.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • The regeneration framework should facilitate positive outcomes for all age groups through the identification of age-specific needs in line with demographic projections, including a general provision of age-appropriate housing, social infrastructure as well as more accessible public spaces and services. • It is noted above that the Frome Gateway area has a higher proportion of young people than the city average, and a lower proportion of older people than the city average. It will be important that the specific needs of older people are not overlooked. • However, in general, the Framework ambition should deliver positive benefits to older people through delivery of new accessible homes and better and more accessible public realm and public spaces, for example. • Particular age groups could be marginalised from the engagement and consultation process if a range of methods are not used or made accessible in various ways e.g. if delivered all online.
Mitigations:	As the project moves to delivery phase, it will be important the needs of older people are properly considered, and that appropriate engagement methods are used as part of this.
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • The framework will facilitate regeneration of the area which will provide a general uplift in terms of physical accessibility (buildings and public realm design; services). • Disabled people led groups could be marginalised from engagement and consultation opportunities if accessibility of spaces and materials is not considered.
Mitigations:	<ul style="list-style-type: none"> • Engagement was conducted in development of the framework to ensure Disabled people could influence the project. This included with WECIL who conducted an accessibility audit and feedback from local wheelchair users. This resulted in additional

	<p>references to inclusivity and physical accessibility added in the framework vision and a new physical accessibility page added to the transport and movement section setting out physical accessibility considerations and requirements. Consultation with Disabled people / Disabled people led organisations should be continued throughout the project, including as part of a future modal filter study.</p>
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Generally, no impact envisioned though it is noted that women are more likely to be concerned with safety in the area. The framework has considered safety issues throughout.
Mitigations:	None
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> No specific impact on this group is noted that there has been growing trend in recent years for more hate crimes related to sexual orientation and gender identity (The Guardian, 2021). Facilitating actual and perceived public safety in the design of public spaces should therefore be kept in mind.
Mitigations:	None. The Framework highlights the importance of safety, and this will continue to be a key design objectives as specific elements of the framework move to detailed design.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> The regeneration framework will facilitate regeneration of the area which will provide a general uplift in terms of physical accessibility (buildings and public realm design; services) e.g. for parents with prams.
Mitigations:	None
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> No specific impact on this group. However it is noted that there has been growing trend in recent years for more hate crimes related to sexual orientation and gender identity (The Guardian, 2021). Facilitating actual and perceived public safety in the design of public spaces should therefore be kept in mind.
Mitigations:	None. The Framework highlights the importance of safety, and this will continue to be a key design objectives as specific elements of the framework move to detailed design.
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Regeneration can support the socio-economic prospects of all races and the regeneration framework has the potential to make a positive impact in the centre of Bristol. Regeneration can support social integration and community cohesion through the design of public spaces and services. This is particularly relevant here given 38.6% of the Lawrence Hill population were born outside of the UK (Census 2021; BCC Ward Profiles). Those whose first language is not English could be marginalised from ongoing engagement and consultation processes if accessibility is not considered.
Mitigations:	As the project moves forward to delivery, it will be important that engagement with all local communities is ongoing.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> A well-used mosque is located within the regeneration. They are their own landowner and so have control over their own land holdings (not at risk of displacement). However, they and the community which they serve have been clear about the need for more space and a bigger mosque. The framework sets out an objective for community and employment spaces as part of the overall mix of uses at Frome Gateway, which the mosque will be able to access when this is made available through new development.
Mitigations:	Specific engagement sessions have been run with the mosque, for example, in Stage 4 there was a bespoke event after Friday prayers when over 100 people were engaged in the consultation. As the project moves to delivery phase, ongoing engagement with the

	Mosque will be important to ensure opportunities to enable them to meet their own objectives are realised.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> This project is not anticipated to have any specific impact on this group.
Mitigations:	<ul style="list-style-type: none"> None.
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> The wider Frome Gateway area has high levels of deprivation. Gentrification of the area risks widening inequality (see above).
Mitigations:	Engagement sought views from a wide range of stakeholders to promote inclusivity and ensure local priorities were incorporated into the framework.
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	<ul style="list-style-type: none"> A Salvation Army Hostel is currently located within the Frome Gateway area. They are their own landowners so not at risk of displacement as a result of the Regeneration Framework.
Mitigations:	<ul style="list-style-type: none"> Engagement with the Salvation Army Hostel was conducted to understand their needs and views.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The overarching intention of the Regeneration Framework is to bring about a general uplift in the built and natural environment (housing, infrastructure, public spaces) and services for local people and businesses which will secure holistic socio-economic and environmental benefits for all, including those with protected characteristics (notwithstanding the risks of gentrification noted above).

Making more efficient use of already developed ('brownfield') land

The Frome Gateway Regeneration Area is one of a number of Areas of Growth and Regeneration set out in BCC's emerging Local Plan. Many of these are areas which are already developed (in this case as an area of employment) and in inner-urban areas. These regeneration areas have been in part identified to help to ensure that city growth is inclusive, responsible and sustainable by:

- Making more efficient use of land and concentrating new development in areas which are already connected to infrastructure and services (such as transport systems, schools and health services). This also has the additional benefit of improving the viability of infrastructure and services (as there is more users to make use of them).
- Preventing the urban sprawl/expansion of the city outwards and generating the need to deliver significant new infrastructure and services where they do not currently exist.
- Enhancing and upgrading under-utilised and/or poorly designed parts of the city which perform poorly in areas such as public realm accessibility and public safety, for example.
- Focusing investment and new development in areas of deprivation (see more below).

This city-wide, strategic approach to growth and regeneration is intended and expected to have a positive contribution to all groups, including those with protected characteristics.

Socio-economic deprivation and quality of life

There is a high level of deprivation in the framework area, as well in neighbouring areas, and associated public health inequalities. Regeneration therefore presents an opportunity to provide socio-economic opportunity and

improve quality of life. This is a very complex and multi-faceted challenge/opportunity that would require significant and sustained investment and effort from many different perspectives which go beyond the remit of the Frome Gateway Regeneration Framework alone and would include things such as targeted public services and programmes to enhance training, skills and employment, for example. However, the Regeneration Framework sets out a long-term vision and principles shape and guide change, and through the delivery of new homes, workspaces, public and community spaces, and infrastructure, provides the initial building blocks for positive change.

Harnessing the power of good urban design and place-making

It is well understood that good urban design and place-making is essential to support and encourage overall quality of life including active and sustainable lifestyles, mental health, wellbeing and community cohesion, public safety, public enjoyment and satisfaction, and access to services and employment. These are cross-cutting outcomes which would benefit all residents and users of the area, but perhaps particularly those with protected characteristics who are more likely to rely on public transport systems and feel limited by accessibility in the built environment.

Accessibility

- The framework will facilitate regeneration of the area which will provide a general uplift in terms of physical accessibility (buildings and public realm design; services).
- Informed by an accessibility audit undertaken by WECIL, and consultation responses from Disabled people, the framework sets out key requirements and expectations with regard to public realm accessibility.
- As per emerging planning policy, the Framework highlights the importance of delivering accessible homes as part of the overall mix of housing.

Social integration and community cohesion

Regeneration of the area is intended to achieve a balance of meeting the needs of existing local communities, while also making a strategic contribution to the city’s housing needs. The project area will see an influx of new residents and businesses from elsewhere across the city, including a student population as student accommodation is delivered as part of the regeneration mix. Exploring and building in means of facilitating social integration and community cohesion will be an important part of regeneration proposals. This should consider the specific integration of users of the Salvation Army homeless shelter and other special interest groups e.g. refugees and asylum seekers.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

<p>Summary of significant negative impacts and how they can be mitigated or justified:</p> <p>Regeneration may result in gentrification of the area if the regeneration framework and regeneration programme does not respond to/target the needs and aspirations of local communities including businesses. This could have the effect of exacerbating rather than reducing socio-economic inequality across the city.</p> <p>The Regeneration Framework is grounded in a vision for inclusive growth which delivers meaningful and tangible benefits for local communities. This aspiration and intent are of high priority and will feed through into all other workstreams individual projects. However, it is important that it is acknowledged that in the absence of tools such as rent controls, there is a limit to what can be done to prevent this as investment and new development brings increased land values as an area’s appeal increases. In the context of the significant and complex needs and challenges in this part of the city, ‘doing nothing’ (i.e., not facilitating regeneration) is not considered to be an appropriate response.</p>
<p>Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:</p> <ul style="list-style-type: none"> • Regeneration and investment will result in the reduction of socio-economic inequality when compared against the city average and the overall improvement of quality of life and access to opportunity (notwithstanding risk of gentrification noted above).

- The regeneration framework and regeneration programme should result in a general uplift in the built and natural environment which will have a knock-on impact on overall quality of life, accessibility and public health outcomes.
- Regeneration and investment in public spaces and services has the potential to foster greater social integration and community cohesion.

Key changes made to the regeneration framework as a result of the consultation responses from people with protected characteristics are shown in the table below:

Consultation findings	Changes to the framework
Those identifying as Disabled and female less supportive of the vision.	Additional references to inclusivity and physical accessibility added to vision.
Those identifying as Disabled and over 55 years of age less supportive of modal filter to prevent through traffic.	Added explicit reference that engagement with disability groups and local community will be undertaken during future modal filter study.
	New physical accessibility page added to the transport and movement section setting out physical accessibility considerations and requirements.

Note that the Frome Gateway Framework is a high-level document. Delivering the detail which is highlighted in this EQIA will largely come through the individual planning applications and detailed design of capital works and investment programmes following its endorsement.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Action 1: Share this EQIA with BCC Project Team for input and comment.	Marc Cooper (Regeneration Project Manager)	By 15 th Dec 2023
Action 2: Review feedback from the formal consultation survey to identify any key issues for the project to be mindful of or target for follow up engagement/workstreams.	Jamie Walling (Regeneration Officer)	By 15 th Dec 2023
Action 3: Collaborate with neighbouring regeneration areas and the wider Regeneration Service to identify and maximise opportunities to improve socio-economic outcomes	Marc Cooper (Regeneration Project Manager)	Ongoing / throughout 2024
Action 4: Maintain and strengthen links developed through this project with community organisations including equalities groups	Marc Cooper (Regeneration Project Manager)	On going throughout the duration of the delivery phase (circa 15 years)


4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

The delivery of the Regeneration Framework is anticipated to take circa 15 years. Further iterations of the Index of Multiple Deprivation and Bristol Quality of Life Survey can be used to assess the impact of regeneration. This includes a number of social integration indicators, including ‘% who agree people from different backgrounds get on well together in their neighbourhood’.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by the Equality and Inclusion Team	Director Sign-Off: 
Date: 24.01.2024	Date: 24.1.2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

Appendix 1: Lawrence Hill Ward Profile 2023

[Lawrence Hill statistical ward profile 2023 \(bristol.gov.uk\)](https://bristol.gov.uk)



Environmental Impact Assessment [version 1.0]

Proposal title: Frome Gateway Regeneration Framework		
Project stage and type: <input checked="" type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Economy of Place	Lead Officer name: Marc Cooper	
Service Area: Regeneration	Lead Officer role: Project Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

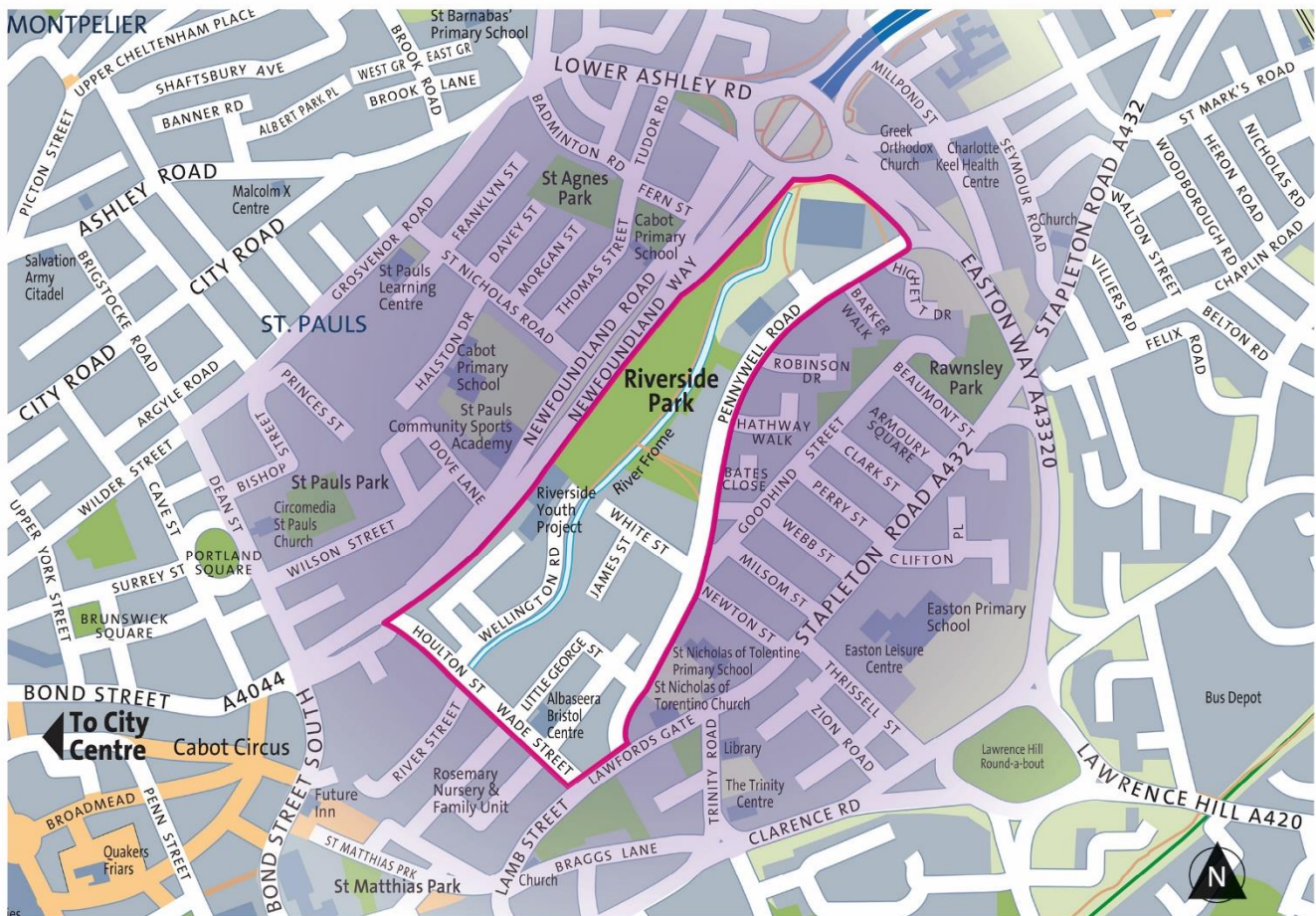
1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

The [Frome Gateway Regeneration Framework](#) (“the Framework”) has been produced in response to emerging planning policy for Bristol being brought forward by Bristol City Council’s Local Plan Review. *Draft Policy DS5: Frome Gateway* in the emerging Local Plan marks a significant change in planning policy for this area aimed at transitioning this area over time from a predominantly industrial, employment-based area to a mixed-use residential neighbourhood. Frome Gateway is one of a number of Areas of Growth and Regeneration across the city set out in the emerging Local Plan aimed at delivering new homes, workspaces and infrastructure to meet the demands of Bristol’s growing population. When Bristol’s emerging Local Plan is adopted and becomes operational, a much wider range of uses will be permissible in the Frome Gateway area, and resultingly there is a growing interest from the private sector to bring forward new development in this area.

In order to get the best out of this planning policy change for St Jude’s communities and the wider city, Bristol City Council has led the production of the Frome Gateway Regeneration Framework. The Framework seeks to provide further guidance and clarity on requirements for new development and investment within the Frome Gateway area to facilitate high-quality and comprehensive area-wide regeneration to deliver better social, environmental, and economic outcomes for local communities, and meet strategic city objectives.

Regeneration Frameworks integrate planning, transport and design thinking. They tend to be prepared for areas where there is a particular need to control, guide and promote change, such a where significant change is anticipated over a long period of time which will be brought forward by many different stakeholders, or where complex opportunities and challenges exist which would be difficult to realise and overcome without holistic co-ordination.



Core Regeneration Area

This area will see significant change as land is brought forward for redevelopment. The Regeneration Framework will outline design and development proposals within this area and guide the future delivery of new and improved homes, jobs, public and green spaces, and infrastructure.

Wider area of local context

The area surrounding the core regeneration area will not be subject to these development proposals, however it is important to consider how any development works with and are connected into the surrounding area.

The framework sets out the following regeneration objectives to guide change in this area:

1. **Improved connectivity:** improve links to surrounding neighbourhoods
2. **1,000+ new homes:** mix of tenures to aid housing supply and meet local housing needs
3. **Employment space:** range of type and sizes to catalyse economic renewal
4. **Neighbourhood leisure and retail:** for existing and new community
5. **Community facilities:** new provisions an enhancement of existing
6. **Mixed-use/Diverse & Inclusive Community:** successfully enabling a mix of uses and communities
7. **Carbon neutral and climate resilient:** pioneering building energy performance and on-site energy creation
8. **Amenity space:** enhance green amenity space and public realm
9. **Green infrastructure:** improve urban greening, re-wilding and river restoration
10. **River Frome restoration:** enhance townscape feature and recreational resource
11. **Health & wellbeing:** Improve health outcomes for new and existing communities

Project objectives

1. Ensure the Regeneration Framework is aligned with meeting strategic city and BCC Regeneration Service objectives:
 - a. *Take a place-based approach to regeneration, promoting inclusive and sustainable growth*
 - b. *Promote a range of housing to meet local housing need, including affordable housing*
 - c. *Promote high quality developments, public realm and place making which enhances health and wellbeing outcomes and reduces health inequalities*

- d. Promote local employment, training and apprenticeships which reduced socio-economic inequalities (in line with BCC's Building Bristol guidance)
 - e. Support local businesses, high streets and the night-time economy
 - f. Respond to the climate and ecological emergencies by being grounded in the city's 2030 carbon neutrality and climate resilient targets.
 - g. Support modal shift to sustainable transport modes by improving connectivity and accessibility for all members of the community.
 - h. Embed the UN Sustainable Development Goals and identify strategic contributions to the One City Plan.
 - i. Identify and deliver the physical, social and community infrastructure required to support growth
 - j. Facilitating meaningful community and stakeholder participation in regeneration projects
2. Ensure the Regeneration Framework is underpinned by a complete costed and phased Infrastructure Delivery Plan
 3. Ensure the Regeneration Framework includes a robust response to existing and future flood risk.
 4. Use effective engagement and communication techniques to secure stakeholder and community support for the Regeneration Framework which must be developed in accordance with a clear design vision and objectives developed with community and key stakeholders.
 5. Embed cultural engagement to ensure the Regeneration Framework responds to the needs of local communities and their cultures, as well as the need to protect and enhance cultural infrastructure across the city.
 6. Ensure Regeneration Framework is a practical and effective tool for relevant parties including landowners, BCC services, infrastructure providers and the community.
 7. Ensure the Regeneration is formally endorsed by BCC Cabinet to secure political backing and 'material weight' in the planning process.
 8. Use the Regeneration Framework to secure a funding allocation to deliver early enabling infrastructure to unlock and regeneration and demonstrate BCC leadership/commitment.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If 'Yes' complete the rest of this assessment.

Yes No [please select]

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

Yes No Not applicable [please select]

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

The production of the Framework was undertaken over a number of project/work stages. Stage 2 was concerned with scenario and options testing. During this stage, a number of a spatial development concepts/options based on spatial layout, movement, desired capacity, density, scale and mix of uses set were analysed. These included:

- **Scenario 1:** Baseline emerging Policy DS5 Frome Gateway
- **Scenario 2:** Baseline + enhanced housing

- **Scenario 3:** Baseline + enhanced employment
- **Scenario 4:** Baseline + enhanced landscape

These four spatial options were underpinned by a common placemaking approach and similar infrastructure principles (such as flooding and movement) and intended to test a range of placemaking outcomes. Each scenario was evaluated against a set of criteria which was informed by BCC’s Sustainability Implementation Plan (the Frome Gateway project was one of a number of pilot projects used to test the use of the draft Sustainability Implementation Plan).

The evaluation of the four spatial concepts was used to inform the preferred development scenario which was taken into stage 3 of the project (framework refinement and detail) and has become the basis of the regeneration and placemaking vision set out in the Framework.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)

This project (the development of the Frome Gateway Regeneration Framework) does not include the physical delivery of infrastructure or development. The purpose of the Framework is to provide an **over-arching vision and design and development principles and objectives** to guide and shape many individual projects within the regeneration area over the next 10-15 years which will be needed to realise the vision for the area.

The primary audience of the framework is built environment professionals including developers, architects, and planners both across the public and private sector. If endorsed by Bristol City Council, it will become a ‘material consideration’ in the planning system and will also be used by BCC’s Development Control team and Development Control Committee in the determination of planning applications within the regeneration area. It will also become a key tool and resource for BCC’s Regeneration team to help co-ordinate and drive change (such as securing funding to enable delivery, or progressing planning applications for BCC owned sites, for example).

Therefore, the environment impact of individual projects and planning applications will be considered on an individual basis as appropriate to their scale and nature.

Health and wellbeing

Benefits listed below are also intended to bring wider health and wellbeing benefits including promoting more active lifestyles, reducing air pollution and improving quality of life through the provision of high-quality homes,

workspaces, infrastructure and services. The [Health Impact Assessment](#) undertaken alongside the Regeneration Framework estimates that the combined societal value of health benefits from guiding long-term change in compliance with the Regeneration Framework (as opposed to an unmanaged approach) over the lifetime of the project are expected to be between £80-100 million.

ENV1 Carbon neutral: Emissions of climate changing gases

BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.

Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.

Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.

[Further guidance](#)

No impact

Benefits

Key aspects of the Regeneration Framework relevant to 'ENV1 Carbon Neutral' are as follows:

- Supporting modal shift through the design of transport infrastructure which prioritises sustainable and active travel, and a managed approach to vehicle access.
- The delivery of the Frome Gateway District Heating Network (DHN) to provide renewable energy to all new development within the regeneration area. The extent of the DHN will expand much beyond the Frome Gateway Regeneration Area to provide renewable energy to neighbouring areas including St Paul's and Easton.
- Advocates pioneering building energy performance and on-site energy generation (this is one of the 11 regeneration objectives).
- The delivery of a Low Carbon Logistics Hub on a BCC-owned site to facilitate sustainable last mile logistics and delivery across the city.

More broadly, the Frome Gateway Regeneration Area is one of a number of Areas of Growth and Regeneration set out in BCC's emerging Local Plan. Many of these are areas of the city which are already developed 'brownfield' areas (in this case as an area of employment) and in inner-urban areas. These regeneration areas have been in part identified to help to ensure that city growth is responsible and sustainable by:

- Making more efficient use of land and concentrating new development in areas which are already connected to infrastructure and services (such as transport systems, schools and health services). This also has the additional benefit of improving the viability of infrastructure and services (as there is more users to make use of them).
- Preventing the urban sprawl/expansion of the city outwards and generating the need to deliver significant new infrastructure and services where they do not currently exist.

This strategic approach to city-wide regeneration is intended to have positive impact on carbon neutrality and emissions by increasing city density and therefore making more efficient use of infrastructure and reducing the need to travel to meet needs and access services.

Enhancing actions

1. Continued working and collaboration with Vattenfall to ensure the Frome Gateway DHN is powered by renewable energy.
2. Ensure that development and infrastructure projects which are directly delivered by BCC take all appropriate steps to minimise their carbon footprint in design, construction and operation.

		<ol style="list-style-type: none"> 3. Communication and collaboration with landowners and developers to advocate for new development proposals being carbon neutral in their design and operation (in accordance with planning policies in BCC's emerging Local Plan). 4. Collaboration with BCC Sustainable City & Climate Change team to scope how 'softer' measures which support behaviour change and more sustainable lifestyles could be integrated into regeneration projects.
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
	Adverse impacts	<ol style="list-style-type: none"> 1. The physical delivery of the regeneration vision will mean a significant amount of construction over the next 15 years. Building and construction materials are commonly accepted to have a high carbon footprint.
	Mitigating actions	<ol style="list-style-type: none"> 1. Ensure that development and infrastructure projects which are directly delivered by BCC take all appropriate steps to minimise their carbon footprint in design, construction and operation. 2. Communication and collaboration with landowners and developers to advocate for new development proposals being carbon neutral in their design and operation (in accordance with planning policies in BCC's emerging Local Plan).
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
<p>ENV2 Ecological recovery: Wildlife and habitats BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	<p>Key aspects of the Regeneration Framework relevant to 'ENV2 Ecological Recovery' are as follows:</p> <ol style="list-style-type: none"> 1. Delivering a river restoration of the river Frome to enhance its placemaking and ecological value. 2. Improving the quality of existing green spaces (Riverside Park; Peel Street Open Space) for wildlife and community amenity value. 3. Increasing the amount of green space within the regeneration area by 1 hectare through the integration of a new network of pocket parks and linear parks through development offsets. 4. A commitment to explore the 'Green Space Big Move' which is a concept for a strategic land exchange between BCC and private landowners which would enable BCC to deliver an additional public park in the heart of the regeneration area. This would provide an additional uplift in green space of 0.8 hectares. 5. Enhanced urban greening and re-wilding throughout the regeneration area. Specifically, this includes a requirement for new development to provide a Biodiversity Net Gain of 10% and apply the Urban Greening Factor methodology in accordance with the emerging Local Plan.
	Enhancing actions	<ol style="list-style-type: none"> 1. Ensure that wildlife recovery is a key design objective of new green infrastructure and the enhancement of existing green and blue infrastructure. 2. Engagement landowners and strategic stakeholders to explore the feasibility and deliverability of the 'Green Space Big Move'
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		

	Adverse impacts	None.
	Mitigating actions	None.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	<p>Key aspects of the Regeneration Framework relevant to ‘ENV3 A cleaner, low-waste city’ are as follows:</p> <ol style="list-style-type: none"> 1. The delivery of a Low Carbon Logistics Hub on a BCC-owned site to facilitate sustainable last mile logistics and delivery across the city. 2. Supporting modal shift through the design of transport infrastructure which prioritises sustainable and active travel, and a managed approach to vehicle access (therefore reducing emissions associated with private vehicle ownership). 3. One of the five key areas of focus of the approach to employment and skills set out in the Framework is ‘Evolving a Green Economy’ which is described as ‘Frome Gateway evolves as a green economy, embedding and piloting new approaches which can support the city’s green transition. 4. The Framework notes that developers should minimise waste and maximise adaptability, reuse and recycling. This includes the exploration of reusing appropriate existing buildings and compliance with emerging planning policy NZC2 (Net zero carbon development – operational carbon)
	Enhancing actions	<ol style="list-style-type: none"> 1. Collaboration with BCC Sustainable City & Climate Change team to scope how ‘softer’ measures which support behaviour change and more sustainable lifestyles could be integrated into regeneration projects. 2. Collaboration and engagement with internal and external stakeholders (such as BCC Economic Development, BCC Employment, Skills & Learning and BCC Sustainable City & Climate Change teams to explore and scope how the economic and skills vision for Frome Gateway can be realised including supporting the city’s green transition. 3. Through delivery, scope how ‘softer’ measures can be incorporated in the approach to regeneration which support ENV3, such as through the use of ‘green leases’ to encourage and support more sustainable business practices.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	

	<p>Adverse impacts</p>	<p>1. The physical delivery of the regeneration vision will mean a significant amount of construction over the next 15 years. Building and construction materials are commonly accepted to have a high carbon footprint.</p>
	<p>Mitigating actions</p>	<p>1. Explore how circular economy principles could be integrated into the construction processes to maximise the re-use of building and construction materials as much as possible, and the responsible disposal/recycling of materials which cannot be recycled.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Key aspects of the Regeneration Framework relevant to ‘ENV4 Climate resilience’ are as follows:</p> <ol style="list-style-type: none"> 1. Dedicated coverage of climate resilience issues within the framework including guidance and requirements on how new design and development should contribute to building resilience to the impacts of climate change. This includes: <ol style="list-style-type: none"> a. Guidance on flood risk management b. Design principles to mitigate the Urban Heat Island Effect (such as building orientation, dual-aspect buildings and the use of green infrastructure. c. The greening of streets throughout the regeneration area. d. Ensuring new infrastructure is designed with a changing climate in mind. 2. Increasing the amount of green space within the regeneration area by 1 hectare through the integration of a new network of pocket parks and linear parks through development offsets (therefore mitigating the Urban Heat Island Effect). 3. A commitment to explore the ‘Green Space Big Move’ which is a concept for a strategic land exchange between BCC and private landowners which would enable BCC to deliver an additional public park in the heart of the regeneration area. This would provide an additional uplift in green space of 0.8 hectares (therefore mitigating the Urban Heat Island Effect). 4. Enhanced urban greening and re-wilding throughout the regeneration area. Specifically, this includes a requirement for new development to provide a Biodiversity Net Gain of 10% and apply the Urban Greening Factor methodology in accordance with the emerging Local Plan. This will increase the resilience of ecological networks and biodiversity by providing more space for nature recovery.
	<p>Enhancing actions</p>	<p>1. Ongoing engagement and collaboration with internal and external stakeholders to progress the ambitions set out above.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

	Adverse impacts	1. The delivery of the regeneration vision set out in the Framework will mean a significant increase in density of new development and buildings in this area. This has the potential to exacerbate the Urban Heat Island Effect (though the above benefits are anticipated to mitigate this).
	Mitigating actions	1. Ongoing engagement and collaboration with internal and external stakeholders to progress the ambitions set out above.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	<p>Key aspects of the Regeneration Framework relevant to ‘ENV5 Prevention of pollution to air, water, or land’ are as follows:</p> <ol style="list-style-type: none"> 1. Due to the historic industrial nature and heritage of the area, development will be required to undertake land remediation during the construction remove pollutants from the ground. 2. Supporting modal shift through the design of transport infrastructure which prioritises sustainable and active travel, and a managed approach to vehicle access (therefore reducing emissions associated with private vehicle ownership). 3. The delivery of a Low Carbon Logistics Hub on a BCC-owned site to facilitate sustainable last mile logistics and delivery across the city. 4. The delivery of the Frome Gateway District Heating Network (DHN) to provide renewable energy to all new development within the regeneration area. The extent of the DHN will expand much beyond the Frome Gateway Regeneration Area to provide renewable energy to neighbouring areas including St Paul’s and Easton. 5. The Framework notes that developers should minimise waste and maximise adaptability, reuse and recycling. This includes the exploration of reusing appropriate existing buildings and compliance with emerging planning policy NZC2 (Net zero carbon development – operational carbon) 6. Enhanced urban greening throughout the regeneration area. Specifically, this includes a requirement for new development to provide a Biodiversity Net Gain of 10% and apply the Urban Greening Factor methodology in accordance with the emerging Local Plan. Green infrastructure is understood to improve air quality and will include the use of Sustainable Drainage Systems (SUDS) which can improve water quality before it re-enters natural systems such as the River Frome.
	Enhancing actions	<ol style="list-style-type: none"> 1. Collaborate with landowners and developers to ensure the safe disposal and/or re-use of contaminated land as part of the land remediation process. 2. Collaboration with BCC Sustainable City & Climate Change team to scope how ‘softer’ measures which support behaviour change and more sustainable lifestyles could be integrated into regeneration projects. 3. Continued working and collaboration with Vattenfall to ensure the Frome Gateway DHN is powered by renewable

		<p>4. Ensure that pollution removal is a key design objective of green infrastructure.</p> <p>5. Through delivery, scope how 'softer' measures can be incorporated in the approach to regeneration which support ENV3, such as through the use of 'green leases' to encourage and support more sustainable business practices.</p>
		<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>
	Adverse impacts	<p>1. The physical delivery of the regeneration vision will mean a significant amount of construction over the next 15 years. Building and construction materials are commonly accepted to have an air, land, and water pollution impact.</p>
	Mitigating actions	<p>1. Explore how circular economy principles could be integrated into the construction processes to maximise the re-use of building and construction materials as much as possible, and the responsible disposal/recycling of materials which cannot be recycled.</p> <p>2. Collaboration with BCC Development Management to ensure Construction Management Plans are utilised to minimise the impact of construction as much as possible.</p>
		<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project's implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Continued working and collaboration with Vattenfall to ensure the Frome Gateway DHN is powered by renewable energy	Marc Cooper	Ongoing through delivery
Ensure that development and infrastructure projects which are directly delivered by BCC take all appropriate steps to minimise their carbon footprint in design, construction and operation.	Marc Cooper	Ongoing through delivery
Communication and collaboration with landowners and developers to advocate for new development proposals being carbon neutral in their design and operation (in accordance with planning policies in BCC's emerging Local Plan).	Marc Cooper	Ongoing through delivery
Collaboration with BCC Sustainable City & Climate Change team to scope how 'softer' measures which support behaviour change and more sustainable lifestyles could be integrated into regeneration projects.	Marc Cooper	Ongoing through delivery
Ensure that wildlife recovery and pollution removal / exposure reduction are key design objective of new green infrastructure and the enhancement of existing green and blue infrastructure.	Marc Cooper	Ongoing through delivery
Engagement landowners and strategic stakeholders to explore the feasibility and deliverability of the 'Green Space Big Move'	Marc Cooper	Ongoing through delivery
Collaboration and engagement with internal and external stakeholders (such as BCC Economic Development, BCC Employment, Skills & Learning and BCC Sustainable City & Climate	Marc Cooper	Ongoing through delivery

Enhancing / mitigating action required	Responsible Officer	Timescale
Change teams to explore and scope how the economic and skills vision for Frome Gateway can be realised including supporting the city's green transition.		
Through delivery, scope how 'softer' measures can be incorporated in the approach to regeneration which support ENV3, such as through the use of 'green leases' to encourage and support more sustainable business practices	Marc Cooper	Ongoing through delivery
Explore how circular economy principles could be integrated into the construction processes to maximise the re-use of building and construction materials as much as possible, and the responsible disposal/recycling of materials which cannot be recycled.	Marc Cooper	Ongoing through delivery
Collaborate with landowners and developers to ensure the safe disposal and/or re-use of contaminated land as part of the land remediation process.	Marc Cooper	Ongoing through delivery
Collaboration with BCC Development Management to ensure Construction Management Plans are utilised to minimise the impact of construction as much as possible	Marc Cooper	Ongoing through delivery

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):

BCC's Environmental Impact Assessment has determined significant beneficial impacts from the proposal: The proposed development framework is part of a city-wide strategic approach that is intended to have positive impact on carbon neutrality and emissions through expansion of heat network connections and reduced reliance on car transport. The framework is also expected to make improvements to the ecological value and climate resilience of the development area.

Summary of significant adverse impacts and how they can be mitigated:

BCC's Environmental Impact Assessment has determined significant adverse impacts from the proposal: The physical delivery of the regeneration vision will mean a significant amount of construction over the next 15 years. Building and construction materials are commonly accepted to have a high carbon footprint.

Environmental Performance Team Reviewer: Daniel Shelton	Submitting author: Marc Cooper
Date: 15/12/2023	Date: 15/12/2023

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Recommissioning of adult homelessness supported accommodation pathways
Ward(s)	City Wide
Author: Paul Sylvester	Job title: Head of Service, Housing Options
Cabinet lead: Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration
Proposal origin: BCC Staff	
Decision maker: Cabinet Member Decision forum: Cabinet	
Purpose of Report: To recommission the supported accommodation pathways services for single homeless adults aged 22+ from 28 October 2024 for up to five years.	
Evidence Base:	
<p>1. Introduction</p> <p>Housing and Landlord Services commission 725 units of low, medium and high support accommodation for single homeless adults aged 22+ (Pathways 1-3) along with a Resettlement service which provides short-term support to Pathways’ clients who move on to independent accommodation. A further 140 units of Pathways accommodation are funded by Public Health specifically for people looking to address substance use support needs (Pathway 4). An overview of current services can be found in Appendix A.</p> <p>The current contracts expire on 27 October 2024. This report seeks approval to recommission services to commence on 28 October 2024 for a period of 3 years with the option to extend for a further 2 years.</p> <p>2. The Need for Supported Accommodation</p> <p>Demand for supported accommodation can be inferred from data showing the number of people rough sleeping and in Temporary or Emergency Accommodation, and those approaching the Bristol City Council (BCC) Homeless Prevention Team for advice and assistance.</p> <p>Single night counts and monthly rough sleeping figures both show significant rises in average rough sleeping year-on-year, with a corresponding increase in demand for supported accommodation. Overall presentations for homeless individuals have similarly steadily increased annually, after a drop between 2020 and 2021. This has led to an increase in the number of people living in unsupported temporary accommodation provided by private landlords.</p> <p>The majority of Pathway units are owned by Registered Providers and are therefore exempt accommodation, with rental costs recoverable from Housing Benefit. BCC is currently looking to extend this type of accommodation through the Supported Singles and Couples Accommodation Framework as it is much cheaper than unsupported temporary accommodation provided by private landlords.</p>	

3. Commissioning Process and Timescales

A high-level overview of the recommissioning process is as follows:

- Early engagement with key stakeholders including clients, current providers, pathways referrers, Public Health and Adult Social Care – September and October 2023
- Needs and Gap Analysis - December 2023
- Draft Commissioning Plan – January 2024
- Engagement on Draft Commissioning Plan – January 2024 - February 2024
- “You said, we did” Document – end of February 2024
- Final Commissioning Plan - end of February 2024
- Procurement – March-April 2024
- Contract award – end of June 2024
- Implementation period – August-October 2024
- New contracts start – 28 October 2024

4. Commissioning Intentions

A draft Commissioning Plan will be published on the Consultation and Engagement Hub. Based on early engagement sessions and the Needs and Gap Analysis, we will be proposing the following:

a. Better matching accommodation type to demand.

In particular:

- Increasing the amount of medium support accommodation to create a more balanced pathway that better facilitates throughput from high support services.
- Reducing the amount of low support accommodation that we commission given the existence of similar forms of accommodation funded through the Rough Sleeping Accommodation Programme. As we don't want to lose this low support pathway provision entirely, we will look to repurpose this as long-term move-on accommodation from Pathways.

b. Ensuring greater consistency across contract values.

Some providers receive differing amounts of income for broadly the same service, which creates unfairness in the system. We will look to establish maximum unit costs for different types of service to ensure greater consistency and value for money.

c. Retaining the benefits of a partnership approach to working, whilst considering how contracts are structured.

Current services are grouped under 4 pathways and have a lead provider responsible for leading partners to meet shared outcomes. This has been beneficial for facilitating cross-sector partnerships and for structuring services more cohesively. However, the lead provider model has also made implementing some changes challenging, as lead providers don't feel they have the authority to make decisions on behalf of the pathway. We are therefore considering reverting back to individual contracts with providers whilst looking to retain the wider concept of partnership working and some shared outcomes that have proved beneficial.

d. Increasing throughput and planned departures.

Move-on from supported accommodation is the ultimate aim of services, however due to the overwhelming demand for accommodation in Bristol clients often end up staying longer than planned in Pathways accommodation which can lead to frustration and tenancy breakdown. We will consider creative options for increasing planned departures from pathways into both private rented and social housing, for example by looking at changes to the Priority Move-On Scheme. We will also consider changes to the design/ flow of services to best support moves through and out of supported accommodation.

e. Balancing best practice in the sector with locally available resources.

The homelessness sector is moving away from large homelessness hostels as these are no longer considered best practice. BCC similarly has ambitions to move away from the larger services we commission, however we have to balance this against a growing need for accommodation and a lack of alternative, smaller buildings. We will ensure flexibility in the contracts of services which don't align with best practice (e.g.

through shorter contracts) to keep the door open to new opportunities, whilst working with providers to mitigate the concerns of larger buildings in the meantime.

f. Procuring services efficiently to protect BCC and provider resources.

Current Pathway contracts were directly awarded in 2017 as there were insufficient options in the market to run a competitive tender process. BCC will undertake soft market testing to explore whether there are new providers who have the ability and resources to provide supported accommodation in Bristol under new contracts. A final decision on the most appropriate procurement route will be taken after this soft market testing is concluded, based on what is best for the service as well as being compliant with the Bristol City Council Procurement Rules and Public Contract Regulations 2015.

g. Reducing subsidy loss.

The vast majority of Pathway units are owned by Registered Providers and are therefore exempt accommodation, with rental costs recoverable from Housing Benefit. However, a small proportion do not meet this exemption. We will look for solutions to mitigate the subsidy loss the council incurs through these units.

h. Considering how pathway services relate to other homelessness services in Bristol.

Since pathway services were last commissioned in 2017, BCC has been successful in securing funding through a number of short term (maximum of 3 years) DLUHC programmes including the Rough Sleeping Initiative (RSI), Rough Sleeping Accommodation Programme (RSAP) and Single Homelessness Programme (SHAP). Housing Options are also in discussions with colleagues in Adult Social Care around the ongoing delivery of a High Stability Housing service in Bristol. We will consider how these services best complement Pathways accommodation, as well as considering the impact of funding streams ending part way through Pathway contracts.

5. Finance

4.1 Pathways 1-3 and the Resettlement Service

Pathways 1-3 and the Resettlement Service are funded from Housing and Landlord Services. These services have an annual budget envelope of £4,824,314.

In the final extension year (starting October 2023), an uplift of £373,230 was given to Pathways 1-3 with no further contribution required from BCC. This was achieved through; (a) one-off external grant funding; and (b) reducing the budget of the Pathways Resettlement service and reallocating funds to Pathways Accommodation. The table below shows the difference in contract values:

Contract	Original (2017) annual contract value	Change in annual contract value for final year (2023) extension	Final year (2023) extension contract value
Pathway 1	£1,969,926	+£164,694	£2,134,620
Pathway 2	£1,632,663	+£197,110	£1,769,160
Pathway 3	£961,401	+£121,426	£1,041,778
Resettlement Service	£260,324	-£110,000	£150,324
Total	£4,824,314	+£373,230	£5,197,544

It is proposed that the annual budget envelope is increased to maintain these final year values, with an additional 3.23% uplift to account for inflation in the final year before new contracts start.

This equates to an additional **£557,560** per year, giving a maximum annual budget envelope of **£5,381,874** in year one, and then subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index.

Our view is that this is the minimum baseline budget needed to retain a similar amount of Pathways Accommodation from October 2024, maximising value for money for the council whilst ensuring the financial

viability of providers.

If contract values are not uplifted to the above then, due to rising provider costs, BCC will see a reduction in the number of units it commissions. As the demand for homelessness accommodation continues to rise, losing units from Pathways will increase the take up of temporary accommodation, which is less cost effective than Pathways accommodation. For example, freezing the budget at the 2017 would lead to the loss of 190 low support units from Pathways. To replace these using Temporary Accommodation would cost £1,569,032 (based on an average 1-bed TA placement costing £8,262 per annum).

5.2. Pathway 4

Pathway 4 is funded by Public Health and has an annual budget envelope of £750,000. Public Health have indicated that they will increase this figure by 5% to £787,500 for new contracts.

5.3. Total Costs

Total costs across all Pathway services are therefore £5,381,874 + £787,500 = £6,169,374.

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Authorises the Executive Director Growth and Regeneration, in consultation with the Cabinet Member for Housing Delivery and Homelessness to take all steps required to procure and award the contracts necessary for the implementation of the Homelessness Pathways Commissioning Plan, for 3 years with an option to extend for a further 2 years, in-line with the procurement routes and maximum total budget envelope of £6,169,374 (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index) as outlined in this report.
2. Authorises the Executive Director Growth and Regeneration in consultation with the Cabinet Member for Housing Delivery and Homelessness to invoke any subsequent extensions or variations specifically defined in the contracts being awarded, up to the maximum budget envelope (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index) outlined in this report.

Corporate Strategy alignment:

This proposal aligns with the following priorities in the Corporate Strategy:

1. Reduce and prevent homelessness and rough sleeping.
2. Reduce the number of households in temporary accommodation.

City Benefits:

1. The proposal will assist people that are rough sleeping and recovering from rough sleeping to access accommodation and support, improving their health, and reducing the physical and mental health impact of living on the streets.
2. The accommodation will support the reduction of rough sleeping in the city and will prevent people from having to spend time on the streets and/or in emergency and temporary accommodation.
3. The accommodation will provide a cost-effective alternative to privately managed, unsupported temporary accommodation.

Consultation Details:

1. Early engagement with key stakeholders including clients, current providers, pathways referrers, Public Health and Adult Social Care – September and October 2023
2. Engagement on Draft Commissioning Plan - January 2024

Background Documents:

[Homelessness and Rough Sleeping Strategy 2019 to 2024](#)

Revenue Cost	£6,169,374 p/a £30,846,870 over 5 years, plus uplift to be agreed	Source of Revenue Funding	£5,381,874 p/a (Housing Options) £787,500 p/a (Public Health)
Capital Cost	N/A	Source of Capital Funding	N/A
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input checked="" type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: At present BCC utilises a number of external providers to assist with the provision of homeless supported accommodation. The contracts currently in place were let a number of years ago and had no inflationary uplifts applied until 2023. Given the recent and ongoing wider economic landscape concerning inflation and wage increases, these providers have now informed BCC that they will be unable to continue to provide these services at current rates.

In order to re-commission these providers it has been deemed by the service that an increase to budget is required to maintain existing levels of provision. A soft market test will also be undertaken to identify any other providers who may be able to meet the contract requirements.

Whilst the report details the need for an uplift in budget for this particular service, it will need to be met from the wider, existing, homelessness budgets. In addition, all efforts will be made to identify and secure external grant funding to mitigate any increase. To date, £210k of internal savings and external funding has been identified and secured. Any additional costs over and above this will be met from savings generated by Temporary Accommodation project, as not proceeding will lead to additional cost pressures, as detailed below, due to the likelihood of the service seeing an increase in subsidy loss as units provided by this contract will be lost.

The impact of losing these units would be follows:-

Year	Subs Loss Pressure
1	£421k
2	£1,011k
3	£1,011k
4	£1,011k
5	£1,011k

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 19 January 2023.

2. Legal Advice: The procurement process must be conducted in line with the 2015 Procurement Regulations and the Councils own procurement rules. Legal services will advise and assist officers with regard to the conduct of the procurement process and the resulting contractual arrangements.

Legal Team Leader: Husinara Jones, Team Leader/Solicitor, 25 January 2024

3. Implications on IT: I can see no implications on IT in regard to this activity.

IT Team Leader: Alex Simpson, Lead Enterprise Architect, 3 January 2024

4. HR Advice: There are no HR implications evident in this report.

HR Partner: Celia Williams, HR Business Partner, 2 January 2024

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	29 November 2023
Cabinet Member sign-off	Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	4 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal Appendix A - Overview of Homelessness Pathways	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Appendix A - Overview of Supported Accommodation Pathways

BCC commissions four supported accommodation pathways for homeless single adults:

- Pathway 1: Men only (352 units)
- Pathway 2: Mixed: men and women (225 units)
- Pathway 3: Women only (148 units)
- Pathway 4: Substance use (140 units)

Pathways 1-3 each have a range of accommodation services grouped under four levels:

- Level 1: High support accommodation (staff on-site 24/7)
- Level 2: Medium support accommodation (staff on-site 9am-5pm Monday-Friday)
- Level 3: Medium/low support accommodation (visiting staff support)
- Level 4: Low support accommodation (visiting staff support)

Pathway 4 has a range of accommodation services grouped under three stages:

- Preparation intake: For clients who are motivated to address substance use
- Preparation housing: For clients actively engaging with drug treatment services (e.g. scripted)
- In-treatment housing: For clients who are abstinent from non-prescribed drugs and alcohol

In addition to the four supported pathways, BCC commissions a Resettlement Service to provide support to clients who have moved on from the pathways into independent accommodation.

The following diagram gives an overview of Pathway services:



Outcomes and contract management

Supported Pathways are contract managed by a dedicated Commissioning Manager based in the Homelessness Contracts and Commissioning Team. Each Pathway has a 'Pathway Lead' employed by the Lead Provider, who is responsible for overseeing the effective delivery of their pathway. The Commissioning Manager meets with Pathway Leads

individually every month, as well as holding a monthly meeting for all Pathway Leads together. Meetings are used to discuss emerging issues and trends and review performance against KPIs. Pathway Leads also provide feedback and action plans against quarterly KPI reports which are compiled by the Homelessness Contracts and Commissioning Team, and have annual reviews taking an in depth look at performance.

Overview of current contracts

All four pathways are currently commissioned and contract managed by the Homelessness Contracts and Commissioning Team. Funding for Pathways 1-3 comes from Housing Options whereas the funding for Pathway 4 comes from Public Health.

A partnership approach was taking to commissioning the current contracts. Support services are provided by a total of 11 providers with each pathway having a lead provider responsible for the pathway but sub-contracting services to other providers. The lead providers are as follows:

- Pathway 1: The Salvation Army
- Pathway 2: Second Step
- Pathway 3: St Mungo's
- Pathway 4: Ara (Addition Recovery Agency)

All pathways started on 28 October 2017, with current contracts ending on 27 October 2024.

The Resettlement Service, run by LiveWest, provides support to clients who have moved on from the pathways into independent accommodation started on 01 July 2018, with the current contract ending on 27 October 2024.

Recommissioning of adult homelessness supported accommodation pathways

Negative risks that pose a threat to BCC relating to the recommissioning of the pathways (aim: reduce level of risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Current Risk Level			Risk Tolerance			
									Likelihood	Impact	Risk Rating	Likelihood	Impact	Risk Rating	Date
1	Current support providers and/or landlords do not want to bid for new contracts.	Support providers have change of strategic direction, or feel that contract value is insufficient to meet service costs. Landlords using properties for alternative purposes or choosing to sell.	Decrease in the pathways' overall capacity and a simultaneous decrease in the number of homeless adults who can be housed in supported accommodation. This, in turn, will likely necessitate an increase in the use of unsupported and costly Temporary Accommodation, to house clients, who formerly might have been accommodated in pathways services.	Open	Homes and Communities	Service Provision; Finance	Head of Housing Options	* Involvement of support providers and landlords in all stages of consultation on the commissioning plan; * Proposal to provide an uplift to the current contract values; * Negotiation as part of the procurement process; * Soft market testing to attract new providers.	1	4	4	1	4	4	Jan-24
2	Support costs for provision of services exceed contract value	High levels of inflation and increased pressure of council finances.	Decrease in the pathways' overall capacity and a simultaneous decrease in the number of homeless adults who can be housed in supported accommodation. This, in turn, will likely necessitate an increase in the use of unsupported and costly Temporary Accommodation to house clients, who formerly might have been accommodated in pathways services.	Open	Homes and Communities	Service Provision; Finance	Head of Housing Options	* Involvement of support providers and landlords in all stages of consultation on the commissioning plan; * Proposal to provide an uplift to contract values; * Needs and demand analysis to make sure we prioritise the groups within the overall client cohort that are most in need; * Remodelling to suit the pathways' budget; * As a last resort, we can consider other options for keeping units within the sector and available for clients who need them, even if they are no longer part of the pathways.	2	4	8	2	4	8	Jan-24
3	Limited buildings from which to accommodate clients and deliver services	Bristol's housing market is currently highly challenging and the number of buildings we can use to deliver supported pathways accommodation is limited. We are making the best possible use of the options we can access, but the ideal number of buildings and units are simply not available in the city; this has already been extensively explored and the provision is not there.	Accommodation provision may not be in settings that are in-keeping with current best practice. For example, the sector is generally moving away from accommodating clients in larger hostel settings, however this may not be possible in Bristol due to a lack of alternative options.	Open	Homes and Communities	Service Provision; Reputational	Head of Housing Options	* Flexibility in contracts will allow us to pursue emerging opportunities; * Soft market testing will hopefully attract new accommodation providers, who may be able to offer buildings that are more suitable for the client group; * Clear accommodation standards will be part of pathway services' service specifications.	4	2	8	4	2	8	Jan-24
4	Proposal to directly award contracts to providers risks not achieving best value for money	Competitive tender processes arguably encourage providers to offer more in the hope of securing contracts. However, due to limited buildings from which to accommodate clients, BCC is not in a position to run a competitive tender process.	Unit costs may be higher than they would through a competitive tender. Providers may be less likely to offer additional value when applying for contracts.	Open	Homes and Communities	Service Provision; Finance	Head of Housing Options	* Close work with procurement to ensure that we are using the best procurement mechanisms for achieving value for money; * Ongoing negotiation with providers and requirement to submit a proposal; * Scrutiny of costs as part of the commissioning process; * Benchmarking of providers' costs to generate indicative unit costs within and between the pathways.	3	2	6	3	2	6	Jan-24
5	The procurement process is not finished by the time current contracts end (27 Oct 2024)	Timelines for recommissioning services are tight. Unforeseen circumstances could delay the recommissioning process.	Breach of procurement regulations.	Open	Homes and Communities	Legal; Reputational	Head of Housing Options	* Regular review of project plan with milestones and realistic but suitable timeframes; * Involvement of procurement team in the event of slippage; * Concurrent processes/recommissioning activities wherever possible.	2	4	8	2	4	8	Jan-24
6	Services are not aligned with the needs and aspirations of service users	Insufficient feedback from service users in the recommissioning process	Poor outcomes for clients	Open	Homes and Communities	Service Provision	Head of Housing Options	* Early engagement with clients and groups with lived experience; * Consultation with clients on the commissioning plan at every stage of its development.	1	4	8	1	4	8	Jan-24
7	Clients with protected characteristics are excluded from services, or experience worse outcomes and greater barriers to access.	Services may be designed with the support needs and characteristics of the majority of clients in mind.	Services may be less accessible for clients with protected characteristics or specific cultural or religious needs, who might struggle to meet these needs in pathway accommodation. Similarly, clients with protected characteristics or religious/cultural needs may be less willing or able to engage with services and/or staff, or may experience higher rates of unsuccessful outcomes and unplanned exits from pathway services.	Open	Homes and Communities	Service Provision	Head of Housing Options	* Ensure EqIA assessment actions are completed and that the EqIA is regularly reviewed; * Review needs and equalities data as part of quarterly KPI monitoring and immediately address any concerns with pathway leads.	1	4	8	1	4	8	Jan-24

Equality Impact Assessment [version 2.12]



Title: Supported accommodation pathways recommissioning	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Paul Sylvester
Service Area: Housing Options	Lead Officer role: Head of Housing Options

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

• What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The supported accommodation pathways began operating on 28 October 2017. The pathways contracts were initially set up to last for five years, but included provision for two one-year long extensions, the second of which will end on 27th October 2024. We are now considering what the recommissioned pathways will look like and how they will operate from this point onwards, to ensure continued provision of safe, supported accommodation for those who need it.

There are four pathways in total. Each is coordinated by a lead agency, who delivers their own supported housing services as well as sub-contracting a range of providers to deliver additional supported accommodation:

- Pathway 1: Men only (354 units). Led by the Salvation Army;
- Pathway 2: Mixed: men and women (231 units). Led by Second Step;
- Pathway 3: Women only (150 units). Led by St Mungo's;
- Pathway 4: Recovery-oriented (146 units). Led by the Addiction Recovery Agency (Ara).

Pathways 1-3 each have a range of accommodation services grouped under four levels:

- Level 1: High support accommodation (staff on-site 24/7);
- Level 2: Medium support accommodation (staff on-site 9am-5pm Monday-Friday);
- Level 3: Medium/low support accommodation (visiting staff support);
- Level 4: Low support accommodation (visiting staff support).

Pathway 4 is funded and commissioned by Public Health, and has a range of recovery-related accommodation services grouped under three stages:

- Preparation intake: For clients who are motivated to address substance or alcohol use;
- Preparation housing: For clients actively engaging with drug and alcohol treatment services (e.g. scripted);
- In-treatment housing: For clients who are abstinent from non-prescribed drugs and alcohol.

In addition to the four supported pathways, BCC commissions a Resettlement Service, which provides support to clients who have moved on from the pathways into independent accommodation.

Demand for supported accommodation can be inferred from analysing data showing the number of people rough sleeping and in Temporary or Emergency Accommodation, and those approaching the BCC Homeless Prevention Team for advice and assistance, all of which are trending upwards year on year. On 8.11.23, there 408 open referrals for clients waiting to be placed in pathway accommodation.

• **Who will the proposal have the potential to affect?**

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

• **Will the proposal have an equality impact?**

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](https://www.bristol.gov.uk/equality-diversity)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Reducing Rough Sleeping Needs Analysis December 2020 (Appended to this EQIA)	The Needs Analysis outlines the current situation regarding the need and demand for affordable housing in Bristol, as well as the need for supported accommodation. It also gives us the demographics and equalities profile of Bristol's current rough sleeping population, many of whom require pathway

	accommodation. It includes data on age, gender, ethnicity, disability, sexual orientation, and religion.
Bristol Quality of Life Survey Quality of Life 2020-21 — Open Data Bristol	The survey shows that Bristol citizens who are: living in council rented accommodation; living in the 10% most deprived areas of the city; aged under 25; Black, Asian and minority ethnicity; have a non-Christian faith/religion; full-time carers, or single parents are less likely to be satisfied overall with their current accommodation than average.
Internal Database (HSR) maintained by the Interim Supported Accommodation Team	On 8.11.23, 408 individuals had open referrals to pathways services, according to the HSR. This is the total number of clients who have been referred to at least one pathway accommodation service and were still waiting for an outcome, which could be a refusal.
Consultation with clients and staff	These sessions were an opportunity to gather feedback from current and former pathway clients, pathway staff and additional stakeholders on a range of topics and concerns relating to the current provision. Clients and staff alike noted the challenges of sharing accommodation with diverse groups of clients, some of whose cultural needs clash or are not met at all at present. There are also particular difficulties around accessibility and progression through the pathways towards independent living for Disabled clients and clients with mobility and accessibility needs, including older people, for whom the stock of appropriate units is limited. This means their entry into and movement through the pathways can take significantly longer than for others within the cohort without these support needs.
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams, diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There is no reliable data on marriage and civil partnership or pregnancy and maternity; no data on these characteristics are collected by the services commissioned to deliver the pathway contracts, as part of their quarterly data reporting and monitoring.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We regularly consult with internal and external stakeholders who are delivering services for clients accessing the supported accommodation pathways, to understand the needs of these clients and the capacity of the current provision to meet these needs. We are also part of ongoing conversations with these stakeholders around clients who cannot access the pathways or for whom pathway placements have ended unsuccessfully. This is also helping us to identify gaps in the existing provision, as well as barriers to clients accessing services and support, paying particular attention to equalities-related issues.

As part of the formal pathways recommissioning process, we have held numerous in-person and online consultation sessions with current and former pathways clients, pathways staff, and external and BCC teams who work with pathway services and clients. Consultation sessions for staff were very well attended, and by a diverse range of professionals. Client sessions attracted a smaller turnout and relied on pathways services inviting and reminding clients to attend. As such, clients with poor relationships with staff or whose engagement is more sporadic are less likely to have received this information or have been willing to attend the sessions. Women's voices were also unfortunately lacking from the client feedback, largely because of a lack of engagement in the consultation process from services in the women's pathway; we attempted to mitigate this by sending reminders and communicating with the pathway lead, but responses were minimal. The pathway lead has offered to take a more active role in any future consultations, which will hopefully increase participation from women living in the pathways during further rounds of consultation.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We will continue to engage with all stakeholders, including clients, as the recommissioning process progresses. This will allow stakeholders to share feedback on our plans at every stage of their development and will ensure that these plans are based on and shaped by the views and experiences of pathways clients and the staff members who support them.

Once the pathways have been commissioned in October 2024, commissioners and managers at accommodation services will continue to liaise regularly with service staff and clients, to make sure that we fully understand the needs of the client group and that access to services is equal for all clients. This will also help us to identify any barriers to access or challenges for individual clients or groups with protected characteristics after placement; we can then effectively support services to address these in a timely manner and apply subsequent learnings and adapt ways of working across the pathways.

There will also be a named commissioning officer or manager that will be responsible for ongoing engagement with providers and contract management. This will include multi-agency meetings to help to ensure a collaborative approach, consistency of quality of service, and collective addressing of any issues that arise, in terms of people accessing services and best practice sharing.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Bristol's housing market is currently highly challenging and the number of buildings we can use to deliver supported pathways accommodation is limited. We are making the best possible use of the options we can access, but the ideal number of buildings and units are simply not available in the city; this has already been extensively explored and the provision is not there. Much of the supported accommodation stock is within larger hostels or shared houses, many of which are located in or near the city centre, so the breadth of available locations is similarly limited.

Clients' protected characteristics and any potential risks relating to these are carefully considered and have a significant bearing on decisions around where clients are placed within the pathways. Supported accommodation providers are required to have established and robust procedures in place around equality, diversity, and inclusion, and as commissioners, we will continue to ensure that these policies are actively considered and play a central role in services' day-to-day operations and staff's ways of working. This will also include promoting ongoing learning and training for accommodation providers around the full range of equality and diversity-related topics. Further, we will ensure that organisations managing accommodation comply with their duty to make reasonable adjustments for Disabled people, in line with the Equality Act 2010 and the Public Sector Equality Duty.

We also know that some groups are the victims of more regular discrimination based on their protected characteristics against more regularly. We also acknowledge that some clients have specific preferences, particularly linked to their cultural backgrounds and religious beliefs, which are often not easily accommodated in the existing pathways provision. However, where possible, we will continue to ensure that clients are placed in services that can accommodate their preferences.

While compiling this document, we collated and analysed data on access to the accommodation pathways and outcomes for clients after placement, for all clients who have been referred to and exited the pathways since they started operating on 28.10.17 up to 27.10.23. We divided these data into demographic categories (gender, ethnic background, disability, age group and religion) to examine whether accessibility or outcomes were better or worse for clients with certain characteristics.

No clients in the sample identify with a gender other than that assigned at birth, so this characteristic was not considered. We recognise, however, that the data on this, and on many of the other protected characteristics that were part of this analysis, are self-reported by clients. As such, our data on this may not be accurate, depending on clients' readiness to share this information and their confidence that doing so will not result in discrimination or increased risk.

It is also important to note that clients were divided into demographic categories based on the categories available on the Housing Support Register. There were some historic issues around these categories and their definitions, which have now been rectified, however these issues continue to affect some of the data available. Consequently, we have had to exclude certain groups from our analysis, such as the significant number of clients whose ethnicity was categorised as 'English/Welsh/Scottish/Northern Irish/British' and 'Irish,' neither of which denote ethnic background. As a result, the data analysed does not pertain to all clients referred, placed and discharged from the pathways during the period in question and certain categories have been grouped (for

example 'White British,' 'White European,' 'White Other' as one category and 'Gypsy, Roma and Traveller' clients as another), which has produced a data set that is easier to handle and produces more meaningful results, but does not reflect the full diversity of the client group.

When considering access, we divided the total population of clients referred to pathways accommodation during the above-mentioned timeframe into the demographic categories listed above. We then compared this to the total population of clients who were actually placed in pathways, again divided into the same categories. If placements for certain groups were lower than referrals, we would assume this indicates a challenge for certain groups to access pathways. The data show a high level of consistency between the makeup of the referred and placed populations, save for minor discrepancies of +/-1 or 2%, except in the cases of disability and ethnicity. 16% of clients referred to pathways consider themselves to have a disability, whereas 10% of pathway placements consider themselves to have a disability. This discrepancy may reflect the limited supply of rooms available in the pathways that are suitable for clients who use wheelchairs, require ground floor rooms and facilities, or have other accessibility and mobility needs; this may also indicate that the demand for these room outstrips the available supply, with pathways currently ill-equipped to accommodate all referred clients with disabilities and mobility needs. As such, accessibility to the pathways for Disabled clients in particular appears to be limited. Similarly, 60% of referrals are for White clients and 4% for those with dual heritage, whereas 53% of placed clients are White and 12% have dual heritage.

To examine outcomes, we similarly divided clients leaving the pathways by their demographic characteristics. We then divided this data into planned departures (i.e., successful moves out of the pathways, into independent or more appropriate supported accommodation, moving in with family or friends etc) and unplanned departures (i.e., unsuccessful moves out of the pathways in cases of eviction, abandonment, long-term hospital admission, custodial sentences etc). We cross-referenced this with the proportion of planned and unplanned departures for the total client population over the same period; this showed that 60% of all departures during the period were unplanned against 40% planned. As above, the data indicated that no particular demographic groups are leaving the pathways unsuccessfully at a rate higher than 60%, apart from male clients (63% unplanned), Jewish clients (100% unplanned) and those who identified as lesbians (67%). In the latter cases, only one client described themselves as Jewish and three clients described themselves as lesbian over the whole period, so these data sets may be too small to lead us to any definitive conclusions or generalisations on outcomes for Jewish and lesbian clients.

What is striking, however, is the discrepancy between unplanned departure rates for men (63%) and women (51%). Similarly, there is significant gulf between the lowest unplanned departure rate by ethnicity (29% for Arab clients) and the highest (59% for White clients), and between the same rates for clients by age (19% unplanned departures for clients aged 65 and over, and 61% for clients younger than 65). The higher rate of planned departures for clients aged over 65 may be linked to the availability of specific, planned move-on options for people of 55 and up.

Regarding gender, it's important to note that while our data does not suggest any barriers to accessibility for the women who are identified as homeless and referred to pathways, women are more likely than men to be 'hidden homeless' or alternating between 'hidden homelessness' and rough sleeping.¹ As such, it's likely that many women are not visible or known to services and are therefore less likely to be placed in supported accommodation than men, who are more likely to sleep rough and are thus relatively more visible.

Graphs showing this data have been provided on a separate sheet at the end of this document.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The supported accommodation pathways accommodate adults aged 22 and over. There is a separate, bespoke accommodation pathway for young people.
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

¹ <https://www.mungos.org/wp-content/uploads/2018/10/Women-and-Rough-Sleeping-Report-2018-Summary.pdf>

Potential impacts:	There is currently a limited supply of accessible and ground floor accommodation, and in some cases, shared facilities may not be located on the same floor as clients' rooms, which may impact older clients with limited mobility or specific accessibility needs.
Mitigations:	<p>We will support services to ensure that older clients with limited mobility are prioritised, among the wider pool of clients with accessibility requirements, for the limited supply of accessible and ground floor rooms across the pathways.</p> <p>We are exploring options to try and bring new accommodation online as part of the pathways, with a particular focus on increasing the stock of accessible units, however Bristol's current housing market is extremely challenging and the options available are very limited in number and suitability. Simultaneously, we are speaking to providers about possible adaptation of existing units to increase accessibility for any Disabled clients or clients with limited mobility. Teams responsible for placing clients prioritise accommodating clients with mobility and accessibility needs in adapted and accessible rooms.</p>
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is likely to be a limited supply of accessible accommodation or units that can be adapted to suit the needs and requirements of Disabled people, including those with mobility needs. As detailed above, the discrepancy between the proportion of Disabled people referred between 28.10.17 and 27.10.23 and those placed during the same period may also be attributable to this limited supply, which does not match the total number of clients who require accessible rooms and facilities or rooms that can accommodate a wheelchair.
Mitigations:	<p>We will engage with referring agencies to understand the numbers of require specific units to accommodate their mobility and accessibility needs and to obtain information about what those needs are.</p> <p>We will use this information to inform the sourcing and conversion works required of the accommodation, in order to increase the number of units available that actually meet clients' needs and requirements. As above, we will ensure that organisations managing accommodation comply with their duty to make reasonable adjustments for Disabled people and those with mobility needs, in line with the Equality Act 2010 and the Public Sector Equality Duty. Disabled clients and clients with mobility needs will be prioritised for accessible accommodation units.</p>
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Women have historically made up a minority of the client group and may experience additional barriers to accessing services, particularly as the identification of potential pathway clients relies on visible rough sleeping or the willingness and ability to present in person to the Homeless Prevention Team.
Mitigations:	The sourcing and allocation of accommodation will consider the distinct needs of women, including safety and facilities. Barriers to accessibility for women specifically will also be considered and addressed on an ongoing basis. We're aware that mixed gender services can bring challenges for some women, particularly those who have experienced domestic and sexual violence and/or abuse. For this reason, we commission a pathway with accommodation for women only, staffed entirely by women, to ensure accessibility for women who cannot live in services with men, or who feel unsafe doing so.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	A lack of diversity in some localities may mean increased likelihood of discrimination, although data on access and outcomes do not suggest any disproportionate, negative impacts on LGBTQIA+ clients.
Mitigations:	We will ensure that all available accommodation options are considered, to ensure that placements are safe and represent the best fit for clients' needs. Resources and training are available to providers on meeting the specific support needs of LGBTQIA+ clients, and these can be updated regularly, to ensure they contain the most current information and recommendations of best practice.

Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The supported pathway accommodation services for specifically for single adults, not parents. Bristol City Council commissions separate supported accommodation services designed for parents and families. In cases where pregnant women require supported accommodation, care is always taken to ensure they are placed in alternative services, not in the pathways. As such, pregnant clients are not generally part of the cohort, except in cases where clients become pregnant while living in pathways accommodation, which is why there is limited data on pathway clients with this particular protected characteristic.
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g., asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Speakers of languages other than English	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	All supported accommodation pathway services operate in English, except in some cases where individual staff members are able to communicate with clients in other languages.
Mitigations:	Providers will be able to access external translation and interpreting services to ensure that support and related literature is accessible and meaningful for clients whose English is their second or additional language. Our expectation is that providers will use translation and interpreting services in all such cases, and this will be clearly communicated in the accommodation service specification, which will be devised later in the recommissioning process.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

There will be open access referral criteria for the accommodation which will ensure there is no unlawful discrimination for a protected group.

This proposal aims to secure continued provision of secure and supported accommodation to some of the most vulnerable citizens of Bristol. The security of this accommodation and the comprehensive support provided to each client will advance the equality of opportunity for occupants to engage with work, volunteering and training opportunities as well as integrating into local communities and developing skills to live independently.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

The possible lack of accessible accommodation for Disabled people, and the risk of clients being accommodated in areas which do not meet their cultural or other needs, can be mitigated by ensuring that allocations to accommodation placements are informed, as much as practically possible, by the unique needs and requirements of individual clients, to ensure clients are well matched.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Meaningful consultation with the services referring into and delivering this accommodation, as well as with clients themselves, has enabled us to fully understand the demographic and the range of needs of specific clients who are likely to be referred to this accommodation. This can be used to ensure that placements and referrals are carefully considered in accordance with clients' needs, particularly those with protected characteristics. Robust, ongoing data reporting processes will enable us to closely monitor that this accommodation is not directly or indirectly excluding certain protected groups.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

Improvement / action required	Responsible Officer	Timescale
Range of relevant monitoring mechanisms to be put in place	Paul Sylvester	Monitoring will be in place.
Seek specific demographic and equalities data for those who could be referred to this accommodation and pass this information to those who are sourcing the accommodation or planning any conversions of existing BCC property stock.	Paul Sylvester	Monitoring will be in place.

4.3 How will the impact of your proposal and actions be measured?

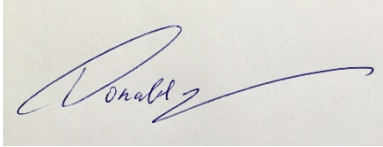
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

The services and organisations responsible for delivering this accommodation will be submitting regular reporting that will monitor who is accessing the service and their progress after placement. We will also regular run reports from the Housing Support Register that will be able to tell us the full demographics data of those being nominated for and accepting or declining the accommodation, and the outcomes for client groups with protected characteristics.

There will be robust contract management and review mechanisms in place throughout the delivery of the pathways contracts. This will include close monitoring of clients who are accessing the service, and prompt investigation and addressing of any issues and barriers preventing anyone from accessing the accommodation. There will be a named commissioning officer or commissioning manager who will ensure regular review meetings with all providers; these currently happen on a monthly basis. This person will be responsible for quality assurance of the contracts and obtaining direct service user engagement and feedback, as appropriate. This will also include feedback from people who have been nominated for and offered the accommodation, but who are unable or unwilling to proceed with the offer on the grounds the accommodation not meeting their needs, possibly due to equalities related risks or issues. They will also collect and interrogate regular service delivery reports, and raise any issues or anomalies promptly with the relevant service provider.

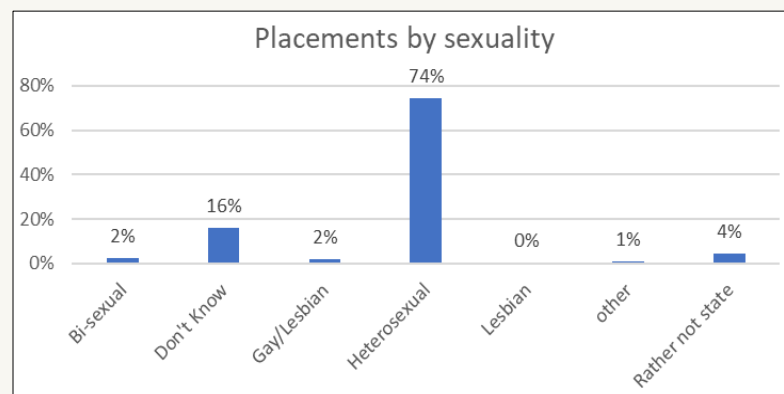
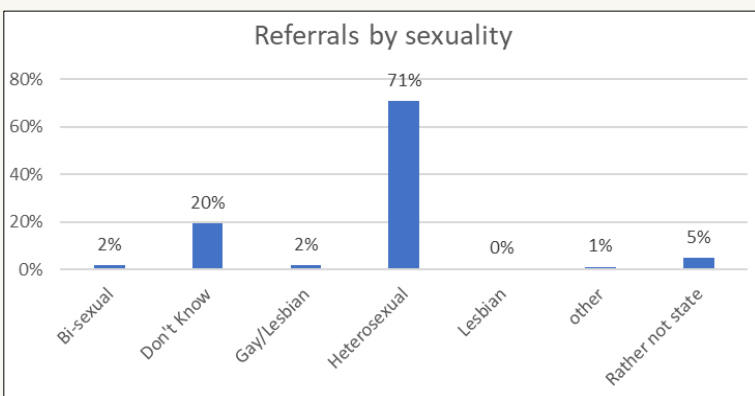
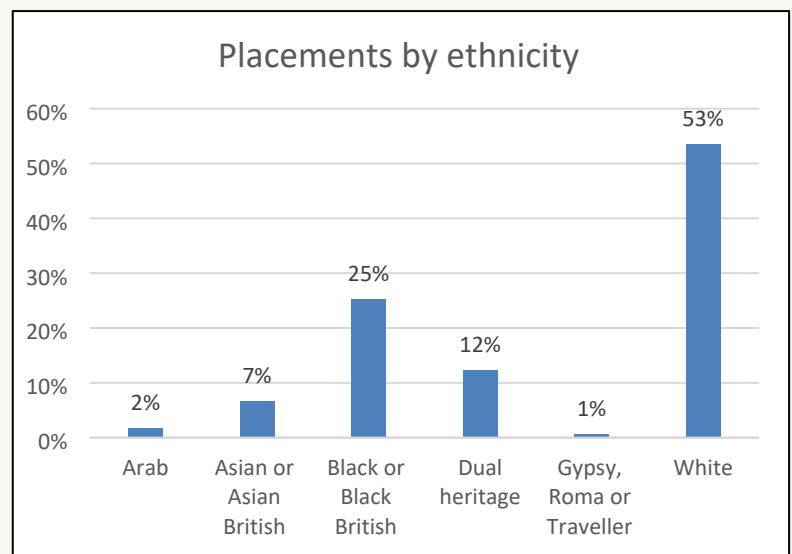
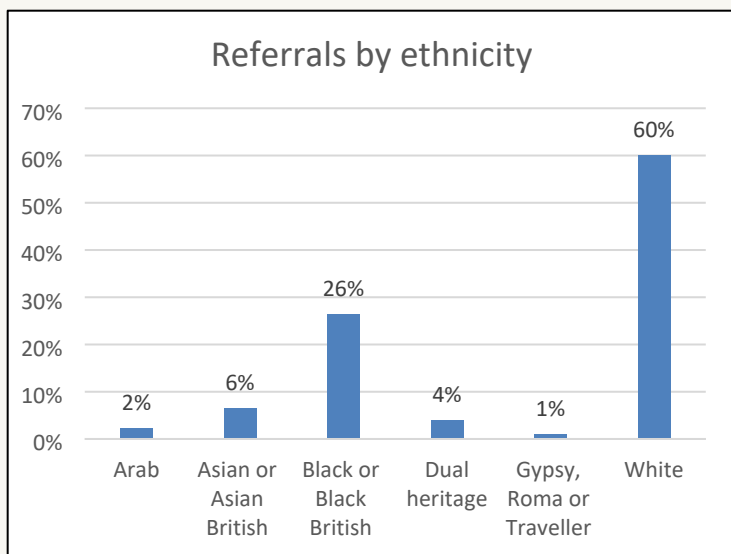
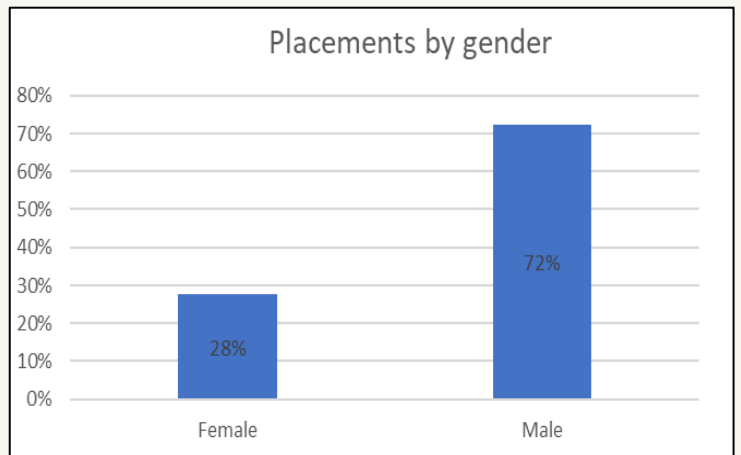
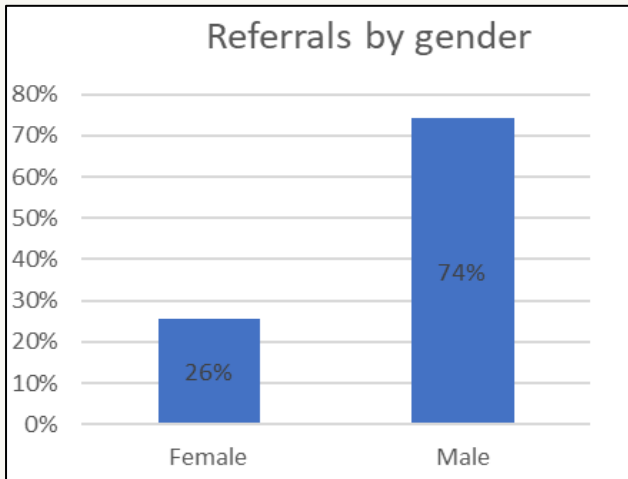
Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director².

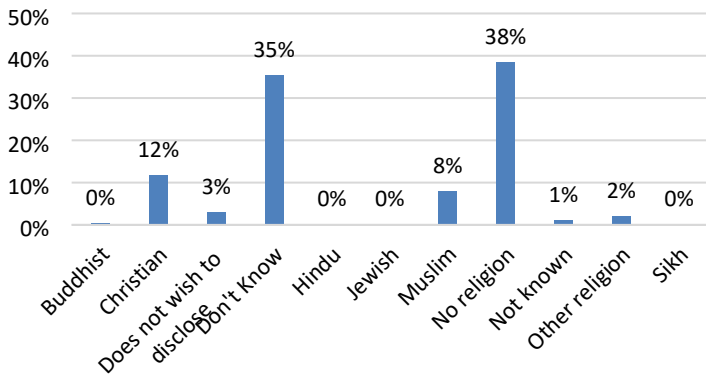
<p>Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i></p>	<p>Director Sign-Off: Donald Graham, Director Housing and Landlord Services</p> 
<p>Date: 8/1/2024</p>	<p>Date: 11/01/2024</p>

² Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

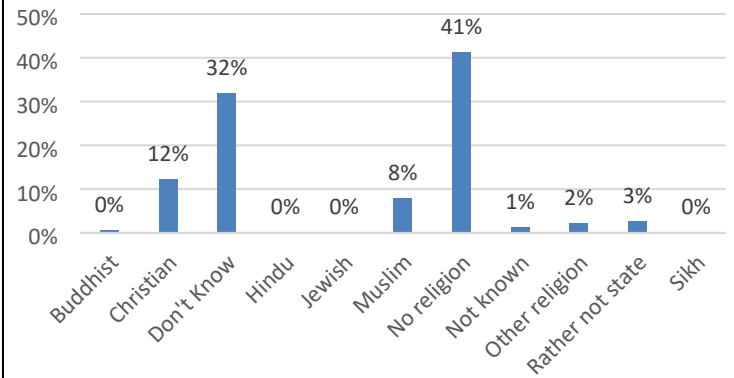
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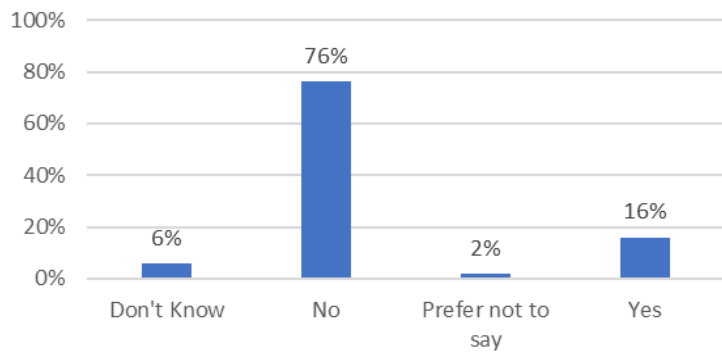
Referrals by religion/belief



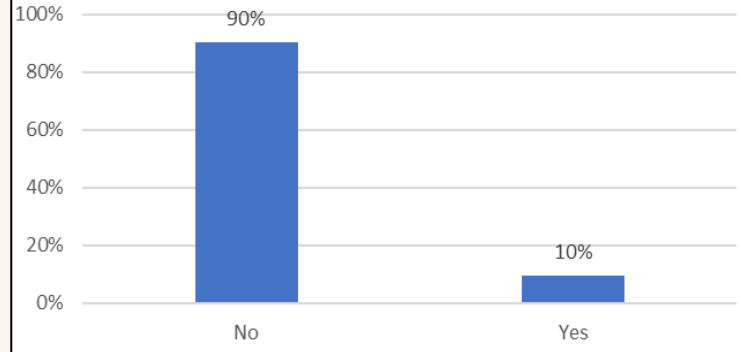
Placements by religion/belief



Referrals by disability

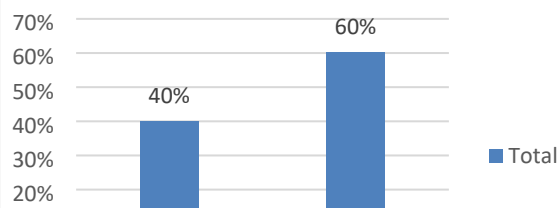


Placements by disability

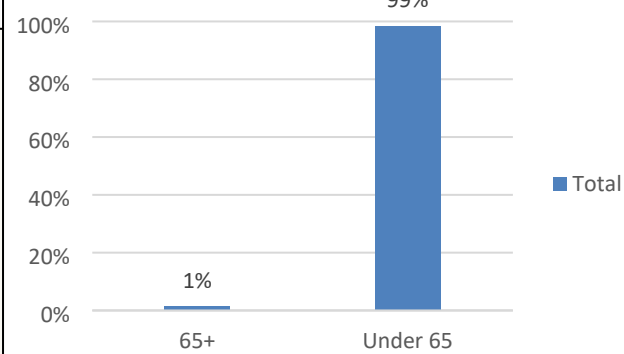


Outcomes data:

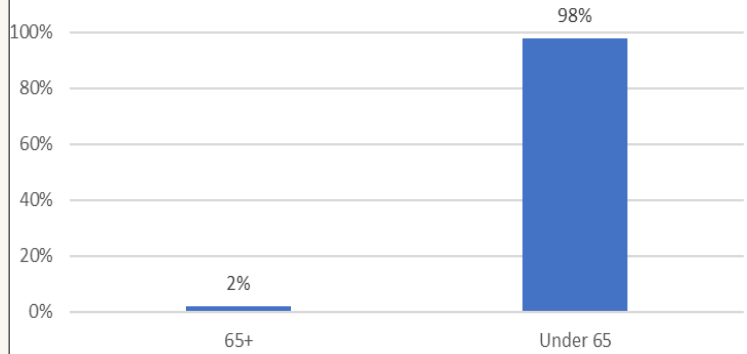
All departures

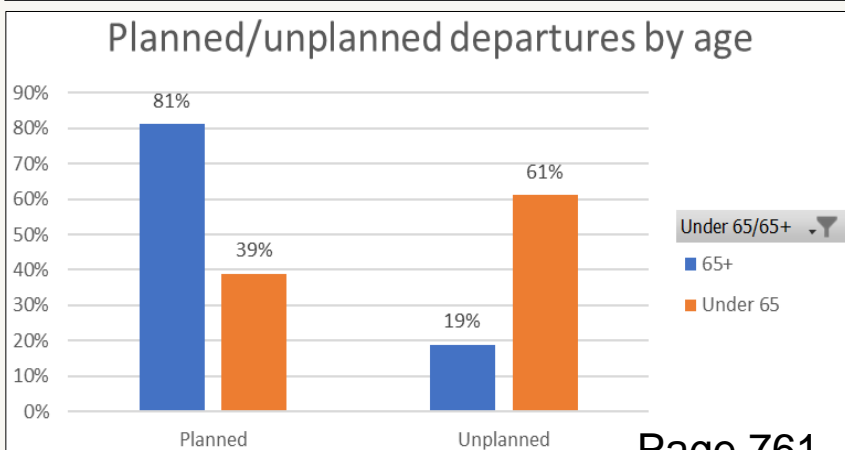
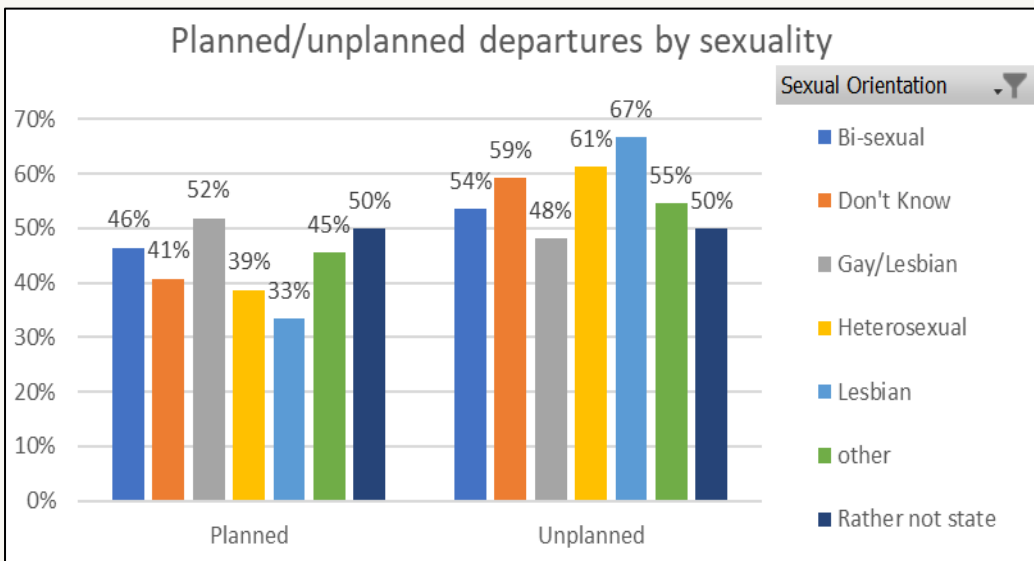
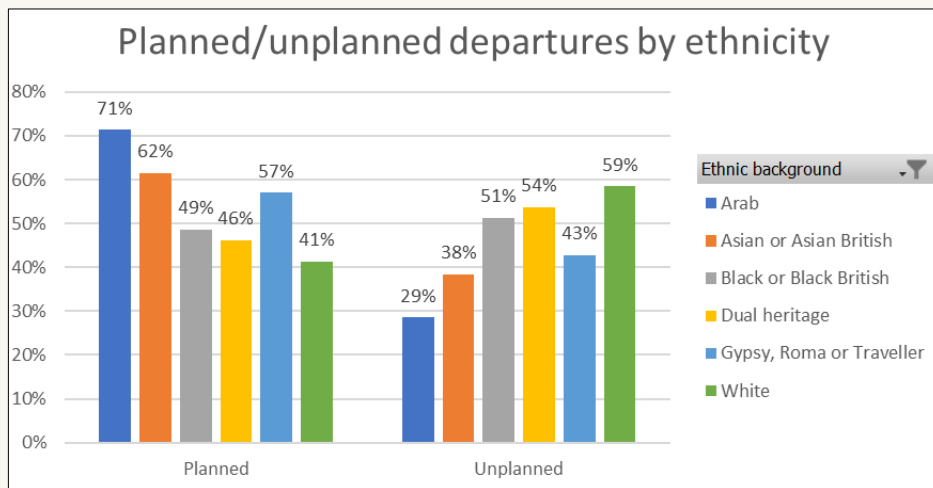
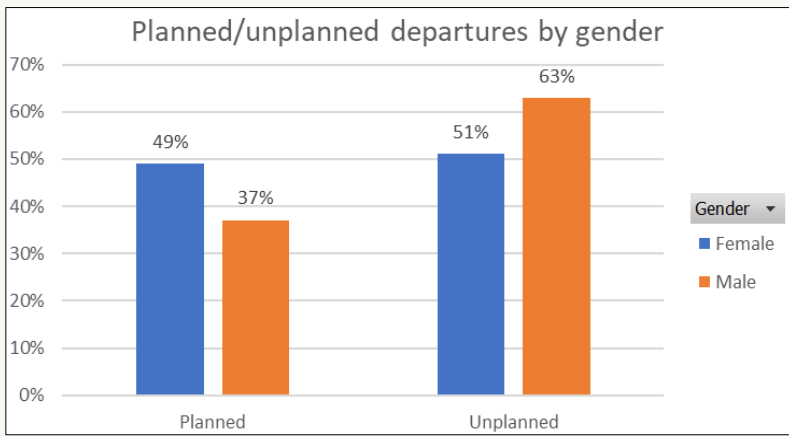


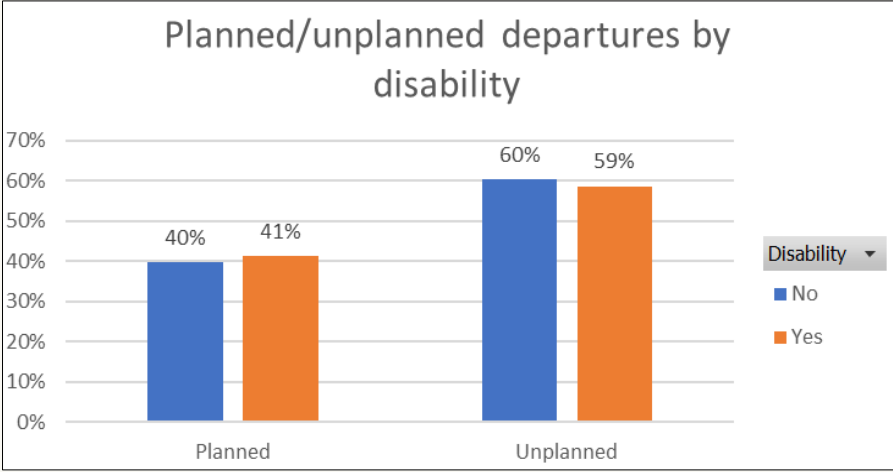
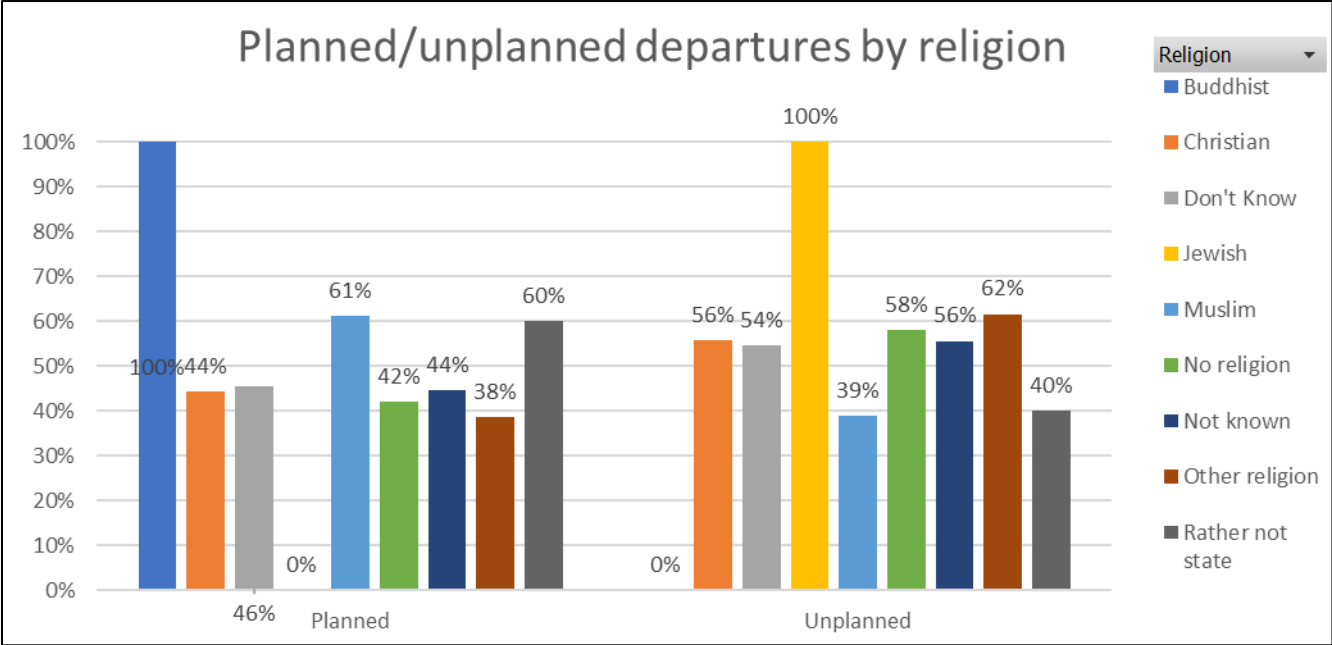
Referrals by age group



Placements by age group









Environmental Impact Assessment [version 1.0]

Proposal title: Recommissioning of supported accommodation pathways for adults		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service	<input type="checkbox"/> New	<input type="checkbox"/> Changing
<input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> Already exists / review	
Directorate: Growth and Regeneration	Lead Officer name: Paul Sylvester	
Service Area: Housing Options	Lead Officer role: Head of Housing Options	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

- For Cabinet to authorise the Executive Director Growth and Regeneration, in consultation with the Cabinet Member for Housing Delivery and Homelessness, to take all steps required to procure and award the contracts necessary for the implementation of the Homelessness Pathways Commissioning Plan for 3 years, with an option to extend for a further 2 years, in line with the procurement routes and maximum total budget envelope of £6,131,874 (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index) as outlined in the accompanying Cabinet report.
- For Cabinet to authorise the Executive Director Growth and Regeneration in consultation with the Cabinet Member for Housing Delivery and Homelessness to invoke any subsequent extensions or variations specifically defined in the contracts being awarded, up to the maximum budget envelope (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing Index) outlined in the accompanying Cabinet report.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
------------------------------	-----------------------------	--	-----------------

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
Housing and Landlord Services commission 725 units of low, medium and high support accommodation for single homeless adults aged 22+ (Pathways 1-3) along with a Resettlement service which provides short-term support to Pathways' clients who move on to independent accommodation. A further 140 units of Pathways accommodation are funded by Public Health specifically for people looking to address substance use support needs (Pathway 4).		
While the Council commissions these services, and is responsible for all aspects of performance and contract management during the contract period, the buildings themselves in which the services are delivered and client are accommodated are owned and maintained by a variety of external organisations, many of whom lease these properties to the commissioned support providers. As such, the Council has limited oversight and control over whether the services themselves are delivered in sustainable buildings with green energy sources.		
ENV1 Carbon neutral: Emissions of climate changing gases	Benefits	
BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city		

<p>in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>The pathways accommodation services will use heat, power, and water. However, their recommissioning is unlikely to cause an increase in the current energy consumption.</p> <p>Providing support to clients living in dispersed accommodation across the city requires staff to use various forms of transport including personal cars.</p>
	<p>Mitigating actions</p>	<p>BCC’s established contract management processes will encourage considered use of efficient utilities and buildings.</p> <p>Support workers will be encouraged to reduce the use of personal cars where possible and to seek transport options that are better for the environment such as buses, trains, lift sharing and bicycles.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Several of the supported accommodation pathways services have their own green spaces and garden areas, which clients often take responsibility for maintaining.</p>
	<p>Enhancing actions</p>	<p>The recommissioning of these services will help to ensure that these garden spaces are protected and continue to be used for this purpose. At the very least, this will contribute to maintaining current levels of biodiversity.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	The provision of waste and recycling services, and staff and clients' willingness to correctly recycle waste will potentially have an adverse effect.
	Mitigating actions	Accommodation and support providers will be encouraged to reduce waste and promote recycling among the client group.
Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		
<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	Clients who are rough sleeping in Bristol during periods of extreme heat or sub-zero temperatures are supported by the St Mungo's Outreach Service to temporarily access accommodation, to avoid adverse impacts on their health due to particularly challenging weather conditions, under the Severe Weather Emergency Protocol (SWEP). Some SWEP accommodation is located within the pathways services; in this way, the pathways contribute to reduced risk and increased safety for vulnerable rough sleepers during periods of extreme weather.
	Enhancing actions	Pathways services provide accommodation to rough sleepers during SWEP, protecting their health and wellbeing when temperatures are particularly high or low, and when sleeping outside would have an even more detrimental impact on people's health than normal.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Encouraging support workers to reduce travel by car between support sessions with clients where possible and alternatively use public transport, share lifts, or use bicycles.	Paul Sylvester	October 2024-October 2029 (plus any subsequent extension periods).
The contract management process will encourage the use of efficient utilities and buildings.	Paul Sylvester (This is actioned however by managers overseeing the conversion works or development of the relevant properties.)	October 2024-October 2029 (plus any subsequent extension periods).
Accommodation and support providers will be encouraged to reduce waste and promote recycling among the client group.	Paul Sylvester	October 2024-October 2029 (plus any subsequent extension periods).

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
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Summary of significant adverse impacts and how they can be mitigated:
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Environmental Performance Team Reviewer:	Submitting author:
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Daniel Shelton	Bethan Candlin
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Date:	Date:
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08.01.24	08.01.24
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¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Extension of We Can Make area of operation	
Ward(s)	Multiple wards in South Bristol: Bedminster; Filwood; Windmill Hill; Knowle; Brislington East; Stockwood; Hartcliffe & Withywood; Southville; Hengrove & Whitchurch Park; Bishopsworth; Brislington West	
Author: Louise Davidson	Job title: Head of Housing Delivery	
Cabinet lead: Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration	
Proposal origin: Councillor		
Decision maker: Cabinet Member Decision forum: Cabinet		
Purpose of Report: To seek approval: 1. To apply to the Secretary of State to request an extension of the area of operation of the We Can Make project to cover all wards in South Bristol.		
Evidence Base: 1. The We Can Make project is being pursued by a community land trust (We Can Make), a subsidiary of Knowle West Media Centre, and aims to develop additional affordable homes on back garden and other unused City Council land in the Knowle West area. The scheme works by identifying existing tenants of Council homes who have large gardens and wish to offer their garden as a development site for a new home to house a household in housing need. There is usually a connection between the household to benefit from the new home and the host household. The garden micro-site is transferred from Bristol City Council (BCC) ownership to We Can Make, at an undervalue (£1) on a long lease, before the new home is developed by We Can Make, using a panelised system with components produced locally in the We Can Make factory. The area of operation currently covers the Knowle West Regeneration Framework area as agreed by the Secretary of State and approved by Cabinet in December 2021. We Can Make have completed two homes using this model, housing two households, and have agreement from Cabinet to develop a further 14 units as a pilot project. 2. So far, We Can Make have progressed two further sites to planning application stage and are exploring the potential of several other micro-sites. A Decision Taking Framework agreed by Cabinet in Dec 21 sets out how the liaison between We Can Make, the Council and the host tenants takes place and the procedure for the land		

transfer. Officers have engaged with We Can Make to explore the suitability of 18 potential sites, but many have been deemed unsuitable, either due to the location/nature of the site or because the housing need proposed to be addressed by the arrangement is not high priority under the Council's allocation scheme. In light of this the Decision Taking Framework has been revised to include a stronger role for the Council in scrutinising the current use of the host home and the housing need of the potential We Can Make tenant. We Can Make have identified several potential sites with tenants who wish to engage with the project that are outside of the current area of operation.

3. We Can Make have requested that the Council should apply to Secretary of State under Section 32 of the Housing Act 1985 to extend the area of operation to encompass all the wards in South Bristol, providing a wider opportunity to identify suitable sites and households that may benefit from the scheme. This is being supported by the Cabinet Member for Housing Delivery and Homelessness. It is proposed that the We Can Make pilot project be reviewed at the end of the 2025-26 financial year, with a report being presented to the appropriate committee in March 2026 to consider whether BCC should continue to engage with and support the project.

Opportunities

4. The potential benefits of the proposed expansion of the project are that it increases opportunities to identify suitable micro-sites for development to address housing need locally, drawing on community links and support networks to provide sustainable tenancies and high-quality low carbon homes. We Can Make have proved that they can deliver the homes relatively quickly once the planning process and legal procedure for the transfer of the site are completed. We Can Make are seeking to become a Registered Provider, giving them the opportunity to apply for additional Homes England grant funding to support delivery.
5. The benefits of extending the scope of the We Can Make Micro-sites Project are to:
 - Accelerate the delivery of Community Led Housing (CLH) opportunities across Bristol;
 - Demonstrate the council's support for the CLH sector;
 - Maximise the development of new homes on Council land;
 - Address pockets of housing need in a very local context, keeping families close to support networks and their local community;
 - Deliver high levels of social value through opportunities for skills development and training, local employment, and environmental sustainability.

Risks

6. There are potential risks to extending the scheme. A significant consideration is the officer time and cost that is required to engage with the project, assess the suitability of sites and the housing need of the potential tenants, and carry through the transactions to transfer the land to We Can Make. Whilst this was implicit in the Council's

support for the further 14 units, experience has shown that staff engagement is both crucial and can be extensive. Thus far BCC has engaged with We Can Make to assess a significant number of possible sites, but only two homes have been delivered, against the ambition of the pilot for 16 completed units. Whilst the extension of the area of operation has potential to bring forward more possible sites and make the staff input more productive, it may significantly increase the officer engagement and revenue cost to the Council. This could be mitigated by:

- Ensuring that the review of the scheme, includes cost benefit analysis from both a We Can Make and Council perspective.
- Clear planning guidance and parameters for appropriate micro-sites agreed with BCC planners, to be applied when assessing feasibility of a potential micro-site.

7. A further consideration is that the new We Can Make home is in different ownership and management to the existing host home, which remains in the Council's Housing Revenue Account (HRA). This may have potential to create housing management and maintenance issues in the future. From a planning perspective the new homes will have to conform to acceptable standards regarding overlooking, overbearing and privacy in relation to neighbouring homes and the host home. Mitigation will include adopting clear planning guidance for the garden schemes - building on the Design Guide that has already been compiled through collaboration with the City Design team.

**Cabinet Member Recommendations:
That Cabinet:**

1. Notes the achievements of the We Can Make project to date and the innovative approach to addressing local housing need.
2. Approves the geographical extension of the area of operation of the We Can Make project to the wards in South Bristol.
3. Authorises the Executive Director Growth and Regeneration in consultation with the Cabinet Member for Housing Delivery and Homelessness to make a new application to the Secretary of State for consent to the extension, which will be completed by the end of March 2024.
3. Authorises the Executive Director Growth and Regeneration, in consultation with the S151 Officer and Cabinet Member for Housing Delivery and Homelessness, to approve the disposal of selected HRA micro sites to We Can Make, in the area of operation covered by the Secretary of State consent, for the development of affordable housing (as defined by the NPPF and in accordance with Council affordable housing policies) to address local housing needs.
4. Notes a review regarding the future of BCC support for and engagement with the We Can Make pilot project will take place in March 2026 and recommendations will be made in accordance with the decision pathway.

Corporate Strategy alignment:

1. Supports delivery of the Fair & Inclusive Key Commitment: ensuring that affordable new homes are delivered in Bristol.
2. Takes an 'asset-based community development' approach by working with communities and partners to transfer assets and power to local people so they have more involvement.

3. Supports the delivery of the Empowering and Caring Key Commitments: Prioritises community development and enables people to support their community.
4. Supports delivery of the Fair and Inclusive Key Commitment: Helps develop balanced communities which are inclusive and avoid negative impacts from gentrification.
5. Supports delivery of the Well Connected Key Commitment: Reduces social and economic isolation and helps connect people to people, people to jobs and people to opportunity.

City Benefits: The project provides a method for increasing supply of land for development of affordable housing and provides a model of housing development that has potential to be of benefit to the whole city. It provides local employment /training opportunities in manufacture of MMC units and the method of construction has benefits for tackling the climate emergency.

Consultation Details: Knowle West Media Centre has undertaken a range of consultation events with local residents, community groups, stakeholders and members to ensure their project delivers homes that meet local need. They have engaged individually with Council tenants who are keen to be involved with the project in areas beyond the current area of operation. The roll out to areas in South Bristol will involve further community consultation through engagement with Council housing officers and tenant engagement officers and with local communities.

Background Documents: Cabinet Decision - [ModernGov - bristol.gov.uk](https://moderngov.bristol.gov.uk)
Report [We Can Make Report to Cabinet 14 Dec 2021 Final post Review 301121 .pdf \(bristol.gov.uk\)](#)

Estimated Revenue Cost assuming We Can Make progress	<u>Ongoing assuming 4 sites per annum</u>	Source of Revenue Funding	Housing Delivery
	S&E staff time £5,713 2 staff one day per month (BG 12/BG 15) Property staff time £ 407 H&LS tenancy audits £ 141 property checks £ 113 mtgs/case work £ 113 Legal title enquiries & clearance reports £1,242 Total p.a. ongoing £7,729 Legal lease negotiation & drafting for disposals £6k estimated per site £24,000 Total p.a.: £31,729 (Assuming 4 disposals p a) <u>One off</u> Legal support for SoS consent estimated £ 5,000		
Capital Cost	£240,000	Source of Capital Funding	BCC Affordable Housing Funding Programme grant (4 sites already committed)
One off cost <input checked="" type="checkbox"/>	Ongoing cost <input checked="" type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: The report seeks approval to expand the geographical area currently allocated for We Can Make to provide new homes within the existing garden boundaries of HRA owned assets to cover all wards in South Bristol, which it is anticipated will assist with the delivery of the total 16 units ambition of this pilot project (to date two have been delivered).

Revenue costs of circa £37k p.a. have been identified, however these will be met through existing resource, both budgetary and staffing. The capital cost to the Council is £240k. This cost has been committed by the council for a number of years and therefore does not represent any additional spend requirement.

The issue of splitting of title deeds in respect of the gardens needs careful consideration as each unit is considered, as this could impact on the valuation of the property, which in turn could affect both the rental income stream of each unit, and potentially also impact on any future Right to Buy receipts. Any such impact would need to be considered alongside the social value provided in order that the position is fully understood.

Finance Business Partner: Martin Johnson – Interim Finance Manager Housing and Landlord Services – 4 January 2024

2. Legal Advice: Secretary of State consent will be required for extension of this project beyond the Knowle West boundary on the basis that any disposal of Housing Revenue Account land at an undervalue is outside the scope of the General Disposal Consents contained in the Housing Act 1985

Legal Team Leader: Andrew Jones – Property Planning and Transport Team, Legal Services 17 January 2024

3. Implications on IT: I can see no implications on IT in regard to this activity.

IT Team Leader: Alex Simpson – Lead Enterprise Architect 28 November 2023

4. HR Advice: I can confirm that no HR implications are presented in these proposals.

HR Partner: Chris Hather Consultancy Lead HR and Work Force, 13 January 2024

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	29 November 2023
Cabinet Member sign-off	Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	4 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal We Can Make Decision Taking Framework revised Sep 2023	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO

Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Appendix A

We Can make Decision Taking Framework Revised Sept 2023

We Can Make: micro-site process. Key stages and decision points (green), completion (red).

	Step	Requirements	Key documents	Lead	Decision takers	Notes/reflections/changes needed
1	Suitable household (including new tenant) and eligible* potential micro-site identified through We Can Make community engagement. *within SoS approved area	Confirmation that eligibility criteria as set out in Local Lettings Policy can be satisfied: <ul style="list-style-type: none"> - One of recognised housing needs; - Registered on Home Choice Eligible for Home Choice - Local Connection - Member of WCM - Consent for info exchange with BCC 	Local Lettings Policy WMC list of potential sites and families. WCM Equalities Policy and Action Plan.	WCM	WCM	Informal List registering interest in participating in the project, with initial eligibility criteria met. WCM will check host household and future WCM tenant circumstances but Home Choice application and Tenancy Audit by BCC to confirm
2	1 st Outline site viability assessment	Desk-top survey and site visit. Production of outline site sketch with WCM home.	Outline viability assessment and site proposal.	WCM	WCM	Confirms a WCM is viable in terms of site space and access. Note this is outline feasibility only.

Appendix A

We Can make Decision Taking Framework Revised Sept 2023

3	<p>Eligibility Check Stage 1 & Participation Agreement.</p>	<p>Participation Agreement of host home and proposed tenant of WCM home; includes agreement to share data with BCC; roles and responsibilities; understanding of the WCM process including land transfer process and how the allocations process works.</p>	<p>WCM Eligibility Stage 1 Form Participation Agreement</p>	WCM	Host household/Applicant and WCM	<p>Once both site and family eligibility have been checked by WCM, the proposed site and family are referred to BCC for assessment – simultaneously by Housing Services and Property. WCM to send copy of agreement to BCC</p>
4	<p>BCC verify Home Choice application and that other housing options for potential WCM tenant have been considered through Home Choice application</p>		<p>Home Choice application and BCC allocations policy</p>	BCC (Strategy and Enabling can access Home Choice)	BCC	<p>Band Four eligible for allocation, so long as certain conditions are met, including appropriate balance of needs provided across the pilot</p>
5	<p>BCC tenancy audit</p>	<p>H&LS consider risk factors for host household and applicant</p>	<p>Consider ASB, rent arrears, housing need,</p>	BCC H&LS	BCC	<p>Target time 4 weeks</p>

Appendix A

We Can make Decision Taking Framework Revised Sept 2023

		and suitability of BCC property for garden development	size of existing home etc	Named Point of BCC Contact: Estates Team Leader		
6	BCC Property team consider site suitability	BCC Property team request clearance reports.	To include: report on title, services, easements or other constraints	BCC Property Team Named Point of BCC Contact Property Development Manager	BCC	Target time 6 weeks
7	Site and eligibility of applicant tenant and host households approved as suitable by BCC	BCC concludes assessment of suitability of site from Property and H&LS perspective		WCM/BCC	BCC and WCM	Target time – 2 weeks for final sign-off following completion of BCC applicant and site assessments
8	In principle MOU Agreement to proceed	Both parties sign MOU agreement with agreed target timescales		BCC	BCC and WCM	
9	2nd level viability checks on site –	Requires site access, site surveys, topographical surveys/inspections/trial digs	Site Survey report.	WCM	WCM	Host tenant and BCC to give permission for works
10	Co-Design process to develop outline proposal for site	Engagement with host family and prospective tenant(s); neighbours	Co-Design report which provides detailed brief	WCM team, BCC Strategy and Enabling and Planning teams	WCM/BCC	Community consultation and response to neighbour concerns/input should be

Appendix A

We Can make Decision Taking Framework Revised Sept 2023

		and BCC planning officers Outline building footprint and massing, and access produced for site (both final build and construction period). Confirmation that host household/applicant and BCC officers happy with proposed outline design. Confirm boundaries of host home and WCM home	for design team.			recorded by WCM and evidenced to BCC. Confirming boundaries between host home and WCM home important to establish so that legal process to prep land transfer agreement can be instructed to begin
11	BCC Valuation of site to be transferred to WCM and approval in principle for disposal	BCC Property services to carry out valuation. Agreement to dispose to be signed off by relevant Officer.	Valuation, Executive Officer Decision (EOD) Report	BCC Named Point of BCC Contact Enabling Manager	BCC	EOD in accordance with overarching Cabinet approval for the roll out of further 14 units.
12	Draft and agree HOTs for documents for disposal and Agreement for Lease	HOTS To include: Agreement for termination of host home tenancy, new host home tenancy,	Statement of HOT Agreement for Lease	BCC Property, H&LS,	BCC Property, H&LS, WCM	Written agreement of HOT will state that WCM must notify and seek approval from BCC as landowner prior to WCM submitting planning application

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		<p>Agreement for WCM to Lease site from BCC</p> <p>Conditional Agreement for lease to be entered into between BCC and WCM CIC (to append agreed form of lease), to be conditional on (i) completion of the termination of the existing tenancy by the host tenant (ii) planning permission for the development being granted and (iii) WCM CIC obtaining funding for the development.</p>				
13	Full proposal developed for submission to planning	Meets Community Design Code; planning policy.	Planning submission.	WCM Team	BCC Planning Authority	Strategy and Enabling to facilitate engagement with planning as needed. BCC S&E and Property to agree to planning application submission.
14	Preparation of the set of documents/	a. Proposed Tenant agreement , to be entered into between	Proposed Tenant Agreement.	BCC Property instruct legal when/if it is clear	WCM, host tenant/s BCC Legal/Property/H&LS	These documents need to be prepared prior to

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	<p>agreements to enable transfer of land.</p>	<p>WCM CIC and the host tenant, to provide the host tenant with the opportunity to propose the first occupier for the new property once it has been constructed conditional on BCC assessment and BCC nomination of proposed WCM tenant;</p> <p>b. Conditional Agreement for termination of the host tenant’s existing tenancy and the grant of a new tenancy to the host tenant, to be entered into between WCM CIC, host tenant and BCC (to append agreed form of notice to quit and the new form of tenancy, which will exclude the land which is to be developed.</p>	<p>New tenancy agreement (BCC standard template with appendix of additional conditions covering access, front garden)</p> <p>Plan of site including ownership on land between host home and WCM home; shared access areas.</p> <p>Agreement for lease.</p>	<p>that planning approval will be granted. Named Point of BCC Contact Enabling Manager</p>		<p>tenant receiving independent legal advice.</p> <p>Note- the site plan may be subject to change following detailed planning. To take account of this changes appended to independent legal advice.</p> <p>Property to instruct Legal</p>
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		Host tenant cannot sign new tenancy if rent arrears.		WCM to check with tenant	BCC confirm	
15	Formal independent legal advice for WCM host tenant	Host tenant receives independent legal advice on how the We Can Make model works, including forecast rent level, proposed tenancy rights rights, access requirements and the legal agreements, prior to signing.	Confirm to BCC this has been issued	WCM	WCM and independent lawyer	
16	Entry into Agreements to enable land transfer once conditions are met.	Signing of the following documents: a. Proposed tenancy b. Conditional Agreement for	Proposed Tenancy Agreement and BCC	BCC legal/WCM Named Point of BCC Contact Enabling Manager	WCM/BCC/Host Tenant	to allow WCM CIC to carry out further design work with assurance the project will proceed once planning and other conditions are met.

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		<p>termination of the existing tenancy and the grant of a new tenancy to the host tenant.</p> <p>c. Conditional agreement for lease to be entered into between BCC and WCM CIC.</p>	<p>Nomination agreement</p> <p>Conditional Agreement for termination of the existing tenancy and the grant of a new tenancy</p> <p>Conditional agreement for lease</p>			
17	<p>Planning consent achieved and construction funding in place.</p> <p>NTQ check</p>		<p>WCM evidence conditions met – eg planning decision, letter from funders, letter from solicitor</p> <p>Check host tenant still meets</p>	WCM	<p>BCC</p> <p>BCC</p>	<p>Consider alternative tenants if change of</p>

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			conditions-eg no rent arrears. Check potential tenant Home Choice position			situation with first potential tenant.
18	NTQ and Exchange of contracts	<ol style="list-style-type: none"> 1. NTQ by host tenant. 2. Exchange lease agreement between BCC and WCM CIC with exact layout/ownership plan 3. New tenancy for host home prepared & signed 	Notice to Quit - 4 weeks, possibly less if agreed	BCC/WCM/host tenants	BCC Legal/H&LS/Property & Host tenant	<p>New tenancy cannot start until expiry of NTQ. Lease agreement cannot complete until new tenancy starts.</p> <p>Start date to be four weeks from NTQ unless agreed shorter NTQ period.</p>
19	Completion of land transfer	<p>New tenancy commences</p> <p>Lease agreement signed and sealed</p>	New tenancy, Lease agreement, completion statement	BCC Legal/H&LS/WCM	BCC Legal/H&LS/WCM	
20	We Can Make take possession					Process/timeframe for ongoing

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	of the micro-site and commence pre-construction works and build.					communication/progress reporting to BCC to be agreed
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Draft Revised Decision FW 28/09/23

APPENDIX D

We Can Make Risk Register

Negative Risks that offer a threat to We Can Make and its Aims (Aim - Reduce Level of Risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Direction of travel	Current Risk Level			Monetary Impact of Risk £k	Risk Tolerance			
										Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	Date
R001	Micro sites don't become available	Host tenants won't or can't participate	Extension of scheme does not deliver additional affordable homes d. Impact on WCM factory production/jobs	open	Fair & Inclusive, Empowering and Caring	Barriers to delivery	WCM/BCC	Agreed process for BCC check and approval of hosts homes early on. Agreed publicity strategy by WCM	improved	4	5	20	0	2	3	6	Nov-23
R002	Planning permission not achieved on future micro sites	Design not acceptable, lack of pre-app engagement with planning	Extension of scheme does not deliver additional affordable homes d. Impact on WCM factory production/jobs	open	Fair & Inclusive, Empowering and Caring	Barriers to delivery	WCM/BCC	Design code developed with BCC Urban Design input. Early preapp with BCC DM team. Agree desing parameters with DM officers.	improved	4	4	16	(design & feasibility costs for WCM)	2	3	6	Nov-23
R003	Funding not secured by WCM	BCC AHFP not available, not eligible for Homes England funding	Extension of scheme does not deliver additional affordable homes d. Impact on WCM factory production/jobs	open	Fair & Inclusive, Empowering and Caring	Barriers to delivery	WCM/BCC	WECM have secured AHFP grant for 4 units. WCM seeking RP status and ability to bid to HE.	improved	2	5	10	BCC + £1,330,000 grant not paid	2	5	10	Nov-23
R004	Issues arise between host tenant and WCM tenant resulting in housing management intervention from BCC	Lack of compatibility or change of circumstances of host and/or WCM tenant leading to management issues	BCC reputational risk and demands on BCC housing management staff	open	Fair & Inclusive, Empowering and Caring	Reputational / management risks post delivery	WCM/BCC	WCM sign up to BCC Governance/Finance and Management Standards for CLH. Lease includes BCC step in rights in last resort. WCM ensure tenants and host compatible/well informed at outset.	improved	3	3	9	BCC staff time	1	3	3	Nov-23
R005	WCM ownership of units/sites impedes redevelopment or disposal of BCC HRA assets	Incidental nature of WCM land holdings, lack of strategic approach to diposals	BCC reputational and financial risk and impediment to HRA estate renewal	open	Fair & Inclusive, Empowering and Caring	Reputational / management risks post delivery	BCC	BCC ensure a strategic overview of WCM micro sites placement, in line with HRA Business Plan. Risk is increased by geographical extension of the scheme	improved	3	4	12	BCC Estates renewal more costly, diposal to developm ent partner prevented	2	4	8	Nov-23



Equality Impact Assessment [version 2.9]

Title: We Can Make extension of area of operation	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other <i>[please state] Housing scheme/lettings policy</i>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Louise Davidson
Service Area: Housing Delivery	Lead Officer role: Enabling Manager

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

We Can Make (WCM) is a community-led housing initiative that aims to deliver new affordable homes at point of need on underused Council-owned land, including the rear gardens of existing Council properties. It has been developed by the Knowle West Media Centre (KWMC) community organisation and has been focused on the Knowle West area.

We Can Make (WCM) is a Community Interest Company (CIC) set up by KWMC to develop and manage the new affordable homes on these sites. The plots are created by Council tenants voluntarily giving up part of their back garden. The existing tenant has input to the nomination of the first tenant for the new home and the existing tenant benefits from improvements to their external space/garden. There will also be opportunities to create micro plots in suitable back gardens of void properties prior to reletting. The Council will dispose of the micro plots to WCM at a peppercorn i.e. at an under valuation, on long-term leases. The Council sought approval from the Secretary of State for the principle of disposing of garden sites in this way in the Knowle West Regeneration Framework area.

The cabinet paper seeks to gain approval for the extension of the area of operation for We Can Make beyond the area of Knowle West to include the whole of South Bristol. This will require a further application to the Secretary of State.

The project will continue to be focussed on areas where there are older family-size Council houses with generous garden plots. In such areas there is often a lack of smaller affordable homes and the project has identified that there are unmet housing needs that can be met locally through development of underused land. The scheme aims to facilitate opportunities for community support between households and is developed with considerable engagement from the local community.

The value of the We Can Make approach to diversifying and increasing the supply of affordable homes lies in the fact that it creates an additional supply of land and homes that would not be possible other than through a localised community-led approach. However, it requires a high level of trust, local knowledge and engagement with the Council to ensure that it operates within relevant policy frameworks for assessment of housing need and allocations. The proposed homes are subject to the usual Council development management policies through the formal planning application process.

For the report to Cabinet that sought approval to roll out the We Can Make pilot to a further 14 units the EQIA

focused on the Local Lettings Policy.

This EQIA will consider the impacts of rolling out the scheme beyond Knowle West.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	

Additional comments: The Local Lettings Plan that governs allocations to the properties created by We Can Make has potential to affect quality of life/standard of living as it relates to access to housing. This was subject to EQIA previously to ensure that the Local Lettings Policy does not discriminate on basis of protected characteristics and is transparent in how homes are allocated.

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes No [please select]

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
<i>Deprivation in Bristol 2019</i> file (bristol.gov.uk)	Poverty and disadvantage The 10 most deprived neighbourhoods in Bristol are all in the South Bristol areas of Hartcliffe, Whitchurch Park and Knowle West. At ward level, the greatest levels of deprivation in Bristol are in the wards of Hartcliffe & Withywood, Lawrence Hill and Filwood,
<i>Census 2021 Population Profile Ethnic Group December 2021</i>	Ethnicity and diversity

[Census 2021 Population Profile - Ethnic group \(bristol.gov.uk\)](http://bristol.gov.uk)

The population of Bristol is increasingly diverse. In 1991 the 'Black, Asian and Minority Ethnic' population accounted for 5.1% of the total population, in 2021 this increased to 18.9%. In Bristol the largest minority ethnic groups in 2021 were Somali 9,167 (1.9%), Pakistani 9,103 (1.9%) and Indian 8,371 (1.8%). However the South Bristol wards are much less diverse than some central, northern and eastern wards see Ethnic Group atlas [Census 2021 Population Profile - Ethnic group \(bristol.gov.uk\)](http://bristol.gov.uk)

Housing opportunities and tenure differ by ethnicity. People from ethnic minority groups are more likely to experience homelessness and overcrowding and people from Black African and Caribbean backgrounds are more likely to live in social housing than people from other ethnic backgrounds. By targeting South Bristol the We Can Make project may have less impact on improving the housing outcomes for ethnic minority people in the city. However, it will target areas where there are high levels of deprivation.

Research undertaken by KWMC in partnership with UWE School of Architecture, 2017

Research focused on Knowle West included 200 doorstep interviews on sample streets in, during Feb-April 2017. Respondents were asked about their support for and views on the We Can Make initiative. Key findings were:

- 90%: agreed development of micro-sites were a good idea for Knowle West
- 73% agreed it was a good idea for their street
- 36% would be interested in using some of their own land

This level of engagement has not taken place in other areas of South Bristol but there are ad hoc instances where households from other parts of South Bristol have expressed interest in participating in the We Can Make scheme. This includes people with children and older people.

Additional comments:

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Diversity monitoring is required as part of the HomeChoice Bristol Housing Allocation Scheme. However, there are gaps in our citywide equality data for some characteristics e.g. sexual orientation, especially where this has not historically been required in statutory reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We Can Make has undertaken extensive consultation with tenants and the wider community in Knowle West and some engagement with local residents in other parts of South Bristol. This has included:

- A series of co-design workshops with tenants and community representatives to identify ways tenants could better meet their own housing needs, and to develop the overall community-led approach to unlocking micro-sites.
- A series of co-design workshops and public exhibition made with tenants and community representatives to develop a Community Design Code for Micro-Sites.
- Existing BCC tenants who volunteer to give up a part of their garden for a micro site have been fully consulted and provided with independent legal advice.
- New tenants who move in to a property where a micro site has been created from the garden will have the scheme and the new development fully explained and given the choice whether to take up a tenancy in that property without any penalty as to further offers of housing through BCC.
- Engagement with local residents in vicinity of sites in Rodfords Mead, Hengrove, Queens Road, Withywood and Pensford Court, Stockwood regarding community-led housing. The consultation for each of the small sites (Rodford Meads, Pensford Court, Queens Road) was designed to be accessible in the following ways:
- Undertaking consultation through extensive door-knocking for homes and businesses in the vicinity of each sites, thereby ensuring that the consultation team went to people rather than on relying on people coming to events.
- Using a disabled accessible community venue for a pop-up consultation event to engage a wide range of community groups and residents in the area. This included elders, people with learning and physical disabilities and young people with additional needs.
- Designing and hosting an on-site daylong pop-up workshop that used creative play and engagement tools to support people of all ages to explore ideas, hopes, and concerns about the possible development. This designed to be as accessible as possible - and again going to where people are in the everyday life of the neighbourhood.
- This community engagement supported the land disposal process. WeCanMake is now undertaking community mapping research and designing a full programme of community co-design for the three sites, which will begin in early Spring 2024.

The roll out to areas in South Bristol will involve further community consultation through engagement with Council housing officers and tenant engagement officers and with local communities.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

WCM provide bespoke consultation with the tenants who opt-in to the scheme. This consultation package includes:

- A viability assessment to check that the We Can Make approach is a suitable way of meeting their housing needs and that they are eligible;
- A participation agreement, which the tenants sign, that sets out how the project will work; their role in it;
- Independent legal advice which sets out target rent levels, the legal process; their rights; and the land assembly process; their involvement and rights in nomination process for any future lets.
- Co-design workshops to develop the specific design of their micro-site home.

BCC will be reviewing the pilot developments to assess how it has worked in practice and highlight any issues to be resolved for further roll out.

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Whilst we have not identified any significant negative impacts from the proposal at this stage, we are aware of the following issues for people on the basis of their characteristics which we will seek to mitigate / address:

- the focus on housing local people, the emphasis on community support and the local connection criteria in the Local Lettings Plan has potential to exclude people from diverse communities and backgrounds, given the relatively less diverse nature of the community in South Bristol.
- host tenants may be hostile or discriminatory towards some groups of people based on their protected characteristics
- new properties may not be suitable or fully meet the needs of potential tenants in terms of accessibility or adaptability

These issues can be mitigated / will be addressed because:

- the Local Lettings Policy will operate within the parameters of the [HomeChoice Bristol Housing Allocation Scheme](#) which has clear eligibility and prioritisation criteria, and has been subject to a separate equality impact assessment process
- the WCM Equality and Diversity Policy sets out the organisations' framework for challenging discrimination, including for housing nominations and allocations, management of tenancies, meeting funders' needs and project delivery, dealing with volunteers, suppliers, supporters and other associated third parties.
- we have recommended that WCM develop an equality action plan to address any emerging issues or under-representation, and include bias awareness training as part of roll-out of the scheme for staff, volunteers and host tenants

- there is an established diversity monitoring system in place for the allocation scheme
- the overall scheme is subject to the Community Led Housing Land Disposal Policy & Self-Build Housing Land Disposal Policy, which underwent a separate equality impact assessment process to ensure there is a fair and transparent process for disposal of land, and that future site development meets the needs of Bristol's diverse population
- the scheme is a pilot and learning (including in relation to equality and inclusion) will inform future / more large-scale projects

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenants may be hostile or discriminatory towards young people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The scheme may not meet the needs older people in terms of accessibility or future adaptability but may offer opportunities to downsize and still have family support.
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM seek to ensure that older people have access to the scheme in the way they promote it locally.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The scheme may not meet the needs disabled people in terms of accessibility or future adaptability. Host tenants may be hostile or discriminatory to Disabled people – particularly if they have hidden impairments or mental health problems
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP. WCM seek to ensure that Disabled people have access to the scheme in the way they promote it locally.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile, homophobic or discriminatory towards people because of their sexual orientation.
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and take up of the scheme.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile or discriminatory towards trans people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and take up of the scheme.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria and emphasis on community links may exclude people from minority ethnic backgrounds, and host tenants may be hostile or discriminatory toward people from different ethnic backgrounds
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and promote the scheme to people from all ethnic groups.

Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria and emphasis on community links may exclude people from diverse religions, and host tenants may be hostile or discriminatory toward people from different religious backgrounds
Mitigations:	See above. WCM adhere to their Equality and Diversity policy for lettings. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and promote the scheme to all faith communities.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The 10 most deprived neighbourhoods in Bristol are all in the South Bristol areas of Hartcliffe, Whitchurch Park and Knowle West. At ward level, the greatest levels of deprivation in Bristol are in the wards of Hartcliffe & Withywood, Lawrence Hill and Filwood, The roll out of the We Can Make project to the whole of South Bristol has potential to empower some households in these areas to improve their housing situation.
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The scheme has potential to assist in keeping carers and those they care for living in close proximity but with adequate privacy and individual space.
Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Has potential to assist these groups in facilitating new housing with links to existing support networks.
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ *Eliminate unlawful discrimination for a protected group*
- ✓ *Advance equality of opportunity between people who share a protected characteristic and those who don't*
- ✓ *Foster good relations between people who share a protected characteristic and those who don't*

The scheme aims to provide additional low-cost housing for people in housing need and has potential to benefit people with characteristics who are more likely to face housing issues and homelessness.

It has potential to enhance equality of opportunity by providing training to tenants with regard to neighbourliness and equalities and to provide opportunities for community-based support.

It has potential to foster good relations between people who share a protected characteristic and those who don't if allocations are managed effectively, and the Equality and Diversity policy and ethos are implemented and promoted.

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Whilst there are no significant negative impacts identified at this stage, there is a risk that the scheme may not meet the diverse needs of citizens or that the Local Lettings Policy will favour only tenants from the local community who are of similar background, and allow prejudice of host households to influence allocations. These risks can be mitigated and through robust policies, and by an ongoing organisational commitment to diversity monitoring, and proactively addressing any emerging discriminatory impacts of the LLP. We Can Make should ensure that they promote the scheme actively in new areas in South Bristol and take into account the characteristics of the local populations in these areas in relation to protected characteristics in the ways that they promote the scheme.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The scheme is an opportunity to empower communities in areas with high levels of deprivation to provide new affordable housing with the active involvement of local people. There is also an opportunity to advance equality of opportunity and foster good relations between different communities. Extending the project geographically opens up opportunities to develop the scheme to cater to different communities and people with a range of protected characteristics.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

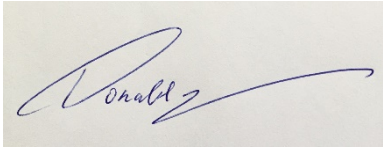
Improvement / action required	Responsible Officer	Timescale
Monitoring of allocations and impact of extension of the scheme to South Bristol as a whole. Review of equalities impacts of the implementation of the LLP and the WCM pilot project	Louise Davidson/Bryony Stevens	End of the financial year 2025-26.

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- Extent that it has Increased provision of affordable housing in South Bristol on underused BCC land
- WCM diversity monitoring of participants in the scheme
- Feedback from participants in the scheme of different ethnic and other protected characteristics.

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by Equality and Inclusion Team	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 11/1/2024	Date: 11/01/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Extension of We Can Make area of operation		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate	<input type="checkbox"/> Outline Business Case	<input checked="" type="checkbox"/> Full Business Case
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service	<input type="checkbox"/> New	<input type="checkbox"/> Changing
<input checked="" type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> Already exists / review	
Directorate: Growth and Regeneration	Lead Officer name: Louise Davidson	
Service Area: Housing Delivery	Lead Officer role: Head of Housing Delivery	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

The proposal seeks approval to apply to the Secretary of State to request an extension of the area of operation of the We Can Make project to cover all of the wards in South Bristol. This will enable more opportunities for community-led development of sustainable affordable homes on under-used Council house garden land, building on existing community support networks.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

Yes **No** [please select]

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

Yes **No** **Not applicable** [please select]

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future. **Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.**

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal</p>	<p>Benefits</p>	<p>The aim is to develop additional affordable homes on under-used Council-owned plots of land in existing urban residential neighbourhoods. Houses will be developed by 'We Can Make' and not BCC.</p> <p>This type of 'soft densification' infill development enables adaptation of existing housing stock to add resilience, increase density, and make efficient use of existing urban infrastructure (roads, services etc). It thereby provides an alternative to more carbon intensive new build on greenfield sites.</p>
	<p>Enhancing actions</p>	<p>A design code has been developed with Bristol City Council Design team input to ensure the design quality and suitability of the developments for constrained urban garden plots.</p> <p>The developments will be subject to BCC planning policies relating to heat hierarchy, reducing emissions and waste and encouraging sustainable transport.</p> <p>The production of components and construction approach and the design of the units is intended to be more sustainable and less impactful on the environment than traditional construction methods.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

<p>will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	<p>There will be a carbon impact during production of pre-fabricated components for the buildings, from construction processes and over the life time of the dwellings once in use.</p>
	<p>Mitigating actions</p>	<p>Energy efficiency: The dwellings have been designed to exceed Building Regulations requirements (Part L1A 2013) and to maximise energy and CO2 reduction through demand reduction measures including a combination of passive design measures (e.g. building design and efficient building fabric) and building services such as – Decentralised Mechanical Extract Ventilation (dMEV), low energy LED fittings throughout.</p> <p>Renewables and heating: There will be a 20.53% saving on typical energy use per home through the use of solar electricity generation and heating using air source heat pumps. This equates to 1.9 tonnes per annum. Solar generation will be reduced if panels are shaded at certain times of day.</p> <p>Embodied emissions: There will be a 50% reduction in embodied emissions for MMC modules than for typical construction materials. Initial embodied carbon analysis shows that incorporation of bio-based materials within the MMC system means the construction of the homes will be carbon negative (more carbon is sequestered than emitted)</p> <p>Travel: Prefabricated units are constructed locally reducing the need for long distance transport of materials. Once in use the provision of bike sheds and EV charging facilities are designed to encourage zero carbon transport.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed</p>	<p>Benefits</p>	<p>The use of existing under used garden land for housing makes best use of existing developed land and reduces the need to develop on greenfield sites or sites that are currently providing habitat for wildlife and bio diversity.</p>
	<p>Enhancing actions</p>	<p>Development of the micro-sites includes landscape and planting of micro-site and host home to enhance wildlife habitats and support biodiversity. This includes bio-diverse planting, bin and bike stores with green roofs, and wildlife supporting kits including bug hotels, hedgehog homes, and sensors to remind people to water thirsty plants.</p> <p>The aim is both to create new homes that make space for nature, improve existing gardens, and build people’s connection and confidence to engage with nature through training, and community events.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

<p>mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	<p>Existing gardens will be developed which could impact wildlife and bio diversity of those gardens.</p>
	<p>Mitigating actions</p>	<p>The new dwellings and host home will have garden space retained and the aim is to facilitate more effective management of the remaining garden space. Garden areas will be improved and appropriate species of plants provided as well as green roofs to bin/bike stores.</p> <p>Development will be subject to BCC planning policies relating to ecological assessment of proposed development, wildlife preservation and bio diversity.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>The project promotes reuse of existing land rather than development on new sites. Waste reduction is an important principle of the We Can Make project both in terms of the construction approach and use of the dwellings.</p>
	<p>Enhancing actions</p>	<p>On site use of MMC will reduce on site waste and pollution during construction process.</p> <p>Engagement with neighbours, adequate sound insulation of new homes, shorter construction times and compliance with Considerate Constructor guidance will minimise the risk of noise or dust nuisance.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Construction processes create waste and consume resources. Additional homes also have potential to contribute to waste and consumption of materials.</p>
	<p>Mitigating actions</p>	<p>The prefabricated units will be produced locally in the We Can Make factory, reducing construction waste from traditional build. The proximity of the sites to the host homes will be an important driver to minimise construction waste and disruption. Recycling facilities will be provided and waste reduction encouraged for residents.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly</p>	<p>Benefits</p>	<p>The project provides an alternative to the impact of new build development on greenfield sites and makes use of existing sites where the risks of flooding are better understood.</p>

<p>frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>Whilst it does remove some garden land the provision of green roofs on bin/bike stores and suitable planting aims to enhance the garden spaces and improve drainage.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>By increasing density of development there is potential that the project increases the burden on existing drainage infrastructure and the likelihood of surface water flooding.</p> <p>Tight proximity of host home to new dwelling may impact shading and increase potential for over heating.</p>
	<p>Mitigating actions</p>	<p>These aspects will be considered through the development management process. Design features and local understanding of existing impacts of sunlight/shading/surface water will aid design to maximise benefits and minimise risks. The modular micro-homes units are designed to make it easy to clip on shade canopies where needed. Permeable surfaces for parking areas and green roofs to bike/bin stores will reduce surface water run-off. Use heat mapping software (Keep Bristol Cool) to help inform planning process.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>The homes will be developed to connect into existing services and production of components will take place locally.</p>
	<p>Enhancing actions</p>	<p>By localising the construction process the transport emissions will be greatly reduced.</p>
	<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>The homes will require foundations which may disturb contaminated soils.</p> <p>The homes will also increase the amount of impermeable area impacting surface run-off</p>
	<p>Mitigating actions</p>	<p>The homes will be designed to be light-weight and use low-cement foundations where possible. This will minimise the amount of excavation required reducing the long-term impact on the soil. On-site water management techniques will be employed where possible such as water butts and attenuation tanks.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
The developments will be subject to BCC planning policies relating to heat hierarchy, reducing emissions and waste and encouraging sustainable transport.		As projects progress
A design code has been developed with Bristol City Council Design team input to ensure the design quality and suitability of the developments for constrained urban garden plots.		As projects progress

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
There will be long term beneficial impacts through the development of sustainable homes by We Can Make, planning policy and design guides will be used during the planning process to ensure the contractor deliver the sustainability standards they have set and to mitigate the short term negative impacts of construction.
Summary of significant adverse impacts and how they can be mitigated:
See above

Environmental Performance Team Reviewer: Nicola Hares – Environmental Performance Senior Officer	Submitting author: Bryony Stevens – Enabling Manager CLH Delivery
Date: 10/01/2024	Date: 11/01/24

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Estate Rationalisation – Surplus Asset Disposals	
Ward(s)	Citywide	
Author: Pete Anderson	Job title: Director - Property, Assets, and Infrastructure	
Cabinet lead: Councillor Craig Cheney, Deputy Mayor with responsibility for Finance, Governance and Performance	Executive Director lead: John Smith – Interim Executive Director Growth & Regeneration	
Proposal origin: BCC Staff		
Decision maker: Cabinet Member Decision forum: Cabinet		
Purpose of Report:		
<ol style="list-style-type: none"> To seek approval to the disposal or re-purposing of Bristol City Council assets. 		
Evidence Base:		
<ol style="list-style-type: none"> In February 2023, Full Council approved the 23/24 budget which included specific proposals to generate £36m in capital receipts (to contribute to an overall target of £71m by 27/28) and make £4m revenue savings related to the Council's asset base. In June 2023, a report on the corporate Property Programme for 23/24 was approved by Cabinet which outlined the scope and approach to meeting these financial targets. The report identified the requirement to complete a review of the operational, development and investment estates to ensure that we are retaining the correct property assets for the correct purposes, while releasing suitable properties to the disposals process to contribute to the revenue savings and capital receipts targets. The approach outlined was that any property that does not have an operational necessity or a sufficient financial yield will be released. An Estate Strategy Board, chaired by the Chief Executive, has been set up to oversee this work and is currently the governance route for recommending assets for disposal. However, although current Delegated Powers delegate authority to officers to undertake disposals at full market value, it has been agreed that any recommended disposals will be subject to final approval by Cabinet. Following ongoing review of the Council's operational estate, there are assets that are no longer required for service delivery and which are vacant or could be vacated relatively quickly. These are set out in Appendix A1/A2. The Estate Strategy Board recommends that, subject to Cabinet approval, these should be disposed of to the best financial advantage of the Council as soon as possible. As part of the process to dispose of surplus assets, the potential to transfer suitable assets from General Fund into Housing Revenue Account (HRA) as additional housing stock or to re-purpose the asset to satisfy a key service requirement is considered prior to disposing on the open market. Appendix A2 lists the assets where transfer to the HRA or appropriation to satisfy an alternative Council service requirement is proposed. Any transfers will be subject to a HRA viability assessment on each individual site and the value of the asset being agreed with Property following independent valuation. 		

6. As part of the Council's ongoing efforts to release land for housing development and delivery of affordable homes, and get more land working to support city strategies, a strategy to use BCC assets for accelerated housing delivery is in development. This will include exploring criteria for site selection and options for disposal routes to enable sites to be brought forward for development. Some of the sites identified in Appendix A1/A2 align with this work and opportunities to increase and accelerate development opportunities will be progressed wherever possible.
7. Should approval be obtained for these disposals subject to any transfer potential mentioned at 5 above, they will be placed with agents for sale on the open market.
8. Legal and agency fees of up to 4% will be deducted from the disposal proceeds.
9. If approved for disposal, the assets listed in the attached appendix A1 are estimated to provide a minimum capital receipt in the region of £1.45m, together with a revenue saving equivalent to premises operating costs which includes Repairs & Maintenance, Business Rates, Utilities and future cost avoidance. In addition to this, the sites in appendix A2 being considered for transfer to the HRA have an estimated total value of £1.65m.
10. The proceeds from the sale of all land and buildings (subject to certain statutory limitations) will not be earmarked for use by a specific service but will be pooled and applied to finance future capital investment or for any other purpose permitted by Regulation.
11. BCC are the current freehold owners of the 6.9 hectare Hengrove Leisure Park, which is held by AEW by way of a 999 year ground lease (from 1996) at a peppercorn rent (£1). The lease was assigned to the current owners AEW in 2018 as a possible redevelopment opportunity as it was recognised that the Leisure Park was failing. AEW are in the process of securing vacant possession of the Cinema and Bingo Hall occupiers (due in May 2024) and will be retaining the other uses on site i.e. Premier Inn, KFC, Costa Coffee and relocation of Dominos. AEW submitted an outline planning application for circa 350 residential units in January 2021 which was approved in Sept 2021 (planning reference 21/00531/P). AEW have agreed terms with Keepmoat to acquire their interest and the Council has agreed to release its freehold interest on satisfaction of reserved matters and vacant possession in agreed phases to enable the delivery of the homes. The disposal to Keepmoat will be at market value of £1 i.e. development value deferred 998 years. As part of the transaction AEW will surrender the current lease 998 year lease of the adjoining Play and Wheels Park back to BCC. Under this lease the Council pay an annual service charge of c£60k pa. There will therefore be a saving to the Council (Parks) after surrender.
12. BCC are also the current freehold owners of the sites at 37/39 Whitehouse Street in Bedminster. The buildings are within the Whitehouse Street Regeneration Framework area and, within the context of the regeneration development, the Council have negotiated a prospective purchase of the site by the existing long leaseholder. The sale will facilitate the long term residential redevelopment of the site in line with the Regeneration Framework. In the short term the site will be used as an Interim Energy Centre until a Permanent Energy Centre is constructed. This is an essential part of City Leaps plans for the District Heat Network for the Bedminster area. Heads of Terms for an option agreement have been drafted via a 3rd party agent. It is a subject to planning transaction. The properties will be sold at Market Value which will be determined by an independent valuation when planning is granted. The transaction is subject to a minimum sale price, overage, clawback, planning uplift and buy back clauses - all of which protect the Council's position and secure best consideration.

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Approves the assets listed in Appendix A1 be declared surplus to Council requirements and subject to them not being considered suitable for HRA transfer, or sold to a registered provider, to be disposed of on the open market for the best consideration.

2. Approves the appropriation of any suitable properties listed in Appendix A2 to the HRA or to satisfy an alternative service requirement if required.
3. Authorises the Executive Director – Growth & Regeneration in consultation with the Deputy Mayor/Cabinet Member Finance, Governance and Performance and S151 Officer, to dispose of the freehold interest in: -
 - a) Hengrove Leisure Park at a peppercorn rent.
 - b) 37/39 Whitehouse Street at Market Value as per the terms set out in this report.
4. Authorises the Executive Director – Growth & Regeneration in consultation with the Deputy Mayor/Cabinet Member Finance, Governance and Performance and S151 Officer, in accordance with the Council’s scheme of delegations, to take all steps required for disposal of the assets whilst ensuring best value is obtained for each property listed in Appendix A1 and A2 in the event they are not required by the HRA or to satisfy an alternative service requirement.

Corporate Strategy alignment:

Theme 7: Effective Development Organisation From city government to city governance: creating a focused council that empowers individuals, communities, and partners to flourish and lead.

ED06 Estate Review: Review our operational estate to ensure we have the right amount and right quality of workspaces. Make sure they are carbon neutral by 2025, as well as climate resilient. Explore the potential for a greater presence in neighbourhoods alongside partners.

City Benefits:

Estate Review, Disposals, & Investment in Retained Assets

A smaller and more efficient office, depot, operational, and investment estate where we have the right amount and right quality of properties to serve the required purpose, while disposing of properties that are deemed surplus to requirements to achieve financial benefits for the organisation.

Consultation Details:

In order that the disposal of surplus assets is achieved at the required pace, a revised ‘Surplus assets procedure’ has been introduced which ensures that Service Directors and Ward Councillors / Lead Members have been informed of the intention to dispose of identified assets prior to them being recommended by Estates Strategy Board.

Background Documents:

Generic:

- [Corporate Strategy 2022-27 \(bristol.gov.uk\)](https://www.bristol.gov.uk/corporate-strategy-2022-27)
- [Feb 2023 -Full Council - 23/24 budget setting savings](#)

Property Programme:

- [\(Public Pack\)Agenda Document for Cabinet, 06/06/2023 16:00 \(bristol.gov.uk\)](#)
- [\(Public Pack\)Agenda Document for Cabinet, 04/07/2023 16:00 \(bristol.gov.uk\)](#)
- [\(Public Pack\)Agenda Document for Cabinet, 05/09/2023 16:00 \(bristol.gov.uk\)](#)
- [\(Public Pack\)Agenda Document for Cabinet, 03/10/2023 16:00 \(bristol.gov.uk\)](#)

Revenue Cost	£	Source of Revenue Funding	
Capital Cost	£	Source of Capital Funding	

One off cost <input type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>
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Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: This report requests approval to sell the properties, largely car parks, listed at Appendix A1 on the open market. That is expected to generate a minimum of £1.45m which will likely fall in 2024-25. The four car parks are Free District Car Parks that do not charge and therefore there is no loss of income to the sale but instead a small reduction in the costs associated with continued maintenance and upkeep.

The report also requests approval to make available the properties at Appendix A2 to the Housing Revenue Account (HRA) in the first instance. If the properties are not required by HRA which have a maximum total value of £1.65m, following detailed viability assessments, they will be sold on the open market. The appropriation of assets between the General Fund and HRA needs to follow the necessary CIPFA accounting guidelines. This process will need the agreement and sign-off of the S151 Officer.

We are not collecting income on any of the properties in Appendices A1 and A2 beyond a small amount of rent possibly being collected on the property formerly used by a caretaker. Any costs associated with holding the properties vacant are currently being drawn from the non-operational property budget.

Separately, the report requests approval to release its freehold interest in Hengrove Leisure Park which will be converted into housing. The freehold will be surrendered for a peppercorn rent of £1. As part of the transaction the Council will secure the lease for the Play and Wheels Park for which we currently pay c. £60k so this will be a revenue saving.

Finally, the report requests approval to sell the current freehold in 37/29 Whitehouse Street in Bedminster. The properties will be sold at market value, determined independently for conversion to an energy centre as part of our plans for the area in the Whitehouse Street Regeneration Framework. The transaction is subject to a minimum sale price, overage, clawback, planning uplift and buy back clauses - all of which protect the Council's position and secure best consideration.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 29 January 2024.

2. Legal Advice:

The Council is under a duty by virtue of S123 of the Local Government Act 1972 to achieve best value for its assets and any disposal should be at the best price reasonably obtainable. The disposal route suggested by this report (disposal on open market) should ensure best consideration is achieved.

Appropriation to the HRA is specifically dealt with in section 19(1) of the Housing Act 1985 (the 1985 Act) where a local housing authority may appropriate for the purposes of dealing with the provision of housing accommodation any land for the time being vested in them or at their disposal. The appropriation will result in an accounting adjustment between the HRA and the General Fund equivalent to the market value of the property appropriated.

Legal Team Manager: Andrew Jones – Property Planning and Transport 24 January 2024

3. Implications on IT: Any IT work undertaken will be completed as part of the site decommissioning so, I can see no implications on IT in regard to this activity

IT Team Leader: Alex Simpson – Lead Enterprise Architect 24 January 2024

4. HR Advice: There are no anticipated HR implications associated with the programme, and the assets that are being disposed of are not occupied by BCC staff or used as work bases.

HR Partner: Celia Williams, HR Business Partner 24 January 2024

EDM Sign-off	John Smith, Executive Director Growth & Regeneration	16 January 2024
Cabinet Member sign-off	Councillor Craig Cheney, Deputy Mayor with responsibility for Finance, Governance and	16 January 2024

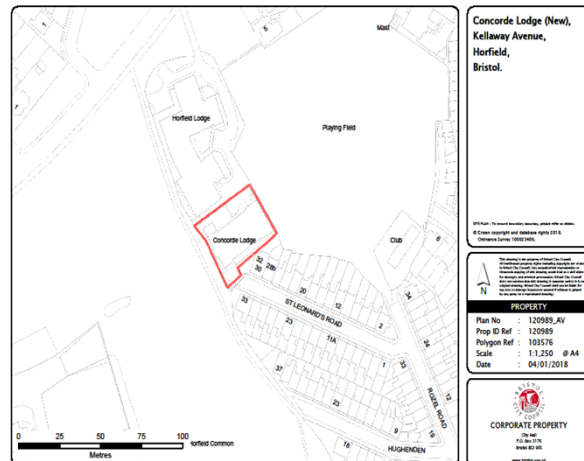
	Performance	
For Key Decisions - Mayor's Office sign-off	Mayor's Office	16 January 2024

Appendix A – Further essential background / detail on the proposal Appendix A1: Assets for Disposal Appendix A2: Assets for transfer to HRA	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	NO
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

APPENDIX A1: Further Information on Assets Proposed for Disposal

The assets listed below are surplus to the Council's operational requirements and are recommended for disposal. The total estimated value is c£1.3m - valuations of the sites have not yet been carried out but estimated figures used as a guide.

1. Concord Lodge, Kellaway Avenue Horfield



A single storey building built in 2010 with a floor area of 608 square metres on a site of 0.13 hectares currently used as supported living accommodation. The property comprises 7 individual living spaces with en suites with central kitchen, laundry and staff areas. Access to the site is from Kellaway Avenue through the adjacent private care home.

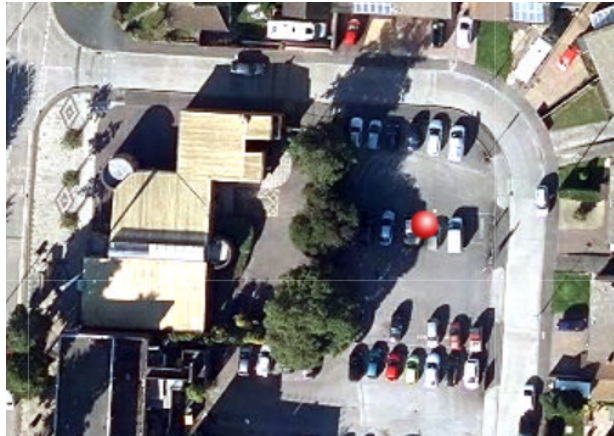
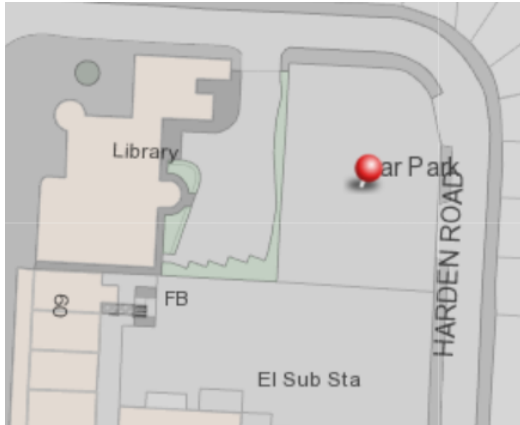
2. Land at Winters Lane Lulsgate



The site is a grassy field which immediately adjoins Bristol Airport. BCC holds freehold and licenses out for 8 months of the year to a local farmer as grazing for £250. The land extends

to approximately 3.81 acres (1.54 ha) and it appears to have no current access of Winters Lane although it is directly adjacent. There have been several approaches from Bristol Airport who are keen to buy the freehold from BCC.

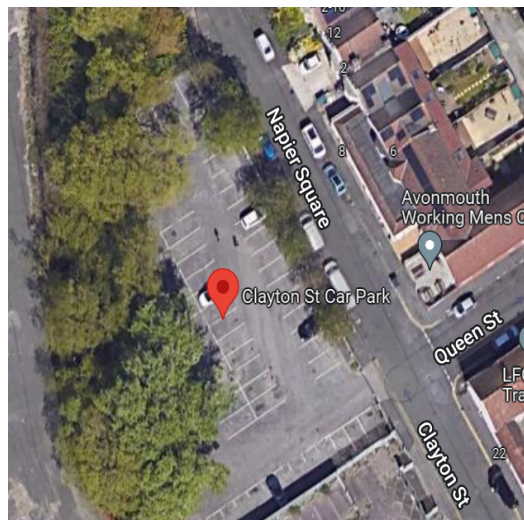
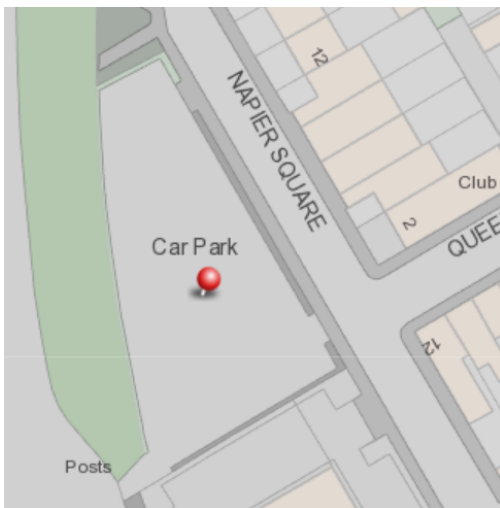
3. Harden Road Car Park



Located next to a library and in close proximity to local shops and medical centre. It has an area of approx. 0.06ha.

The site will need to go through a process of removal from the Traffic Regulation Order prior to disposal or re-use.

4. Clayton Street Car Park Avonmouth



Predominately in a residential area with unrestricted on street parking. This car park served a social club opposite, that's no longer in use. Site has an area of approx. 0.2ha.

The site will need to go through a process of removal from the Traffic Regulation Order prior to disposal or re-use.

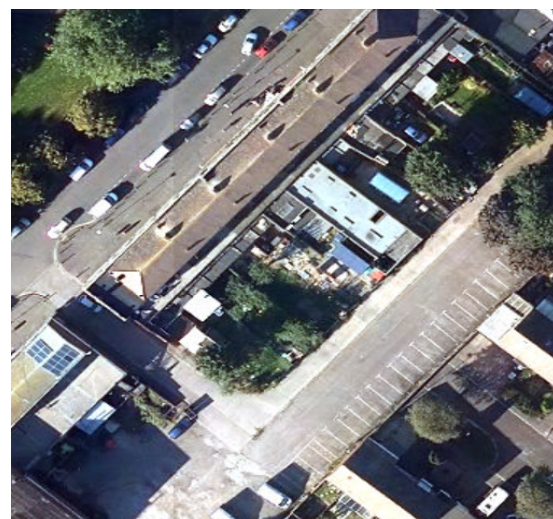
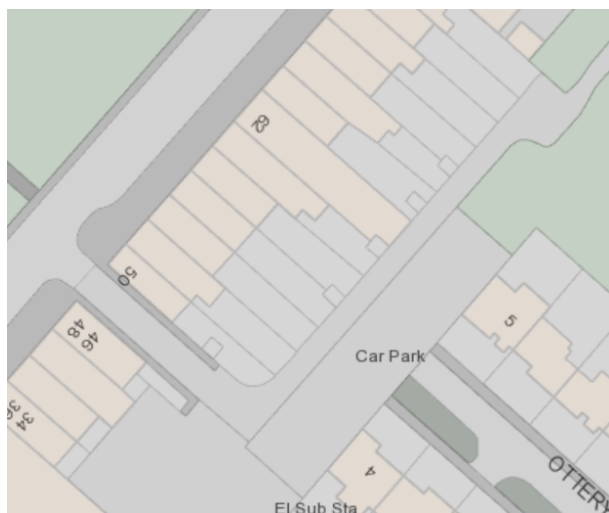
5. Queens Road Car Park, Bishopsworth

This site is already earmarked for Community Led Housing but has not been through the surplus asset process, so is included for transparency.



This car park is in close proximity to the local community centre, church and local shops. It has an area of approx. 0.05ha. The site will need to go through a process of removal from the Traffic Regulation Order prior to disposal or re-use.

6. Ridingleaze Car Park



This car park is in close proximity to local shops, businesses and church. It has an area of approx. 0.06ha. The site will need to go through a process of removal from the Traffic Regulation Order prior to disposal or re-use.

APPENDIX A2: Assets being considered for transfer to Housing Revenue Account

The assets listed below are surplus to the Council's operational requirements (therefore no longer required for service delivery) and are under consideration for transfer to the Housing Revenue Account (HRA). The total estimated value is c£1.8m - valuations of the sites have not yet been carried out but estimated figures used as a guide.

The HRA development process is subject to ongoing feasibility and viability assessments, so assets on this list may ultimately not be appropriate or viable for transfer. In this scenario, as the asset has already been declared surplus, the Council will look to dispose of the asset on the open market.

1. Chester Park Infant School House - 298 Ridgeway Road, Fishponds, Bristol BS16 3LA.



Description – Semi-detached three bedroomed house, with front garden laid to lawn with bushes and shrubs and rear garden laid to lawn with shrubs and trees.

Ground Floor Accommodation – entrance hall, lounge, dining room and kitchen.

First Floor Accommodation – Three bedrooms with bathroom.

Sec of State consent is required for any disposal or non-education use, and this is currently being sought.

There is a gate built into the boundary wall of the school, which provided the former residential caretaker with access directly from the garden of the house, into the school grounds. This access will need to be permanently blocked as a matter of urgency.

2. St Barnabus Primary School House - 41 Albany Road, Montpelier, Bristol, BS6 5LQ.



Description – End terrace, four storey, three/four bed roomed house, with no front garden and small rear garden with trees and shrubs.

Basement Accommodation – two large storage rooms

Ground Floor Accommodation – entrance hall, lounge, kitchen and toilet.

First Floor Accommodation – two/three bedrooms and bathroom with toilet.

Second Floor/Loft Accommodation – two bedrooms.

Sec of State consent is required for any disposal or non-education use, and this is currently being sought.

Windows at the property overlook the entrance to the school site. For security and safeguarding reasons, the glass in these windows will have to be replaced with opaque glass and the windows will have to be permanently sealed shut. It will also be necessary to ensure that these windows cannot be changed by any future owner/occupier of the property, to clear glazing/opening windows, by introducing a requirement into the deeds of the house. The small garden to the rear of the building has access to the school grounds. To comply with safeguarding and security requirements, a solid fence of the maximum height will have to be installed.

The property water supply will need to be separated from that of the school.

3. Compass Point School House - 124 British Road, Bedminster, Bristol BS3 3BZ.



Description – End terrace, three bedroomed house, with paved front garden and small rear paved space.

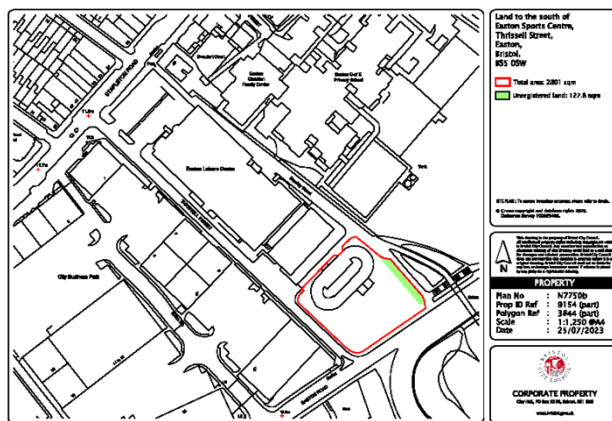
Ground Floor Accommodation – entrance hall, lounge, dining room, kitchen. And bathroom

First Floor Accommodation – Three bedrooms.

Sec of State consent is required for any disposal or non-education use, and this is currently being sought.

There is a gate built into the boundary wall of the school, which provided the former residential caretaker with access directly from the rear garden of the house, into the school grounds. This access will need to be permanently blocked as a matter of urgency.

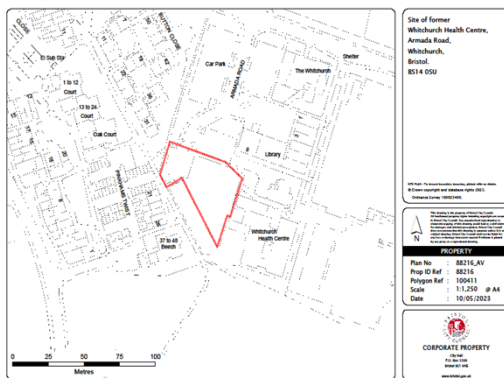
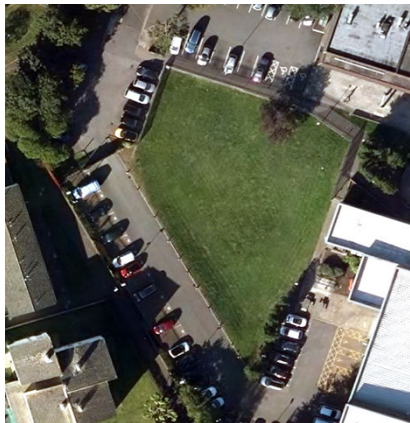
4. Land at Easton Sports Centre



The site was formally declared surplus to requirements by the service on the 5th of September 2023 and has a total site area of 3,291m², or 0.33 Hectares (0.81 acres).

It was used as a cycle speedway track some years ago but has not been in use for many years and it will not be included in the new lease of the Sports Centre to SLM as it has no operational function.

5. Land at Whitchurch District Centre



Site of the former Whitchurch Health Centre, Armada Road, BS14 0SU

Link to Google Maps: [Aerial map](#) and [Streetview](#)

This land is owned by BCC and was acquired following a 'land swap' when the new Armada Health Centre was constructed (approx. 20 years ago) on land that was formerly owned by BCC. It is part of the commercial estate and has been vacant for the past 20 years.

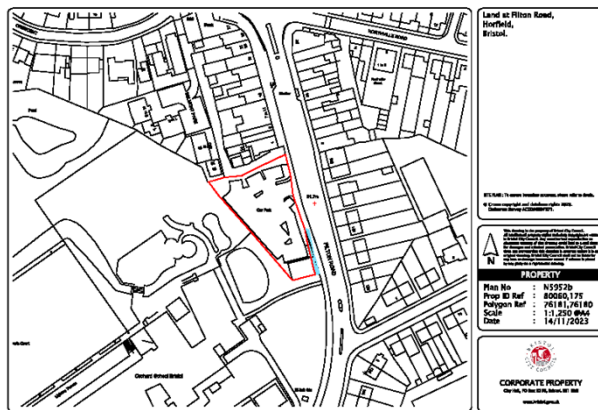
The property consists of a triangular shaped area of fenced-off area of open land (approx. 1,200 m²) and an informal carparking area (approx. 12 spaces), which also provides access into the health centre carpark (private access).

The total area is approx. 1,800 m², but this is not a neat rectangular shape.

The property is located directly adjacent to the Whitchurch District Centre (constructed late 70s), which consists of an ASDA superstore, several smaller retail units, a pub, and a large carpark. Despite its awkward shape, the land is capable of providing a mixed-use development, with residential on the upper floors. The ground floor would lend itself to a children's nursery and part of it could provide a new home for Whitchurch Library, which is currently located in one of the retail units in the district centre.

The new Health Centre consists of three storeys, so it may be possible to use a similar scale and massing for the proposed development.

6. Land at Filton Road – Car Park



The site is currently used as a car park and has an area of approx. 0.215he (0.53acres)

Equality Impact Assessment [version 2.12]



Title: Property Programme – Estate Rationalisation and Disposals	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: John Smith
Service Area: Corporate Landlord	Lead Officer role: Executive Director – Growth & Regeneration

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

This EqIA is to accompany a report to Cabinet on 6th February on Estate Rationalisation.

In June 2023, a report on the corporate Property Programme for 23/24 was approved by Cabinet which outlined the scope and approach to meet Bristol City Council's financial targets. The report identified the requirement to complete a review of the operational, development and investment estates to ensure that we are retaining the correct property assets for the correct purposes, while releasing suitable properties to the disposals process to contribute to the revenue savings and capital receipts targets. The approach outlined was that any property that does not have an operational necessity or a sufficient financial yield will be released.

To enable the Council to deliver target revenue savings and capital receipts by the end of 2023/24, the Corporate Landlord service are reviewing all assets to ensure that we are retaining the correct property assets for the correct purposes, while releasing suitable properties/ sites to the disposals process (where there is no operational necessity or if they do not return a sufficient financial yield).

This proposal is to dispose of or re-purpose a list of identified assets on the open market to reduce the revenue cost to the Council of holding property and to raise capital receipts to support the Council's current funding gap. The aim is to consolidate the estate to ensure that all assets are fully used or disposed of when no longer required. These assets have been identified as being surplus to the Council's requirements in their current format.

The report details the assets currently under consideration (outlined in section 1.3 of this EQIA). with a recommendation that they are either sold on the open market or re-purposed to fulfil another Service requirement. Disposals on the open market will be progressed as quickly as possible and any assets identified for re-purposing or development as part of the Bristol City Council (BCC) small sites strategy will be monitored for progress and should they not proceed for any reason the asset will then be disposed of on the open market.

If there are any deviations from the information in this EqIA in the final cabinet report, this EqIA will be updated.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	[please select]
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The review of the office, depot, operational, and investment estates (to ensure that we are retaining the correct property assets for the correct purposes) will result in suitable assets being released to the disposals process and has the potential to have an equality impact to service users and the wider community, although it will vary significantly between individual properties.

However, for the disposal of these properties specifically we have not identified any significant potential impacts.

This proposal covers the following sites:

1. Concord Lodge – Cabinet have already approved closure of the facility and occupants have been relocated
2. 298 Ridgeway Road Fishponds – Ex caretakers House for Chester Park Infant School - currently vacant.
3. 41 Albany Road Montpelier – Ex caretakers house for St Barnabus Primary School – will be sold when vacated. The school has now been closed, in line with HR policies the current occupant will be rehoused and is aware of this process.
4. 124 British Road Bedminster – Ex caretakers house for Compass Point School – currently vacant
5. Land adjacent to Easton Sports Centre – Vacant land un-used for many years
6. Land at Whitchurch District Centre – vacant land un-used for many years
7. Land at Winters Lane – currently used as grazing land under an agreement with notice provisions that may need to be exercised in the event of sale in accordance with the terms of the grazing agreement. Legal protocol will be followed and the council will work with the tenant in line with the agreement.
8. Filton Road Car Park – currently operated by South Gloucester Council (There is an old agreement that has expired, and South Gloucestershire are holding over under that agreement. We are in discussions with them on this site and if there are any changes, this EqIA will be updated)
9. Ridingleaze Car Park – Cabinet have already approved closure of the car park
10. Harden Road Car Park - Cabinet have already approved closure of the car park
11. Clayton Road Car Park - Cabinet have already approved closure of the car park
12. Queens Road Car Park - Cabinet have already approved closure of the car park


Cabinet have already approved the closure of the four car parks above and an EqIA was completed <https://bristolintranet.moderngov.co.uk/documents/s79907/Appendix%20E%20-%20EQIA.pdf>.

The proceeds from the sale of all land and buildings (subject to certain statutory limitations) will not be earmarked for use by a specific service but will be pooled and applied to finance future capital investment or for any other purpose permitted by Regulation.

As part of the Council’s ongoing efforts to release land for housing development and delivery of affordable homes, and get more land working to support city strategies, a strategy to use BCC assets for accelerated housing delivery is in development. This will include exploring criteria for site selection and options for disposal routes to enable sites to be brought forward for development. Some of the sites identified in this proposal may align with this work and opportunities to increase and accelerate development opportunities will be progressed wherever possible.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

<p>Equality and Inclusion Team Review:</p> <p><i>Reviewed by the Equality and Inclusion Team</i></p>	<p>Director Sign-Off:</p>  <p>Peter Anderson Director Property Assets & Infrastructure</p>
<p>Date: 24.01.2024</p>	<p>Date: 26/01/2024</p>

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Proposal title: Estate Rationalisation – Surplus Asset Disposals		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service	<input type="checkbox"/> New	<input checked="" type="checkbox"/> Changing
<input type="checkbox"/> Other [please state]	<input type="checkbox"/> Already exists / review	
Directorate: Growth and Regeneration	Lead Officer name: Lois Woodcock	
Service Area: Economy of Place	Lead Officer role: Asset Strategy and Information Manager	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please contact the [Sustainable City and Climate Change Service](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

To obtain Cabinet approval to the disposal on the open market of BCC assets which have been initially identified by the Estates Rationalisation Board as being surplus to the Council’s requirements.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by the [Sustainable City and Climate Change Service](#).

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No [please select]

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable [please select]

If ‘No’ explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

2.1 Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support [our corporate environmental objectives](#) and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p>	Benefits	<p>It is hoped that sale of the assets will enable them to be put to productive use by third parties and that the energy efficiency of the buildings will be improved as part of any works carried out to enable re-use.</p> <p>If Concord Lodge had been sold before the 2022/23 financial year, it would have reduced the council's scope 3 electricity and gas emissions by 37.7 tonnes (less than 0.5% of the council's total scope 3 emissions). The other disposal sites proposed have either been recently leased, have been vacant for some time, or are plots of land that do not use energy. In these cases, there is no recent data and disposal will not reduce measured emissions on the council estate.</p>
	Enhancing actions	<p>Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.</p> <p>Potential buyers may be encouraged to engage in the One City Strategy and Bristol One City Climate Change Ask.</p>
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	
	Adverse impacts	<p>Any construction or redevelopment works to prepare the properties for sale, or by their new owners will create emissions in the short term, which should be outweighed by greater future efficiencies.</p>

Further guidance <input type="checkbox"/> No impact	Mitigating actions	Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
ENV2 Ecological recovery: Wildlife and habitats BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030. Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world. If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible. Further guidance <input type="checkbox"/> No impact	Benefits	The land around these buildings may be altered to provide biodiversity net gain.
Enhancing actions		Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
Adverse impacts		
Mitigating actions		
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		
ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated	Benefits	
Enhancing actions		
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		
Adverse impacts		Any construction or redevelopment works will generate waste.

<p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Mitigating actions</p>	<p>Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Any construction or redevelopment works may improve resilience.</p>
	<p>Enhancing actions</p>	<p>Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.</p>
	<p>Adverse impacts</p>	<p>Disposals of assets that could be otherwise used to improve resilience could prevent improved resilience.</p>
	<p>Mitigating actions</p>	<p>Future disposals of green and blue spaces will be made only where it has been indicated by the relevant team that it is not used or needed for:</p> <p>Generating heat for a heat network, ground source heat for an adjacent building, or renewable electricity (Bristol City Leap Client Function)</p> <p>Slowing stormwater runoff, acting as a flood basin, or cycle infrastructure (Highways and Flood Risk Team)</p> <p>Carbon sinks or potentially significant changes in biodiversity net gain (Parks and Sustainable City Team)</p> <p>Providing shade trees to manage the temperature of vulnerable buildings or areas of the city in a warming climate (Sustainable City Team).</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air,</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

water, or land and what steps will be taken to prevent pollution occurring. Further guidance <input type="checkbox"/> No impact	Adverse impacts	Any construction or redevelopment works may cause pollution.
	Mitigating actions	Any impacts and mitigation will be the responsibility of the new owners of the assets and will result from their decisions. Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	

Step 3: Actions

3.1 Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Future owners will be provided with information about how to manage land and buildings to deliver beneficial climate and ecological outcomes.	Lois Woodcock	30/06/2025
Disposals of vacant land will be made after checking whether will be critical for the short term for the delivery of: Generating heat for a heat network, ground source heat for an adjacent building, or renewable electricity (Bristol City Leap Client Function) Slowing stormwater runoff, acting as a flood basin, or cycle infrastructure (Highways and Flood Risk Team) Carbon sinks or potentially significant changes in biodiversity net gain (Parks and Sustainable City Team) Providing shade trees to manage the temperature of vulnerable buildings or areas of the city in a warming climate (Sustainable City Team).	Lois Woodcock	30/06/2024

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for

decision-makers on the environmental impact of the proposal. Please seek feedback and review from the [Sustainable City and Climate Change Service](#) before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here and included on the cover sheet of the decision pathway documentation.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
Summary of significant adverse impacts and how they can be mitigated:

Environmental Performance Team Reviewer: Giles Liddell, Environmental Performance Co-ordinator	Submitting author: Lois Woodcock
Date: 11/01/2024	Date: 08/01/24

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This does not constitute an endorsement or approval of the proposal.



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Hard FM Contract Extension, re-procurement and Capital H and S Programme		
Ward(s)	Citywide		
Author: David Martin	Job title: Head of Corporate Landlord		
Cabinet lead: Councillor Craig Cheney, Deputy Mayor - Finance, Governance and Performance	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report:			
<ol style="list-style-type: none"> To seek approval to procure and award a new contract for the Repair and Maintenance contract and to secure continued RandM services for up to 12 months, (whilst the re-procurement process is undertaken) in order to continue to deliver statutory health and safety obligations. The new arrangements will enable the Corporate Landlord budget accountability for all repair and maintenance activity on behalf of the authority (with the exclusion of the HRA). To seek approval for the 2024/25 Health and Safety capital programme. 			
Evidence Base:			
Temporary arrangement with current supplier			
<ol style="list-style-type: none"> The provision of Mechanical, Electrical and Building Fabric maintenance is covered by a contract which had a 3 year initial term with effect 1 May 2019 and an option to extend by a further 24 months. The first 12 months of this extension came to an end in April 2023. This was extended up to the end of the original maximum term up to end of April 24. This contract currently covers circa 350 corporate properties. Mechanical works relate mostly to the maintenance of heating and plumbing systems, Electrical works involve maintenance of electrical systems and an example of Building Fabric works could be interior wall repairs or maintenance of flooring surfaces. Officers are exploring ways to continue to deliver services for 12 months post May 2024 to enable the continued delivery of these essential statutory works and allow time to undertake a robust procurement exercise, for which we have a live project to retender this work and activity. The Contract Management function for this strategic contract moved to the Strategic Supplier Relations team during 2023 and they are involved in a supporting the process in relation to this strategic contract. The approval for continued arrangements with current supplier will limit risk to the council and its service users and ensuring statutory compliance activities are implemented during our transition period to the new contract. 			

6. Other departments and services have been able to procure services from this existing agreement, which were not included in the original contract award. This has affected the spend profile, as more 'works' activity has been linked to the contract than was originally intended.
7. As of March 2023 £2,692,000 spend has also been added to the scope of the contract since the award in 2019 through the following urgent elements being added to. These include:
 - Fire Risk Assessments, Legionella, Lift Auto diallers and SIM cards, Covid works for temp mortuaries and furthermore, other departments (Car Parking, VPRS, Energy, Trading with Schools, Bottle Yard, Docks and Housing) have access to spend on the contract.
8. This area of activity has seen significant labour and material cost increases in the past few years which we need to be mindful of when we procure a new approach.

New Contract

9. We have a live project which is working toward the retendering of Hard FM to cover the wider estate. This is a significant exercise and we need time to ensure that we have a robust process which yields the best outcome for the authority. This project is part of the property programme and being project managed by the PMO.
10. We have undertaken options analysis for delivery and undertaken soft market testing which has helped shape our approach to the procurement.
11. The new contract will also seek to include delivery of the H and S programme of capital works, to help increase efficiency and speed of delivery.
12. Value of the new contract is likely to be circa £8m per annum. This is based on analysis of R and M spend by our financial strategic partner with estimated efficiencies taken off, based on in depth analysis of spend for currently non centralised sites.
13. The performance of the contract will be managed with relevant KPIs in accordance with strategic contracts.

Health and Safety Capital Programme

14. This is a programme of essential building repair and maintenance work which ensures that our estate is safe and fit for purpose.
15. Appendix A details the sites which require work, and what type of work is needed and is constructed using 4 streams of information:
 - a) Statutory Obligations
 - b) Surveyor Activity across Bristol City Council (BCC) portfolio (on-going)
 - c) Condition Survey Data
 - d) Unsighted emergency Health and Safety work
16. A contribution from the Capital Programme is made to educational operational sites and BCC Primary schools.
17. The appendix details the different works that will be undertaken across the estate which covers the following areas;
 - Works required to fulfil legal and statutory obligations

- Works required to avoid possible litigation from statutory bodies
- Works required to ensure acceptable Health and Safety Standards
- Works required to ensure continued operation of buildings

18. Total including contingency is £6.003m works for 2024-2029

19. The works have been formulated using the information streams listed above a-d.

20. The formulation of the programme has been based on condition survey data for the estate as well as site inspections by Senior Building Surveyors, there has also been dialogue and engagement with various teams, including Health and Safety, Property, City Leap, Procurement, Senior leaders and the Mayor's office. This engagement exercise was cost neutral and involves input from key stakeholders.

21. The programme helps to increase the environmental performance of the estate by installing more efficient heating approaches and improving insulation to some sites through repairs to roofs, windows and doors. The programme helps support us moving toward a carbon neutral estate. The net environmental effects of the proposals are likely to be beneficial. These necessary works will generate greenhouse gas emissions and other impacts, but they are likely to be more effectively mitigated through working with Bristol City Leap and the tendering process impacts than with the current arrangements.

22. It is worth noting that the estate rationalisation programme may impact on some of the sites listed, the proposition is that any funds allocated to sites which are subsequently disposed of, would return to the contingency for reallocation to sites further down the priority list

Cabinet Member / Officer Recommendations:

That cabinet:

1. Authorises the Executive Director Growth and Regeneration in consultation with the Deputy Mayor - Finance, Governance and Performance to take all steps required to procure and award a new Hard FM contract for an initial period of 5 years with the option to extend for 3 further periods of one year, up to the maximum budget envelope as outlined in this report.
2. Authorises the Executive Director Growth and Regeneration in consultation with the Deputy Mayor - Finance, Governance and Performance to take all steps required to secure the continuation of Repair and Maintenance services for up to 12 months whilst the re-procurement process is undertaken...
3. Authorises the Executive Director Growth and Regeneration in consultation with the Deputy Mayor - Finance, Governance and Performance to take all steps required to invoke any subsequent extensions/variations specifically defined in the contracts being awarded, up to the maximum budget envelope outlined in this report.
4. Approves the Capital programme of Health and Safety activity as set out in Appendix A (at an estimated cost of £2,060,000 and £319,000 for Education Lifecycle)
5. Authorises the Executive Director Growth and Regeneration in consultation with the Deputy Mayor - Finance, Governance and Performance to take all necessary steps to procure and award contracts to undertake the works set out in Appendix A.

Corporate Strategy alignment:

Contributes to safer working environments and wellbeing for citizens, colleagues, and service users of our buildings.

City Benefits:

The Authority owns and occupies a large number of buildings used to deliver its services. We have a statutory duty to maintain and service the mechanical and electrical assets in these buildings. It is crucial we meet our legal obligation to maintain all assets to allow colleagues, partners and building users to operate in a safe and secure environment.

We also provide a service to numerous schools across the city. This ensures these schools are fulfilling their statutory duties and operating in a safe manner.

Consultation Details:

DMT- August, September, October 2023

EDM - 6 December 2023

Cllr Cheney CMB - 11 December 2023

Background Documents: Previous Cabinet Papers –

Decision Pathway Report 4 September 2018 – [Cabinet Report Facilities Management Hard Services 15.8.18.pdf \(bristol.gov.uk\)](#)

Decision Pathway Report 18 January 2022 - [Repair and Maintenance Contract Extension Version 8.pdf \(bristol.gov.uk\)](#)

Revenue Cost	£44.5m	Source of Revenue Funding	Various internal Cost Centres plus external funding from Schools for the Indemnity Scheme
Capital Cost	5 year MTFP - £5,684,000, however, this includes the 24/25 request for £2,060,000, plus £319,000 for Education.	Source of Capital Funding	Prudential borrowing - £5,684,000 DfE Condition Grant - £319,000
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice: This report requests approval to extend the current contractual arrangements delivering repair and maintenance of the Council estate for a further 12 months while the service is re-procured. The current contract costs c. £3m in 2023-24. That includes £900k in planned preventative maintenance and £2.1m in reactive works but excludes any other repairs and maintenance ordered by other departments. The one-year extension of the contract will cost £2m in capital, c. £3m in revenue and a further £4m in revenue budgets to transfer to the Corporate Landlord model. We expect the £4m in budget transferred to Corporate Landlord to generate c. 35% in savings as a result of the greater efficiency of the Corporate Landlord model as compared to the currently disaggregated nature of the projects. The long-term contract is expected to cost c. £8 million per annum over a five year initial period with the option to extend for a maximum of a further three years. The costs of repairs and maintenance are thus remaining the same over the coming years reflecting the increasing properties being managed by the Corporate Landlord and inflationary pressures balanced by the increasing efficiencies of scale as we bring this work together.

Separately, the report requests approval to the Cabinet programme of Health and Safety works with costs of £2.379m (of which £319k in Education) in 2024-25. Appendix A lays out the work planned for 2024-25 with all projects appearing to be either statutory or required to prevent further costs downstream.

Finance Business Partner: Ben Hegarty, Finance Business Partner Growth and Regeneration, 24 January 2024.

2. Legal Advice: The procurement of the new contract and the arrangements for the continuation of existing services whilst this procurement process is undertaken, will need to have regard to the Public Contracts Regulations 2105 and the Council own procurement rules.

Legal Team Leader: Eric Andrews, Team Manager, Legal Services 29 January 2024

3. Implications on IT: In terms of the proposed extension by 12 months of the existing contract, there are no immediate IT implications although this does not address existing shortcomings.

In terms of the proposed re-procurement of a Hard FM contract for Repairs and Maintenance:
It is imperative that the procurement considers the issues and opportunities identified during the recent review of property systems and data and how this fits in as an element of the wider Corporate Landlord model.

IT Team Leader: Will Lewis, Solution Architect, 24 January 2024

4. HR Advice: There are no HR implications evident

HR Partner: Celia Williams, HR Business Partner, 23 January 2024

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	6 December 2023
Cabinet Member sign-off	CLr Cheney; Deputy Mayor - Finance, Governance and Performance	11 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Requirements for 24/25 - TO BE FUNDED FROM H&S BUILDINGS PLANNED PROGRAMME 2024/25				
Site	Work Type	Works	Justification For Work	Condition Data
Various	Statutory	Asbestos Removal works	To ensure we meet our obligations under Control of Asbestos Regulations 2012. This budget is to cover the Capital costs of asbestos removal works highlighted from the Asbestos Management Surveys.	D1
Various	Statutory	Fire Precaution Works	Remedial works identified following Fire Risk Assessments to meet the requirements of FRO regulations.	D1
Various	Legionella	Water Hygiene	To ensure we meet our obligations under The Control of Legionella Bacteria In Water Systems. This budget covers both the Risk Assessments required for each site and remedial works	D1
Various		Condition Surveys		D1
Various	Statutory	Safety Glazing	Works required to fulfil legal and statutory obligations	D1
Listed Building Strategy	Statutory	Various Works	Works required to Non Operational listed Buildings and structures that if not repaired may go on "at risk" register	D2
Blaise Estate - stable roof		Replace stolen leadwork to hipped roofs	Exposed roofs are letting in water	D2
Bristol Community Links - South		Replacement Ceiling Tiles, Asbestos Removal & Temporary Accommodation for Occupants	Works required to ensure acceptable Health and Safety Standards	C3
Bristol Community Links - South		Re- surface upper car park including line marking	Work required to ensure Health and Safety risk due to gritting up and potholes which cause slip and trip hazards are removed.	C2
Bristol Museum and Art Gallery		Damp proofing work to fine art store	To prevent damage to collections	D1
Bristol Museum and Art Gallery		Repairs to asphalt roofs	Leaks in galleries which put collections at risk	D1
Bristol Museum and Art Gallery		Replace lean-to roof over TEG plant room	Water leaks have caused damaged to electrics and AHU plant	D1
Bristol Museum and Art Gallery		Entrance lanterns	The lanterns are severely corroded and potentially unstable over the public highway.	D1
Canford Crem		New overlay to Crem flat roof	Ongoing reports of leaks	C1
Canford Crem		Replace heaters in the Crematorium	Current Heaters are constantly failing parts not available anymore	C1
City Hall		Upgrade Intruder Alarm	Works required to ensure continued operation of buildings	C1
City Hall		Replacement drop bollard on ramp	Security bollard not working after being hit	C1
City Hall		Replacement Uninterrupted Power Supply	UPS are old and need upgrading for continued service of DC2	D1
Easton Leisure Centre		Boilers, Heating system	Leisure Lifecycle requirement following outsource	C1
Georgian House		Repairs to chimneys and gutter	Loose masonry is a H&S issue and the gutter need adapting to prevent major leaks	C2
Greenbank Cemetary Lodge		Repair/replacement roof, gutters rainwater pipes	leaking roof and gutters causing damp problems in residential property	D1
Horfield Leisure Centre		Boilers, calorifier and water softener	Leisure Lifecycle requirement following outsource	C1
John Cuzons House		Replacement Uninterrupted Power Supply	Works required to ensure power back up for continued service of the ICT Equipment in the Operations Centre	C1
Landrail walk 1a		windows	Single glazed metal windows need to be replaced with new double glazed windows	C1
M Shed		Replacement Flat Roof	Works required to ensure continued operation of buildings	C1

M Shed		Concrete repairs to elevations	Spalling concrete is a potential H&S risk	C1
Mortuary - Flax Bourton		Ventilation System (M&E)	Works required to ensure continued operation of buildings - includes 25k Building Work estimate	C2
Red Lodge		Masonry repairs in garden	Repair to prevent falling masonry in archway and trip hazard on steps	C2
Registry Office		New opening roof lights to atrium	To prevent excessive heat buildup which has caused occupants to suffer	C1
Temple street 100		Lift Maintenance	The Lifts are over 30 years old and parts are expensive/difficult to source	C1
Various	H&S	Contingency	Required for unforeseen situations arising	D1
EDUCATION PROJECTS - TO BE FUNDED FROM LIFECYCLE (CAPITAL R&M) - BUDGET HOLDER: JAMES ANDERSON				
Site	Work Type	Works	Justification For Work	Condition Data
Air Balloon Primary		Bath stone repairs	coping stones deteriorating and bits falling off	D2
Ashley Down Primary school		3 No bell/ventilation towers	lead stolen or damaged and only temporary solution in place. leaking causing further damage	D2
Ashton Gate Primary		Stonework Repairs	Stones deteriorating - H&S issues	D1
Hillcrest Primary		Roofing works - Phase II		D1
Southville Primary		Replacement Windows - Phase II		D1
St Peters C OF E Primary		Re-wire of Infants block and associated Asbestos removal works.	Unsatisfactory Fixed Wire Teat (Awaiting clarification from Lorne Stewart).	Possible D1
Upper Horfield school		Replacement of Metal Casement windows	Constantly leaking/repairing	C2
Other items we have been requested to fund				
A Bond		CCTV	Building may not be insured without this.	D1
A Bond		Graffiti removal and Security Improvements	Building may not be insured without this.	D1
Bristol South Pool		Boiler	Leisure Lifecycle requirement following outsource	
Easton Leisure Centre		Boiler etc - moved up to 24/25 request 150k		
Easton Leisure Centre		BMS	Leisure Lifecycle requirement following outsource	
Easton Leisure Centre		Air Handling Units	Leisure Lifecycle requirement following outsource	
Easton Leisure Centre		GRP to Roof lights	Leisure Lifecycle requirement following outsource	
Horfield Leisure Centre		Boilers, calorifier and water softener - moved up to 24/25 request 100k		
Horfield Leisure Centre		Air Handling Units	Leisure Lifecycle requirement following outsource	
Horfield Leisure Centre		BMS	Leisure Lifecycle requirement following outsource	



APPENDIX D Risk Narrative for the H and S Capital Programme

Written by: David Martin, Head of Corporate Landlord

Date: 22/01/2024

Background

This year we have presented items that Corporate Landlord's Building Surveyors see as the priority items within their portfolio of sites they have ownership for. This short paper seeks to give some additional context to the programme expanding on some of the items in the cabinet paper and appendix A.

As mentioned in the report, we try to identify risks across the operational estate by using 4 streams of information

1. Statutory Obligations
2. Surveyor Activity across BCC portfolio (on-going)
3. Condition Survey Data
4. Unsighted emergency Health and Safety work

These information streams are an attempt to identify and plan where the highest risks are in our portfolio. This is then put into the programme based on urgency and significance of risk.

In terms of understanding what risk we are taking on by not undertaking a larger programme of activity - I believe this is minimal as we have factored in contingency within the programme for any un-foreseen activity, although the way the programme is formulated tries to mitigate this as much as possible. This gives us flexibility to respond if needed within year.

We do have a significant backlog of maintenance within the Operational Estate, due to historic underfunding of repair and maintenance activities and a purely reactive approach to this in many areas. Many of these items are items of revenue activity and not necessarily linked to direct health and safety obligations or statutory obligations. The condition and financial data currently being reviewed is many years old.

Based on condition report data, these are the areas of risk we still have not programmed in;

Type of work	Amount of spend identified as Capital requirement	Residual Risk Commentary
Electrical	607,626	There are 22 items still listed on the spreadsheet with a variety of different tasks which will be reviewed and look to be added into the future programme- some are low risk such as replacing light fittings. A lot of the items are at school sites which will be funded through the DSG capital funding

Type of work	Amount of spend identified as Capital requirement	Residual Risk Commentary
Externals (Walls, windows, doors)	356,000	There are 12 different items identified in this area with largely condition ratings of C on the whole these items can form part of the longer term programme and at present do not represent significant risk
Floors and Stairs	35,000	2 items listed under this heading and both do not represent a current significant risk to the council- replacement of vinyl flooring for example
Mechanical	2,348,000	38 different items listed in this area and on the whole covering boiler replacement for the largest cost items- a plan is being worked on with City Leap for a replacement programme and we have identified the highest risk ones on the programme
Redecorations	48,000	No significant risks in this area by not taking these items forward at this stage
Roofing works	509,000	Works here covering multiple sites, but not as urgent as the items already bought forward for the programme- these will be assessed and bought forward in further iterations of the programme based on urgency.
Total Capital identified but not yet on programme	3,968,626	

Please note that the condition data is not completely up to date and would be subject to inflationary increases.

Proposed changes in approach

As we progress with the Corporate Landlord model and centralise Repair and Maintenance funding we can better analyse and prioritise where it is spent and be able to identify residual risks.

We are in the process of procuring an asset management system which will also contain our condition data for our estate, this will be able to link directly to the Capital planning process and give

greater visibility to where risk is in the estate, when this is in place we will use it to support the formulation of the programme.

Items listed above will be assessed based on urgency and bought into the programme accordingly. The programme backlog will be added to Pentana as a risk assigned to the Corporate Landlord.

Equality Impact Assessment [version 2.12]



Title: Hard FM Contract Procurement Project	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] <i>Hard FM Contract expiring need to go out to tender for new contract circa £8 million per annum.</i>	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: David Martin
Service Area: Corporate Landlord	Lead Officer role: Head of Corporate Landlord

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

This EqIA is to go to full Tender – Official Journal of the European Union (OJEU) for the Hard FM (Hard Facilities Management covers **all servicing and repairs to Mechanical and Electrical Installations and the Building Fabric with buildings within the Corporate Property** portfolio) Contract for all servicing and repairs to Mechanical, Electrical Installation and Building Fabric within buildings within the Corporate Property Portfolio. All work proposed under this contract are already being undertaken by the existing supplier ‘Lorne Stewart’.

‘Lorne Stewart’ have had this contract for the past 4.5 years and the contract ends 30th April 2024 at the 5-year completion date. We will be going out to full Tender OJEU, however due to time constraints **we will be looking to extend or to have a temporary replacement contract in place for approx. 6 – 9 months** to allow time to carry out a full tender OJEU contract process. This could complete October 2024 (we will need to implement a temporary contract 6-9 months from a Framework to cover beyond April 2024 until the full Tender contract process is completed.

The Corporate Property Portfolio consists of a wide range of properties / assets including museums, parks, schools, libraries, children centres, mansion houses in the city, park & ride sites, cemeteries.

Performance by current contractor Lorne Stewart is monitored by our Contract Management Team.

Corporate Landlord is the mechanism by which the councils’ assets will be optimised by bringing the responsibility and accountability for land and property asset management, including all budgets and decisions, centralised within one function. It will lead the delivery of efficient, effective, and sustainable land and property solutions whilst maximising social and economic returns for Bristol and its residents.

The existing contract is due to expire on 30th April 2024. The Corporate Landlord service is currently working with Corporate Procurement to consider a temporary contract framework’ to cover the planned preventative

maintenance schedules and reactive call out requirements temporarily whilst we deliver a full Tender for a 5+ year contract. This will have no adverse effect on communities or groups. It will allow for the continued planned preventative maintenance schedules and reactive call out requirements.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	[please select]
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The works may affect all persons working in any building within the Corporate Portfolio at some stage. However, the majority of the works are undertaken in areas that citizens, service users and employees do not access, with a large amount of the works undertaken within restricted areas i.e. – boiler houses, roofs, lift shafts etc.

Where work is planned outside these areas, the contractor has to supply RAMS (Risk Assessments / Method Statements) to ensure the works are undertaken without our affecting our citizens, service users and employees.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off:  Peter Anderson Director, Property, Assets and Infrastructure
Date: 07.11.2023	Date: 12.01.24

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

Environmental Impact Assessment [version 1.0]



Proposal title: Hard FM Contract Procurement Project and Capital Programme		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input type="checkbox"/> Service	<input type="checkbox"/> New	<input checked="" type="checkbox"/> Changing
<input type="checkbox"/> Other [please state]	<input type="checkbox"/> Already exists / review	
Directorate: Growth and Regeneration	Lead Officer name: David Martin	
Service Area: Corporate Landlord	Lead Officer role: Head of Corporate Landlord	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

<ol style="list-style-type: none">1- Continued arrangements to deliver Hard FM services up to new contract award2- Procurement and award of new contractual arrangements3- Approval of the Capital Health and Safety Programme
--

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No [please select]

<p>A Hard FM contractor will have impacts on the environment and risks associated with their activities. Contractors will be working around climate harming substances / materials.</p> <p>The initial part of this process is for a 12 month extension using the existing contractor, which will be followed by a full tender for a five year contract, plus allowable 12 month extensions.</p>
--

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

Yes
 No
 Not applicable
[please select]

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future. **Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.**

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal</p>	Benefits	<p>The existing contractor has an Environmental Management System to effectively manage these risks and impacts.</p> <p>Documentary evidence that the contractors have appropriate qualifications for relevant tasks is checked and available for review.</p> <p>While the capital works programme is mainly concerned with safety and maintaining what already exists, window replacements and insulation of new replacement roofs may make buildings may become more efficient.</p> <p>Existing contractor's sub-contractors are mainly based in Bristol.</p>
	Enhancing actions	<p>Emissions reductions may include efficiency, energy type, thermal performance, embodied emissions.</p>
Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	<p>Contractors will be asked for details of how they propose to minimise their travel impacts, such as through locality, vehicle specifications, optimised stock and tools carried, combining routine maintenance and route planning, geographical area covered, driving efficiency.</p> <p>Contractors will be asked to measure and report their greenhouse gas emissions as a baseline for the tendering of future contracts.</p> <p>Contractors will be asked to provide information about how they propose to optimise thermal performance and efficiency, and minimise embodied greenhouse gas emissions associated with materials and products used.</p> <p>In consultation with Bristol City Leap, the feasibility of ground or air source heat pumps are to be considered instead of a like for like boiler replacement.</p> <p>Installation of Solar Panels is being considered.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
<p>ENV2 Ecological recovery: Wildlife and habitats BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider</p>	<p>Benefits</p>	<p>Contract is to renew existing arrangements and there are no plans to reduce the land used for nature.</p>
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Maintenance may be affected where protected species roost or nest in buildings.</p>

<p>how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Mitigating actions</p>	<p>Contractors will be asked what they would do in the event of finding species in buildings when doing works. The existing provider is already aware of this.</p> <p>Renewal of contract is to re-new existing arrangements and there are no plans to reduce land used for nature.</p> <p>Full details of BCC's plans will be included within the tender process.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>The existing contractor is locally based, with locally based mechanics will reduce the transport of waste.</p> <p>The use of a portal that can show paperwork in an electronic form will ensure that paperwork needed for evidencing legal compliance is easy to access and readily available. The requirement to continue the move away from paper worksheets will reduce consumption of paper.</p>
<p>Enhancing actions</p>	<p>Introduction of KPI's as part of the contract offer provides a chance to integrate environmental targets into the KPI's.</p> <p>Contractors will be asked how they propose to minimise or eliminate hazardous waste through the procurement of safer products and materials.</p>	
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>Adverse impacts</p>	<p>Waste will inevitably arise from maintenance activities.</p>	
<p>Mitigating actions</p>	<p>Contractors will be asked about how they propose to maximise reuse and recycling without affecting performance and minimising the waste from their selection of products and their packaging.</p> <p>Ensure the contractor has the correct and knowledge of waste law and waste registrations for their activities (or that any sub-contractors in the control of the main contractor have the correct registration) when procuring for the contract to ensure legal compliance. Contractor to be using the waste hierarchy and minimising waste disposed.</p>	
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	<p>The contractor will continue to support BCC's requirements for extreme weather via their sub-contractors who provide temporary heating and support when flooding occurs.</p> <p>Roofing, windows and heating projects can all help increase the resilience of buildings.</p>
	Enhancing actions	Request that the Environmental Performance Team can gain access to maintenance records either through a portal system / or that docs are sent directly to the team, this will help ensure legal compliance.
	Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	<p>Sub-contractor has already shown examples in 2023 of supporting flooding and temporary heating.</p> <p>Performance of insulation and materials efficiency will be reviewed when works that affect the building envelope are carried out, such as roof or window replacement.</p>
Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	<p>Emissions from vehicles</p> <p>Contractors will be handling chemical and other hazardous materials as part of their role.</p>
	Mitigating actions	<p>Contractor uses telematics to monitor journey efficiency. Can also assess vehicle specification, looking for efficiency within the contractor fleet. Appointing a contractor with locally based mechanics will reduce travel impacts as well as improve response time for call outs.</p> <p>Contractors will be evaluated for training in spill prevention and how they will achieve COSHH compliance during tendering.</p>

Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Ensure improvement actions are included within the new tender specification.	Gary Goodwin	30/9/2024
ENV1 Contractors will be asked for details of how they propose to: 1. minimise their travel impacts during the delivery of the contract. 2. optimise the thermal performance and efficiency of the materials and products they use in the delivery of the contract. 3. minimise the embodied greenhouse gas emissions associated with materials and products used	Gary Goodwin	31/11/2024
ENV 1 Contractors will be asked to measure and report their greenhouse gas emissions as a baseline for the tendering of future contracts.	Gary Goodwin	31/11/2024
ENV1 The council and Bristol City Leap will consider the feasibility of: 1. ground, water or air source heat pumps instead of a like for like boiler replacement. 2. installing solar panels.	Gary Goodwin	31/11/2024
ENV2 Contractors will be asked what they would do in the event of finding species in buildings when doing works.	Gary Goodwin	31/11/2024
ENV3 Contractors will be asked how they propose to: 1. minimise or eliminate hazardous waste through the procurement of safer products and materials without affecting their performance. 2. to maximise reuse and recycling without affecting performance and minimising the waste from their selection of products and their packaging.	Gary Goodwin	31/11/2024
ENV3 Environmental key performance indicators will be introduced into the contract.	Gary Goodwin	31/11/2024
ENV4 Performance of insulation and materials efficiency will be reviewed when works that affect the building envelope are carried out, such as roof or window replacement.	Gary Goodwin	31/11/2024
ENV3 Ensure the contractor has the correct and knowledge of waste law and waste registrations for their activities (or that any sub-contractors in the control of the main contractor)	Gary Goodwin	31/11/2024

Enhancing / mitigating action required	Responsible Officer	Timescale
have the correct registration) when procuring for the contract to ensure legal compliance. Contractor to be using the waste hierarchy and minimising waste disposed.		
ENV5 Contractors will be evaluated for training in spill prevention and how they will achieve COSHH compliance during tendering.	Gary Goodwin	31/11/2024

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):

The significant impacts of this proposal are through contractor activities such as chemical handling, resource use, waste production and travel. Many of these areas are also subject to legal compliance such as waste disposal. It is important to ensure the contractor is assessed on their compliance in this area during procurement. There is opportunity around travel and reducing impacts by looking at locality and vehicle specifications.

Summary of significant adverse impacts and how they can be mitigated:

Mitigation will be adaptations of those already used, with an additional requirement to supply emissions and travel data that can be used as a baseline for retendering.

The net environmental effects of the proposals may be slightly beneficial if additional or improved mitigations are effective, compared to current performance.

With respect to the Capital Programme, the significant impacts of this proposal are embodied emissions in the chosen materials and products, contractor handling of chemicals, resource use, waste production and travel. Waste disposal and F-Gas/ air conditioning maintenance are subject to particular regulation. After works have taken place, the significant ongoing impacts of this proposal include the thermal or energy efficiency, or emissions reductions from chosen materials and products. The potential addition of renewables to generate energy may add a beneficial impact.

The contract includes the following measures to mitigate the impacts: Competitively tendered contractors where the mitigation measures within this document have been considered in the tender process will help to manage environmental impacts.

The net environmental effects of the proposals are likely to be somewhat beneficial. These necessary works will generate greenhouse gas emissions and other impacts, but they are likely to be more

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage and does not constitute an endorsement or approval of the proposal.

effectively mitigated through working with Bristol City Leap and the tendering process impacts than with the current arrangements.

Environmental Performance Team Reviewer: Giles Liddell, Environmental Performance Co-ordinator	Submitting author: - Gary Goodwin
Date: 24/01/2024	Date: - 22/01/24



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	The future of the Homelessness Prevention Youth Hub Service		
Ward(s)	Citywide		
Author: Paul Sylvester	Job title: Head of Housing Options		
Cabinet lead: Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	Executive Director lead: John Smith, Interim Executive Director Growth & Regeneration		
Proposal origin: BCC Staff			
Decision maker: Cabinet Member Decision forum: Cabinet			
Purpose of Report: To seek approval for the recommissioning of a multi-agency Youth Hub and to seek delegated authority to the Executive Director of Growth and Regeneration in consultation with Executive Director for Children and Education to agree the details for the tender documents for this service.			
Evidence Base:			
<p>1. <u>Young Person’s Housing & Independence Pathway Commissioning Plan</u> A refreshed Young Person’s Housing & Independence Pathway (HPHIP) Commissioning Plan was agreed by Cabinet in September 2023 – including a total baseline budget for the new services that remained within the current budget envelope.</p> <p>While most of the services were approved for recommissioning from April 2024, the Youth Hub service was extended for six months (until September 2024) to enable a government funded consultant to advise on remodelling the service to maximise its effectiveness and to enable implementation of the new Joint Protocol. With a separate Cabinet report outlining tendering proposals for this service to be brought to Feb/March 2024 Cabinet.</p>			
<p>2. <u>Outcomes for Young People facing Homelessness</u></p> <p>The Youth Hub provides a positive, dedicated space for young people threatened with homelessness to get comprehensive early advice. Over a quarter of all young people (16 – 22 year olds) presenting at the Hub are helped to return or stay in their current home or with their wider family network where safe to do so. For 16 /17 year olds facing a housing crisis - the Hub provides access to social workers, housing advisors and support staff, all within the same space.</p>			
<p>3. <u>Initial finding from Consultancy Work:</u></p> <p>The consultant’s stage 1 report has recently been received following a 2-day deep dive into our services and linking into national best practice. This is the first stage of a larger commission to provide support to Bristol City Council over a few months on improvements to our youth housing pathways. The intention of the report is to provide an external view regarding the current arrangements and services provided through our current partnership arrangements to prevent</p>			

and relieve homelessness amongst 16 – 22-year-olds.

4. Key recommendations relating to the recommissioning of a Youth Hub include:

- Support for retaining the central youth hub model (good practice elsewhere also indicates this is the most successful model for bigger urban authorities)
- Retaining current commissioning approach – i.e. tendering out for an external provider as a commissioned partner, led by Housing Services but with joint oversight and responsibility with Children’s services.
- Defining more clearly the roles and functions of the third-party provider staff, housing advisers and social workers - and testing whether all parties understand and knows the role they play
- Closer alignment to the natural flow of the homelessness legislation and the relevant parts of the Children Act
- A requirement for evidence in tenders of added value for preventing youth homelessness in Bristol (over and above the usual elements assessed by Social Value Portal)

To improve the effectiveness of this service, the recommendations are:

A greater focus on early help response – including:

- The development of a consistent response for 16/17 year olds and their families in local communities where they already have an open or recently closed case with the local Children’s Social Care teams
- Further examination of the ‘early help’ response to homelessness prevention for older teenagers and consideration of whether this could be improved through a blended model with more specialist or structured homelessness prevention work in local areas, alongside the centrally based youth hub.
- More emphasis, and clarity, on prevention work by the third-party provider staff
- Revised performance indicators for the third-party provider based more logically on key outcomes relating to homelessness prevention and relief, linked to the homelessness legislation and relevant areas of children’s legislation.
- An increase in social work capacity, so there are 2 full time social workers linked to the youth hub as a minimum.
- Ongoing review of the 2.5 Housing Advisers caseloads and capacity. Caseloads may need to increase over time, although this is not definite.

5. Next Stage

There will now be an on-going process with commissioners and practitioners from both Directorates, and with the external consultant’s input, to develop a more detailed specification and tender documentation, and design in best value and measurable outcomes.

The timeline now for the procurement process is as follows:

- | | |
|--------------------------------------|-----------------------------|
| • Tender launch: | March 2024 |
| • Tender close | late April 2024 |
| • Decision notification / standstill | June 2024 |
| • Contract award & sign off | late June/early July 2024 |
| • Implementation period | July/August /September 2024 |
| • Service start date | October 2024 |

Other HPHIP recommissioned contracts start from April 2024 with contract lengths, of three years with the option to extend for a further two years, as advised by procurement. The Youth Hub will be tendered out, with the new service in place in October 2024 with contract length of three years and the option to extend for a further 18 months to align with other HPHIP contract end dates.

The consultant's work raises a number of additional possible improvements and these will be reported back to the joint Housing Options and Childrens Service planning board at regular intervals.

We will also build on learning from our engagement with young people, during the YPHIP consultation phase, to ensure that the planning phase takes account of their feedback.

6. Budget Envelope

The costs for the remodelled service will still align with the figures agreed at Cabinet in September 2023, as part of the overall HPHIP Plan. This was based on an increase of 8% for Core and Dispersed supported housing services and the Youth Hub, with the increased costs covered by identifying alternative funding sources for some other elements of the Plan. This enables the total first year costs for the full YPHIP to remain within the current Housing Options budget.

First year Youth Hub budget envelope (October 24 – end September 25) is £348.84K

- This includes an increased contribution from Childrens service of £47K (13.5% of the total revised Youth Hub budget)

– calculated on the basis that:

- Children Services and Housing Options have joint assessment responsibilities for young people aged 16-17, and these young people make up 27% of the Youth Hub presentations.

The total maximum five year envelope for YPHIP, as approved by September 2023 Cabinet was £9.213M - subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index.

The total maximum budget for the Youth Hub element (if the full four and half years are utilised to align with the overall HPHIP contract end dates) will be £1,569,780 subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index.

Cabinet Member / Officer Recommendations:

That cabinet

1. Authorises the Executive Director Growth and Regeneration, in consultation with Executive Director for Children and Education and Cabinet Member for Housing Delivery and Homelessness and Cabinet Member for Children's Services, Education and Equalities to take all steps required to procure and award the contract for 3 years with an option to extend for a further 18 months, in-line with the procurement routes and maximum total budget envelope of £1.570 M (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index) as outlined in this report
2. Authorises the Executive Director Growth and Regeneration in consultation with Executive Director for Children and Education to invoke any subsequent extensions or variations specifically defined in the contract being awarded, up to the maximum budget envelope (subject to any annual uplift agreed that will be based on CPI and an appropriate Housing index) as outlined in this report.

Corporate Strategy alignment:

Theme 1: of the Corporate Strategy 2022-27 is Children and Young People with the top-level aim of achieving "a city where every child belongs and every child gets the best start in life, whatever circumstances they were born in to".

CYP1. Child friendly city

CYP2. Supported to thrive

CYP4. Intergenerational equality

Theme 5: of the Corporate Strategy 2022-27 is Homes and Communities with the top-level aim of achieving "Healthy, resilient, and inclusive neighbourhoods with fair access to decent, affordable homes."

The Corporate Strategy includes additional and specific aims around Homelessness (HC3).

City Benefits:

1. This proposal, if approved, will benefit the city as it will prevent many young people from becoming homeless by providing timely information, advice and prevention work, and will refer on, where appropriate, to a range of supported housing options for those who are homeless. It is also expected that this will help reduce spend on emergency accommodation, though it is not yet possible to accurately calculate the impact of this.
2. In addition, we will assess potential providers through the procurement processes in relation to social value, environmental awareness, and sustainability that they will bring to the contracts. We have effective contract management processes set up within the team with regular reporting on equalities data of service users and staff.

If the approach outlined in this report is not approved the Youth Hub will cease to operate and young people who are homeless or at risk of homelessness will have to present at the Citizen Service Point alongside homeless adults, or to Children’s Services. This will put additional pressure on these services and it is likely that young people will not get the level of assistance needed for some to return to family or recover from homelessness. Without more specialist services for young people, the risk of homelessness being the gateway into rough sleeping for the most vulnerable under 25 year olds will increase..

Consultation Details:

Users of MAPS were contacted by phone and asked to respond to various questions to explore whether they had been seen promptly, if they had felt listened to, if they had been treated with respect.

A group of staff from Housing and Children’s Services were brought together to meet monthly (from November 2023) to feedback on the services and the developing proposals.

Young people have also told us that they want to continue with engagement sessions about homelessness and we are building this into our process.

Background Documents:

- St Basil’s [The Positive Pathway framework](#)
- [Young People’s Housing & Independence Pathway Plan 2017](#)
- [Young People’s Housing & Independence Pathway Plan 2024](#)
- [Homelessness & Rough Sleeping Strategy 2019-2024](#)
- [5 September 2023 Cabinet Paper ‘Young People’s Housing & Independence Pathway Commissioning Plan 2024’](#)

Revenue Cost	£1.57M over four and half years (uplift still to be agreed)	Source of Revenue Funding	£301.83K Housing Options pa Childrens Services £47K pa
Capital Cost	£n/a	Source of Capital Funding	
One off cost <input type="checkbox"/> Ongoing cost <input checked="" type="checkbox"/>		Saving Proposal <input type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:

The proposal seeks to procure and award a contract for the ongoing provision of the Homelessness Prevention Youth Hub Service. The proposal is for a three year contract with an 18 month option to extend, at a total cost of £1.570m.

Funding from Childrens Services has been identified of £0.212m over the life of the contract. The remaining £1.358m will be funded through existing budgetary provision. Whilst the report details the need for an uplift in budget for this particular service, it will need to be met from the wider, existing, homelessness budgets. In addition, all efforts will be made to identify and secure external grant funding to mitigate any increase.

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Finance Business Partner: Martin Johnson – Interim Finance Manager Housing and Landlord Services 18 January 2024

2. Legal Advice: The procurement process must be conducted in line with the 2015 Procurement Regulations and the Councils own procurement rules. Legal services will advise and assist officers with regard to the conduct of the procurement process and the resulting contractual arrangements.

Legal Team Leader: Husinara Jones, Team Manager/Solicitor 16 January 2024

3. Implications on IT: I can see no implications on IT in regard to this activity.

IT Team Leader: Alex Simpson – Lead Enterprise Architect. 22 December 2023

4. HR Advice: There are no implications on BCC staffing in relation to this proposal

HR Partner: Celia Williams, HR Business Partner 17 January 2024

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	22 November 2023
Cabinet Member sign-off	Cllr Asher Craig, Cabinet Member for Children’s Services, Education and Equalities	27 November 2023
	Cllr Tom Renhard, Cabinet Member for Housing Delivery and Homelessness	11 December 2023
For Key Decisions - Mayor’s Office sign-off	Mayor’s Office	8 January 2024

Appendix A – Further essential background / detail on the proposal	NO
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	YES
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO

Appendix K – ICT	NO
Appendix L – Procurement	NO

The future of the Homelessness Prevention Youth Hub Service - Risk Register

Negative Risks that offer a threat to Homelessness Prevention Youth Hub Service and its Aims (Aim - Reduce Level of Risk)

Ref	Risk Description	Key Causes	Key Consequence	Status Open / Closed	Strategic Theme	Risk Category	Risk Owner	Key Mitigations	Direction of travel	Current Risk Level			Monetary Impact of Risk £k	Risk Tolerance			
										Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating	Date
	Prevention work not effective and there is an increase in youth homelessness	increase in presentations that reduces resources that can be focussed on specialist work	Increase in youth homelessness and associated costs	Open	Empowering & Caring	Financial, service delivery and reputational risk	Head of Housing Options / Childrens Services	Working with external consultant to establish roles and functions	<>	3	3	9	n/a	3	3	9	
	Low level of interest from external providers in this tender opportunity	specialist service knowledge and office accommodation required to bid	Lack of any competitive process / evaluation of bids	Open	Empowering & Caring	Financial, service delivery and reputational risk	Head of Housing Options	Engaging with market to promote opportunity	<>	3	3	9	n/a	3	3	9	
	Existing provider/ potential bidder withdraws their office provision element	Value of contract not seen as sufficient to justify inclusion of office provision	Potentially no location to provide a multi-agency youth hub service	Open	Empowering & Caring	Financial, service delivery and reputational risk	Head of Housing Options	On-going discussion with market to better understand &	<>	2	4	8	n/a	2	4	8	
	Recommended increase in social work capacity within hub is not forthcoming	Lack of resources/priority within Childrens Services	Reduced prevention work with 16/17yr olds and increased homelessness	Open	Empowering & Caring	Service delivery and reputational risk	Head of Childrens Services	Working with external consultant to clarify social	<>	2	3	6	n/a	2	3	6	

Equality Impact Assessment [version 2.9]



Title: Young People's Housing & Independence Pathway Commissioning Plan 2023 - Recommissioning Extension of Youth Hub Service MAPS	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Carmel Brogan
Service Area: Housing Options	Lead Officer role: Contracts & Commissioning Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use [plain English](#), avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

We are asking cabinet to give delegated authority to the Strategic Director of Growth & Regeneration for the Re-commissioning of the Youth Hub service MAPs which was extended for six months in the Young People's Housing and Independence Pathway Commissioning Plan (YHIP) agreed in September 2023.

We seek delegated authority from the Executive Director of Growth and Regeneration in consultation with Executive Director for Children & Education to agree on the extension of the existing Youth hub services Mediation, Advocacy, Prevention & Support on preventing homelessness.

A refreshed YHIP Commissioning Plan was agreed by Cabinet in September 2023. The contract for the Youth hub project MAPs for young people who are homeless or at risk of homelessness will end in Sept 2024. We are requesting cabinet to give delegated authority to the Director of Growth & Regeneration to extend the contract for the youth hub service MAPs within the budget envelopes set out in the report.

We have developed a recommissioning plan for the Youth Pathway Maps which seeks to secure:

- Improved website and information resources for early homeless prevention
- Recommissioned Youth pathway MAPs, focused on preventing homelessness for young people aged 16-24
- Recommissioned supported housing pathway with a more flexible support offer

Reasons for changes from the current Youth Housing & Independence Pathway:

Whilst most of the services were approved for recommissioning in the YHIP Commissioning plan (2023) the Youth Hub service MAPs was extended for six months on the following terms:

- The current youth homelessness prevention hub contract will be extended for a further six months (until September 2024) to enable a government funded consultant to advise on remodelling to maximise the effectiveness of this service and to enable implementation of the new Joint Protocol.
- A separate Cabinet report outlining tendering proposals for this service will be brought to Feb/March 2024 Cabinet.

The current externally commissioned contracts are coming to an end in Sept 2024.

The BCC budget has been the same since 2017 and will no longer purchase the same level of services. To respond to the changed needs of young people, especially after the pandemic, who are presenting increasingly with mental health needs. To commission a supported housing pathway to enable the provider organisations to work in proactive partnership to make best use of scarce resources.

The support that will be provided through recommissioning these services is housing-related, enabling the young people to gain independence skills to allow them to successfully move on in a planned way, including money advice, budgeting and benefits advice, support around relationships, and support around accessing education, training, and employment.

- The proposal is to recommission a pathway of supported housing services for young, single people who are care leavers or care-experienced or who are homeless or threatened with homelessness. This includes Unaccompanied Asylum Seeker Children.
- The proposal to recommission the Youth Prevention Hub within the pathway will provide triage, case work advice, mediation and assessment for young people who are homeless or at risk of homelessness; support and advice for officers working with care leavers.
- This pathway approach works to reduce homelessness and the Youth Hub has, and the recommissioned Hub would continue to have, a focus on homelessness prevention. Nearly 30% of young people who refer to MAPS are helped to safely remain at or return home. Where this is not possible, they are supported through an assessment process which, depending on their age and situation, may involve both Children's Services and Housing Advisors.
- The proposed commissioned supported accommodation within the pathway will provide a range of accommodation: up to 55 units of supported 'core' accommodation in shared flats, including 3 units in an accessible/adapted flat for Disabled young people, with 24/7 staffing and managed front door; up to 190 units of supported dispersed accommodation in shared houses and self-contained flats with visiting support.
- We are bidding for Government funds from the Single Homeless Accommodation Programme for a scheme of 5 units of supported accommodation for young men with high and complex needs and for a scheme of 5 units for young women with high and complex needs as well as a further scheme of 10 core style units.
- In addition, the council provides 20 units of medium-low support accommodation in shared houses and a supported lodgings scheme. This accommodation range means that there is a greater likelihood of young people being able to access supported accommodation which meets their needs, and it is proposed that this will be refocused to provide specialist accommodation for young people leaving care.
- The age focus of the Pathway is 16-21 but young people who have additional vulnerabilities may be able to access and remain in the pathway at age 22+ up to age 25.
- The Pathway includes 3 units of immediate access temporary accommodation, with proposals to seek a further 6 units of short stay temporary accommodation, all of which would be supported (and a further 3 assessment beds) which are primarily used for 16-17year old young people instead of B&B accommodation.

There was a decision originally taken in January 2017 to begin giving delegated authority to the Strategic Directors to extend and vary contracts for the Young People's Housing & Independence Pathway.

An Equality Impact Assessment was again done in September 2023 which enabled cabinet to make the decision to give delegated authority to directors to extend the existing contracts and end in 2024.

This is a review of the 2022 EQIA, updated with current equality and needs data from the commissioned services and with data from the 2023 needs analysis.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: Commissioners have been working in partnership with current providers in drafting the needs analysis and during consultation.		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g., quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g., from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<p>The following sources are not available to the public currently: Needs Analysis for Young People's Housing & Independence Pathway 2023 which has data taken from The Joint Strategic Needs Assessment (this will be published when the Commissioning Plan has been agreed by Cabinet).</p> <p>BCC Housing Support Register data reports</p> <p>BCC Abritas system data reports about presentations to the Homeless Prevention Team</p> <p>Performance reports for the MAPS Youth Hub submitted to the council by 1625 Independent People</p> <p>Needs data about young people housed - submitted to the Council by commissioned supported housing providers</p> <p>Children's Services data about Care Leavers, young people in Care and about Young Offenders.</p> <p>Sufficiency Strategy Update (February 2023)</p> <p>Bristol Youth Justice Plan 2022</p> <p>Supported Parents Service Needs Analysis (September 2022)</p> <p>Future of Youth Services Report (March 2023)</p>	<ul style="list-style-type: none"> • The youth population of Bristol grew by more than 10% in the 5 years up to 2023. • Up to 2028, the 16-19 age group is forecast to grow by 31%. • Presentations and referrals to Bristol Youth MAPS (our commissioned youth hub service for young people facing homelessness) have increased by 35% since 2018/19. • There has been a consistency in the main reason for homelessness since the recording under the Homelessness Reduction Act. The top three reasons are: Family no longer willing to accommodate; Friend no longer willing to accommodation; End of private renting. • There is an increase in the number of young people with mental health needs accommodated in the pathway, and a reported increase in severity of those needs. • 48% of young people aged 16-17 whose Youth MAPS cases were closed in the period 01/10/2020 to 20/09/2022 were back at home or with their family/friends' network. • There are higher than national rates of young people locally admitted to hospital due to self-harm. • The proportion of Bristol children and young people who belong to a Black, Asian, or Minority Ethnic group is 28%, much greater than in older age groups. • There are still young people aged 16-25 rough sleeping in Bristol • There is a current and predicted increase in the number of Care Leavers needing supported accommodation • There is a current and predicted increase in the numbers of unaccompanied children seeking asylum • There are gaps in the pathway for young people with high and complex needs and who present a higher risk • Planned move on from the pathway has not returned to pre-pandemic levels <p>This evidences that the need for help and support for young people experiencing or facing homelessness is increasing, and where homelessness can be prevented, the Youth hub approach does work. The demand for supported accommodation is increasing and the intensity of support needed also appears to be increasing, as well as the diversity of young people using the services. Our proposed commissioning plan has been put together to try to meet these needs within budgetary constraints.</p>

<p>An EQIA was done in March 2022</p>	<p>The following actions were noted because of the 2022 EqIA: Appendix-E EqIA YPHIP FINAL.pdf (bristol.gov.uk)</p> <p>Measures were put into the procurement processes to ensure providers demonstrated robust equality policies, equality related training, would promote inclusive environment, LGBTQ+ awareness, Disability awareness, robust Safeguarding policies and procedures.</p> <p>The Bristol Youth MAPS service has been set up to: be adequately staffed to be and feel safe (minimising risk of CSE or DV); have links with the child sexual exploitation service (BASE); assist young people to access adult social care services where appropriate; agree arrangements to enable planning housing for young offenders leaving custody; has a robust risk assessment process, including consideration of domestic violence and issues relating to sexual orientation; ensure that triage/assessment and communication takes account of young people with Learning Difficulties; link with the council’s Gypsy, Roma and Traveller Liaison Officer.</p> <p>There is a geographical spread of low support accommodation. There are adapted units in the high and medium-high support accommodation and there are ground floor units in medium and low support services. There are women-only clusters of flats in the high and medium-high services, but men are accommodated in other cluster flats in these buildings. There are several low support shared houses that are women-only.</p> <p>All services collect and report on equalities data, including sexual orientation. Commissioners monitor representation in services and examine reasons if over representation occurs.</p>
<p>Performance data for the MAPS Youth Hub Service <i>(this is not published data and is not available to the public).</i></p>	<p>Referrals to MAPS during the period 01/10/2020 to 30/09/2022 A total of 1,649 young people were referred to, or self-referred to, the MAPS service over the period.</p> <p>There were 375 referrals of single young people aged 16-17 who were not care - experienced during the period. Of these, 121 were closed following triage and 252 full cases were opened with MAPS AMS workers.</p> <p>There were 1035 referrals of single young people aged 18-21 who were not care-experienced over the period. Of these, 302 cases were closed following triage and brief intervention work, and 723 full cases were opened with MAPS AMS workers.</p> <p>There were 45 referrals of young people aged 22-24 . Of these 41 were closed following triage and 4 full cases were opened.</p> <p>There were 35 new referrals of young parents (who were not care experienced) over the period. Of these, 13 were closed following triage and brief intervention, and 22 full cases were opened. In addition, there were 4 referrals from young parents who were care experienced, 2 of which resulted in full cases being opened.</p> <p>There were 159 new referrals of care experienced young people to MAPS during the period 01/10/2020 to 30/09/2022. Of these 41 were closed following triage. 39 full cases were opened with MAPS AMS workers for care-experienced young people.</p> <p>We can see from comparison with 2018 data that the demand for MAPS services has increased by over 30%. This will reflect the increase in numbers of young people and the increasing pressures on young people leading to homelessness.</p>

Equality and Diversity monitoring data from the MAPS service shows us:

Sex

Male		49%
Female		50%
Non-Binary		1%

Gender

Same as at birth		94%
Did not want to say		5%
Trans		1%

Sexual Orientation

Heterosexual		80%
Bisexual		8%
Did not want to say		6%
Gay		2%
Lesbian		2%
Other		1%

Racial origin

Asian/British Asian		2%
Black/Black British African		5%
Black/Black British Somali		4%
Black/Black British Caribbean		8%
Black/Black British other		2%
Eastern European		2%
Other (inc Gypsy/Roma/Traveller)		3%
Mixed heritage		10%
White British		58%
White other		5%
Did not want to say		1%

Religion

Agnostic/Atheist		2%
Other religion		2%
Christian		14%
Did not want to say		4%
Muslim		11%
No religion		67%

Disability

Disabled		30%
Non-Disabled		70%

Please note that there were significant gaps in this data, and it is not reliable. Comparing this with data from referral forms for young people shows us that no information is given for 37% of the young people referred.

Disabled		21%
Non-Disabled		42%
No information		37%

There is improvement needed in the collection of data for young people referred to MAPS. This will be improved from April 2024 because all new referrals will now be loaded onto the Council's Abris system so that we are able to monitor all prevention work and report this to the Department of Levelling Up, Housing & Communities.

We also have data from MAPS External Case Review Panels which are held monthly and discuss the cases of young people who may not be able to access the supported housing pathway. In 2022/23 69 cases were considered.

Age	
16-17	11
18-21	56
22+	2

Gender	
Male	43
Female	24
Trans Male	1
Not Known	1

Ethnicity	
Black African	1
Black British	4
Black British Caribbean	4
Dual Heritage	2
Iranian	1
Polish	1
White and Black African	2
White/ Black Caribbean	3
White British	37
White Irish	4
White UK Traveller	2
White Other	1
Not known	6

Religion	
Agnostic	1
Catholic	2
Christian	3
Muslim	2
None	32
Unknown	28
Unsure	1

Sexuality	
Bisexual	2
Heterosexual	47
Homosexual	1
Unknown	8
Not disclosed	3
Not recorded	8

were made because young and high needs.

The data from MAPS also shows leavers (and care-experienced referred to MAPS case review plans can be put in place,

Disability	
Yes	25
No	23
Unknown	18
Not Recorded	3

42% of these referrals people have complex

clearly that care young people) are panels so that housing the multi-agency hub.

<p>The Council's Homelessness Prevention Team monitoring data</p>	<p>The Council collects monitoring information for all referrals to the Housing Prevention Team (HPT). Most young people will go to MAPS and be referred to the HPT Housing Advisors from there is their homelessness cannot be prevented by the other MAPS staff.</p> <p>For the period 01/04/20 to 31/12/2022 the equality monitoring for young people tells us that there at age 16/17 we see roughly the same number of young men (48%) and young women (52%). At age 18-21 there are more young women (57%) than men (42%), and for ages 22-25 there are more young men (65%) than women (34%) presenting.</p> <p>24% of those presenting aged 16-17 are Black, Asian and minority ethnic, which is slightly under the Black, Asian and minority ethnic proportion of children in the city (28%).</p> <p>26% of those presenting aged 18-21 are Black, Asian and minority ethnic.</p> <p>30% of those presenting aged 22-24 are Black, Asian and minority ethnic.</p> <p>This tells us that Black, Asian and minority ethnic young men are over-represented in the figures for young people who are experiencing homelessness aged 22+.</p>																																																									
<p>Equality Monitoring data from the contracted supported accommodation services, contract management information.</p>	<p>All services collect and report on equalities data, including sexual orientation. Commissioners monitor representation in services and examine reasons if over representation occurs.</p> <p>Monitoring data for all new placements into the youth pathway in 2021/22 is shown below:</p> <table border="1" data-bbox="435 1088 1465 2098"> <thead> <tr> <th colspan="3">The number and percentage of young people who identify as:</th> </tr> <tr> <th>Sexual Orientation</th> <th>YTD (year to date) Totals</th> <th>YTD %</th> </tr> </thead> <tbody> <tr> <td>Lesbian or gay</td> <td>13</td> <td>7%</td> </tr> <tr> <td>Heterosexual</td> <td>128</td> <td>70%</td> </tr> <tr> <td>Bisexual</td> <td>11</td> <td>6%</td> </tr> <tr> <td>Prefer not to say</td> <td>41</td> <td>22%</td> </tr> <tr> <td>Transgender</td> <td></td> <td></td> </tr> <tr> <td>whose gender identity is different to that assigned at birth</td> <td>2</td> <td>1%</td> </tr> <tr> <td>Physical Impairment and/or Sensory Impairment</td> <td></td> <td></td> </tr> <tr> <td>having a Physical Impairment and/or a Sensory Impairment</td> <td>16</td> <td>9%</td> </tr> <tr> <td>Mental health and Learning needs</td> <td></td> <td></td> </tr> <tr> <td>having mental health support needs</td> <td>27</td> <td>15%</td> </tr> <tr> <td>having learning support needs</td> <td>10</td> <td>5%</td> </tr> <tr> <td>Ethnicity</td> <td></td> <td></td> </tr> <tr> <td>White</td> <td>104</td> <td>57%</td> </tr> <tr> <td>Mixed/ Multiple ethnic groups</td> <td>21</td> <td>11%</td> </tr> <tr> <td>Asian/ Asian British</td> <td>6</td> <td>3%</td> </tr> <tr> <td>Black British</td> <td>29</td> <td>16%</td> </tr> <tr> <td>belonging to any other ethnic group</td> <td>6</td> <td>3%</td> </tr> </tbody> </table>	The number and percentage of young people who identify as:			Sexual Orientation	YTD (year to date) Totals	YTD %	Lesbian or gay	13	7%	Heterosexual	128	70%	Bisexual	11	6%	Prefer not to say	41	22%	Transgender			whose gender identity is different to that assigned at birth	2	1%	Physical Impairment and/or Sensory Impairment			having a Physical Impairment and/or a Sensory Impairment	16	9%	Mental health and Learning needs			having mental health support needs	27	15%	having learning support needs	10	5%	Ethnicity			White	104	57%	Mixed/ Multiple ethnic groups	21	11%	Asian/ Asian British	6	3%	Black British	29	16%	belonging to any other ethnic group	6	3%
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Religion		
having no Religion	91	50%
Christian	11	6%
Muslim	25	14%
having any other religion or belief	54	30%

We also know that in 2021-22 of young people newly placed in supported accommodation:

- 58% were young men
- 30% had mental or emotional distress
- 12% had multiple complexity of needs

A demographic snapshot looking at all residents of the Pathway at the midpoint in 2021-22 showed that 57% are male and 43% female. There had been a shift towards more young women being housed in the Pathway recently however men are slightly overrepresented using this service.

Of the accommodation users, 7% had a physical impairment. 46% were Black, Asian and minority ethnic . 22% were Muslim, 14% were Christian, 57% had no religion.

Men, Black, Asian, and Minority Ethnic, Christian, and Muslim communities are overrepresented in this supported accommodation category.

The Housing Support Register gives us equality data about referrals and waiting lists for our services as well as refusals. We collect data about new placements, planned departures and unplanned departures so that we can look at the journey through the services.

The data for planned and unplanned departures does not show any notable representation issues.

Over the life of the contracts, providers and BCC staff have worked to ensure that psychologically informed (also known as trauma-informed) practice underpins the service provision.

Additional comments:

In terms of the proposed commissioning plan, this tells us that:

- Overall demand has increased for the youth hub service. Our plan is to recommission this service.
- Services must cater for diverse needs, particularly noting the over representation of Black, Asian and minority ethnic young men accommodated in the Pathway. We know that the numbers of unaccompanied asylum-seeking children coming to Bristol has increased and is increasing. We will seek to commission services which recruit a diverse workforce. Young people in the pathway have increasing mental health support needs. Our proposal is to set up a new mental health navigator service to meet this need.
- Advice and support are needed about housing options for care experienced young people. We plan to continue to provide this through the youth hub external case panel system.
- We will ensure that we secure accessible accommodation for Disabled young people through our procurement process.
- We currently have gaps in the provision of supported accommodation for young people with high and complex needs and our proposal is to seek funding from central government to deliver this.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g., pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Equality data about young people using the commissioned services is collected by the services themselves and by referrers using our Housing Support Register.

There are gaps in the Bristol Youth MAPS data (missing records), but data collection will be improved from 01/04/2023 because from this date all new referrals will be entered onto the Council's Abris system which should include basic equality monitoring data. This means the data for the year 2023-2024 should be intact.

There are gaps in overall diversity data at a local and national level for some characteristics e.g. gender reassignment – especially where this has not historically been included in statutory reporting e.g. for sexual orientation. As a council we rarely monitor marriage and civil partnership. There is a corporate approach to diversity monitoring for service users and our workforce, however the quality of available evidence across various council service areas is variable. No robust data on gender identity exists. Gaps in data will exist as it becomes out of date or is limited through self-reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g., staff-led groups and trades unions as well as affected staff.

Young people and other stakeholders were consulted about their experiences of our current provision in January 2023 through an online survey which was used to start the process, alongside meetings with providers and a questionnaire form to seek stakeholder feedback. We asked providers to provide support to young people to complete the survey if they required this in accessible versions or translations. In April and May we ran a series of five engagement workshops with young people. These were with young people who are living in the supported housing pathway or have lived in it, or who are care leavers, or who are in care and may move into the pathway. These were attended by 14 young people. We developed and wrote the commissioning plan during and following these sessions so that the voice of the young people had a direct impact on the changes we are proposing. We then consulted on the draft commissioning plan, running two consultation sessions (one via Teams and one face to face) and a consultation survey.

A consultation and engagement report is included in Appendix 4 of the commissioning plan.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The providers of the commissioned services engage with their service users through support sessions and surveys/questionnaires as well as through comment and complaints processes. The Contracts and Commissioning Team met with providers regularly and they feedback about issues raised. We annually monitor the equality and needs data of the young people accommodated and supported by Pathway services. During the engagement sessions with young people, we were asked if and how the engagement could continue, with young people having ideas about how they would like to be involved (e.g., podcasts about youth homelessness) and we will be looking at how we can facilitate regular engagement going forward and this is now included in the commissioning plan.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Services need to be inclusive, representative of the young people they are serving, and supporting young people to build independence skills and engage in meaningful activities. Commissioned services will need to demonstrate that they are inclusive, compliant with the Equality Act of 2010 and meet the needs of vulnerable groups, such as Black and minority ethnic young people, LGBTQIA+ young people, young people with SEND, Care Leavers and unaccompanied young people seeking asylum, amongst others. There will be an expectation that this approach will enable a diverse and intersectional workforce.

We will expect our services to continue work in partnership with key organisations who support young people from protective characteristic groups e.g., Bristol Refugee Rights, WECIL, Off the Record, MIND, Albert Kennedy Trust etc. We will continue to search and work with city partners to apply for additional funding streams that will increase total available expenditure and capacity in line with the Council's 'One City' approach.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Any reduction in the current funding from BCC will result in a reduction in the units of supported housing and prevention services for young people, which have been contracted for the past 6 years with no annual uplift for the providers. It is likely that even if budgets are not reduced, we will see a reduction in capacity because unit costs have increased. We will potentially see a loss in services and therefore young people will have longer waits for supported accommodation and will be at greater risk of homelessness.
Mitigations:	We are looking at options that change the delivery of some of our services, including changes to night cover. A new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, coordination of services, and active management of waiting lists. This would mitigate some of the

	risked losses of supported accommodation, hopefully enabling us to maintain the current number of supported housing bedspaces for young people.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Disabled young people are overly represented in the pathway and at MAPS, therefore any reduction to service capacity will have a disproportionate impact on them because there will be less availability of supported housing, and longer waiting times to access supported housing. Changes to night cover may have an impact on young people who experience emotional distress at night. There is particularly an over representation of young people with mental health, neurodivergence and Learning Difficulties who would find the additionally long waiting times stressful, often impacting on their wellbeing. The specific needs of these young people can include interpreting and translation. The costs of interpreting during support sessions can be high. BSL interpreting, Easy Read translations are sometimes needed.
Mitigations:	We are looking at options that change the delivery of some of our services . A new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, coordination of services, and active management of waiting lists. This would mitigate some of the risked losses enabling us to look carefully at options to best provide support those young people who need it. Training will be available to all MAPS staff on Mental Health, Neurodivergence and Learning Difficulties so they can adapt their support service to be accessible for young people that fall within this category. This service will have access to telephone, online and in person interpreting and translators including BSL. Any written information can be provided in an easy read format or can be explained by a trained staff member, tailored towards the young people's individual needs.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Young men are over-represented in the data and therefore any reduction to service capacity will have a disproportionate impact on them because there will be less availability of supported housing, and longer waiting times to access supported housing.
Mitigations:	We are looking at options that change the delivery of some of our services, including changes to night cover. A new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, coordination of services, and active management of waiting lists. This would mitigate some of the risked losses of supported accommodation, hopefully enabling us to maintain the current number of supported housing bedspaces for young people.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	National data shows that LGBTQ+ young people are more likely to experience homelessness and whilst our monitoring data does not show an over representation of young LGBTQ+ people, there are gaps in data, and we can assume that there is under reporting. Therefore, any reduction in capacity is likely to have a disproportionate impact on them because there will be less availability of supported housing, and longer waiting times to access supported housing.
Mitigations:	We are looking at options that change the delivery of some of our services. A new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, coordination of services, and active management of waiting lists. This would mitigate some of the risked losses enabling us to look carefully at options that best provide support to young people who need it. We will ensure that all placement options considered for young people are safe and represent the best fit for clients' needs. Resources and training are available to providers on meeting the specific support needs of LGBTQ+ clients, and these can be updated regularly, to ensure they contain the most current information and recommendations for best practice.

Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Any reduction in the service is likely to have an increased impact on young people from Black, Asian and minority Ethnic Communities because they are overrepresented in the services therefore any reduction to service capacity will have a disproportionate impact on them because there will be less availability of supported housing, and longer waiting times to access supported housing
Mitigations:	We are seeking to recommission these services at the existing capacity, the budget was agreed at the earlier cabinet in Sept 2023- there is no change in budget.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Any reduction in the service is likely to have an increased impact on young people from Christian and Muslim Communities because they are overrepresented in the services therefore any reduction to service capacity will have a disproportionate impact on them because there will be less availability of supported housing, and longer waiting times to access supported housing.
Mitigations:	We are seeking to recommission these services at the existing capacity, the budget was agreed at the earlier cabinet - there is no change in budget.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Young people are experiencing the impact of the cost-of-living crisis, are asked to leave home because of overcrowding issues or family financial strain and are unable to secure affordable rented housing. Their age means that benefit rates, the Local Housing Allowance rate (which caps how much housing benefit they can get), and minimum and living wage rates are lower and so they are financially disadvantaged. Therefore, they are more likely to need homeless prevention advice and support, as well as access to affordable supported housing.
Mitigations:	We are looking at options that change the delivery of some of our services, including changes to night cover. A new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, coordination of services, and active management of waiting lists. By doing this we hope to minimise any reduction in capacity of our supported housing pathway. We are also proposing improving our early prevention resources, to provide better information for young people and their families at an earlier point.
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g., Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Our commissioned accommodation services are for single young people including young people who are unaccompanied asylum seekers. Any reduction to service capacity will

	<p>have a disproportionate impact on them. The specific needs of these young people include interpreting and translation. The costs of interpreting during support sessions can be high. These young people often have trauma related emotional and mental health needs, such as PTSD, and sometimes physical health needs relating to their situation. These, combined with the language challenges, can present a complexity for providers.</p>
Mitigations:	<p>The numbers of unaccompanied asylum-seeking children coming to Bristol has increased with high level of mental health support needs. We will explore options to set up a new mental health navigator service to meet this need through the youth hub external panel system.</p> <p>We will embed and clarify our expectations about inclusive services for young people seeking asylum in our documentation and specifications. We will negotiate with children's Services to seek release of some of the home Office funding they receive for UAS young people to offset some of the additional interpreting costs. CF&SC also commission other accommodation for UASC young people.</p> <p>Training will be available to all MAPS staff on Mental Health, Neurodivergence and Learning Difficulties so they can adapt their support service to be accessible for young people that fall within this category.</p>
Potential impacts:	<p>Our commissioned accommodation services are for single young people including young people who are Care Leavers or who are leaving care, and young people aged 16-17 who are accommodated under the Children Act Section 20 are sometimes placed in the supported housing pathway by Children's Services. Any reduction to service capacity will have a disproportionate impact on them. The introduction of Ofsted registration, standards and inspections for all supported accommodation which houses young people aged 16-17 who are either accommodated under s.20 or who are care leavers, will have a cost and administrative impact on our commissioned providers.</p>
Mitigations:	<p>We have clarified our registration expectations in our commissioning plan to try to reduce the burden on providers for the services which infrequently house this cohort of young people.</p>

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The contracts within the Young People's Housing & Independence Pathway advance equality of opportunity for young people who are care-experienced or who are homeless or at risk of homelessness through providing information, advice, and mediation to prevent housing crisis, through providing information, advice, and support to access safe accommodation, and through providing a range supported housing options for young people who need them, with ongoing support to promote independence.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

<p>Summary of significant negative impacts and how they can be mitigated or justified:</p> <p>This is a Pathway of services for young, single people who are care leavers or who are homeless or threatened with homelessness. Older people, or young people who are married or in civil partnerships, or young people with children can access housing advice and homelessness assessments through BCC's Citizen Service Points. BCC commissions supported accommodation for vulnerable parents, including young people.</p> <p>The freezing of or reduction in BCC funding means that we cannot secure like for like services when recommissioning. This means the number of young people supported directly by our commissioned services may reduce. We are looking at options that change the delivery of some of our services, including changes to night cover, so that there is less support coverage but security or concierge to lessen the costs of the service.</p> <p>The new flexible support approach combined with commissioning a pathway of supported housing will enhance partnership working, and coordination of services, active management of waiting lists and enable young people to move through the pathway more freely.</p>
<p>Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:</p> <ul style="list-style-type: none"> It will provide us with the opportunity to work with organisations locally which will ensure that we can collectively work together to promote the Public Sector Equality Duty.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Review equality monitoring data for all referrals to MAPS which is being input onto the BCC Abritas system with effect from April 2023.,	Commissioning Manager	October 2023
Embed expectation of inclusive services, with specific reference to unaccompanied young people seeking asylum, in the commissioning plan and in contract specifications and tender processes.	Commissioning Manager	September 2023
Set up regular engagement opportunities for/with young people to feedback about their experiences and influence service development.	Commissioning Manager	April 2024

4.3 How will the impact of your proposal and actions be measured?

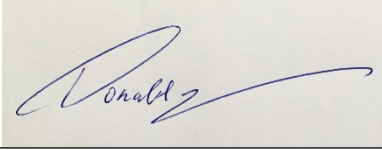
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

<p>Regular quarterly performance monitoring from commissioned providers.</p> <p>Regular six-monthly equality and diversity monitoring from the Housing Support Register.</p> <p>Regular six-monthly equality and diversity monitoring from the Abritas system.</p> <p>Annual reviews of contract delivery assessed by commissioning manager.</p> <p>Regular and planned engagement with young people, likely to be through quarterly engagement meeting and will include the exploration of a Peer Housing and Homelessness Podcast for young people and by young people.</p>

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities

impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 5/12/2023	Date: 26/01/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

Environmental Impact Assessment [version 1.0]

Proposal title: The future of the Homelessness Prevention Youth Hub Service		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Paul Sylvester	
Service Area: Housing Options	Lead Officer role: Head of Housing Options	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

We are asking cabinet to agree the Young People’s Housing & Independence Pathway Commissioning Plan and to give delegated authority to the Strategic Director of Growth & Regeneration to procure commissioned supported accommodation services and a youth hub focussed on preventing homelessness. We are also asking cabinet to give delegated authority to the Director Growth & Regeneration to extend and vary the contracts for these services within the budget envelopes set out in the report. The contracts for the current Pathway services for young people who are homeless or at risk of homelessness all end in 2024.

We have developed a recommissioning plan for the Pathway which seeks to secure:

- Improved website and information resources for early homeless prevention
- A recommissioned Youth Prevention Hub, focused on preventing homelessness for young people aged 16-24
- A recommissioned supported housing pathway with a more flexible support offer
- A specialist mental health support service, bringing specialist support to young people housed in the pathway and upskilling their key workers

Reasons for changes from the current Youth Housing & Independence Pathway:

- The current externally commissioned contracts are coming to an end in March 2024.
- The BCC budget has been the same since 2017 and will no longer purchase the same level of services.
- To respond to the changed needs of young people, especially after the pandemic, who are presenting increasingly with mental health needs.

To commission a supported housing pathway to enable the provider organisations to work in proactive partnership to make best use of scarce resources

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If 'Yes' complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
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If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
ENV1 Carbon neutral: Emissions of climate changing gases	Benefits	All the accommodation provided for young people uses gas and electricity for heat, light and power.
BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city		

<p>in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>Young people will be supported through the contracts to budget (minimise usage) and to manage their utilities efficiently. There may be opportunity for housing providers to look at efficiency measures in the home, perhaps accessing efficiency funding that is available. Looking at light fittings (LED), insulation, or boiler type. Housing providers could talk to the City Leap to check if there is any funding available for efficiency works on properties. The healthy and sustainable procurement policy should be referenced during procurement process.</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>		
	<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>			

<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	<p>YP will be encouraged and supported to engage in garden activities where there is access to green space on properties.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	Domestic waste and recycling services are used for all the accommodation provided for young - Young people will be supported to budget (minimise waste) and to recycle their waste appropriately.
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years
<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
N/A		

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This does not constitute an endorsement or approval of the proposal.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the 'evidence base' section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
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Summary of significant adverse impacts and how they can be mitigated:
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Environmental Performance Team Reviewer: Nicola Hares
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Submitting author: Carmel Brogan
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Date: 22/11/2023

Date: 22/11/2023



Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Critical Assets Harbour River Wall Asset - Remedial Works	
Ward(s)	Various affected: Central, Hotwells & Harbourside, Bedminster, Southville and Lawrence Hill	
Author: Shaun Taylor	Job title: Head of Highways	
Cabinet lead: Councillor Donald Alexander, Cabinet Member for Transport	Executive Director lead: John Smith, Interim Executive Director Growth and Regeneration	
Proposal origin: BCC Staff		
Decision maker: Cabinet Member Decision forum: Cabinet		
Purpose of Report: This paper sets out the project progress made since the Bristol City Council (BCC) approval of the Strategic Partner (SP) Condition report, and the subsequent adoption of the Early Contractor Involvement (ECI) and Design and Build (D&B) procurement routes, using existing approved BCC framework Contractor, Alun Griffiths Contractors, (AGCL). This paper also sets out the immediate recommendation and the additional “ask” for further Capital forecasted requirement funding of £11.90m (now also including the re-introduction of £1.0m for the works to the Underfall Sluice footbridge), within the next five years to facilitate the full delivery of the identified mitigations and remedial works required to reduce the overall critical risks to the Transport Network to the overall recommendations as contained within the (SP) Condition Report findings.		
Evidence Base: Refer to Appendices as follows: Appendix Ai copy of the Strategic Partner (SP) Critical Harbour Asset Report Appendix Aii for BCC review of that (SP) Report and various Location Plans. Appendix Aiii for additional supplementary detailed site information to support overall narrative within main Report. Appendix Aiv Spreadsheet of detailed breakdown of individual sites costs with priority ratings.		
<u>1.0 Executive Summary of Findings from previous cabinet papers</u> Bristol’s Floating Harbour is an integral, and historic, part of the city, neighbouring homes and supports a range of businesses and livelihoods, as well as diverse wildlife. It is an important part of Bristol’s tourism offer too. The New Cut river walls support Coronation Road and Cumberland Road, which are both major strategic highway routes. The Floating Harbour and river asset condition survey undertaken in 2019/20 identified 194 retaining river wall		

assets within the Floating Harbour and New Cut waterways.

There are 11 Harbour retaining river wall assets identified as where a structural failure of could result in potential loss of life or serious injury, major flooding, adjacent property damage and immediate closure of the strategic Highway Network. This could mean impacts on traffic, environment, the wider local economy as well as financial and reputational damage to the Authority. Refer to Appendix A for further details.

2.0 Ongoing deterioration of the New Cut River Walls and potential additional structural issues and failures

The “New Cut” was constructed between 1804 and 1809 using materials and methods available, mainly masonry and hydraulic lime mortar. These assets have endured and performed remarkably well considering the lack of preventative maintenance undertaken over many decades. It is however now apparent that the masonry facing River Walls are deteriorating very rapidly, with three new river breaches in recent years to the south bank, just East of Vauxhall Footbridge being noted since the (SP) Condition Report in June 2023.

There are some sections not faced by masonry and are exposed rock face. In general, this river facing wall rock face is approximately 15m – 20m in height, and comprises of relatively robust sandstone layers, overlying softer sedimentary mudstone layers, subject to ongoing and cyclical tidal river erosion and scour, which is undermining. This is causing ongoing further slips and deterioration and requires urgent and timely intervention.

The rock faces to the west of Gaol Ferry Footbridge were not originally included in the (SP) Report, or part of the original structures inventory, so as part of the current investigation works, our contractors (AGCL), have been additionally commissioned to carry out a full-length de-vegetation and provide further estimate costs for a new photogrammetry/hands-on condition survey and further investigation/assessment to determine overall condition.

3.0 Strategic Partner (SP) Condition Report – BCC Client Appraisal

The draft Critical Asset Overview Report received from (SP) in January 2023, has now been reviewed by BCC Structures Team (refer to Appendix A for report details and for location plans), and the finalised (SP) report was accepted in June 2023.

Building from this report, our approach is to intervene with timely suitable proportional stabilisation measures.

Further strategic “Risk Profiling” has been undertaken based primarily on the (SP) report, and our own expertise and lessons learnt from events such as the failure of the Cumberland Road River wall in January 2020 that timely prior interventions would have prevented the ultimate failure (as consultant investigations were still ongoing, prior to the 2020 failure). There can now be a controlled “Risk Based” acceleration of the works programme with the removal of critical risks by structural stabilisation routes, rather than to continue to monitor/investigate as recommended in the (SP) report, thereby removing each targeted critical structural risk as deemed appropriate, in good time. This will enable an appropriate proportional reduction of immediate failure risks, rather than prolonged further ongoing investigations and monitoring.

The identified structural “Facing river walls” have an overall “durability core” function in protecting the existing river banks and sedimentary rock planes/faces from river erosion, so their ultimate structural repair is now also critically necessary, and this structural function can be readily reinstated (with approved additional Capital Funding), without the need for further ongoing investigations or geotechnical testing and would be suitable for (BCC-BST) to readily procure the required works on these critical structural facing walls by using our existing Core Bridges framework contracts and by using alternative procurement routes such as the Design and Build Contracts (D&B), where the Principal Contractor (AGCL), can design and construct and will also take on and share some of the inherent constructional risk here, utilising (D&B) contracts.

Using the existing Core Bridges Framework Contracts and considering design and build options is now the preferred delivery route and (BCC-BST) are recommending this route is taken, as this will allow the authority, having now just critically risk reprofiled (using D&B routes) 8 of the 11 critical structures, the authority will then be left with three remaining high-priority river wall structures as below. Further details of these river walls are

contained in Appendix A.

1. NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall – Retains York Road
2. NCN16 The Gateway/Slipway (Adjacent to Gaol Ferry Entrance Gate) – Retains Cumberland Road
3. NCN21/23 Bedminster Bridge wingwall (Adjacent to Bedminster Old Bridge) – Retains Coronation Road

4.0 Summary of the Workstreams & Investigation/Design Work Costs (from the £2.50m Approved Capital Budget)

See below the new revised estimated costs to undertake the necessary ongoing stabilisation works that were previously agreed to be executed utilising the Cabinet approved £2.50m funding stream and involves a mixture of further investigation, monitoring and actual stabilisation works. For further details on this, refer to Appendix Ai, ii, iii and iv as part of this report.

NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall	£435k
NCN16 The Gateway/Slipway – Adjacent to Cumberland Road	£514k
NCN21/23 Bedminster Bridge wingwall – Adjacent to Coronation Road	£150k
NCN-11 Gaol Ferry Rock Faces – Ecology/clearance/Survey and report (No design/GI)	£150k
New Cut LIDAR survey/Data management	£30k
Ecological Survey (Stage 1	£20k
General De-vegetation (For LIDAR/Survey work	£20k
BCC internal staff costs @ 15%	£200k
Initial Strategic Partner Report (Out-turn cost, including BCC staff costs	£160k
Site welfare/accommodation (Preliminaries	£45k
Diving surveys (Grain Barge and Feeder Canal)	£30k
Current total estimated/committed	£1.75m

5.0 Project Progress on Scoping the Preliminary D&B Design and Investigatory Works (3 High Priority Assets)

Langton Street Bridge/Banana Bridge River Retaining Wall and NCN16 The Gateway/Slipway have been identified as two of three high priority assets to focus on. For further detailed progress information on these specific high priority sites, along with other secondary project workstreams programme and progress information, refer to Appendix Aiii.

The mobilising of a Principal Contractor (AGCL) and Principal Designer (D&B) requires accurate investigatory scoping of the works, the availability and lead-times for the Contractor, the nominated Consultants and the specialist Sub-Contractors, and the gaining of the required ecological licences and associated Environment Agency (EA) permissions.

To expedite the third high priority asset, Bedminster Bridge, works (and the required minor design input) we will progress with construction and to mobilisation no site in early 2024.

6.0 Options considered for BCC to mitigate risk to the Strategic Transport Network

Option 1 – Do Nothing

Due to Bristol City Council’s overarching statutory duty as the Highway Authority this is therefore not considered to be a viable option and is therefore discounted.

Option 2 – Do basic minimum - Immediate Term – (2023 into 2033) Over 10 financial Years

Setting up a “Cyclic Monitoring Regime” of regular programmed 6 monthly inspections, and the surveying of all identified New Cut River walls, using normal surveying techniques, Visual Inspection where possible, new 3D drone photogrammetry survey and also new LIDAR surveys and modelling regimes.

The regime would monitor movement trends or structural events caused by the tidal watercourse. A six-monthly

cycle basis does mean that any event (unless reported via a separate source) might not be identified until the subsequent inspection. Such an approach will require a fully managed dynamic “Live Risk Register” with the appropriate “Mitigation Action Plan” compiled, approved and financed.

This risk management strategy for the New Cut river walls would operate as an “Early Warning System” by identifying new risks as they arise, allowing for a safe, effective, and cost-efficient mitigation Strategies to be then formulated. This approach will therefore allow BCC to discharge its statutory highways duties and minimise the ongoing risk of loss of life, injury, flooding, damage to property and all other impacts. This option would require an ongoing level of additional capital funding commitment “reserve stabilisation Pot” of circa £1.0m per annum to facilitate an immediate “rapid response plan” scenario for immediate mitigations and/or safety measures in the event of an unforeseen failure event(s) and would also require an additional annual ongoing monitoring Budget along in the scale of £70k-80K per annum.

This approach is not considered to be a viable option as a stand-alone measure, without further capital investment for these “now known” high priority sites.

Option 3 – Short term option – (2023 through to 2028), Over 5 Financial years

This option would be to deal with the “known” identified high-profile High Risk Priority sites:

- | | |
|---|----------|
| 1. Langton Street Bridge\Banana Bridge River Retaining wall | NCN28 |
| 2. Gaol Ferry Gateway\Slipway Retaining Wall | NCN16 |
| 3. Bedminster Old Bridge S\W Wing Wall | NCN21\23 |
| 4. Gaol Ferry Rock Faces (Additional high-priority asset) | NCN11 |

There is existing Capital funding already committed to the three high priority sites as identified in the (SP) Critical Asset Overview report. A fourth high priority has also since been identified after the report, which will be covered as part of the approved capital funding of £2.50m to undertake the required targeted investigations and design works.

The project is forecasting an intended capital commitment (as part of the approved £2.50m), of approximately £2.0m for the further ongoing investigations, design, and monitoring for these four sites.

At this juncture of the project, it is now forecasted that the final stabilisation measures required for the assets (1 – 3) will cost approx. £9.0m, plus a provisional sum of £1.80m has been allowed to cover any works required to the river wall rock faces over the next five years. This creates a projected forecasted project capital total of £10.80m.

Option 4 – Medium Term Option – (2023 to 2028), Over 5 Financial years and further (recommended Option)

This option includes the short-term option 3 (as described above) and would also include priority river facing wall sites: Bristol Metal Spraying (NCS-06), Camden Road (NCS-13), and Gaol Ferry Ramp (NCS18), which are all categorised Priority 2 risks, along with Feeder Road Jetty (S28b) categorised Priority 3 risk.

There is already existing capital funding committed to the further investigation, ecological assessment, site clearance, and design of the above high priority facing wall sites as part of the original approved £2.50m project scope, with an additional estimated cost of circa £100k for the actual investigation and other works.

With the recommended inclusion option 3 at circa £10.80m, this brings the full combined estimated cost of this option to £10.90m.

Long term Ongoing Capital Commitment – (2028 – 2038), Over 10 Financial years

This would be the main overall long-term objective of the River Asset project following the mitigation of the four main structures (option 3 or 4) to 2028, it would also be prudent to set aside up to £1.0 million per financial year beyond that point to completion of the full project to 2038 (and possibly further), to deal with the major existing Health and Safety risk to the network.

This long-term option would be considered prudent as there will always be ongoing deterioration of these river walls and appropriate intervention on a yearly basis will allow the authority to control and monitor the ongoing deterioration of this whole network of again river walls and look at further additional capital funding streams, should that be further considered to be required.

Refer to the breakdown of site costs in Appendix A iv, which include a breakdown of these sites, risk priority and estimated costs for further information to evidence the narrative of this report. Further details of the current expenditure and forecasted spend of the approved capital of 2.50 million, are contained further along in this report.

7.0 Underfall Sluice Bridge

The Underfall Sluice Bridge will be re-introduced back into the scope of this project, as BCC have been granted a £1.80m grant from the Environment Agency (EA) to undertake flood defence mitigation works to encompass this structure. These works are due to commence in 2024, therefore the structural works to the Underfall Bridge will need to be rescoped back in and included within the forecasted costs, with an anticipated cost of £1.0m (including the full assessment, design, and construction).

8.0 Overall Forecast Project Programme Finances

Final summary of additional Capital Budget now required to complete full programme of New Cut river wall works

Project	Costs
Option 4 (Per description above)	£10.90m
Underfall Sluice footbridge bridge	£1.00m
Total Estimated Costs	£11.90m

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Note an update on the project progress to date, remaining programmes, current immediate works and further findings.
2. Authorises the Executive Director for Growth and Regeneration, in consultation with the Cabinet Member for Transport to take all steps required to proceed with the works in relation to the High-Risk priority sites and additional priority river facing wall sites as outlined in recommended options 3 and 4 in this report including procuring and awarding contracts over the key decision threshold.
3. Authorises the Executive Director for Growth and Regeneration, in consultation with the Cabinet Member for Transport and Cabinet Member for City Economy, Finance and Performance to approve in principle the revised capital funding required for the project noting that priority funding of up to £6.10m be considered for inclusion in the Council's Capital Programme for 2024-25 , the remainder known to be required as a priority in 2025-26 and beyond will be subject to approval as part of the Council's capital process.

Corporate Strategy alignment:

Both the floating Harbour and the New Cut support the Adopted Highway in all the 194 locations identified, BCC, as the Local Highways Authority, has a statutory duty to maintain and keep in use and open for the public. The overall Corporate Strategy alignment of this project would be fulfilment of some of the corporate strategic themes with regard to Wellbeing, well connected and business as usual.

City Benefits:

Stabilisation of all these critical identified highway New Cut River wall structures will ensure the overall safety of these strategic assets, meeting the Council's overall statutory duty, obligations. It would also address the concerns of Corporate Council Insurers, in regard to providing related corporate insurance cover for the operational aspect of the City Docks.

It will reduce the risk of asset failure, which could affect the operation of the surrounding highway network, including Metrobus. It will reduce risk of any potential financial claims from owners of vessels in the Floating Harbour, who require constant notifiable maritime access in accordance with the legalisation. It will reduce risk

of increased repair costs and operational costs due to any additional mitigation measures, should there be significant delay in undertaking the urgent asset stabilisation work. Significant investment in stabilising these identified failing assets will produce overall future operational savings and performance reliability.

Consultation Details:

The Cabinet Member for Transport, Executive Director and the Mayor’s Office will be briefed on the proposed ongoing developing costs to this Capital project.
 Individual ward councillors will in time be briefed once these works get to site as a project and have an impact on the public.
 The Harbourmaster will be consulted and involved in the scheme developments.
 The Environment Agency (EA) will require details of the proposed activities, as the proposed works are next to a main watercourse and will require the appropriate consents from the EA.
 The Marine and Maritime Organisation (MMO) will be consulted on this project as they license, regulate and plan marine activities in the seas around England to ensure that this project proposal is carried out in a sustainable way.
 Local neighbouring Interest groups such as FRANC, will be kept informed of project and planned works before they get to site.

Background Documents:

[Corporate Strategy 2022-27 \(bristol.gov.uk\)](http://bristol.gov.uk/corporate-strategy-2022-27)

Revenue Cost	N/A	Source of Revenue Funding	N/A
Capital Cost New Cut River Wall Asset Stabilisation and investigations and also Underfall Sluice Footbridge Strengthening Works	£11.90 million of the approved Capital Programme. Full Breakdown of Capital Funding required contained in Main Body of Report and Appendices. <ul style="list-style-type: none"> • FY24/25 Total = £3.10m (£3m of Banana Bridge Wall + £0.1m Minor Masonry) • FY25/26 Total = £4.00m (£2m of Banana Bridge Wall + £1m Gaol Ferry/Gateway Wall + 1m Underfall sluice footbridge.) • FY26/27 Total = £3.0m (£2m Balance of Gaol Ferry/Gateway Wall + £1m works on the Gaol Ferry Rock Faces) • FY27/28 Total = £1.80m (1.8m on the goal ferry rock faces) 	Source of Capital Funding	Capital Funding to be sought through several routes such as CRSTS 2 Funds routes and also from EDF sources.
One off cost <input checked="" type="checkbox"/> Ongoing cost <input type="checkbox"/>		Saving Proposal <input type="checkbox"/> Income generation proposal <input type="checkbox"/>	

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:

This report seeks approval to repair four high risk sites in the New Cut River Walls which support Coronation and Cumberland roads along with several priority sites. Cabinet previously approved £2.50 million to deliver a series of stabilisation works and repairing these priority sites is forecast to cost £11.90 million. Separately, the Environment

Agency is planning to improve flood defences around the Underfall Sluice Bridge, and it is recommended the Council invest a further £1.0 million to improve the bridge as part of those works.

Given recent failures in river walls the investment is clearly of a high level of importance but capital funding in the Council is limited. The Growth and Regeneration Directorate is considering what funding could be switched from other programmes to allow this work to take place. That includes the contingency funding set aside for the Bristol Beacon, Western Harbour and available Community Infrastructure Funding (CIL), all of which are subject also to wider corporate priorities as set out in the Councils Budget policy framework. Priority funding of up to £6.10m will be considered for inclusion in the Council's Capital Programme for 2024-25, the remainder then to be considered as a priority in 2025-26 and subsequent years subject to approval as part of the Council's Budget Framework. However, in some cases we will need to return to the providers of grants and central government to approve our plans.

Finance Business Partner: Richard Young, Head of Strategic Finance (G&R) 26 January 2024

2. Legal Advice:

The procurement process must be conducted in line with the 2015 Procurement Regulations and the Councils own procurement rules. Legal services will advise and assist officers with regard to the conduct of the procurement process and the resulting contractual arrangements.

Legal Team Leader: Husinara Jones, Team Manager/Solicitor 19 January 2024

3. Implications on IT:

IT are supportive and available to aid in progressing relevant work and can be engaged through the existing work request process

IT Team Leader: Alex Simpson – Lead Enterprise Architect 28 November 2023

4. HR Advice: There are no HR implications evident.

HR Partner: Celia Williams, HR Business Partner 12 December 2023

EDM Sign-off	John Smith, Interim Executive Director Growth and Regeneration	29 November 2023
Cabinet Member sign-off	Cllr Donald Alexander, Cabinet Member for Transport.	7 December 2023
	Cllr Craig Cheney, Cabinet Member for City Economy, Finance and Performance	11 December 2023
For Key Decisions - Mayor's Office sign-off	Mayor's Office	8 January 2024

Appendix A – Further essential background / detail on the proposal Ai - Strategic Partners (SP) Harbour/New Cut Asset Priority Condition Report Aii - BCC-BST Review of the Strategic Partners (SP) Harbour/New Cut Asset Priority Condition Report and also Site Location Plans. Aiii - Supplementary detailed information to support overall narrative contained within Report. Aiv – Spreadsheet Table and Breakdown of separate River Wall Site costs.	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	NO
Appendix E – Equalities screening / impact assessment of proposal	YES
Appendix F – Eco-impact screening/ impact assessment of proposal	YES
Appendix G – Financial Advice	NO

Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO



SPI - Asset Investigations and Repairs Project ID 052

Critical Asset Overview Report

June 2023

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SPI - Asset Investigations and Repairs Project ID 052

Critical Asset Overview Report

June 2023

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
P01 - DRAFT	06/01/2023	Structural: C Braithwaite- Lock J Harrison-King Geotechnical: F Bottom Environmental: J Toy	Structural: Dave Stewart J Harrison-King Geotechnical: G Mason Environmental: P Hawkes	Structural: R Brueckner Environmental: T Crabb	DRAFT
A01	01/06/2023	C Braithwaite- Lock	J Harrison-King	R Brueckner	Final Issue

Document reference: | 100105143-MMD-00-XX-RP-CV-003 | A01 |

Information class: Standard

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Executive summary

This report details priority group ratings and proposed actions for the assets within the scope of this project.

Asset Prioritisation

Within context of the critical asset ratings, the assets have been ranked into groups in order of repair priority, with Group 1 being the highest priority and Group 3 the lowest. The rankings are in Table 1.1 below. Further details can be found in Section 12.

Table 1.1: Asset priority summary

Priority Group	Assets
1	NCS21/23 and NCS28
2	NCN16, NCS18 and S28b
3	NCS06 and NCS13
N/A	N06

Asset Recommendations

A summary table of the recommended actions can be found below in Table 1.2. In addition to the listed recommendations, there are potential constraints from ecology, unexploded ordnance and contaminated land, see relevant sections for further details.

NCN16 has been omitted from this table as its repairs have been expedited by Bristol City Council (BCC). Details of suggested repair options and recommended geotechnical investigations can be found in documents 100105143-MMD-NCN16-XX-TN-CV-001 [8] and 100105143-MMD-NCN16-XX-SP-GT-002 [10].

Table 1.2: Asset recommendations summary

Priority	Asset	Summary
1	NCS21/23	<p>Ground Investigations</p> <ul style="list-style-type: none"> • 2No. boreholes • Slit trench behind the top of the wall <p>Monitoring</p> <ul style="list-style-type: none"> • Visual – 1 month intervals <p>Reconstruction</p> <ul style="list-style-type: none"> • Deconstruct existing wall and replace with reinforced concrete retaining wall. • Reinstate footway and carriageway (if applicable) <p>Other Constraints</p> <ul style="list-style-type: none"> • Bedminster bridge listed status
	NCS28	<p>Ground Investigations</p> <ul style="list-style-type: none"> • 8No. boreholes • 2No. trial pit <p>Monitoring</p> <ul style="list-style-type: none"> • Visual – 1-month intervals • Real time monitoring – tilt meter and displacement sensor installation • Real time monitoring (potential tilt meter and displacement sensors) of bridge and abutment • CCTV survey of outfalls and functionality check of flap valves <p>Reconstruction*</p>

Priority	Asset	Summary
		<p>*It is not thought to be practical to repair the asset as there are concerns over the adequacy of the existing foundations. However, given the disruption of piling, a high level feasibility study should be undertaken to determine whether a wailing beam and anchor system (with miscellaneous masonry repairs) is appropriate.</p> <ul style="list-style-type: none"> Reconstruction is likely to consist of pile installation behind the existing masonry wall. Masonry wall can be rebuilt or allowed to deteriorate (risk of poor perception from public). <p><u>Other Constraints</u></p> <ul style="list-style-type: none"> Langton Street Bridge listed status
2	NCS18	<p><u>Ground Investigations</u></p> <ul style="list-style-type: none"> 4No. boreholes 2No. hand dug trial pit Slope stability analysis <p><u>Monitoring</u></p> <ul style="list-style-type: none"> Visual – 2 month intervals Real time monitoring – tilt meter installation <p><u>Repair – Slipway defects</u></p> <ul style="list-style-type: none"> Repairs to collapsed sections in the vicinity of the slipway are considered to be a high priority if BCC find it important to retain the use of the slipway for access into the New Cut. Repairs here are to be of a combination of masonry (like for like) and reinforced concrete patch. <p><u>Repair – Slope wall defects</u></p> <ul style="list-style-type: none"> Repair method to be evaluated following ground investigations and contractor engagement. There is an anticipated high cost of siting plant and access to conduct patch repairs on the wall (concrete or masonry). Slope stabilisation works are a potential interim option
	S28b	<p><u>Ground Investigations</u></p> <ul style="list-style-type: none"> 2No. boreholes Dive survey <p><u>Monitoring</u></p> <ul style="list-style-type: none"> Monitored for global movement – regular (3-4month intervals) photogrammetric model capture either from drone or boat, or automated monitoring <p><u>Repair</u></p> <ul style="list-style-type: none"> To be determined following dive survey and ground investigations. Likely piling or a concrete repair
3	NCS06	<p><u>Ground Investigations</u></p> <ul style="list-style-type: none"> 4No. boreholes 4No. hand dug trial pit Slope stability analysis <p><u>Monitoring</u></p> <ul style="list-style-type: none"> Visual – 2 month intervals <p><u>Repair</u></p> <ul style="list-style-type: none"> Repair method to be evaluated following ground investigations and contractor engagement. There is an anticipated high cost of siting plant and access to conduct like for like masonry repairs, or local demolition and rebuild. Slope stabilisation works are a potential interim option. <p><u>Other Constraints</u></p> <p>Ground investigations to dictate whether priority group increases dependant on:</p> <ul style="list-style-type: none"> The building foundations are found to be dependent on the river wall and a concern develops over that section of the wall. The condition of the bank retaining wall significantly deteriorates. The slope stability assessment indicates there is a risk of collapse.

Priority	Asset	Summary
	NCS13	<p><u>Ground Investigations</u></p> <ul style="list-style-type: none"> • 2No. boreholes • 2No. hand dug trial pit • Slope stability analysis <p><u>Monitoring</u></p> <ul style="list-style-type: none"> • Visual – 2 month intervals <p><u>Repair</u></p> <ul style="list-style-type: none"> • Repair method for collapsed section to be evaluated following ground investigations and contractor engagement. • There is an anticipated high cost of siting plant and access to conduct like for like masonry repairs, or local demolition and rebuild. Slope stabilisation works are a potential interim option. • Sections of deformation to be repaired if movement is experienced.
N/A	N06	<p><u>Follow-up actions</u></p> <p>Contact Edwards Diving Services (EDS) to seek and understand why the void behind Grain Barge was not mentioned in their report. Clarification should also be obtained with regards to accessibility of the arches, whether the arch barrels were inspected, and where the recorded spalls are located.</p> <p>Potential follow up dive inspection to confirm condition and function of void.</p> <p>No deformation found at any of the arch barrels.</p> <p>Potential to de-risk asset from scope of this project following conversation/follow up dive survey with EDS relating to the void.</p>

1 Introduction

1.1 Background

Across 2019 and 2020, Mott MacDonald were commissioned to undertake inspections of Bristol City Council (BCC) assets in the Bristol Floating Harbour, Feeder Canal, and the River Avon New Cut as part of the Harbour Condition Survey project. Overall, there are 194 retaining wall assets and the inspections found that there were 58 assets rated as being either in a serious or critical condition.

Mott MacDonald were then tasked with prioritising these 58 assets in terms of their consequence and likelihood of failure, and this resulted in 11 assets being identified as having both a high consequence and high likelihood of failure. Failure of these assets could potentially result in loss of life or serious injury, major flooding, adjacent property damage and immediate closure of the road network in the vicinity of the failure which are likely to have significant effects on the wider road network. Additionally, this will have financial, environmental and reputational damage to BCC and the local economy and South-West Region.

The 11 assets rated as having a high likelihood and high consequence of failure are:

- N06
- NCN03a*
- NCN16
- NCS06
- NCS13
- NCS18
- NCS21
- NCS23
- NCS28
- NCS30*
- S28b

Two of these assets, NCN03a and NCS30 have been removed from the scope of this project by BCC as they are undergoing further works within other schemes.

1.2 Scope of Works

Mott MacDonald have been commissioned by BCC to further investigate the highest priority assets, in an effort to fast-track necessary repairs and outline potential monitoring programmes. This report outlines findings and suggests monitoring options and recommends further investigations to be undertaken to inform repair options.

Within this project, BCC has further prioritised the investigation and remediation work for NCN16. This can be found in report 100105143-MML-NCN16-XX-TN-CV-001 [8].

1.3 Site Walkovers

Since the initial asset inspections, Mott MacDonald have completed site walkovers for geotechnical and structural purposes on the following dates:

- 17th, 19th & 28th January 2021
- 28th June 2022

- 27th September 2022

Observations and photos from these site walkovers and condition surveys are included in this report. Additional information is included from Bristol City Council archives.

The following surveys have been undertaken to collect data:

- Terra Drone (Skeye) in March 2019 – November 2019
- Glanville Geospatial Services – December 2019
- Glanville Geospatial Services – April 2019 to December 2019
- Skeye (drone survey) – October 2022

1.4 Asset Defect Sections

The following asset defect sections presented in this report, do not provide a complete summary of all defects identified for each asset. Instead, they highlight the critical defects being considered for repair and monitoring at this stage.

2 Monitoring

There are a variety of different monitoring techniques which can be used in the project to gather regular information on the deterioration of the assets. The primary options to consider include:

- Visual monitoring with photographic evidence.
- Visual monitoring with photogrammetric model (Drone survey).
- Laser scanning.
- Total station surveying.
- Installation of sensors.

To facilitate these monitoring options, vegetation removal in the vicinity of the assets should be conducted as required to enable the regular and unobstructed monitoring of them visually.

2.1 Visual Monitoring with Photographs

Mott MacDonald staff undertake a site walkover and capture photographs of an asset from safe available locations. Photographs are captured using a long lens camera to obtain the best images possible.

These photographs are then compared with the previously captured images to document visible changes and to compile a visual record of an asset.

Using this method in isolation and without further monitoring methods means that only significant changes to an asset are detected (e.g., additional loss of masonry), it may not be possible to detect minor movement.

There could also be issues with being able to capture photographs of certain assets during times when vegetation growth is at its peak, as a clear line of sight is required.

This option would be cheap as it would require approximately 3 days of staff time per walkover.

If additional close-up inspections are necessary, either boat or rope access would be required at a supplementary cost.

2.2 Visual Monitoring with Photogrammetric Model

A drone survey can be used to create a photogrammetric model. The model can be compared with previous models, such as the 2019 model and 2022 model to look for movement and any discreet changes to the masonry.

In the process of creating the model, hi-resolution images will be captured from numerous vantage points, which are unable to be reached by foot or boat (aerial/birds eye view). This allows for better coverage of the asset than would be possible if only taking images on foot.

Additionally, creating digital photogrammetric models of the New Cut assets contributes towards the initial investment outlaid in the digital twin, which was a key target of the 2019 project, and builds up the information on the assets.

While different models can be compared and overlaid, it may only be possible to detect larger movement events and loss of masonry, and minor movement may not be readily apparent. High accuracy surveys and models can improve the level of detection in combination with machine learning, but this will be at a higher cost.

This is considered to be an option as a biennial (every 2 years) practice to gain information over the long-term rather than a regular practice.

The cost of the drone survey can be estimated to be about £10,000 to £15,000 (excluding VAT) per survey depending on the number of assets to be surveyed. The cost comprises 2 to 4 days of drone survey and access provision to the New Cut by a specialist contractor. The drone survey can be also extended to the entire New Cut assets to obtain regular information about their condition.

2.3 Laser Scanning

Laser scanning of the walls would provide a point cloud model. Through this model, sections would be drafted to allow the comparison of readings allowing the detection of movement. The readings can be given in graphic form which will give a complex view of asset changes.

Specific sections will need to be selected meaning that there is the potential for new deformations to be initially missed. To avoid this occurrence, a site inspection should be undertaken prior to the confirmation of section positions.

A quote for laser scanning, processing scan data to a point cloud and the preparation of drafting sections from scan data has been provided by Anthony Brookes Surveys (ABS), an extract of this is provided in A.1.

The quoted cost to laser scan all 8 assets and have 20 sections drafted would be £7,260 (excluding VAT) per round of scanning.

The laser scan data would likely have some fuzz or noise, so the accuracy could be in the region of 6mm to 20mm depending on the surface and condition. ABS expects to get around 6mm accuracy across the New Cut sites.

Additionally, creating models of the New Cut assets continues contributing towards the initial investment outlaid in the digital twin approach and builds up the repository of information on the assets. To incorporate this data into the existing 3D model, it would require processing further than required for section drafting and this would be available to purchase from ABS at an additional cost.

To facilitate the laser scanning, there will need to be regular de-vegetation to ensure that the best possible coverage is obtained, and a clear line of sight is possible. This may be necessary on both sides of the river.

As laser scanning is a periodic survey method, there is the potential to miss signs of a sudden failure.

At the time that the quote was given (17/11/2022), ABS could attend site within 15 working days from receipt of a written instruction to proceed.

2.4 Total Station Survey

A total station survey scans targets installed onto the assets to detect changes in position between scan dates. Information will be compiled in a spreadsheet for comparison. The accuracy of the surveying is approximately 3mm.

The targets require rope access for installation and be installed using an adhesive suitable for a marine environment. Over time, there is a risk that targets are lost which will lead to an incomplete data set.

A quote for surveying and processing the survey data into a comparison table has been provided by Anthony Brookes Surveys (ABS), an extract of this is provided in A.1.

The quoted cost to survey all 8 assets would be £3,860 (excluding VAT). There is also an initial additional cost for the installation of survey targets of £520 (excluding VAT) per day, it is anticipated that the installation process would require a minimum of 3 days, totalling £1,560 (excluding VAT).

Additionally, the quote has specified that targets will be installed at 1m intervals in two rows along an asset, the density of the targets could be increased or decreased as required which will vary cost.

To facilitate the surveying, there will need to be regular de-vegetation to ensure that the best possible coverage is obtained, and a clear line of sight is possible. This may be necessary on both sides of the river. Furthermore, prior to a survey taking place, targets will likely require cleaning to remove any sediment that may have been deposited on them, this will incur added costs.

As surveying is a periodic survey method, there is the potential to miss signs of a sudden failure.

At the time that the quote was given (17/11/2022), ABS could attend site within 15 working days from receipt of a written instruction to proceed.

There could also be issues with being able to undertake a survey of certain assets during times when vegetation growth is at its peak, as a clear line of sight is required.

2.5 Remote Sensor Installation

The installation of sensors would provide real-time (frequency adjustable) information on the movement of an asset and how an asset was being affected by different conditions e.g., tide, traffic, temperature, and other seasonal effects. There would also be signals relating to movement of an asset prior to a failure.

Sensor installation would come with a warning system that, if certain conditions are experienced, notifications will be sent out to critical individuals (BCC leadership team).

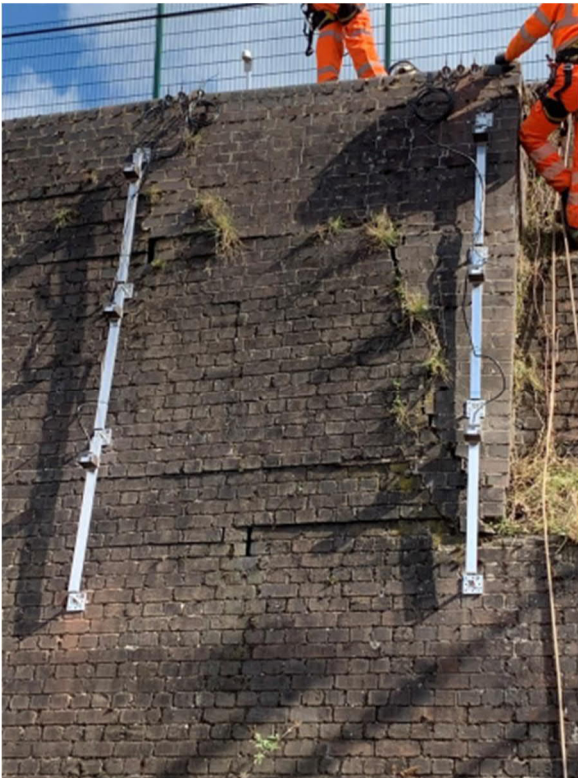
Remote tilt meters (Figure 2.1) can be installed on an asset wall and/or on the slope behind an asset. These would enable detection of deformations occurring on the wall or on the slope. Nodes can be fitted to beams to monitor global movement (Figure 2.2).

Figure 2.1: Wireless 3D tilt node fitted directly to concrete structure



Source: James Fisher Strainstall 2022

Figure 2.2: Wireless tilt nodes fitted to beams (for global movement)



Source: James Fisher Strainstall 2022

Additionally, displacement measurements (Figure 2.3) can be installed on a wall to detect whether cracks are propagating, or bulges are increasing in size.

Figure 2.3: Typical linear displacement sensor across crack



Source: James Fisher Strainstall 2022

For any particular asset, the installation of a series of sensors would be required, as well as a wireless gateway. The wireless gateway can be utilised by several different sensor locations provided that they are in range. A quote for the installation and running of the system has been provided by James Fisher Strainstall (JFS), an extract of this is provided in A.2.

The quoted upfront cost of installing remote monitoring sensors would be approximately £10,000 per installation location. This price includes the installation of 3No. tilt nodes, 2No. displacement measurements, and 2No. temperature measurements (with associated analogue node). The wireless gateway which can be shared over multiple assets costs circa £4,000 excluding VAT.

Monthly running costs of between £350-£500 would be incurred for remote transmission, storage, and display of the data. Note, the ultimate installation cost would be subject to final sensor specification (i.e., displacement sensors may not be required at some locations).

The JFS quotation also allows for monitoring to be implemented across a number of assets, with a total estimated price of £100,000 to be split over 8No. locations along with a £5000 yearly monitoring charge. This could be scaled up or down as required and allows for JFS design fees of £10,000 to £12,000 (excluding VAT).

JFS require a minimum of 6 weeks lead time to procure the equipment specific to the project.

It is also noted that this type of monitoring system may be of interest to BCC in relation to other assets outside of the scope of this project, and there are potential cost efficiencies to be had if wireless gateways are shared.

2.6 Monitoring Summary

A summary table with the advantages and disadvantages of monitoring options can be found in Table 2.1 below.

Table 2.1: Monitoring summary table

Survey Type	Advantages	Disadvantages
Visual monitoring	<ul style="list-style-type: none"> Cheapest option 	<ul style="list-style-type: none"> Unable to accurately compare for small amounts of movement Potential limitations due to vegetation growth – obscuring Line of Sight (LoS) across the watercourse and local to the asset in question Boat or rope access would be required for close-up visual inspections – unknown lead time.
Drone survey	<ul style="list-style-type: none"> Provides better coverage than on foot – reduced blockage to LoS from vegetation Digital information can be integrated into BCC digital twin 	<ul style="list-style-type: none"> Photogrammetric model can only be compared visually through overlaying models More expensive than visual monitoring on foot Requires boat access to fly Coordination required between access provider, drone company and BCC (Harbour Master) which could cause a long lead time Potential obstruction from vegetation covering an asset Data processing times
Total station surveying	<ul style="list-style-type: none"> Accurate to 3mm Results easily interpreted, results between surveys can be compared in excel spreadsheet 	<ul style="list-style-type: none"> Requires rope access installation of survey targets Potential limitations due to vegetation growth – obscuring LoS across the watercourse and local to the asset in question Targets would likely require a cleaning programme prior to a survey 3 weeks lead time Periodic surveying – potential to miss signs of a sudden failure Targets may fall off the wall Adhesive may be sensitive
Laser scanning	<ul style="list-style-type: none"> Can build up a record of asset movement Digital information can be integrated into BCC digital twin (for additional cost) 	<ul style="list-style-type: none"> Lower accuracy than total station (6mm-20mm) Potential limitations due to vegetation growth – obscuring LoS across the watercourse and local to the asset in question 3 weeks lead time Cost over an extended period of time will be expensive Periodic surveying – potential to miss signs of a sudden failure

Survey Type	Advantages	Disadvantages
Installation of sensors	<ul style="list-style-type: none">• Real time monitoring (hourly updates).• High accuracy (3/3600 of a degree)• Use of smart asset monitoring system.• Gateways can be used across multiple sites• Sensor battery life can extend into years depending on frequency of positioning updates (3 years at 1 hr updates)	<ul style="list-style-type: none">• Expensive (£100k for installation of 8 locations, with £5k annual running costs)• 6 weeks lead time

3 Non-structural and Non-geotechnical Considerations

3.1 Ecology

An ecological constraints assessment has been undertaken for assets NCN16, NCS18, NCS28 and NCS13, this included a desk study and ecological walkover survey, and the findings are summarised within the respective section for each asset.

A desk based search of open access data was undertaken for assets S28b, NCS06 and NCS21/23. No ecological walkover survey has been undertaken for these assets. An ecological walkover survey will be required prior to any GI works, the results of this may recommend further protected species surveys.

An ecological assessment for asset N06 was not undertaken as part of this report as it will first need to be verified whether the asset can be de-scoped. In case further investigations or repairs will need to be carried then an ecological assessment should be undertaken prior to any such works.

3.2 Unexploded Ordnance (UXO)

A review of Zetica Risk Mapping [6] shows that Bristol is in a high-risk area. This is defined as an “area indicated as having a bombing density of 50 bombs per 1000acre or higher”. In addition, there are multiple Luftwaffe Targets around the River Avon New Cut. Any intrusive works will require further, more detailed research, risk assessments and applicable mitigation undertaken by the relevant party.

3.3 Contaminated Land

A contaminated land assessment will be required and undertaken as part of the ground investigations.

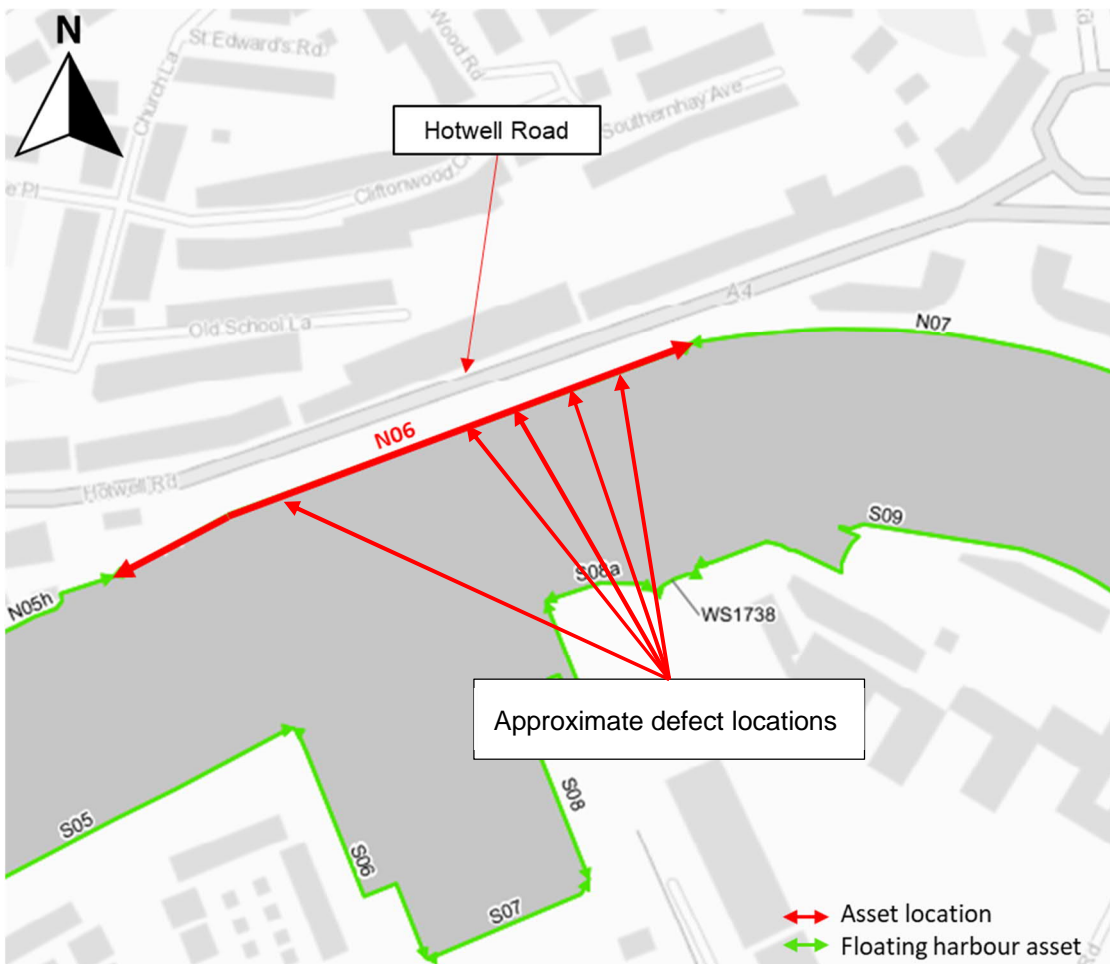
4 N06

4.1 Background Information

4.1.1 Asset Location

N06 is located within the Floating Harbour and is adjacent to the harbourside footpath which runs parallel to the A4, Hotwells Road. It is approximately 227m long and 7.8m high. The harbourside footpath lies at approximately 5mAOD and is generally level along the length of the asset. N06 lies at approximate National Grid Reference 357543, 172456 and a location plan is shown in Figure 4.1. A number of residential and retail properties are located to the north of the A4 Hotwells road and the land rises steeply to an area known as Clifton Wood.

Figure 4.1: N06 Location plan



Source: Mott MacDonald

4.1.2 Asset Description

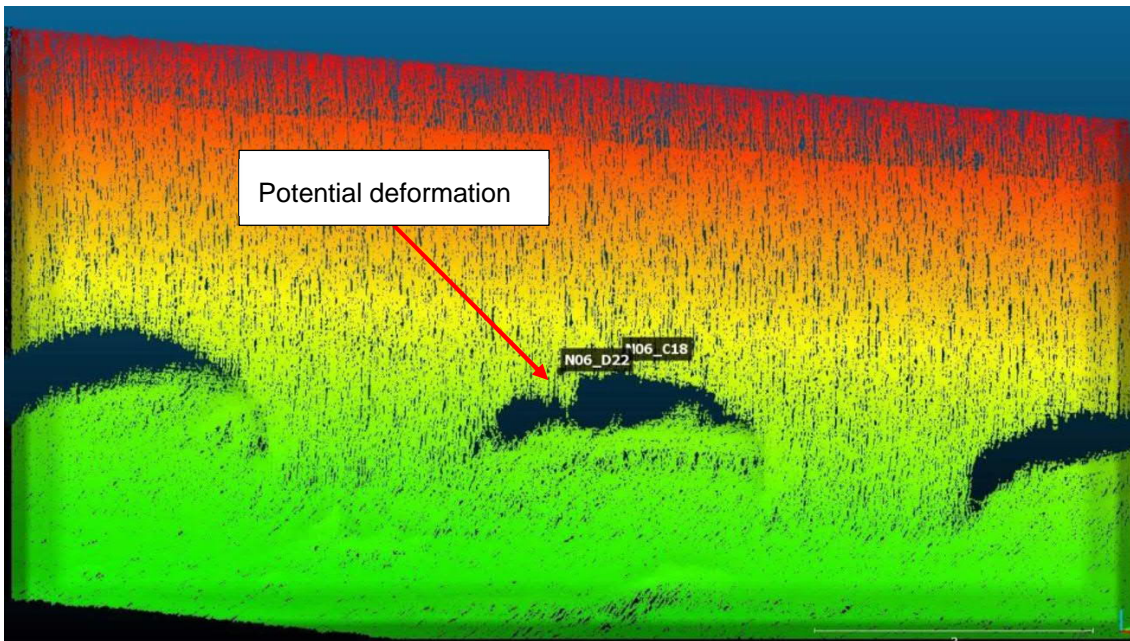
Asset N06 is predominantly constructed in masonry and has a series of 23 No. arches located underwater at the base of the harbour wall. The crowns of the arches are approximately 3m below the water level. The arches measure 1.5m high, 4m wide between springing points, and

600mm thick. There is a concrete apron below the arches measuring 700mm high, 200mm wide and spans the entire length of the wall.

4.1.3 Asset Defects

During the initial inspections, undertaken in 2019, potential deformations were detected in four separate arch barrels, Figure 4.2 shows an example of this. The potential deformations were all approximately 0.6m wide and drop 0.3m below the arch barrel. However, these defects were not identified during the dive survey (see section 4.1.8) and are now assumed to be anomalous readings in the sonar scan.

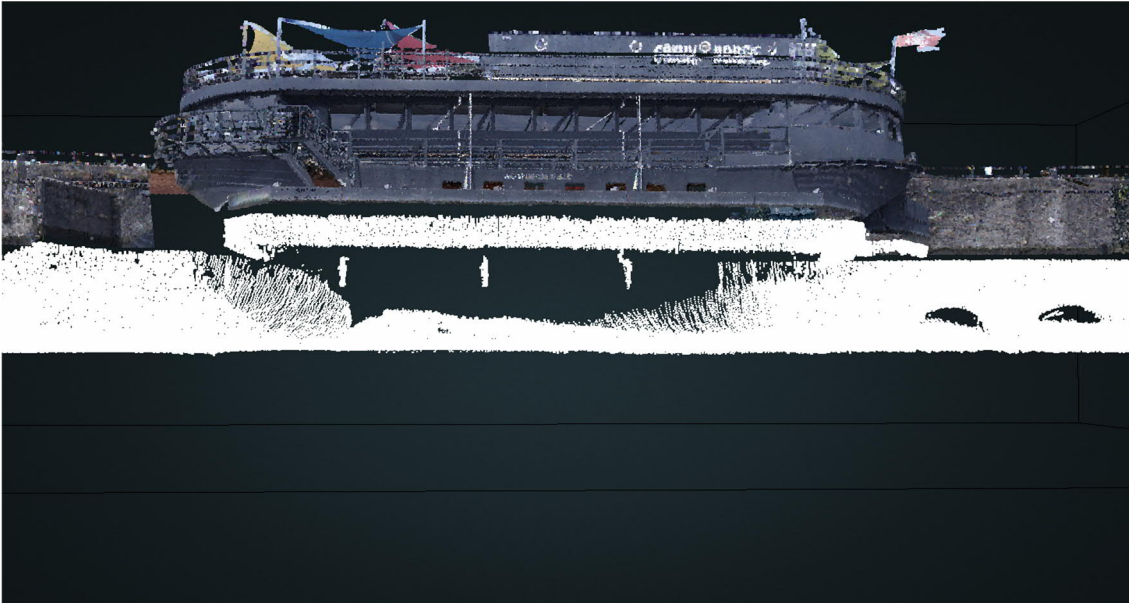
Figure 4.2: N06 Potential arch deformation of barrel (underwater)



Source: Mott MacDonald 2019

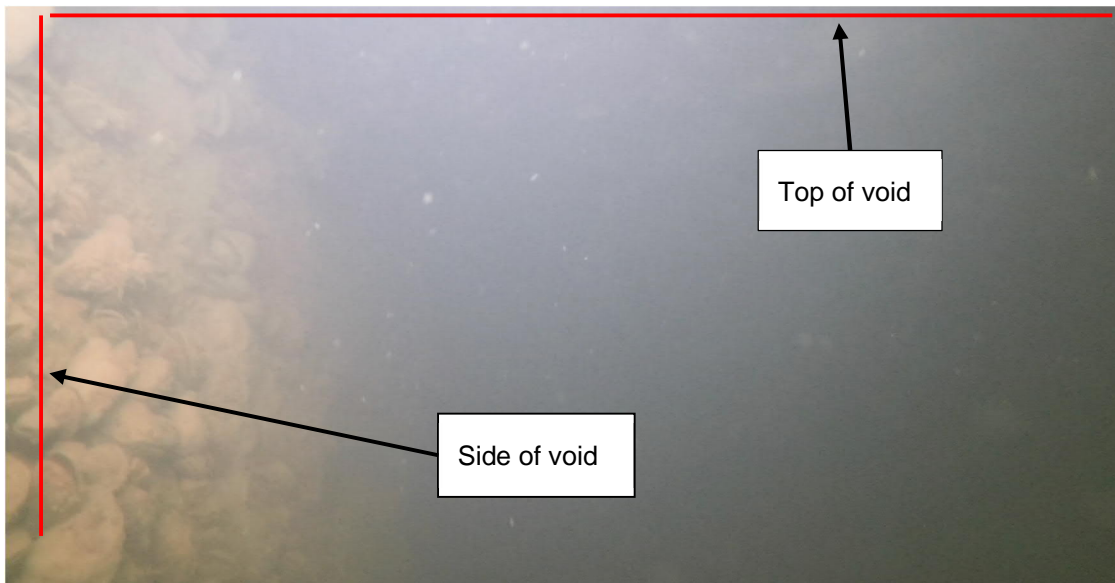
The Grain Barge blocks line of sight to a length of wall, and consequently this area could not be captured using Multi Beam Echo Sonar (MBES) scanning, as seen in Figure 4.3. An on-site inspection was undertaken for this area and a void in the harbour wall was detected below the waterline. An underwater video was subsequently taken using a camera on a long reach pole which confirm the presence of a void in this area, see Figure 4.3. The void is approximately 1.5m wide and of unknown height and depth.

Figure 4.3: N06 Data blackspot caused by Grain Barge



Source: Mott MacDonald 2019

Figure 4.4: N06 Void in harbour wall behind Grain Barge



Source: Mott MacDonald 2019

4.1.4 Consequence of Asset Failure

The failure of any of the arches or deterioration around the area of lost masonry would result in a loss of support to the masonry above the defects, to the footpath and potentially the carriageway.

4.1.5 Historic Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the site. Table 4.1 presents a summary of history on site.

Table 4.1: N06 Summary of site history

Year	On site	Off site
1881-1883	Mardyke Ferry crossing is shown as a dashed line running from the site location southwards to Chartham Wharf across the Floating Harbour	Mardyke Tramway runs north of the site, bounded by the harbour to the south and housing to the north
1901-1902	No change	Industrial School (Boys) is marked north of site
1913-1918	Mardyke Ferry crossing appears to have moved westwards of site	No significant change
1928	Mardyke Ferry moved back to the original position	No significant change
1930	No change	No significant change
1938	No change	No significant change
1938-1955	No change	Hotwell Road, A4 is marked adjacent north of site
1938-1963	No change	No significant change
Present day	No change	No significant change

4.1.6 Geology

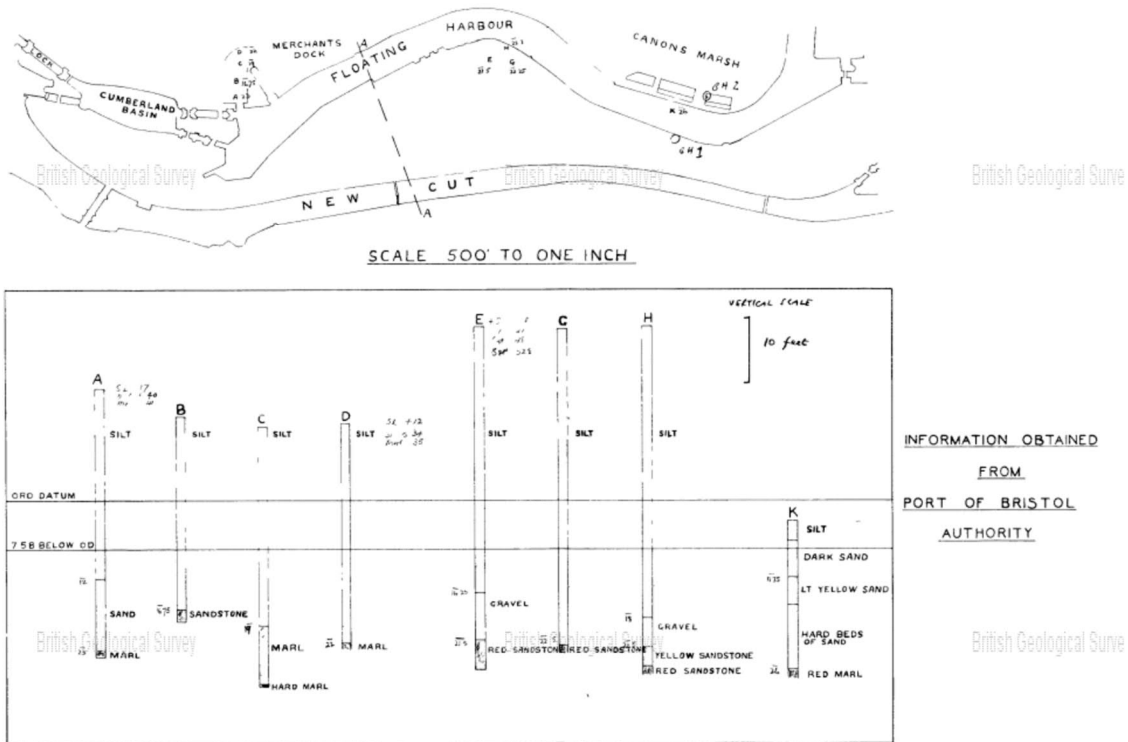
A review of geological mapping [1] shows the site to be overlain by Tidal Flat Deposits. These are described by BGS Lexicon as *“mud flat and sand flat deposits, deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment. Normally a consolidated soft silty clay, with layers of sand, gravel and peat.”*

The asset is located on the boundary of two bedrocks:

- Quartzitic Sandstone Formation is described by BGS Lexicon as *“Hard pale grey quartzitic sandstones with grey mudstones, seatearths and thin carbonaceous or coaly beds”*
- Redcliffe Sandstone Member is described by BGS Lexicon as *“Sandstone, distinctive fine- to medium-grained, deep red, calcareous and ferruginous. Commonly decalcified at shallow depths below the surface, giving rise to an uncemented sand.”* There are no relevant exploratory hole records on the site to confirm deposits

There is one cross-section available from BGS which is undated, however, depths are described in feet which suggests the cross-section was developed pre. 1965. Generally, the boreholes given show between 20-40ft (6-12m) of silt over sandstone or marl. An extract is shown in Figure 4.5.

Figure 4.5: Geological cross-section at Asset N06 - BGS ID: 388598



4.1.7 Mining

A review of the Coal Authority Mapping [5] shows the asset is located in a Coal Outcrop area which means that ground workings associated with mining could have occurred in the past. Therefore, coal mining could affect the asset and a repair solution.

4.1.8 Dive Survey Summary

Following the 2019 inspection a dive survey was recommended to further investigate the void and the arches. This was undertaken by Edwards Diving Services (EDS) in June 2021.

EDS were tasked with providing information on the physical condition of all inspectable elements of the asset underwater, particularly the underwater arches where potential deformation was detected by the MBES scan. Site conditions on the day of inspection were fair and dry.

The overall condition of the arches was reported as good, with only minor defects noted, such as spalling, pointing loss and marine growth.

There were signs of timber planks or shutters which potentially covered the arch faces historically. The timbers have decayed and deteriorated which has caused them to fail and fill the area within the arches. Due to the presence of the timbers, it appears that EDS were unable to enter and fully inspect the arch barrels.

Pointing loss in the arches reaches a maximum of 20mm and the details of the spalling are in Table 4.2.

The position of the spalls has been interpreted as being to the face of the arch, rather than within the arch barrel. The survey has been interpreted in this way due to the survey reports

defect table “*There were minor areas of spalling to the surface of the arches*” and because of the timbers restricting access into the arches.

Table 4.2: N06 Arch Spalling Details

Arch No.*	Spalling Details
4	12 o'clock position, 60mm deep, 60mm wide and 50mm high
5	Between 9 and 12 o'clock positions, up to 30mm wide
10	Between 12 and 2 o'clock positions, 65mm deep, 100mm wide and 90mm high
11	Between 11 and 12 o'clock positions, 70mm deep, 70mm wide and 30mm high
12	Between 9 and 10 o'clock positions, 110mm deep, 85mm wide and 40mm high
13	3 areas at 11, 12 and 2 o'clock positions, up to 170mm deep, 145mm wide and 125mm high
16	2 areas at 2 and 3 o'clock positions, up to 200mm deep, 90mm wide and 100mm high
21	Between 2 and 3 o'clock positions, up to 50mm deep, 65mm wide and 70mm high
23	12 o'clock position, 200mm deep, 70mm wide and 70mm high

* Arches are numbered from west to east (see also [11]). Arches with no reported spalling omitted from above list

EDS reported that the defects and areas of pointing loss stated in Table 4.2 were not considered significant enough to warrant immediate action; however, they are likely to get worse and be more expensive to repair if left.

It is noted that a recess identified during the on-site inspection in 2019 was not recorded during the EDS inspection. An image of the void can be seen in Figure 4.4.

The report can be found in document A8379 [11].

4.2 N06 Summary

The dive survey completed by EDS (June 2021) failed to identify any deformation in the 23 No. arches. Given this, it may be possible to de-risk this asset and remove it from the critical list.

However, prior to this, BCC should contact EDS to seek an understanding as to why the void in the harbour wall behind Grain Barge was not recorded in their dive survey report, and to confirm whether the area behind Grain Barge was inspected as part of that survey. The void was clearly visible in the underwater video captured on-site in 2019.

BCC should also seek clarification about the accessibility of the arches, whether the arch barrels were inspected, and where the recorded spalls are located.

Once confirmation has been sought, the void, and the arch barrels should either be inspected, or if already inspected and in a good condition, the asset could be de-risked from the critical asset shortlist.

As a visual inspection is not possible of the underwater elements, it is recommended that a follow-up principal inspection be undertaken within 72 months from June 2021 and should be conducted no later than June 2027, as set out in CS 450 Inspection of Highways Structures, The Inspection Manual for Highway Structures, 2007, unless a longer period is agreed with the overseeing organisation.

5 NCN16

Asset NCN16 has been expediated and a repair strategy formulated within a separate document as requested by BCC. The document reference for this report is 100105143-MMD-NCN16-XX-TN-CV-001 [8]. Ground investigations for this asset have been specified in 100105143-MMD-NCN16-XX-SP-GT-002 [10].

To the east of the asset, between NCN16 and NCN18, there is an apparent 30m failed section of wall. This area is not part of asset NCN16 as defined by BCC and therefore outside of the scope of this project.

5.1 Historic Mapping

The historic mapping section was omitted from the expediated report and has been included here for completeness.

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the site. Table 5.1 presents a summary of history on site.

Table 5.1: NCN16 Summary of site history

Year	On site	Off site
1882	Coronation Ferry is present and marked with a dashed line from north to south, across the water Steps lead down to the water's edges from a slip way that extends east and west of the crossing on the northward side, and just west of the crossing on the south Brickwork is shown on the northern slope	Cumberland Road is present north of site, bounding the New Cut Bristol Harbour Branch Great Western Railway (GWR) is present north of site and north of the Redcliff Ward New Goal (Disused) is present adjacent northwards of site. Housing is present due south and southeast of site, south of the river Access to Coronation Ferry south bank appears to start from Southville Road, approx. 50m southwest of site, following an un-named road northward to the water's edge. This road appears to pass under Coronation Road where it is labelled Coronation Bridge. There is also stepped access directly from Coronation Road.
1883, Published 1886	No change	No significant change
1881-1883 Published 1887	No change	No significant change
1901-1902 Published 1904	No change	New Goal (Disused) is no longer labelled Tram tracks have been constructed to the north of site
1901-1902 Published 1905	Coronation Ferry is no longer marked	No significant change
1902	Coronation Ferry marked on map	Coronation Bridge is no longer labelled The slipway and access to the Coronation Ferry is no longer visible on mapping
1912	No change	No significant change
1913 Published 1918	No change	No significant change

Year	On site	Off site
1913 Published 1921	No change	No significant change
1930	Coronation Ferry is still labelled but there is no dashed line to indicate the direction of the ferry	No significant change
1938	No change	No significant change
1938-1955	Coronation Ferry is no longer labelled. There is now a bridge present which crosses the New Cut	No significant change
1938-1963	No change	Buildings are present on the land where New Goal (Disused) was previously labelled. No label to indicate building use
1938-1967	No change	No significant change
Present day	No change	No significant change

5.2 Ecological Constraints

An ecological walkover survey was undertaken on 29 June 2022 by Mott MacDonald ecologists. The survey consisted of a walkover of the asset and a 30m buffer, where access permitted. The purpose of the survey was to identify the ecological constraints and risks of works. A summary of the Ecological Constraints Assessment produced following this survey is provided below.

Listed below are the habitats that were identified within the survey buffer;

- Scattered scrub and introduced shrub, present along the masonry wall closest to Cumberland Road.
- Scattered broad-leaved trees, present along the top of the masonry wall edge closest to the river.
- Small patch of semi-improved grassland, with a varied sward length.
- Mudflats are present directly underneath the masonry wall along the river edge.

In line with policy and best practice, avoidance measures should be embedded into the design of the works. The following avoidance measures were identified;

- Works within the river and mudflat Habitats of Principal Importance should be avoided;
- Where possible trees and other vegetation should be retained;
- Artificial lighting should be avoided during the construction and operational phases of the development;
- Obstructions to the watercourse and riverbanks should be avoided during the construction and operational phase;
- Any retained trees should be assessed by an appropriately qualified arboriculturist to determine root protection areas and any exclusion zones required to mitigate for damage during demolition and construction; and
- If possible, the site compound should be situated at least 16m away from the river and riverbanks, if this is not possible, permission would be required from the Environment Agency.

The table below summarises the identified ecological constraints and the recommended mitigation for each feature.

Table 5.2: Ecological constraints and mitigation/compensation recommendations

Feature	Location description	Mitigation and/or compensation
Designated sites	Avon Gorge Woodlands Special Area of Conservation and Site of Special Scientific Interest, Horseshoe Bend Site of Special Scientific Interest, and Severn Estuary (Special Area of Conservation, Special Protection Area, RAMSAR and Site of Special Scientific Interest downstream of the Site. Avon New Cut Local Nature Reserve on site.	A Habitat Regulations Assessment is recommended. The county ecologist should be consulted regarding the proposed works within the Avon New Cut Local Nature Reserve.
Habitats of principal importance	River and mudflats within the site	The county ecologist should be consulted at the earliest opportunity if the habitats of principal importance are anticipated to be impacted to discuss the working methodology as well as any compensation, enhancement or restoration work.
Bats	A basal cavity on one of the trees on site offers moderate to high potential to support roosting bats	Night-time working should be avoided. An endoscope survey of the basal cavity of the tree on NCN16 should take place immediately prior to any vegetation clearance works commencing, in order to establish the suitability of the feature to support roosting bats, and the presence or likely absence of bats. A toolbox talk regarding bats should be given to all site personnel.
Reptiles	The scrub and grassland habitats within the riverbank offer suitable habitat for common reptiles	If any habitat removal affecting potential hibernacula (such as log piles or root systems) is required, this should occur during the reptile active season (April – October inclusive, depending on the weather) under supervision of an ecologist. Vegetation clearance should follow phased cuts in a directional manner to allow dispersal of active reptiles to neighbouring habitats. A toolbox talk regarding reptiles should be given to all site personnel.
Nesting birds	The scattered trees, scrub and rough grassland provide suitable habitat for nesting birds. A nest was also observed on one of the trees, although it was deemed inactive at the time of the survey	Vegetation clearance of habitat suitable for nesting birds should be undertaken outside of the nesting season (between March and August inclusive) in line with standing government guidance. If this is not possible, vegetation will need to be checked by an ecologist no more than 24 hours prior to removal. The feasibility of nesting bird checks will be subject to the judgement of a suitably qualified ecologist, who will determine whether the vegetation to be cleared can be safely and adequately searched.
Bony fish	The River Avon New Cut has potential to be used by different species of bony fish (including European eel) for commuting and foraging	Should the scope of works include significant disturbance that could impact fish, such as high noise and vibration levels, works may need to be timed to avoid fish migration periods. A toolbox talk regarding fish should be given to all site personnel.
Otters (<i>Lutra lutra</i>)	The River Avon New Cut has potential to be used by commuting and foraging otters	No mitigation or compensation measures specific to otters identified.

Source: Mott MacDonald, 2022.

Further ecological surveys are recommended due to the potential for protected and notable species in the area.] A full Preliminary Ecological Appraisal Report should be undertaken.

Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on bats, fish, otters and reptiles should be included in a Reasonable Avoidance Measures Method Statement this should include best practise measures and general construction safeguards.

6 NCS06

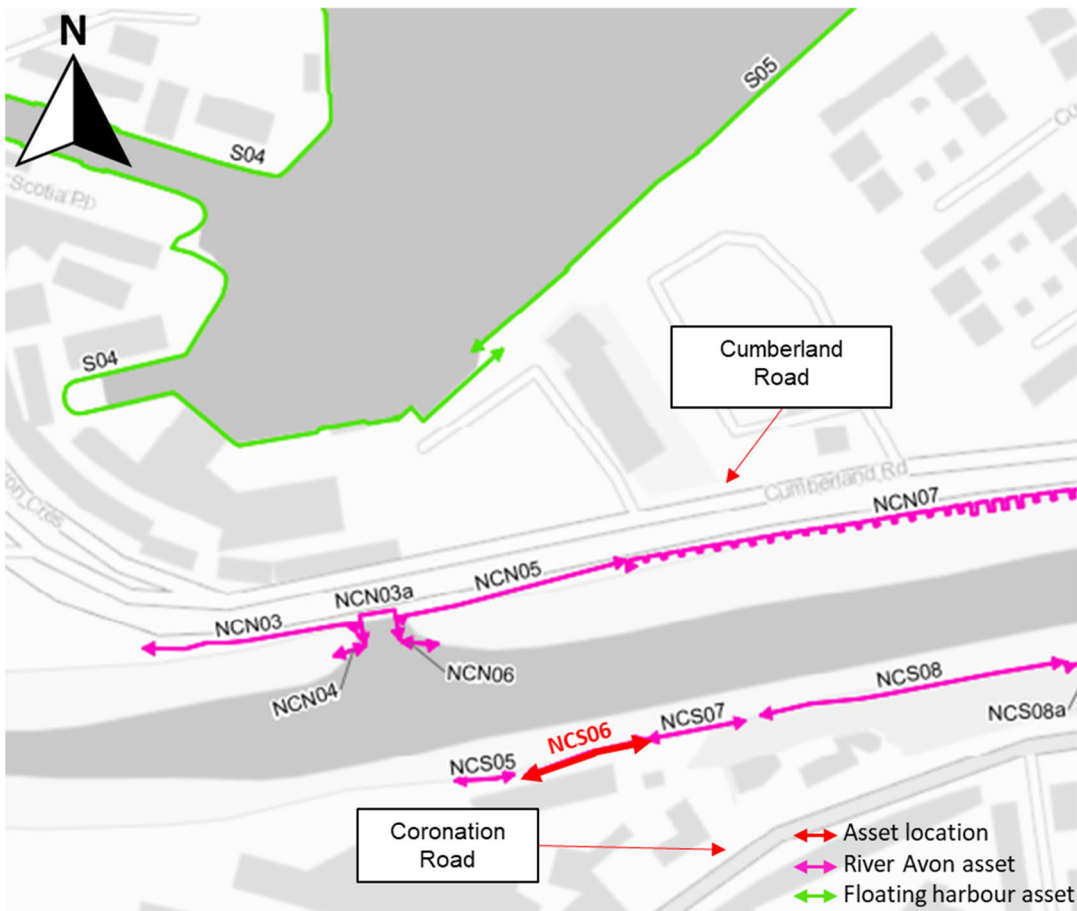
6.1 Background Information

6.1.1 Asset Location

Asset NCS06 is located directly south of the New Cut River and north of A370 that runs parallel to the river. NCS06 lies at approximate National Grid Reference 357283,172016. Figure 6.1 presents a location plan.

A petrol station, charging station and car repair station are located south of the asset. Bristol Metal Spraying & Protective Coatings Ltd (BMS) is located to the southwest of the asset. To the north of the asset, and across the river, a boathouse outbuilding, and other residential buildings have been identified.

Figure 6.1: NCS06 location plan



Source: Mott MacDonald

6.1.2 Asset Description

The asset is a masonry wall of apparent dry stone construction, it is approximately 44m long and 1.8m high. There are several sections of collapsed wall along the length of the asset. Behind the asset there is a steep vegetated slope containing several mature trees, the slope

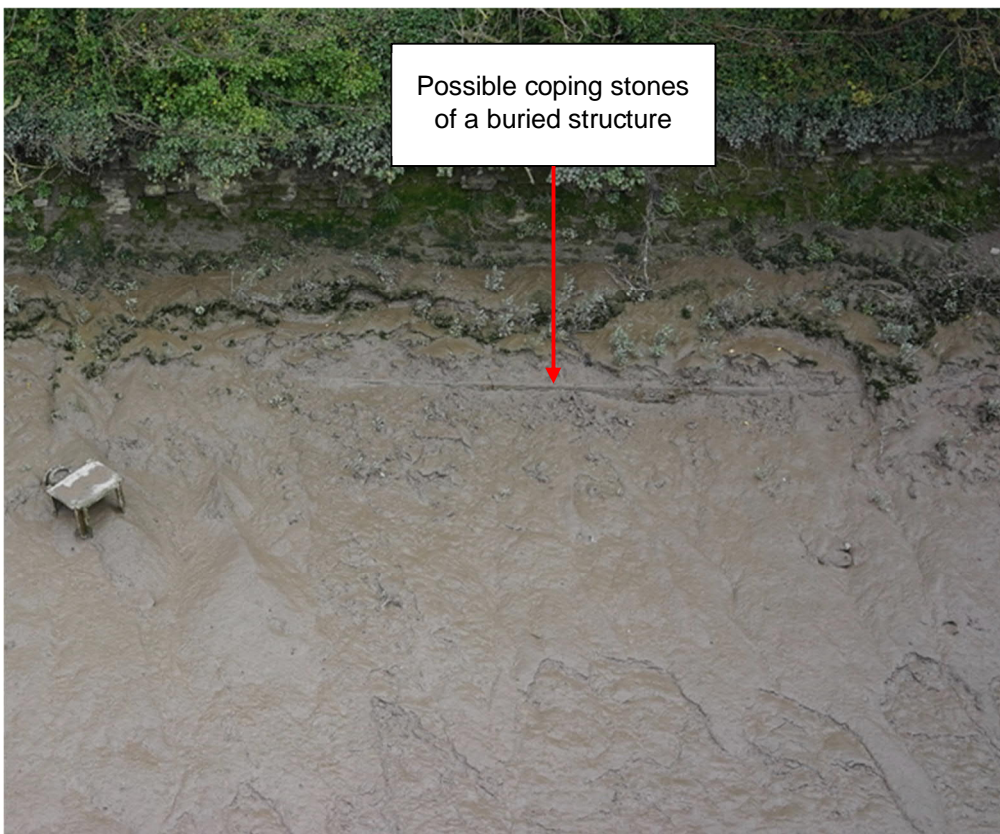
has an approximately gradient of 1:1.5. There is no obvious evidence of slope failure above. There is a significant sediment build-up and some vegetation in-front of the asset.

The original purpose of the wall is not clear, however, given the lack of any visible rock formations, it would appear likely that the function of the wall is to retain the slope or to provide scour protection to the slope.

There is potential evidence of a structure buried in sediment in front of NCS06 and a review of historical mapping indicates that there was previously a ferry crossing in this approximate location. It may also be a potential continuation of an apparent slipway located approximately 13m upstream. The feature is shown in Figure 6.2.

There are buildings located at the top of the slope behind the asset and, there is a building located above the western end of the asset.

Figure 6.2: NCS06 Buried structure

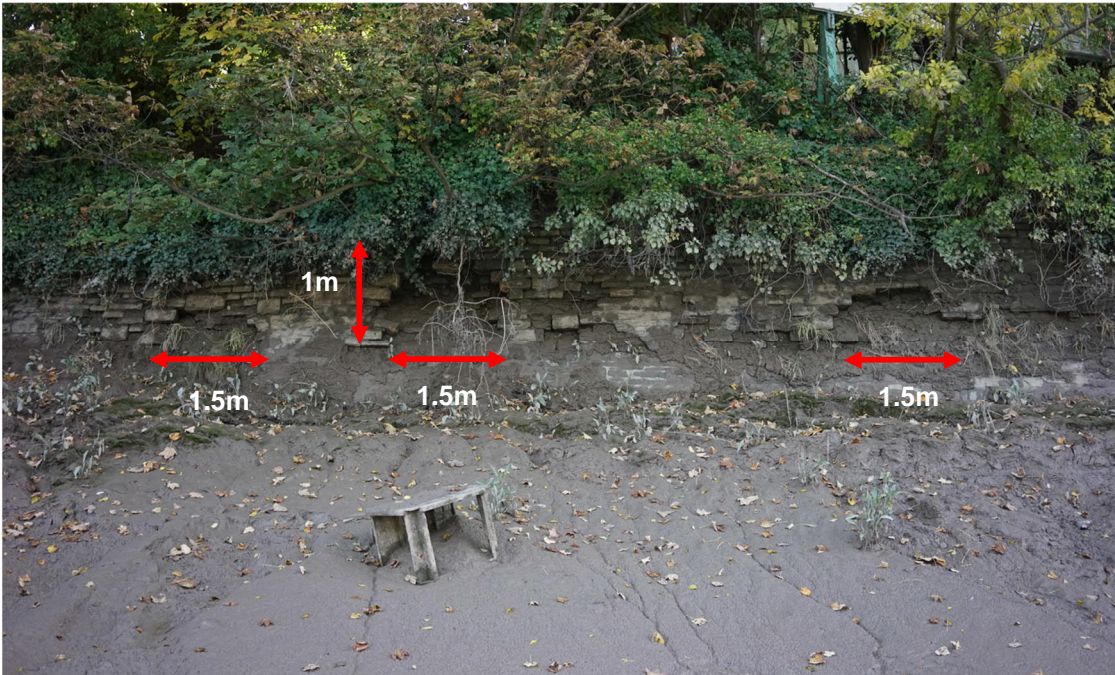


Source: Mott MacDonald 2019

6.1.3 Asset Defects

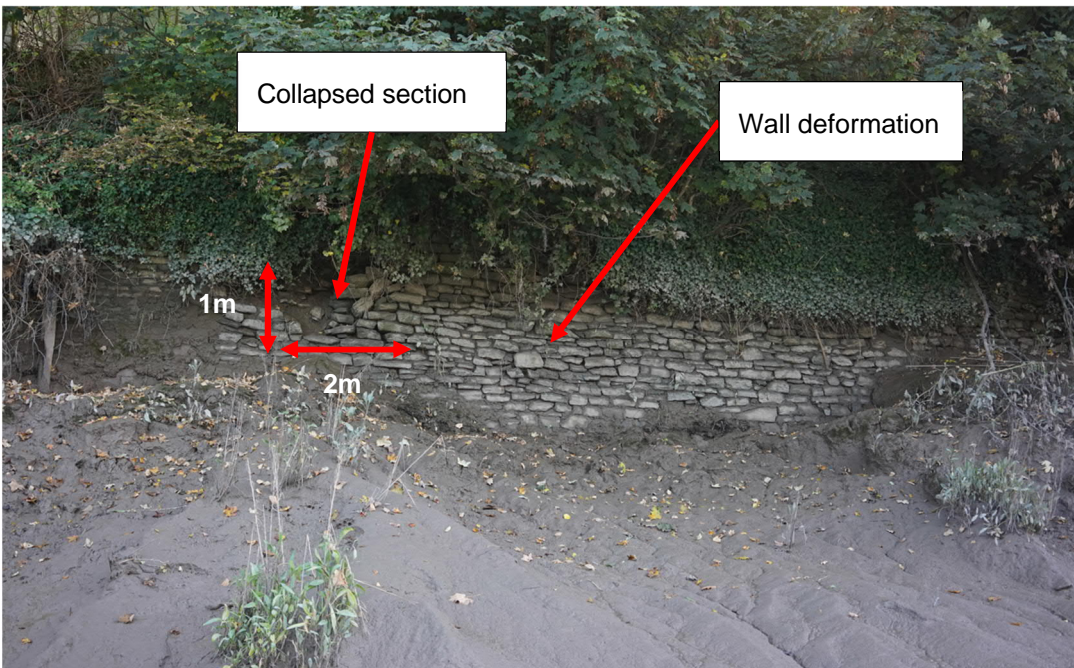
Localised collapsed sections of masonry are shown in Figure 6.3 and Figure 6.4. The approximate level at the bottom of the defects in Figure 6.3 is 6.36mAOD, and the toe of the wall in Figure 6.4 is 5.50mAOD. The typical range of the river in this location is between - 0.7mAOD and 6.71mAOD.

Figure 6.3: NCS06 Collapsed sections



Source: Mott MacDonald October 2022

Figure 6.4: NCS06 Collapsed section and wall deformation



Source: Mott MacDonald October 2022

To the western end of the asset a building, part of the Bristol Metal Spraying & Protective Coatings site, is located above the wall. This is shown in Figure 6.5. This building is located approximately 8m from the wall deformation shown in Figure 6.4. It is unknown whether the wall is providing any support to the building but it is possible that the wall is retaining the material around the building's foundations. In addition, there are several buildings located at the top of the slope.

Figure 6.5: NSC06 Building part of Bristol Metal Spraying & Protective Coatings site



Source: Mott MacDonald 2019

6.1.4 Consequences of Asset Failure

As described in Section 6.1.2, the intended function of this wall is not clear. The immediate consequences of a failure differ depending on the asset function.

If the intended function is to be a retaining wall, then there is potential for a loss of support to the retained ground. Behind the asset, the nearest buildings are positioned approximately 8m from the wall. If there is a loss of support to the retained ground, then there is a risk of a loss of support to the building foundations.

At the western end, the building shown in Figure 6.5 is 8m from the nearest defect. If the defect continues to deteriorate and the wall collapsed, there is a risk of the defect propagating. The material retained in the vicinity of the building foundations could then lose support.

If the intended function of the wall is to provide scour protection, then there is a potential long-term risk of slope erosion and an increasing risk of slope failure. The consequences of a slope failure could be a loss of support to the various building foundations; however, this is anticipated to be a longer-term risk in comparison to if the asset is a retaining wall.

6.1.5 Historic Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the asset. Table 6.1 presents a summary of history on site.

Table 6.1: NCS06 Summary of site history

Year	On site	Off site
1881 to 1882, published 1896 Or 1881 to 1883, Published 1887	Vauxhall Yard (Shipbuilding) is located south of site A wall or pathway leads from the road southwards of Vauxhall Yard to the Vauxhall Ferry, when the path meets the water's edge, follows the slope westward to meet Vauxhall Ferry.	Vauxhall Ferry is located adjacent east of site that cross the River Avon New Cut from north to site The River Avon New Cut is bounded by unmarked roads to the north and south There are man-made indent northwards of the Avon River New Cut. The indent is not labelled but the slope around the indent is labelled as 'Stones'. Northwards, in the Floating Harbour, there is a sluice labelled. This suggests that a This suggests that a culvert connects the River Avon New Cut and Floating Harbour at this point
1901 to 1902 Published 1904/1905	A wall has been constructed on the southern side of the slope of the River Avon New Cut.	Vauxhall Ferry is removed Sluice in the Floating Harbour is no longer labelled Great Western Railway (GWR) Harbour Railway is located on the northern slope of the River Avon New Cut. This follows the length of the island
1902 Published 1905	No change	No significant change
1912 to 1913	No change	No change
1913 Published 1918	The pathway leading to the Vauxhall Ferry (no longer exists) is labelled as slip	No significant change
1913 Published 1921 (two maps)	No change	The road that runs parallel to the New Cut is now labelled as Coronation Road
1930 Published 1933	No change	No significant change
Revised 1938 Published 1944	No change	No significant change
Revised 1938 Published 1945	No change	No significant change
Revised 1938 Published 1946	No change	No significant change
Revised 1938 Published 1947	No change	No significant change
Revised 1938 to 1955 Published 1955	No change	Great Western Railway (GWR) Harbour Railway is no longer present on mapping and has been replaced with Cumberland Road which runs parallel to the River Avon New Cut northern slope

Year	On site	Off site
1938 to 1963 Published 1964	No change	No significant change
Surveyed / Revised: 1938 to 1967, Published: 1967	No change	No significant change
Present day	No change	Multiple stages and slipways are now marked located in the Floating Harbour

6.1.6 Geology

Superficial Deposits on site are likely to be Tidal Flat Deposits. These are described by BGS Lexicon [4] as “mud flat and sand flat deposits, deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment. Normally a consolidated soft silty clay, with layers of sand, gravel and peat. Characteristically low relief”.

Bedrock on site is likely Redcliffe Sandstone Member which is described by BGS Lexicon [4] as distinctive fine- to medium-grained, deep red, calcareous and ferruginous sandstone.

Two historical boreholes are available on BGS Geoindex [3] located approximately 200m due south of the asset at approximately 11mAOD. The boreholes are undated. One borehole was available from the 2015 Structural Soils Ground investigation approximately 70m due north of the asset. A summary of exploratory holes is presented Table 6.2.

Logs were also available for three boreholes located 200m northwest of the site. These borehole logs typically show a silty clay over gravel, becoming marl. Stratum depths were not included on the logs and the boreholes have therefore not been included in the summary table.

Table 6.2: NCS06 Existing exploratory hole summary

	Historic BGS Geoindex borehole records		2015 Structural Soils Ground Investigation
	ST57SE58	ST57SE266	BH545
Approx. distance from asset	300m S	300m S	70m N
Made Ground	0m BGL (description illegible)	0ft (0m BGL) concrete	0m BGL Dark brownish grey very sandy, fine to coarse subangular to angular GRAVEL 1m BGL Dark mottled grey reddish brown sandy slightly gravelly CLAY
Drift Deposits	-	4ft (1.45m BGL) Brown sandy loam	1.2m BGL Soft greyish brown slightly sandy slightly gravelly CLAY (Alluvium) 9.5m BGL Firm light bluish grey mottled brown silty CLAY 15m BGL Very dense dark greyish brown sandy GRAVEL
Keuper Trias	4.3m BGL (description illegible)	14ft (4.27m BGL) Brown sandy marl 20ft (6.1m BGL) Keuper Marl	17m BGL reddish brown mottled grey slightly sandy silty CLAY (MMG IVb) 18m BGL Extremely weak reddish brown medium bedded silty MUDSTONE 20m BGL Very weak locally extremely weak reddish brown SANDSTONE 21.8m BGL Weak very thinly to medium bedded reddish brown SILTSTONE
Middle Coal Measures	36m Hard brown shale	120ft (36.6m) Hard brown shale	Terminated at 23.40m BGL

6.1.7 Mining

A review of BGS Coal Authority Mapping [5] shows that the asset is located on an area of worked ground. Due to Bristol's history with Coal Mining, it is possible that the area of worked ground is related to coal mining. An out-crop of coal is located 100m south of the site.

6.1.8 Ecological Constraints

A desk study was undertaken in January 2023. This involved a search for designated sites and habitats to identify potentially important ecological constraints at the Site. Data to inform the desk study was obtained from the following sources:

- Multi Agency Geographical Information for the Countryside (MAGIC) website (<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>);
- Joint Nature Conservation Committee (<http://jncc.defra.gov.uk>);
- OS maps; and,
- Aerial imagery.

Based on aerial imagery and mapping the following habitats were identified within 30m of the asset:

- Developed land; sealed surface, present south of the asset;
- Buildings south of the asset;
- A line of trees along the southern edge of the asset; and,
- Mudflats, present along the northern edge of the asset.

Two Habitats of Principal Importance, river and mudflat habitats, were identified within 30m of the asset. The asset lies within Avon New Cut Local Nature Reserve. In addition, one site

designated for its international importance and three for their national importance were identified within 2km of the Site. Three further designated sites are hydrologically linked downstream of the Site. Table 6.3 below summarises the designated sites within 2km of the site or that are hydrologically linked.

Table 6.3: Designated sites within 2km or hydrologically linked downstream of the asset

Designated site name	Designation	Orientation and distance from the site at the closest point
Avon New Cut	Local Nature Reserve	On site
Ashton Court	Site of Special Scientific Interest	0.9km west
Leigh Woods	National Nature Reserve	1.1km northwest
Avon Gorge Woodlands	Special Area of Conservation and Site of Special Scientific Interest	1.1km northwest and hydrologically linked
Horseshoe Bend	Site of Special Scientific Interest	5.4km northwest and hydrologically linked
Lamplighters Mash	Local Nature Reserve	6.2km northwest and hydrologically linked
Severn Estuary	Special Area of Conservation, Special Protection Area, Ramsar and Site of Special Scientific Interest	6.4km northwest and hydrologically linked

Source: MAGIC, 2023.

Based on the findings of the desk study, the following features have been identified as potential Important Ecological Features within the context of the site;

- Designated sites;
- Habitats of Principal Importance – river and mudflat habitat;
- Commuting, foraging and roosting bats;
- Nesting birds;
- Commuting otters;
- Bony fish; and
- Reptiles.

A full Preliminary Ecological Appraisal Report (PEAR) is recommended. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment (PRA) of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index (HSI) assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement. .

A Habitat Regulations Assessment is recommended to advise on potential impacts of the proposed works on statutory designated sites downstream of the Site.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on protected species should be included in a Reasonable Avoidance Measures Method Statement this should also include best practise measures and general construction safeguards.

6.1.9 Site Walkover

Site walkovers were undertaken in June 2022 and September 2022, as well as the original drone survey in April 2019.

During the June 2022 site walkover, it was not possible to view the asset due to access constraints and new images were not obtained.

During the September 2022 site walkover, images were obtained, however, they were not of a similar quality to the 2019 inspection images. The asset appeared to be in a comparatively poor condition, but an accurate assessment of the asset condition could not be made.

6.1.10 Drone Survey

In October 2022, a drone survey was completed of the asset. The collapsed sections are all similar in appearance with no discernible changes to the masonry. There has potentially been some washout of fill, however, it is unknown whether this is retained or deposited material. Examples are shown in Figure 6.6, Figure 6.7, Figure 6.8 and Figure 6.9 below. The area of wall deformation is also similar in appearance and does not appear to have changed discernibly.

Figure 6.6: Defect example 1 2019



Source: Mott MacDonald 2019

Figure 6.7: Defect example 1 2022



Source: Mott MacDonald, October 2022

Figure 6.8: Defect example 2 2019



Source: Mott MacDonald 2019

Figure 6.9: Defect example 2 2022



Source: Mott MacDonald, October 2022

The drone survey has revealed further evidence that there is a buried structure as highlighted in Figure 6.2. This is shown in Figure 6.10, where it appears that there may potentially be buried steps.

Figure 6.10: NCS06 Buried structure 2022



Source: Mott MacDonald 2022

6.1.11 NCS06 Summary

It is considered likely that the asset provides support to the slope behind it. However, it is not understood how significant that role is, and whether, if the asset were allowed to deteriorate in the short-term, there would be a slope failure. The wall is providing toe protection against washout and if it were allowed to deteriorate, the risk of a slope failure would increase over time. Ground investigations are required to confirm the ground conditions and would confirm the function of the wall. A slope stability analysis would also provide information as to the risk to the slope in the absence of the wall. The ground investigations will also provide key geotechnical information parameters to be used for design remedial works.

It is unknown whether the wall is providing any support to the buildings, but it is likely that the wall is retaining material around the building's foundations. It is noted that there is significant sediment build-up in front of the wall in the location of the building.

As set out above, the short-term risk to these buildings is considered to be low, however, the long-term risk is higher due to the possibility of incremental wall failure and eventual slope failure.

Due to the level of sediment present on the face of the wall, it is difficult to determine some of the modes of failure which are present, however, there has likely been deformation in the wall caused by earth and tree root pressures from behind, followed by a collapse under self-weight and washout of loose masonry.

The 2019 drone data was compared to the 2022 drone data and the defects shown in previous figures do not appear to have significantly changed.

6.2 NCS06 Monitoring

There are several options for the monitoring of NCS06, these include:

- Regular visual monitoring with long lens photographs.
- Real-time monitoring with sensor system.
- Surveying with total station.
- Laser scanning.

Further details of these monitoring techniques can be found in Section 2.

In this instance, it is recommended that the asset is monitored visually at 2 month intervals.

Regular visual monitoring will enable a visual record of the asset to be collated and pick up any further changes to the wall structure, such as the loss of discreet masonry blocks.

The other listed options could be considered; however, they are not deemed to be essential for this asset.

6.3 NCS06 Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 4 No. Boreholes.
- 1 Nr Hand dug trial pit inside building at western end (Figure 6.5) to understand foundations of the building.
- 2 Nr. Hand dug trial pits to confirm ground conditions directly behind the wall.
- 1 Nr Hand dug trial pit to investigation of possible structure in-front of NCS06 (Figure 6.2).

Full and final details of ground investigation requirements can be found in 100105143-MMD-00-XX-SP-GT-004.

6.4 Slope Stability Analysis

A slope stability analysis could be undertaken for the areas local to defects which if allowed to deteriorate could potentially result in a slope failure.

The purpose of undertaking the analysis would be to determine whether, in the absence of the wall, the slope would fail. If the slope were found to have sufficient stability, the priority of some of the defects (Figure 6.3 and Figure 6.4) would be decreased, potentially leading to the asset being descope from the scheme.

It should be noted that in the short term, while the slope may be stable in the absence of the wall, over a longer-term, following gradual washout from the river, that may change, and the slope may become unstable.

6.5 NCS06 Repair Options

It is likely that the current defects can be repaired in a like for like manner and repointed to secure them to adjacent masonry (if considered necessary following slope stability assessment). Note however, that restoring the existing wall with like for like patch repairs is unlikely to comply with modern design codes for a retaining structure.

Other options are available, such as the construction of reinforced concrete patch repairs to maintain stability of the adjacent masonry, the construction of a new (or replacement) retaining structure (e.g., reinforced concrete retaining wall, sheet piles, a gabion basket wall). or undertaking bank stabilisation works. These options would need to be informed by ground investigations.

Local construction of a reinforced concrete retaining wall would also be a possibility; however, a local retaining wall is considered to be of limited benefit and reconstructing the entire asset would be more appropriate.

Additionally, due to the steep slope and likely soft ground, undertaking remedial work will be challenging and contractor engagement will be important when evaluating a repair strategy. For a new retaining structure to be in-front of the existing asset there are a number of potential options including sheet piling, a precast concrete retaining wall or a gabion basket wall.

6.5.1 NCS06 Slope Stabilisation

This could be a feasible option if it is determined that in the absence of the wall, the slope would fail, and that targeted stabilisation works would be cheaper than repairing or reconstructing the wall. Ground investigations followed by a slope stability analysis would initially be required to understand this.

Bank stabilisation would require the installation of soil nails and a facing system into the bank. Prior to this being undertaken, widespread de-vegetation would be required in the area of installation. This is envisaged to be more extensive than de-vegetation requirements for the above patch or deformation repair methods.

It could be difficult to install a facing system due to the quantity of trees in the area and early contractor involvement should be undertaken to determine the site requirements. The removal of any trees from the bank could have a destabilising effect by changing the pore water pressure and potentially cause movement. In addition, tree removal would likely be strongly objected to by local residents and the ecological concerns over removing potential habitats would need to be determined.

It should be noted that in the short term, while the slope may be stable following slope stabilisation works, over a longer-term, following gradual washout from the river, that may change, and the slope may become unstable.

6.6 NCS06 Recommendations

The asset has been ranked in Priority Group 3, see Section 12.

At this time, repairs for this asset are not considered to be as high a priority as repairs for other assets. In the meantime, the asset should be monitored to track movement and further deterioration.

It is recommended that regular visual monitoring is undertaken at 2 month intervals until the risk to the surrounding buildings is understood.

It is recommended that trees whose proximity to the wall is likely causing structural damage should be removed. Any tree removal should be done in consultation with an arboriculturist and ecologist and provision for replacement planting to retain habitats will need to be considered. Note, tree removal could result in a loss of stability of the slope and a suitably qualified geotechnical engineer should be engaged before any vegetation removal is undertaken.

There are no significant concerns over the condition of the wall immediately in front of the building to the western end. It is noted that there is significant sediment build up in front of the wall in this location.

It is recommended that ground investigations and a slope stability analysis are undertaken to confirm ground properties, wall function, slope stability, and the presence of a buried structure in-front of the asset (Figure 6.2).

Once investigations are completed, contractor engagement should be conducted to determine the costing for the different options outlined in Section 6.5. It is anticipated that there will be difficulty in siting the plant required for a like for like repair, or local demolition and rebuild. It may prove to be most cost effective to undertake slope stabilisation works and provide mitigations to slow the deterioration of the masonry wall. However, this would not protect the wall from progressive deterioration or washout of the bank material in the longer term (in the vicinity of wall failures).

If masonry repairs are to be undertaken, a touching distance visual inspection of the wall should also be undertaken, in order to confirm the location and extents of missing and loose masonry.

The Priority Group of this asset is likely to increase if:

- The building foundations are found to be dependent on the river wall and a concern develops over that section of the wall.
- The condition of the bank retaining wall significantly deteriorates.
- The slope stability assessment indicates there is a risk of collapse.

If any of these scenarios occur, repairs would become more urgent.

Available as-built records for the wall and adjacent buildings, including those at the top of the slope should be reviewed, if records show that foundations are sufficient to support the structures in the event of a slope failure, then the asset could potentially be descoped. However, there should be an awareness that progressive deterioration of the slope through washout could lead to future slope instability.

7 NCS13

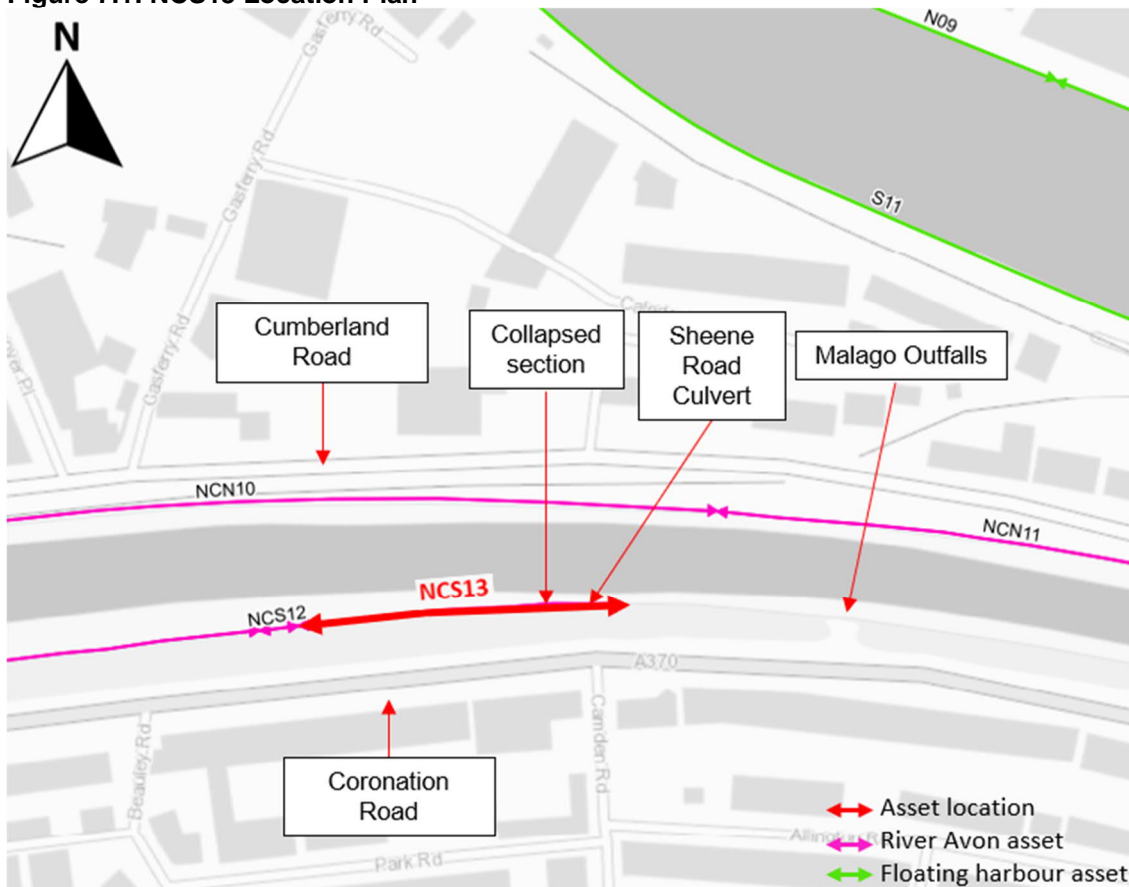
7.1 Background Information

7.1.1 Asset Location

The asset is located on the River Avon New Cut adjacent to the A370, Coronation Road. A Location plan is presented in Figure 7.1. The asset is located at approximate National Grid Reference 357305, 172026.

Coronation Road is located at the top of the slope and runs parallel to the New Cut River Avon, south of the asset. To the south of the asset is the residential area of Southville.

Figure 7.1: NCS13 Location Plan

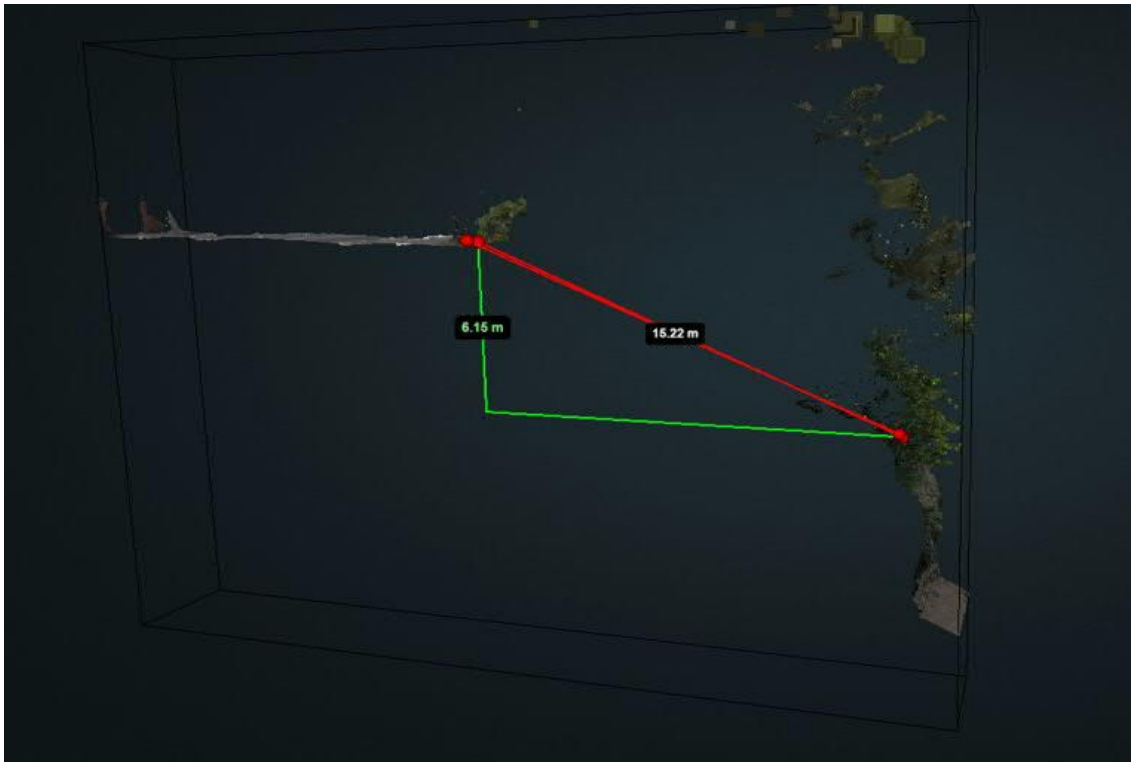


Source: Mott MacDonald

7.1.2 Asset Description

Asset NCS13 is a masonry wall which has been constructed upon rock outcrops. The asset is approximately 124m long and 2m high. The western section of the asset is retaining a steep vegetated slope set back up to 6m from the wall reducing towards the east. The eastern section (approx. 60m) of the asset, is believed to be directly supporting the steep vegetated slope. The slope behind the asset is approximately 1 in 3. A cross section showing the wall, slope and road positions is in Figure 7.2.

Figure 7.2: NCS13 Cross section

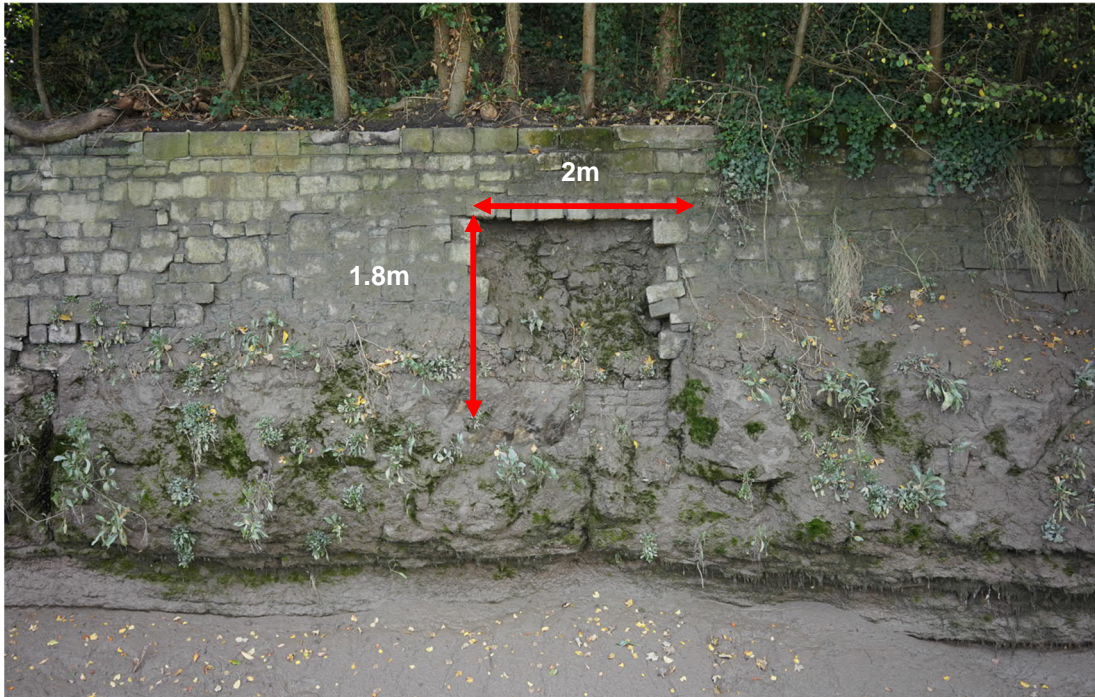


Source: Mott MacDonald 2019

7.1.3 Asset Defects

The main area of concern is the eastern section of the asset. There is a collapsed section of wall, approximately 2.5m x 2m, this is shown in Figure 7.3. Additionally, there are several areas of minor wall deformation, a typical example of this is shown in Figure 7.4. The level at the bottom of the collapsed wall section is 5.70mAOD. The river height in this area is not accurately known, but it is anticipated to regularly rise above the bottom of the defect.

Figure 7.3: NCS13 Collapsed section



Source: Mott MacDonald October 2022

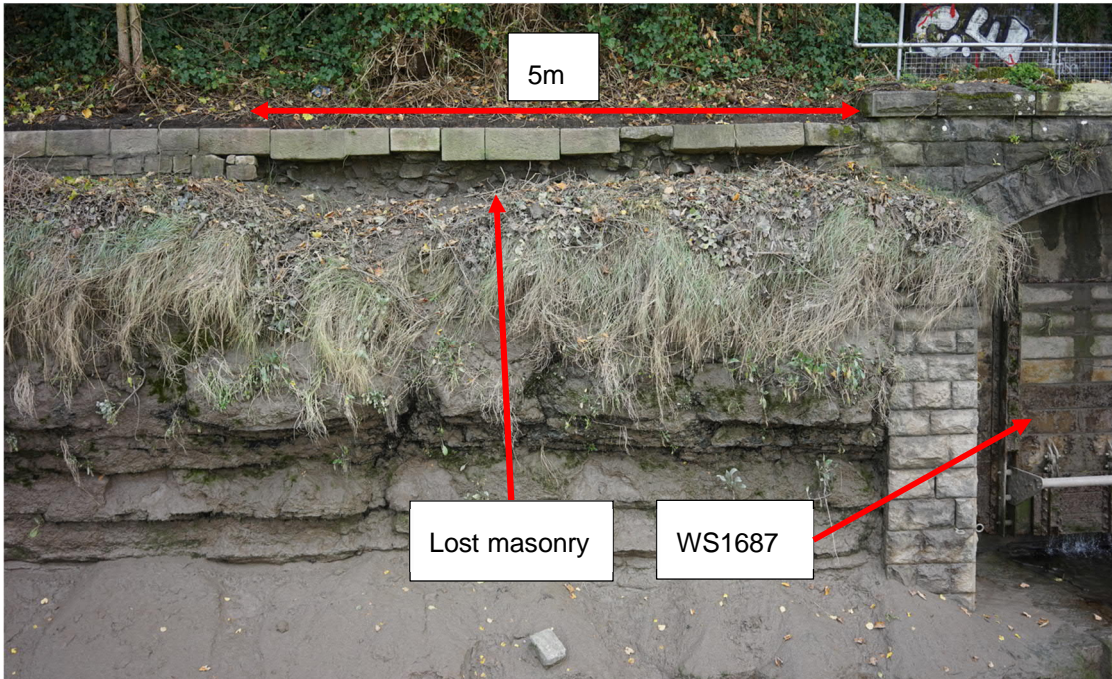
Figure 7.4: NCS13 Typical example of minor wall deformation



Source: Mott MacDonald October 2022

The gated outlet for Sheene Road Culvert (WS1687) is located along the asset's length. The outlet is owned by Wessex Water and is not part of this scope, but it appears to be in a fair condition. However, adjacent to the outlet, an approximate 5m length of wall is exhibiting lost masonry. This is shown in Figure 7.5.

Figure 7.5: NCS13 Missing masonry by Sheene Road Culvert



Source: Mott MacDonald October 2022

There is potentially scour happening to the bedrock that the wall has been constructed upon. The appearance of the rock is similar to other locations up and down the New Cut. This is shown in Figure 7.6. This is not considered a short-term concern.

Figure 7.6: NCS13 Scour



Source: Mott MacDonald October 2022

7.1.4 Consequences of Asset Failure

In the eastern section of the asset, where the defects shown in Figure 7.3 and Figure 7.4 are located, there is the potential for a failure to result in a loss of support to the slope behind and

subsequently to Coronation Road which is located approximately 15m from the face of the wall (measured along the length of the slope, rather than on plan). If this were to occur, there would be major travel disruption as Coronation Road is a main distribution route.

7.1.5 Historic Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the site. Table 7.1 presents a summary of history on site.

Table 7.1: NCS13 Summary of site history

Year	On site	Off site
1882 Published 1885	Retaining wall is labelled as stone	There is an unnamed road south of New Cut There is a row of 7 houses south of the road with open space adjacent to and south of the houses
1883 Published 1886	No change	No significant change
1901 to 1902 Published 1904	No change	Significant development in the area and is now known as Southville
Revised: 1901 to 1902, Published: 1905	No change	No significant change
Revised: 1902 Published 1905	No change	No significant change
Revised 1913 Published 1918	No change	No significant change
Revised 1912 to 1913 Published 1921	No change	No significant change
Revised 1913 Published 1921	No change	No significant change
Revised 1930 Published 1933	No change	No significant change
Revised 1938 Published 1944	No change	No significant change
Revised 1938 Published 1945	No change	No significant change
Revised 1938 Published 1946	No change	No significant change
Revised 1938 Published 1947	No change	No significant change
Revised 1938 to 1955 Published 1955	No change	No significant change
Revised 1938 to 1963 Published 1964	No change	No significant change
Revised 1938 to 1967 Published 1967	No change	No significant change
Present day	No change	No significant change

7.1.6 Geology

A review of BGS mapping [1] shows there are no superficial deposits on site and bedrock is found at ground level. Redcliffe Formation is described by BGS Lexicon [4] as “sandstone, distinctive fine- to medium-grained, deep red, calcareous and ferruginous. Commonly decalcified at shallow depths below the surface, giving rise to an uncemented sand”.

NCS13 is not in a worked ground area but ground workings surround the site.

A review of the BGS Geoindex [2] shows that there are also no historical borehole logs available within 200m of the site. Three boreholes were available from the 2015 Structural Soils Ground Investigation [3]. A summary of the exploratory holes is included in Table 7.2 below.

Table 7.2: NCS13 Existing exploratory hole summary

2015 Structural Soils Ground Investigation			
	BH547	BH549	BH551
Approx. distance from the site:	70m N	80m N	90m NE
Made Ground	0m BGL Asphalt 0.2m BGL Grey very sandy subangular to angular fine to coarse GRAVEL 0.4m BGL Brown fine to coarse gravelly SAND	0m BGL Asphalt 0.2m BGL Grey very sandy subangular to angular fine to coarse GRAVEL 0.6m BGL Reddish brown gravelly clayey fine to coarse SAND 1.2m BGL Firm low strength reddish brown sandy slightly gravelly CLAY 1.45m BGL firm low strength greenish brown ad brown slightly gravelly sandy CLAY 1.7m BGL Brown mottled grey very clayey fine to coarse SAND	0m BGL Asphalt 0.2m BGL Grey subangular limestone COBBLES 0.6m BGL Yellowish brown very gravelly slightly clayey fine to coarse SAND 0.8m BGL Stiff high strength greyish brown mottled red sandy slightly gravelly CLAY 1.3m BGL Stiff brownish grey mottled CLAY
Possible Made Ground	0.8m BGL Reddish brown gravelly clayey fine to coarse SAND 2.8m BGL Reddish brown mottled yellow brown very clayey SAND 3.2m BGL Firm becomes very soft brown mottled grey sandy CLAY 3.7m BGL Yellowish brown very clayey fine to coarse SAND 4.1m BGL Grey very clayey fine SAND 4.2m BGL Very stiff very high strength reddish brown sand CLAY 4.9m BGL very soft reddish brown sandy CLAY	2.7m BGL Firm yellow low strength reddish brown mottled yellow brown and greenish grey sandy CLAY	1.8m BGL Brown mottled red brown very clayey fine to coarse SAND
Mercia Mudstone Group	-	3.4m BGL Very stiff reddish brown sandy CLAY	2.2m BGL Soft yellowish brown mottled reddish brown sandy CLAY 3.1m BGL Very stiff reddish brown sandy CLAY

2015 Structural Soils Ground Investigation

Redcliff Sandstone Formation	5.2m BGL Very weak becoming weak reddish brown conglomeratic SANDSTONE	4.5m BGL Weak becoming medium strong very thinly to thinly bedded reddish brown and brown fine to coarse SANDSTONE	4.0m BGL Weak to medium strong thinly laminated to thickly laminated orange brown and reddish brown fine to coarse SANDSTONE
	9.05m BGL Weak thinly laminated to thinly bedded brown fine to medium grained SANDSTONE	5.75m BGL Weak thickly laminated to thinly bedded brown fine to medium SANDSTONE	5m BGL Very weak locally extremely weak brown and reddish brown very thinly to medium bedded fine to coarse SANDSTONE
		6.2m BGL Very weakly thinly laminated to very thinly bedded reddish brown silty slightly weathered MUDSTONE	5.9m BGL Extremely weak to very weak thinly to medium bedded reddish brown silty MUDSTONE
		7.0m BGL Weak thinly laminated to very thinly bedded brown fine to medium slightly weathered SANDSTONE	6.5m BGL Weak/very weak thinly laminated to thickly laminated brown fine to medium SANDSTONE
		7.3m BGL Very weak very thinly bedded reddish brown silty MUDSTONE	7.5m BGL Very weak becoming weak brown fine to coarse conglomeratic SANDSTONE
		7.9m BGL Weak to medium strong thinly to medium bedded reddish brown fine to coarse conglomeritic SANDSTONE	8.7m BGL Very weak reddish brown silty MUDSTONE
		8.8m BGL Very weak thinly bedded reddish brown slightly weathered silty MUDSTONE	
		Hole terminated at 11m depth	Hole terminated at 9.5m depth

7.1.7 Mining

Bristol is known for its past as a Coal Mining area. A review of the Coal Authority interactive tool [5] shows map shows to site to not be within an area of known or probable coal mining.

7.1.8 Ecological Constraints

An ecological walkover survey was undertaken on 29 June 2022 by Mott MacDonald ecologists. The survey consisted of a walkover of the asset and a 30m buffer, where access permitted. The purpose of the survey was to identify the ecological constraints and risks of works. A summary of the Ecological Constraints Assessment produced following this survey is provided below.

Listed below are the habitats that were identified within the survey buffer;

- Semi-natural deciduous woodland, present in a 20m wide strip along the entire asset;
- Scattered scrub understory dominated by bramble (*Rubus fruticosus*) nettle (*Urtica dioica*) and ivy (*Hedera helix*);
- Patches of mixed dense scrub present along the eastern half of the asset;
- Semi-improved grassland growing on a 4m wide strip along the masonry wall edge closest to the river; and
- Mudflats are present directly underneath the masonry wall along the river edge.

In line with policy and best practice, avoidance measures should be embedded into the design of the works. The following avoidance measures were identified;

- Works within the river and mudflat Habitats of Principal Importance should be avoided;
- Where possible trees and other vegetation should be retained;

- Artificial lighting should be avoided during the construction and operational phases of the development;
- Obstructions to the watercourse and riverbanks should be avoided during the construction and operational phase;
- Any retained trees should be assessed by an appropriately qualified arboriculturist to determine root protection areas and any exclusion zones required to mitigate for damage during demolition and construction; and
- If possible, the site compound should be situated at least 16m away from the river and riverbanks, if this is not possible, permission would be required from the Environment Agency.

Table 7.3 below summarises the identified ecological constraints and the preliminary mitigation and/ or compensation recommendations.

Table 7.3: Ecological constraints and mitigation/compensation recommendations

Feature	Location description	Preliminary mitigation and/or compensation recommendations
Designated sites	Avon Gorge Woodlands Special Area of Conservation and Site of Special Scientific Interest, Horseshoe Bend Site of Special Scientific Interest, and Severn Estuary (Special Area of Conservation, Special Protection Area, RAMSAR and Site of Special Scientific Interest downstream of the Site. Avon New Cut Local Nature Reserve on site.	A Habitat Regulations Assessment is recommended. The county ecologist should be consulted regarding the proposed works within the Avon New Cut Local Nature Reserve.
Habitats of principal importance	River and mudflats within the site	The county ecologist should be consulted at the earliest opportunity if the habitats of principal importance are anticipated to be impacted to discuss the working methodology as well as any compensation, enhancement or restoration work.
Bats	Most trees on the asset offer low to moderate potential to support roosting bats due to the presence of potential roosting features and thick ivy cover	Night-time working should be avoided. A toolbox talk regarding bats should be given to all site personnel.
Reptiles	The scrub and grassland habitats within the riverbank offer suitable habitat for common reptiles	If any habitat removal affecting potential hibernacula (such as log piles or root systems) is required, this should occur during the reptile active season (April – October inclusive, depending on the weather) under supervision of an ecologist. Vegetation clearance should follow phased cuts in a directional manner to allow dispersal of active reptiles to neighbouring habitats. A toolbox talk regarding reptiles should be given to all site personnel.
Nesting birds	The scattered trees, scrub and rough grassland provide suitable habitat for nesting birds. A nest was also observed on one of the trees, although it was deemed unactive at the time of the survey	Vegetation clearance of habitat suitable for nesting birds should be undertaken outside of the nesting season (between March and August inclusive) in line with standing government guidance. If this is not possible, vegetation will need to be checked by an ecologist no more than 24 hours prior to removal. The feasibility of nesting bird checks will be subject to the judgement of a suitably qualified ecologist, who will

Feature	Location description	Preliminary mitigation and/or compensation recommendations
		determine whether the vegetation to be cleared can be safely and adequately searched.
Bony fish	The River Avon New Cut has potential to be used by different species of bony fish (including European eel) for commuting and foraging	Should the scope of works include significant disturbance that could impact fish, such as high noise and vibration levels, works may need to be timed to avoid fish migration periods. A toolbox talk regarding fish should be given to all site personnel.
Otters (<i>Lutra lutra</i>)	The River Avon New Cut has potential to be used by commuting and foraging otters.	No mitigation or compensation measures specific to otters identified.

Source: Mott MacDonald, 2022.

Further ecological surveys are recommended due to the potential for protected and notable species in the area. A full Preliminary Ecological Appraisal Report should be undertaken. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on bats, fish, otters and reptiles should be included in a Reasonable Avoidance Measures Method Statement this should include best practise measures and general construction safeguards.

7.1.9 Site Walkover

Site walkovers were undertaken in January 2022, June 2022 and September 2022, as well as the original drone survey in April 2019.

During the January 2022 site walkover, images of the asset were obtained. Due to extensive vegetation growth, it is difficult to compare the overall condition of the asset with the condition in 2019, however, the collapsed section shown in Figure 7.3 appears to be in a similar state.

During the June 2022 site walkover, no images were obtained.

During the September 2022 site walkover, due to access limitations, no images of a reasonable quality were obtained of the asset.

7.1.10 Drone Survey

In October 2022, a drone survey was completed of the asset. As shown in Figure 7.7 and Figure 7.8, the collapsed section is similar in appearance with no discernible changes to the masonry. The minor wall deformation shown in Figure 7.9 and Figure 7.10, is also similar in appearance, however, due to the vegetation removal, the size of the defect area is more apparent.

Figure 7.7: NCS13 Collapsed section 2019



Source: Mott MacDonald 2019

Figure 7.8: NCS13 Collapsed section 2022



Source: Mott MacDonald, October 2022

Figure 7.9: NCS13 Wall deformation 2019



Source: Mott MacDonald 2019

Figure 7.10: NCS13 Wall deformation 2022



Source: Mott MacDonald, October 2022

Due to the hit and miss devegetation approach, a number of the defects in the less critical western section are not visible for comparison, however, these are not considered to be within the scope of this project.

7.1.11 NCS13 Summary

It is considered likely that the asset primarily functions as a retaining wall, providing support to the slope behind it. In the area where the collapse has taken place (shown in Figure 7.3), no further deterioration of the wall (or slope failure) is evident between 2019 and 2022.

In the absence of the wall, there is a possibility that there is enough support within the slope from vegetation and soil compaction, that would stop a short-term slope failure. However, a secondary function of the wall is to provide washout protection and in the long-term gradual erosion would likely lead to a slope failure. This would need to be confirmed through ground investigations and a slope stability analysis.

The 2019 drone data was compared to the 2022 drone data and the critical defect (Figure 7.3, Figure 7.7) does not appear to have changed significantly. The areas of minor wall deformation are more apparent, due to vegetation clearance, but they are not considered critical in nature.

7.2 NCS13 Monitoring

There are several options for the monitoring of NCS13, these include:

- Regular visual monitoring with long lens photographs.
- Surveying with total station.
- Laser scanning.
- Real-time monitoring with sensor system.

Further details of these monitoring techniques can be found in Section 2.

In this instance, it is recommended that the asset is monitored visually at 2-month intervals.

Regular visual monitoring will enable a visual record of the asset to be collated and should help identify significant deterioration of the wall within a reasonable timeframe (i.e., further loss of masonry, fractures, large movements).

The other listed options could be considered; however, they are not deemed to be essential for this asset.

7.3 NCS13 Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 2No. Boreholes.
- 2 Nr. Hand dug trial pits to confirm ground conditions directly behind the wall.

7.3.1 Slope Stability Analysis

A slope stability analysis could be undertaken for the areas local to defects which if allowed to deteriorate could potentially result in a slope failure.

The purpose of undertaking the analysis would be to determine whether, in the absence of the wall, the slope would fail. If the slope were found to have sufficient stability, the priority of the defect (Figure 7.3) would be decreased.

It should be noted that in the short term, while the slope may be stable in the absence of the wall, over a longer-term, following gradual washout from the river, that may change, and the slope may become unstable.

7.4 NCS13 Repair Options

At this time, repairs are only recommended for the collapsed section shown in Figure 7.3. There are two primary repair methods which can be considered for the asset repair. These methods will stabilise the wall in the region local to the defect.

1. A like for like repair consisting of masonry blockwork.
2. In-situ concrete patch repair utilising rock fixings / ground anchors (subject to geotechnical investigations).

The repair methodology will need to consider the tidal nature of the New Cut and may need to be completed quickly within a short window of time.

It may be a requirement that the upper section of wall above the current defect needs to be taken down or stabilised prior to commencing work; this will be subject to the outcome of geotechnical investigations, the ability for plant to access the site, temporary works considerations; and the wall's current condition at the time of the repair.

Alternatively, ground investigations and the slope stability assessment may find that the bank has sufficient capacity or can be strengthened such that the wall could be allowed to fail, although this would have negative aesthetic impact.

If there are any particular concerns over the scour of the bedrock the installation of reno-mattresses could be considered.

ECI discussions have informed that a cantilevered scaffold will likely be required to create a safe working environment to complete necessary repairs.

7.4.1 NCS13 Masonry Patch Repair

Where the collapse has occurred (Figure 7.3), it is anticipated that there would be a useable foundation as the rock shelf is still visible and there is masonry below the hole, however, this would need to be confirmed through ground investigations.

The collapsed section would be reconstructed using masonry blocks and to provide additional support, tie-bars into the adjacent masonry could also be used to provide better continuity (if required). As this wall is expected to be a retaining structure (subject to ground investigations), there is a risk that reconstructing in masonry would not adhere to current design standards.

There are also potential safety concerns over this methodology as the section of masonry which remains above the collapse is likely to be unstable and could potentially collapse when remedial work is being undertaken. The upper section of masonry may require temporary support or deconstruction prior to a repair being undertaken. However, deconstruction would potentially remove support for any retained material, increasing risk of a slope failure. The safety concern of upper wall stability is increased versus a concrete repair due to a longer working time.

7.4.2 NCS13 In-situ Concrete Patch Repair

Repairing the collapsed section (Figure 7.3) with this methodology would be sufficient to stabilise the wall local to the repair. It is unlikely that it would adhere to current design standards for a retaining structure.

This entails installing a series of fixings throughout the defect which will be used to anchor/support a reinforced concrete patch repair. The type of fixing (anchor/dowel) will be determined following ground investigations. Without sufficient rock anchors/dowels to support the vertical load, a useable foundation will be required.

It is likely that the final repair will sit proud of the existing masonry wall face and extend for a nominal distance beyond the maximum extents of the defect to obtain a rectangular repair (subject to ECI input on concreting).

7.4.3 NCS13 Deformation Repair

There are several areas of deformation throughout the asset. Where there are areas of deformation as shown in Figure 7.4, the current recommendation is to monitor these and track movement. If movement is experienced, the areas should be repaired with potential options as follows:

- The wall can be demolished local to that area and rebuilt (either a masonry repair, or concrete repair, subject to ground investigations) as outlined above.
- Pattress plates could also be installed in the area of deformation to stabilise the local area, the suitability of pattress plates would need to be determined through preliminary investigations to find the angle of misalignment and ground properties.

7.4.4 NCS13 Slope Stabilisation

This could be a feasible option if it is determined that in the absence of the wall, the slope would fail, and that targeted stabilisation works would be cheaper than repairing or reconstructing the wall. Ground investigations followed by a slope stability analysis would initially be required to understand this.

Bank stabilisation would require the installation of soil nails and a facing system into the bank. Prior to this being undertaken, widespread de-vegetation would be required in the area of installation. This is envisaged to be more extensive than de-vegetation requirements for the above patch or deformation repair methods.

It could be difficult to install a facing system due to the quantity of trees in the area and early contractor involvement should be undertaken to determine the site requirements. The removal of any trees from the bank could have a destabilising effect by changing the pore water pressure and potentially cause movement. In addition, tree removal would likely to be strongly objected to by local residents and the ecological concerns over removing potential habitats would need to be determined.

It should be noted that while the slope may be stable following slope stabilisation works, there is a longer-term risk of gradual washout and reduced bank stability. It's likely this approach will be favourable as an interim repair measure where the cost and practicalities of conducting smaller repairs is not considered to be an effective solution; potentially allowing for a larger scale repair/replacement to be undertaken in the future.

7.5 NCS13 Recommendations

The asset has been ranked in Priority Group 3, see Section 12.

It is recommended that regular visual monitoring is undertaken at 2 month intervals to note any further asset deterioration.

It is recommended that ground investigations and a slope stability analysis are undertaken to confirm ground properties, wall function, slope stability. Subject to slope stability findings, the asset could potentially be descope from remedial works in the future, if there is no risk to the carriageway.

If the ground information and slope stability analysis support the need for repairs, a more informed decision can then be taken on an appropriate repair methodology. This is likely to be as follows:

- Concrete / masonry patch repairs for areas of missing masonry,
- Installation of localised patch plates at areas of bulging

Note, that restoring the existing wall with like for like patch repairs is unlikely to comply with modern design codes for a retaining structure and would instead be focussed on providing a stabilising repair of the adjacent masonry.

As an alternative to the above, slope stabilisation works could potentially be undertaken as an interim measure, mitigating the risks to the bank and adjacent infrastructure in the event of a wall failure. However, this would not protect the wall from progressive deterioration or washout of the bank material in the longer term (in the vicinity of wall failures).

The areas of deformation could potentially be monitored using remote sensors to give accurate data on wall movement. It is not deemed to be essential in this location and could be considered in the event that the sensors would be within range of a monitoring Gateway (see Section 2.5) used for higher priority assets.

It is advised that the targeted removal of specific trees (whose proximity to the wall is likely to be causing structural damage) be considered. Any tree removal should be done in consultation with an arboriculturist and ecologist and provision for replacement planting to retain habitats will need to be considered. Note that there is a risk of loss of stability to the bank due to excessive vegetation removal, and a suitably qualified geotechnical engineer should be engaged before any vegetation removal is undertaken.

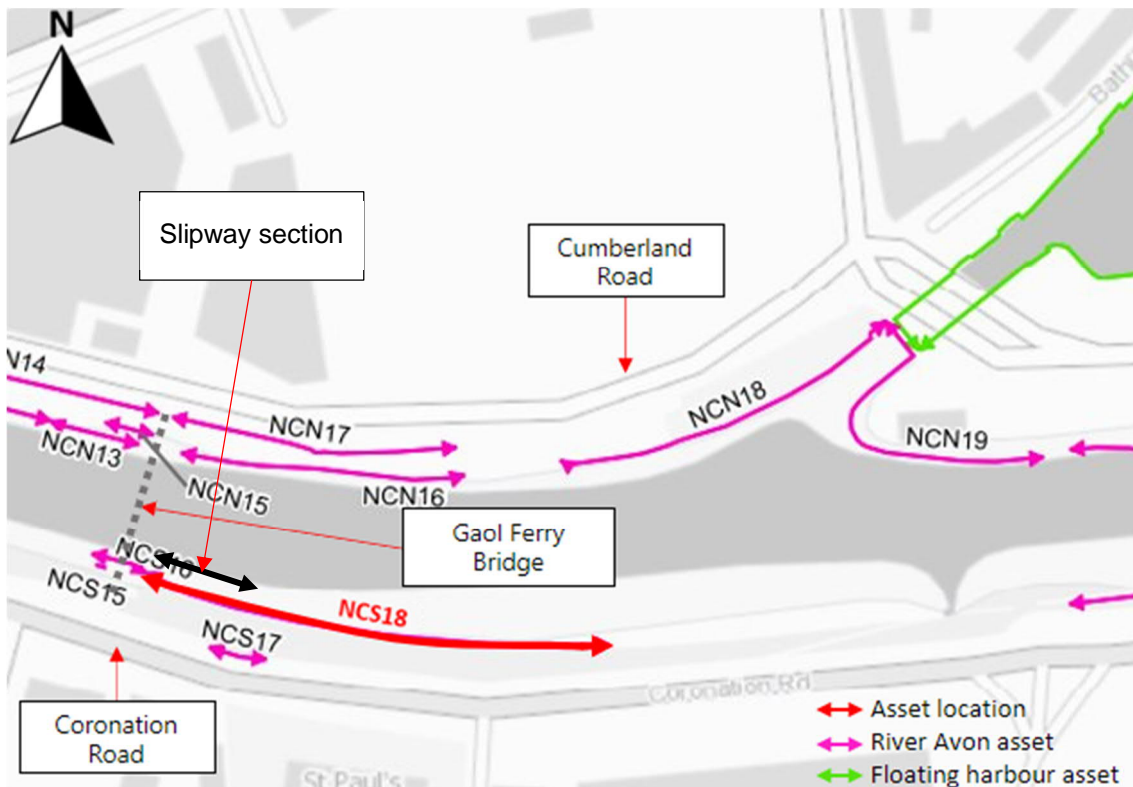
8 NCS18

8.1 Background Information

8.1.1 Asset Location

Asset NCS18 is located adjacent to the A370 Coronation Road, on the south bank of the River Avon at National Grid Reference 358424, 172018. Figure 8.1 shows the site location plan. It is located to the east of Gaol Ferry Bridge.

Figure 8.1: NCS18 Location plan



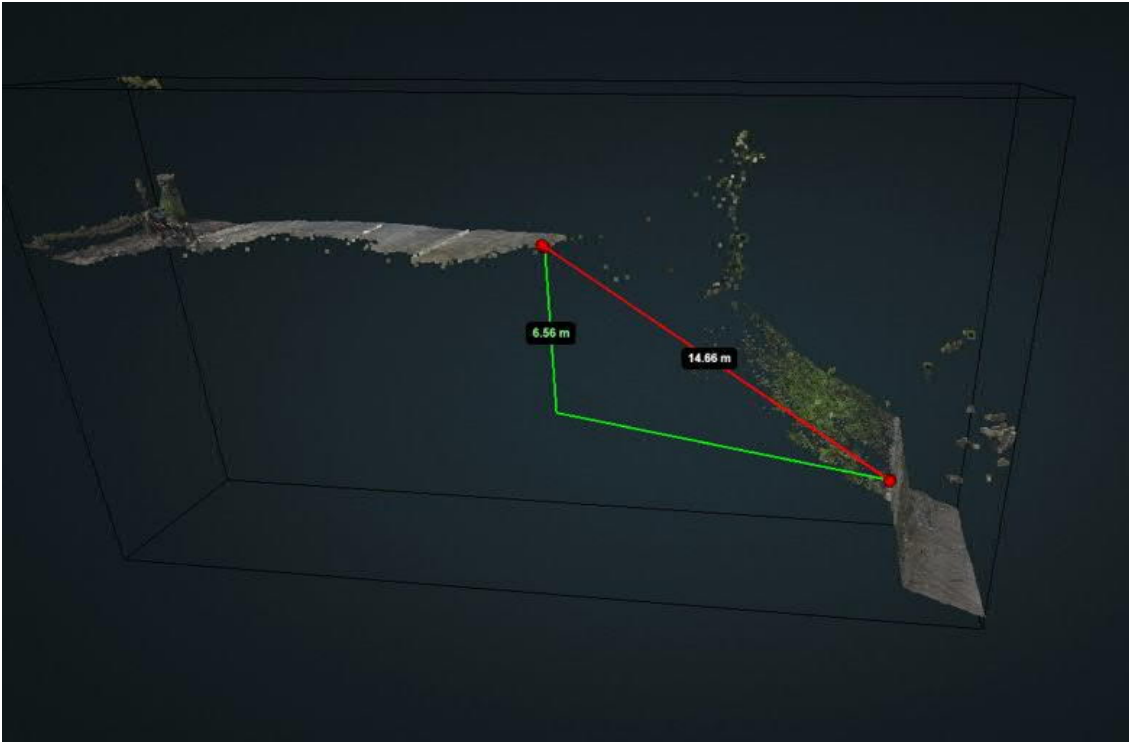
Source: Mott MacDonald

8.1.2 Asset Description

The asset is a masonry wall approximately 130m long, the height of the exposed wall varies due to sediment. It was constructed for the Gaol Ferry Crossing which was the connecting route between Southville and Gaol Ferry Steps across the River Avon. The ferry crossing has since been replaced by the Gaol Ferry footbridge. The asset partly forms a walkway down to the ferry slipway (30m) as well as acting as a retaining/facing wall for a length (100m) of the riverbank.

The exact role of the masonry wall is unknown throughout its length and may act as either a facing wall or a retaining structure, or as a mixture of the two. In the event that it is a retaining structure, it is likely supporting the steep bank below Coronation Road. The slope behind the asset is approximately 1 in 2 with Coronation Road located approximately 13m behind the wall. A cross section showing the wall, slope and road positions is in Figure 8.2.

Figure 8.2: NCS18 Cross section



8.1.3 Asset Defects

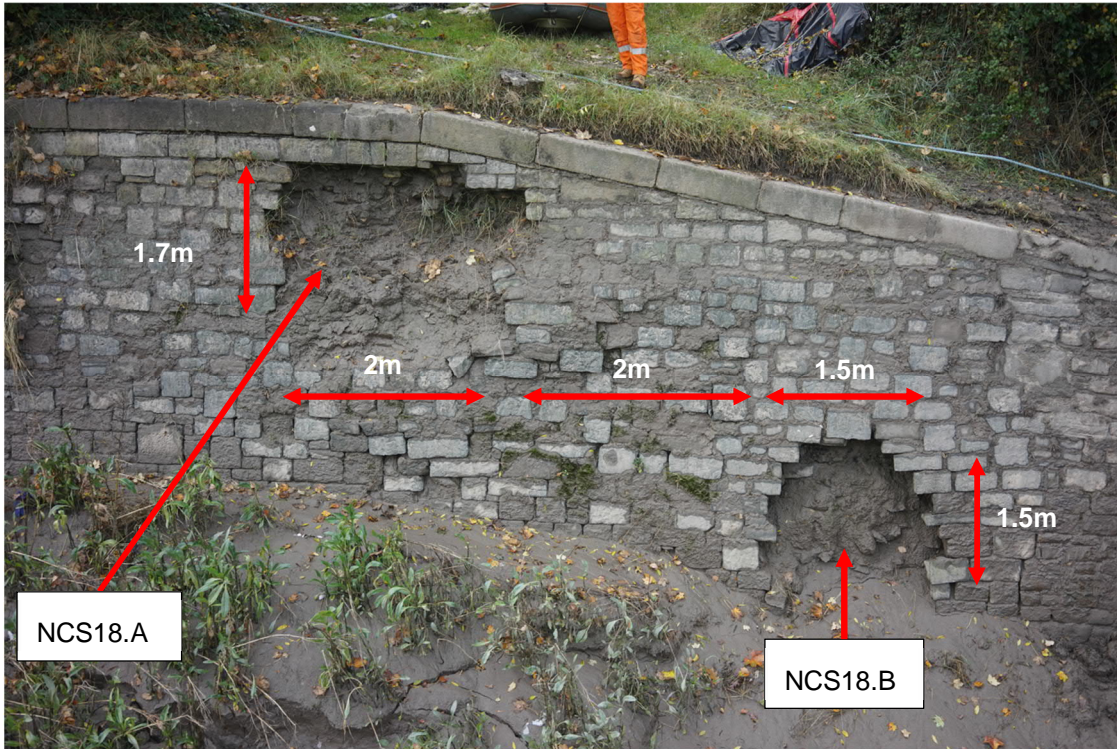
There are several collapsed sections of the wall and areas of deformation. The defects have been treated as two different sections depending on their location, slipway and slope wall.

Slipway defects are located below or within the immediate vicinity of the slipway to the River Avon. These are the defects shown in Figure 8.3 and Figure 8.7.

Slope wall defects are located in-front of the slope which rises to Coronation Road. These are the defects shown in Figure 8.4, Figure 8.5 and Figure 8.6. It is anticipated that tree roots are causing some of the deformations that are present.

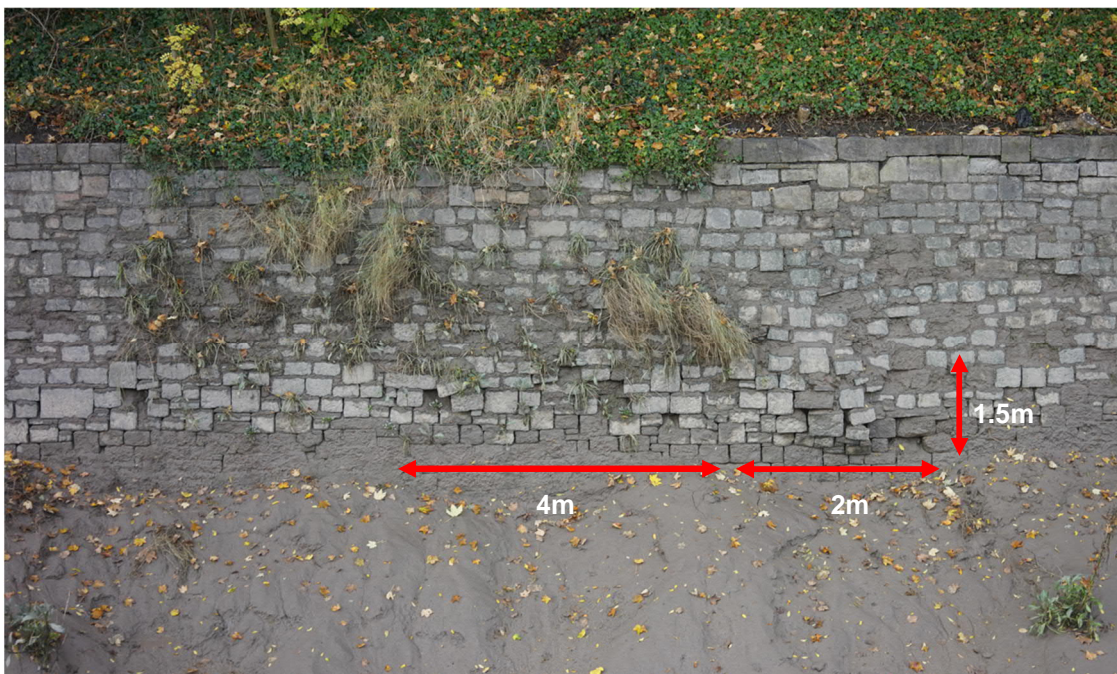
The level at the bottom of the defects in Figure 8.3 is 4.5mAOD and 6.2mAOD respectively. The level at the bottom of the defect in Figure 8.7 is 2.5mAOD. The approximate toe of wall height for the remaining defects (Figure 8.4, Figure 8.5 and Figure 8.6) is 5mAOD. The river level in these locations is anticipated to regularly rise above these levels.

Figure 8.3: NCS18 Collapsed sections (Slipway)



Source: Mott MacDonald, October 2022

Figure 8.4: NCS18 Wall deformation (Slope wall)



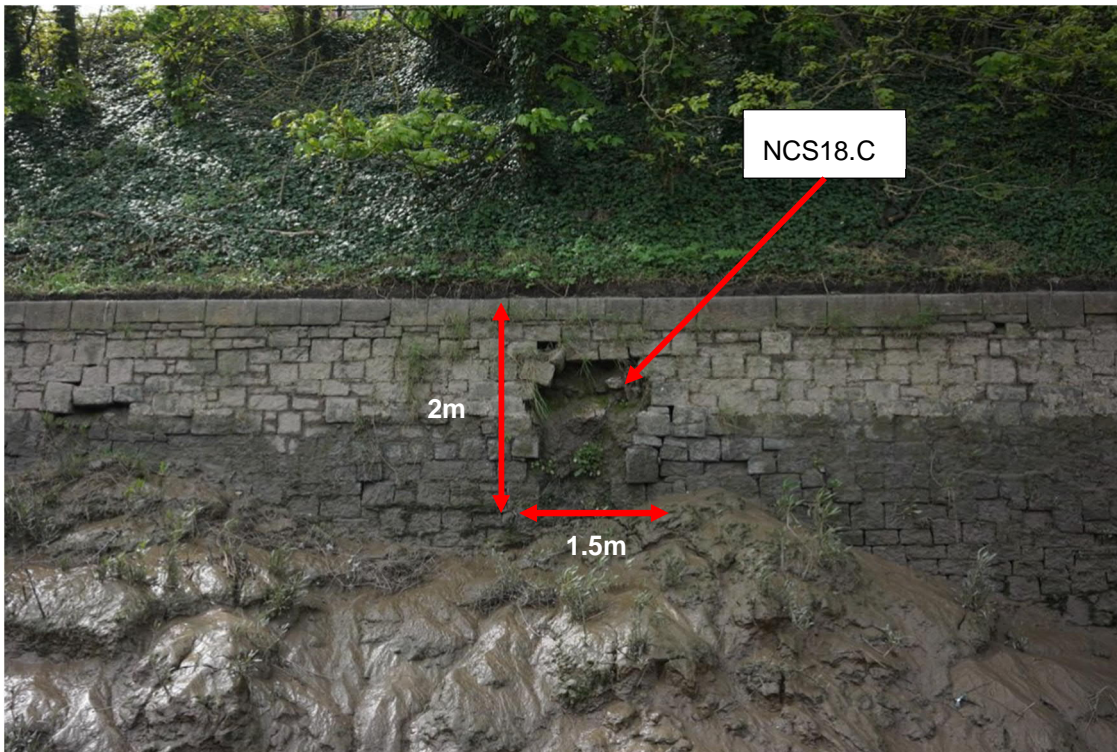
Source: Mott MacDonald, October 2022

Figure 8.5: NCS18 Wall deformation and lost masonry (Slope wall)



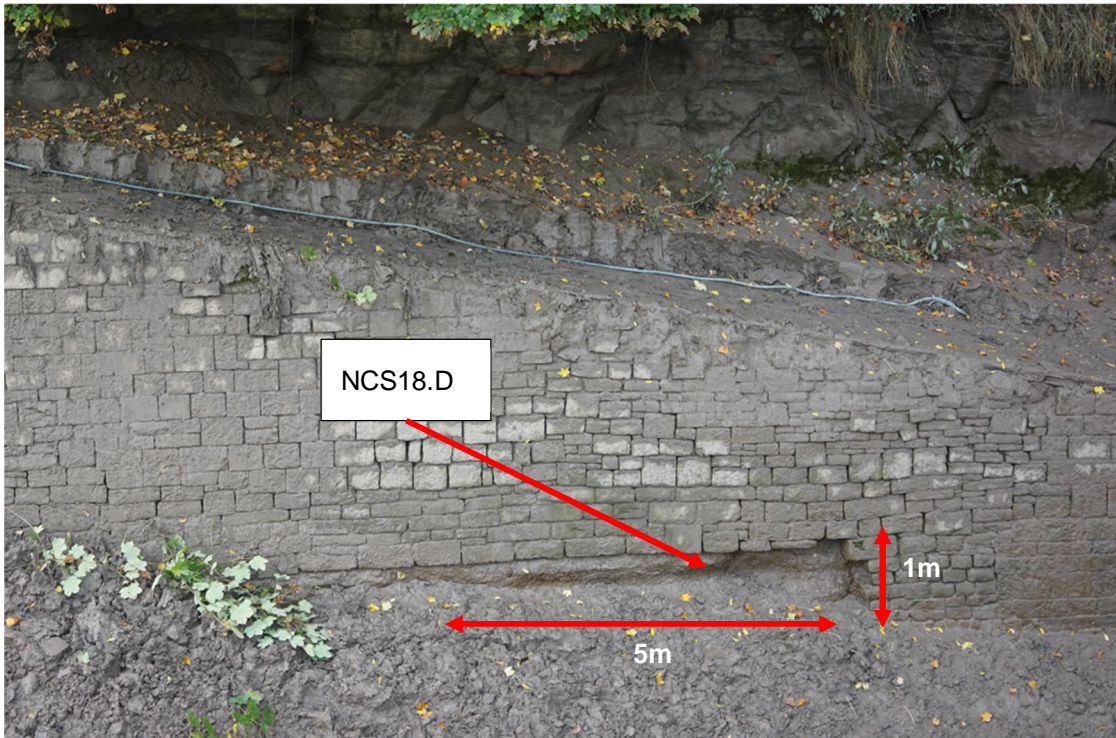
Source: Mott MacDonald, October 2022

Figure 8.6: NCS18 Collapsed section (Slope wall)



Source: Mott MacDonald 2019

Figure 8.7: NCS18 Lost masonry (Slipway)



Source: Mott MacDonald, October 2022

8.1.4 Consequences of Asset Failure

The consequence of further failure depends on the position along the asset as the supported features differ along its length.

Were it to occur where the slope is directly supported by the asset (Figure 8.4, Figure 8.5 and Figure 8.6), there is the potential for Coronation Road to be impacted. If this were to occur, there would be major travel disruption as Coronation Road is a main distribution route in central Bristol.

If a further failure happened in the vicinity of the slipway (Figure 8.3 and Figure 8.7), the slipway would potentially become unusable, limiting maintenance access to the bridge pier and access to the river.

8.1.5 Historical Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the asset. Table 8.1 presents a summary of history on site.

Table 8.1: NCS18 Summary of site history

Year	On site	Off site
1882	Coronation Ferry is present and marked with a dashed line from north to south, across the water Steps lead down to the water's edges from a slip way that extends east and west of the crossing on the northward side, and just west of the crossing on the south The slope southwards of the asset is labelled as stone.	Access to Coronation Ferry appears to start from Southville Road, approx. 50m south west of site, following an un-named road northward to the water's edge. This road appears to pass under Coronation Road where it is labelled Coronation Bridge. There are stepped access directly from Coronation Road. New Goal (Disused) is present adjacent northwards of site across the New Cut. Housing is present due south and south east of site
1883, Published 1886	No change	No significant change
1881-1883 Published 1887	No change	No significant change
1901-1902 Published 1904	No change	New Goal (Disused) is no longer labelled Tram tracks have been constructed to the north of site
1901-1902 Published 1905	Coronation Ferry no longer marked	No significant change
1902	Coronation Ferry marked on map	Coronation Bridge is no longer labelled The slipway and access to the Coronation Ferry is no longer visible on mapping
1912	No change	No significant change
1913 Published 1918	No change	No significant change
1913 Published 1921	No change	No significant change
1930	Coronation Ferry is still labelled but there is no dashed line to indicate the direction of the ferry	No significant change
1938	No change	No significant change
1938-1955	Coronation Ferry is no longer labelled. There is now a bridge present which crosses the New Cut	No significant change

8.1.6 Geology

A review of the BGS geological mapping [1] shows the site to be underlain by the Redcliffe Sandstone Member formation. BGS Lexicon describes this as *“sandstone, distinctive fine- to medium-grained, deep red, calcareous and ferruginous. Commonly decalcified at shallow depths below the surface, giving rise to an uncemented sand”*. Superficial deposits are shown to not be present on the geological maps.

A review of BGS Geindex [2], showed that no exploratory holes were available on site. Four trial pits were located approximately 200m to the north west of site. The trial pits were excavated in the 1980s and the logs are typed. One borehole was available from the 2015 Structural Soils Ground Investigation [3] approximately 200m north east of site. A summary of the exploratory holes is shown in the Table 8.2 below.

Table 8.2: NCS18 Existing exploratory hole summary

	Historic BGS Geindex borehole records				2015 Structural Soils Ground Investigation
	ST57SE326 TP01	ST57SE327 TP02	ST57SE328 TP03	ST57SE329 TP04	BH561
Approx. distance from the site:	200m W	200m W	200m W	200m W	200m NE
Made Ground	0.1-0.2 m BGL Loose creamy grey sandstone chippings 0.2 - 0.7 m BGL Rubble in silt matrix	0 - 0.9 m BGL Rubble in sandy matrix	0 - 1.1 m BGL Rubble	0.0– 1.1 m BGL Silty matrix 1.2 m BGL Black cinder layer	0-0.2 m BGL Dark brown sandy SILT 0.2-0.35m BGL yellowish to orangish brown gravelly SAND
Weathered Zone (Assumed Redcliffe Sandstone)	0.7 - 2.6 m BGL Soft to stiff (increasing strength with depth) brown CLAY	0.9 - 2.4 m BGL Medium to coarse brown SAND	1.1 - 2.7 m BGL Medium to coarse red brown clay sand	1.2 - 2.3 m BGL Medium to coarse dark brown clayey SAND	0.4-0.7m BGL Light yellowish brown slightly gravelly SAND
Redcliffe Sandstone	> 2.6 m BGL Moderately strong calcareous SANDSTONE	>2.4 m BGL SANDSTONE	>2.7 m BGL Moderately strong calcareous SANDSTONE	>2.4 m BGL Moderately strong calcareous SANDSTONE	0.7-9.7m BGL Extremely weak to weak, SANDSTONE OR Very weak MUDSTONE
					9.7-38.8m BGL Extremely weak to very weak MUDSTONE OR Weak SANDSTONE
South Wales Middle Coal Measures Formation					>38.8m BGL Very weak CONGLOMERATE OR Weak to medium strong SILTSTONE

8.1.7 Mining

Bristol is known for its past as a Coal Mining area. A review of the Coal Authority interactive tool [5] shows that the asset is located within the area of a Coal Outcrop. This indicates that a coal seam is present either at or close to the surface. However, the map shows to site to not be within an area of known or probable shallow coal workings

8.1.8 Ecological Constraints

An ecological walkover survey was undertaken on 29 June 2022 by Mott MacDonald ecologists. The survey consisted of a walkover of the asset and a 30m buffer, where access permitted. The purpose of the survey was to identify the ecological constraints and risks of works. A summary of the Ecological Constraints Assessment produced following this survey is provided below.

Listed below are the habitats that were identified within the survey buffer;

- Line of semi-mature deciduous trees growing along the southern edge of the asset;
- A stone wall is present on the middle section (underneath Gaol Ferry Bridge) separating the asset from Coronation Road. Parts of the wall showed gaps and cracks on the stonework;
- Dense patches of mixed scrub and introduced shrub present along the edge of the asset closest to Coronation Road;
- Scattered scrub understory dominated by bramble, nettle and ivy. A 5m wide strip of less dense scrub is also growing along the masonry wall edge closest to the river;
- Semi-improved grassland growing on a central patch immediately east of the bridge; and
- Mudflats are present directly underneath the masonry wall along the river edge.

In line with policy and best practice, avoidance measures should be embedded into the design of the works. The following avoidance measures were identified;

- Works within the river and mudflat Habitats of Principal Importance should be avoided;
- Where possible trees and other vegetation should be retained;
- Artificial lighting should be avoided during the construction and operational phases of the development;
- Obstructions to the watercourse and riverbanks should be avoided during the construction and operational phase;
- Any retained trees should be assessed by an appropriately qualified arboriculturist to determine root protection areas and any exclusion zones required to mitigate for damage during demolition and construction; and
- If possible, the site compound should be situated at least 16m away from the river and riverbanks, if this is not possible, permission would be required from the Environment Agency.

Table 8.3 below summarises the identified ecological constraints and the preliminary mitigation and/ or compensation recommendations.

Table 8.3: Ecological constraints and mitigation/compensation recommendations

Feature	Location description	Preliminary mitigation and/or compensation recommendations
Designated sites	Avon Gorge Woodlands Special Area of Conservation and Site of Special Scientific Interest, Horseshoe Bend Site of Special Scientific Interest, and Severn Estuary (Special Area of Conservation, Special Protection Area, RAMSAR and Site of Special Scientific Interest downstream of the Site. Avon New Cut Local Nature Reserve on site.	A Habitat Regulations Assessment is recommended. The county ecologist should be consulted regarding the proposed works within the Avon New Cut Local Nature Reserve.
Habitats of principal importance	River and mudflats within the site	The county ecologist should be consulted at the earliest opportunity if the habitats of principal importance are anticipated to be impacted to discuss the working methodology as well as any compensation, enhancement or restoration work.
Bats	Most trees on the asset offer low to moderate potential to support roosting bats due to the presence of potential roosting features and thick ivy cover	Night-time working should be avoided. A toolbox talk regarding bats should be given to all site personnel.
Reptiles	The scrub and grassland habitats within the riverbank offer suitable habitat for common reptiles	If any habitat removal affecting potential hibernacula (such as log piles or root systems) is required, this should occur during the reptile active season (April – October inclusive, depending on the weather) under supervision of an ecologist. Vegetation clearance should follow phased cuts in a directional manner to allow dispersal of active reptiles to neighbouring habitats. A toolbox talk regarding reptiles should be given to all site personnel.
Nesting birds	The scattered trees, scrub and rough grassland provide suitable habitat for nesting birds. A nest was also observed on one of the trees, although it was deemed unactive at the time of the survey	Vegetation clearance of habitat suitable for nesting birds should be undertaken outside of the nesting season (between March and August inclusive) in line with standing government guidance. If this is not possible, vegetation will need to be checked by an ecologist no more than 24 hours prior to removal. The feasibility of nesting bird checks will be subject to the judgement of a suitably qualified ecologist, who will determine whether the vegetation to be cleared can be safely and adequately searched.
Bony fish	The River Avon New Cut has potential to be used by different species of bony fish (including European eel) for commuting and foraging	Should the scope of works include significant disturbance that could impact fish, such as high noise and vibration levels, works may need to be timed to avoid fish migration periods. A toolbox talk regarding fish should be given to all site personnel.
Otters (<i>Lutra lutra</i>)	The River Avon New Cut has potential to be used by commuting and foraging otters	No mitigation or compensation measures specific to otters identified.

Source: Mott MacDonald, 2022.

Further ecological surveys are recommended due to the potential for protected and notable species in the area. A full Preliminary Ecological Appraisal Report should be undertaken. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment of all trees and structures within 20m of the proposed

works (Collins, 2016), a Habitat Suitability Index assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on bats, fish, otters, eels and reptiles should be included in a Reasonable Avoidance Measures Method Statement this should include best practise measures and general construction safeguards.

8.1.9 Site Walkover

Site walkovers were undertaken in January 2022, June 2022 and September 2022, as well as the original drone survey in 2019.

During the January 2022 site walkover, images were obtained from the opposite bank. Not all of the critical defects were visible due to vegetation growth.

During the June 2022 site walkover, no images were obtained.

During the September 2022 site walkover, images were obtained but were not of comparable quality with the 2019 images.

8.1.10 Drone Survey

In October 2022, a drone survey was completed of the asset. As shown in Figure 8.8, Figure 8.9, Figure 8.10 and Figure 8.11 the defects are similar in appearance with no discernible changes to the masonry. The other defects highlighted previous for NCS18 have not been shown as their 2022 appearance is similar to 2019.

Figure 8.8: NCS18 Defect A and B 2019



Source: Mott MacDonald 2019

Figure 8.9: NCS18 Defect A and B 2022



Source: Mott MacDonald, October 2022

Figure 8.10: NCS18 Wall deformation 2019



Source: Mott MacDonald 2019

Figure 8.11: NCS18 Wall deformation 2022



Source: Mott MacDonald, October 2022

8.1.11 NCS18 Summary

It is considered likely that the asset primarily functions as a retaining wall, providing support to the bank behind it. However, this is not confirmed, and in the areas where collapses have taken place, there has not been a progression of the defect or slope failure in the immediate vicinity between 2019 and 2022.

A secondary function of the wall is to provide washout protection and in the long-term gradual erosion would likely lead to worsening wall condition and eventual slope failures.

The cause of the defects is not known; however, it is anticipated that several of the deformed areas are being caused by tree roots.

Comparison of 2019 and 2022 drone data shows that the defects identified do not appear to have deteriorated significantly in the time between the two surveys.

8.2 NCS18 Monitoring Options

There are several options for the monitoring of NCS18, these include:

- Regular visual monitoring with long lens photographs.
- Real-time monitoring with sensor system.
- Surveying with total station.
- Laser scanning.

Further details of these monitoring techniques can be found in Section 2.

In this instance, it is recommended that the asset is monitored using a combination of regular visual monitoring at 2 month intervals and real-time monitoring.

Regular visual monitoring will enable a visual record of the asset to be collated and pick up any further significant changes to the wall structure, such as the loss of discreet masonry blocks. Visual monitoring will not pick up gradual movement or subtle changes.

Localised real-time monitoring with a sensor system could be installed, this will provide accurate monitoring of any slope or wall movement. It will also provide information on a potential failure that may occur and be able to trigger a warning system, alerting necessary individuals (BCC Leadership team). The system may be able to detect whether the tide, temperature, or other seasonal events are affecting the wall.

The other listed options could be considered; however, they are not deemed to be essential for this asset.

8.3 NCS18 Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 4 No. Boreholes.
- 2 No. Hand dug trial pits to confirm ground conditions directly behind the wall.

8.3.1 Slope Stability Analysis

A slope stability analysis could be undertaken for the areas local to defects which if allowed to deteriorate could potentially result in a slope failure.

The purpose of undertaking the analysis would be to determine whether, in the absence of the wall, the slope would fail. If the slope were found to have sufficient stability, the priority of some of the defects (Figure 8.4, Figure 8.5 and Figure 8.6) could be decreased.

It should be noted that in the short term, while the slope may be stable in the absence of the wall, over a longer-term, following gradual washout from the river, that may change, and the slope may become unstable.

8.4 NCS18 Repair Options

Prior to a repair, ground investigations will be required to confirm the ground properties and wall function (i.e., retaining or facing), as well as the stability of the slope and constraints on construction access / temporary works etc.; all of which will help determine a recommended design option.

There are currently two repair methods which are considered likely for the asset. These methods will stabilise the wall in the region local to the applicable defects.

- A like for like repair consisting of masonry blockwork.
- In-situ concrete repair utilising rock fixings / ground anchors (subject to geotechnical investigations).

In order to facilitate the repair, it may be necessary to local demolish a local section of masonry (i.e., where the top of the wall is unstable or where there is excessive deformation – see Figure 8.4 and Figure 8.5). It is thought that either a masonry or concrete repair could be used in these instances dependant on the results of ground investigations and the specific location of the failure in question (see below). If sediment removal is required local to defects, eel rescue may be necessary depending on the proximity to water level.

Note, concrete and masonry patch repairs will act to stabilise the adjacent masonry and restore wall continuity, however they are unlikely to meet modern design standards for earth retaining structures. An alternative to this would be the localised full demolition of failed areas and construction of a replacement retaining structure. This has not been considered due to the cost, sits outside of the critical repair scope for this package of works, and because it will not strengthen the adjacent sections of wall.

8.4.1 NCS18 Masonry Patch Repair

This option is considered to be most appropriate for the following defect:

- NCS18.A (Figure 8.3)

Where the collapse has occurred, it is not known whether there would be a useable foundation as the rock shelf is not visible. The function of the wall at this location is also unknown, and a masonry repair would not be suitable if the wall were found to be retaining rather than facing. These would need to be confirmed through ground investigations.

Where a rock shelf/useable foundation is not immediately apparent, material would need to be excavated down to a level such that one is found, or a new foundation would need to be cast so that it can be built upon.

The collapsed section would be reconstructed using masonry blocks and to provide additional support, tie-bars into the adjacent masonry could also be used to provide better continuity (if required). Instead of masonry blocks dry-bags may be utilised for small repairs where aesthetics are less important.

Subject to contractor engagement, a cantilevered gantry scaffold could be lowered into place to enable a safe working environment.

8.4.2 NCS18 In-situ Concrete Patch Repair

This option is considered to be most appropriate for the following defects, due to their positioning low down on the wall which would necessitate a quicker repair:

- NCS18.B (Figure 8.3)
- NCS18.C (Figure 8.6)
- NCS18.D (Figure 8.7)

The repair would entail installing ground fixings throughout the defect which will be used to support a reinforced concrete patch repair. The type of fixing (anchor/dowel/bolt) will be determined following ground investigations.

It is likely that the final repair will sit proud of the existing masonry wall face and extend for a nominal distance beyond the maximum extents of the defect to obtain a rectangular repair (subject to ECI input on concreting).

8.4.3 NCS18 Slope Stabilisation

This could be a feasible option if it is determined that in the absence of the wall, the slope would fail, and that targeted stabilisation works would be cheaper than repairing or reconstructing the wall. Ground investigations followed by a slope stability analysis would initially be required to understand this.

Bank stabilisation would require the installation of soil nails and a facing system into the bank. Prior to this being undertaken, widespread de-vegetation would be required in the area of installation. This is envisaged to be more extensive than de-vegetation requirements for the above patch or deformation repair methods.

It could be difficult to install a facing system due to the quantity of trees in the area and early contractor involvement should be undertaken to determine the site requirements. The removal of any trees from the bank could have a destabilising effect by changing the pore water pressure and potentially cause movement. In addition, tree removal would likely be strongly objected to by local residents and the ecological concerns over removing potential habitats would need to be determined.

It should be noted that while the slope may be stable following slope stabilisation works, there is a longer-term risk of gradual washout and reduced bank stability. It is likely this approach will be favourable as an interim repair measure where the cost and practicalities of conducting smaller

repairs is not considered to be an effective solution; potentially allowing for a larger scale repair/replacement to be undertaken in the future.

8.5 NCS18 Recommendations

The asset has been ranked in Priority Group 2, see Section 12.

It is recommended that the areas of wall deformation and slope above are monitored using remote sensors and that regular visual monitoring is undertaken at 2 month intervals to note any further asset deterioration.

It is recommended that ground investigations and a slope stability analysis are undertaken to confirm ground properties, wall function, slope stability. The slope stability analysis should be conducted to confirm the overall stability of the bank (both local to the defects and throughout the length of the asset), and therefore whether the asset can potentially be de-risked.

Following these investigations, a decision can be made on the type of repairs to be conducted, as well as on access provisions, temporary works selection, and risk of a carriageway collapse.

When assessing potential design solutions for deformed sections of wall, special consideration should be given to the presence of tree roots in the immediate area of the defect. These roots may provide additional component of overall stability to the ground conditions, however, their growth and development may also exacerbate deformation of the structures present. It is advised that targeted tree removal, whose proximity to the wall is likely to be causing structural damage, should be undertaken provided that it does not result in a loss of stability of the slope. Any tree removal should be done in consultation with an arboriculturist and ecologist and provision for replacement planting to retain habitats will need to be considered.

8.5.1 Slipway Recommendations

If the client wishes to maintain access into the River Avon, it is recommended that the collapsed sections in the vicinity of the slipway be repaired (NCS18.A, NCS18.B and NCS18.D) before they deteriorate to a position that the slipway cannot be used safely. The recommended repair for these sections would be a potential combination of like for like masonry patch repairs and/or reinforced concrete patch repairs to stabilise the masonry. Appropriate ground fixings (subject to ground investigations) would be required to secure the concrete to the ground behind as the wall in these locations.

8.5.2 Slope Wall Recommendations

The repairs to the slope abutting wall are likely to consist of concrete patch repairs or the local demolition and reconstruction of the wall in concrete or masonry.

Note, that restoring the existing wall with like for like patch repairs is unlikely to comply with modern design codes for a retaining structure.

As an alternative to the above, slope stabilisation works could potentially be undertaken as an interim measure, mitigating the risks to the bank and adjacent infrastructure in the event of a wall failure. However, this would not protect the wall from progressive deterioration or washout of the bank material in the longer term (in the vicinity of wall failures).

9 NCS21 & NCS23

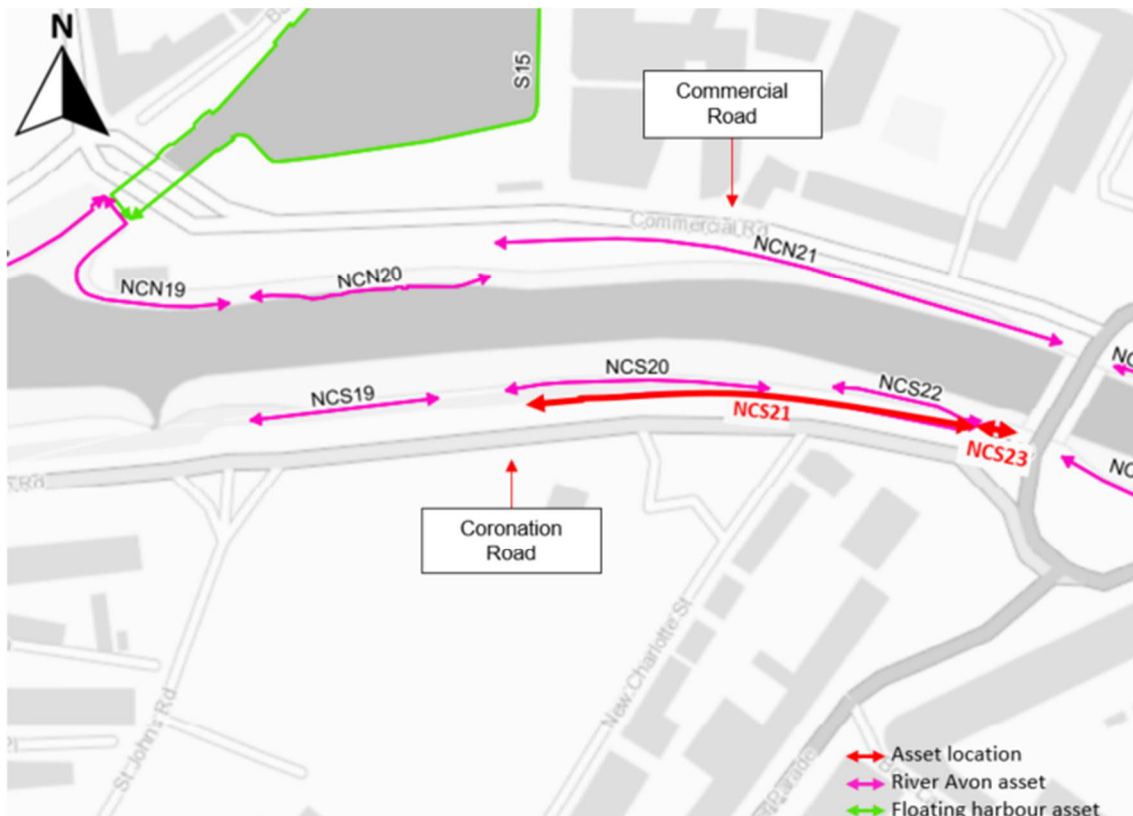
Due to the proximity of the assets NCS21 and NCS23, they have been reviewed together.

9.1 Background information

9.1.1 Asset Location

Assets NCS21 and NCS23 are located on the southern slope of the Avon River New Cut at National Grid reference, 358841, 172032. The assets are bound to the south by the A370, Coronation Road, which runs from east to west where it reaches Bedminster Bridge. A superstore is located approximately 50m south of the assets. The assets are surrounded by roads and buildings. Figure 9.1 shows the site location plan.

Figure 9.1: NCS21 & NCS23 Location plan



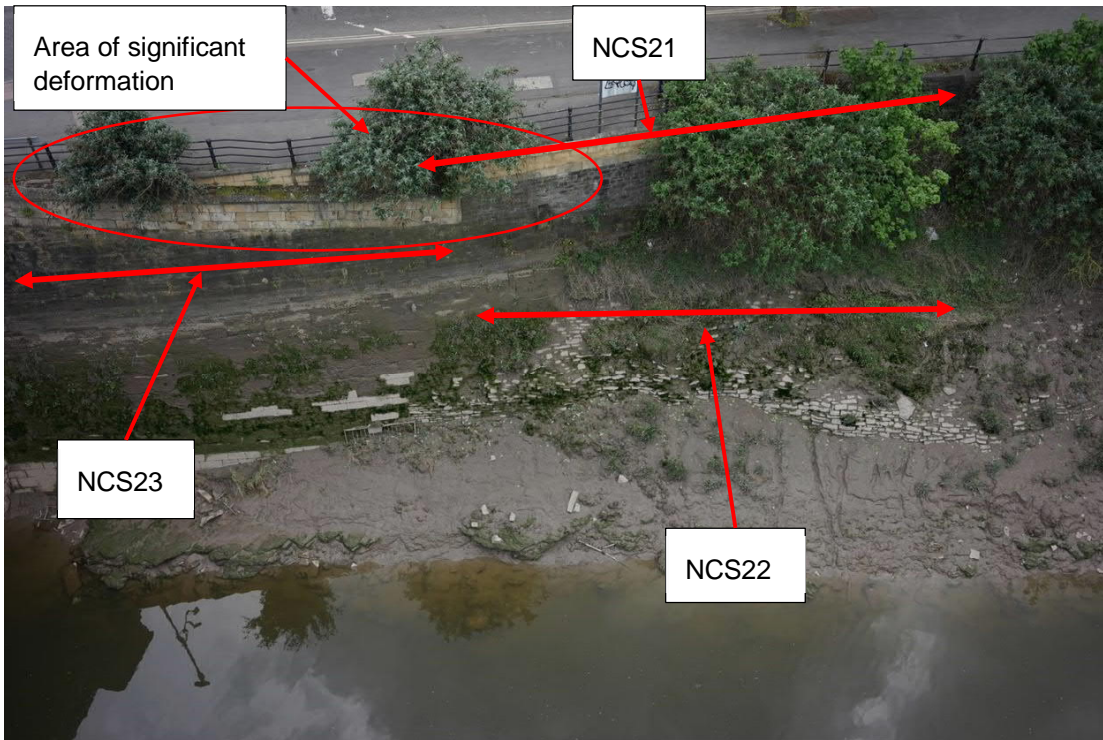
Source: Mott MacDonald

9.1.2 Asset Description

Assets NCS21 and NCS23 are masonry walls which are situated above the adjacent bridge wing walls and retain the bank to support the adjacent carriageway and pedestrian parapet. In the vicinity of the defects, the assets appear to be constructed in single leaf blockwork.

Located below these two assets is NCS22. It is in a critical condition and is providing an unknown level of support to NCS21 & NCS23. The arrangement of the three assets is shown in Figure 9.2.

Figure 9.2: NCS21, NCS22 & NCS23 Arrangement



Source: Mott MacDonald 2019

9.1.3 Asset Defects

The critical sections are the deformed areas over a 20m length, situated along the top of the wall, shown in Figure 9.3. There is evidence of significant buddleia growth potentially causing the damage. These sections would be unlikely to resist a vehicle or concentrated pedestrian loading and sections of the wall are unstable. The defects can be seen in Figure 9.4, Figure 9.5 and Figure 9.6. Cracks are visible in the blockwork where the wall is leaning.

The footway is immediately behind the asset and Coronation Road is a 3m behind at its closest point. The level at the lowest point of the defect area is 9.2mAOD, the river is not anticipated to regularly rise to this level.

Figure 9.3: NCS21 & NCS23 Dimensions



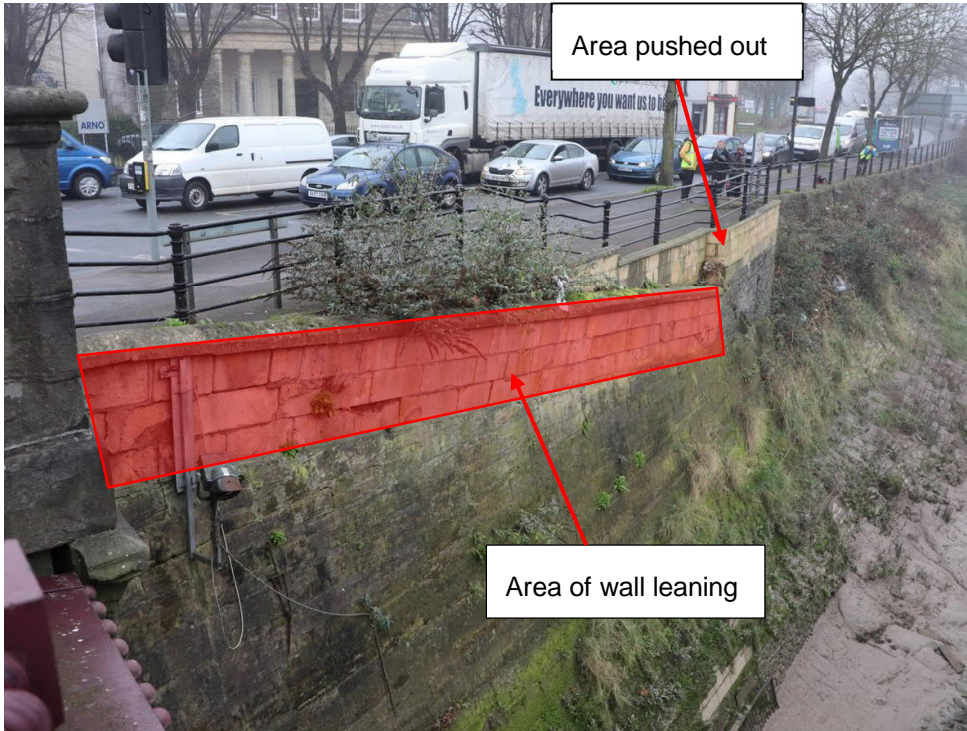
Source: Mott MacDonald 2019

Figure 9.4: NCS21 & NCS23 Wall deformation



Source: Mott MacDonald, January 2022

Figure 9.5: NCS21 & NCS23 Defect area



Source: Mott MacDonald, January 2022

Figure 9.6: NCS21 Leaning wall



Source: Mott MacDonald, January 2022

9.1.4 Consequences of Asset Failure

In the event of a failure, there is likely to be a loss of support/collapse of the footway. As the critical area is at the top of the asset, and the footway is wide (minimum distance to carriageway is 3m), Coronation Road is unlikely to collapse because of the defect progressing, however buried highways infrastructure in the footway may be impacted.

The safety of the road users and load carrying capacity of the road would likely be reduced as a result, and load restrictions or a partial closure of Coronation Road may be necessary. There is likely to be significant travel disruption as Coronation Road is a main distribution route.

9.1.5 Historic Mapping

A review of historic mapping as undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the asset. Table 9.1 presents a summary of history on site.

Table 9.1: NCS21 and NCS23 Summary of site history

Year	On site	Off site
1882	Asset is located on the south slope of the River Avon New Cut. Hatching indicative of brickwork is present 'Mud & Shingle' are labelled in the river	Bedminster Bridge is present, directly perpendicular to site, crossing the River Avon New Cut A tramway is marked that runs north to south, over Bedminster Bridge The area is dense with buildings north and south of the river The river is bound to the north and the south by unmarked roads
1883	No change	Commercial Road and York Road are now marked to the north and south of the river respectively
1881 to 1883 Published: 1887	No change	No significant change
1901 to 1902 Published 1905	No change	No significant change
1902 Published 1905	No change	No significant change
1912 to 1913 Published 1921	No change	The tramway is no longer marked on mapping
1913 Published 1921	No change	No significant change
1930, Published: 1933	No change	No significant change
1938 Published 1945	No change	No significant change
1938 Published 1947	No change	No significant change
1938 to 1955 Published 1955	No change	No significant change
1938-1963 Published 1964	No change	No significant change
1938-1967 Published 1967	No change	Bristol Bridge has been converted to a roundabout consisting of two bridges across the River Avon New Cut.

9.1.6 Geology

A review of BGS mapping [1] shows that Tidal Flat Deposits are likely to be present on site. BGS Lexicon [4] describes Tidal Flat Deposits as *“mud flat and sand flat deposits, [that] are deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment. Normally a consolidated soft silty clay, with layers of sand, gravel and peat”*.

The asset is likely found on bedrock of Redcliffe Sandstone Member. BGS Lexicon describes this as “sandstone, distinctive fine- to medium-grained, deep red, calcareous and ferruginous. Commonly decalcified at shallow depths below the surface, giving rise to an uncemented sand”.

According to Geology of Bristol district: A brief explanation of the geological map 264 ‘Redcliffe Sandstone Formation’ was deposited in an elongate depression between Bedminster and Winterbourne, and locally exceed 50m in thickness. The Redcliffe Sandstone passes laterally into red mudstones and is locally interdigitated with Mercia Mudstone Marginal Facies’. Redcliffe Sandstone Formation is exposed in the New Cut along Coronation Road, Southville.

A review of BGS Geindex [2] shows that there are no locally available boreholes to confirm ground conditions.

9.1.7 Mining

Bristol is known for its past as a Coal Mining area. A review of the Coal Authority interactive tool [5] shows the site to not be located within an area of known or probable coal mining.

9.1.8 Ecological Constraints

A desk study was undertaken in January 2023. This involved a search for designated sites and habitats to identify potentially important ecological constraints at the Site. Data to inform the desk study was obtained from the following sources:

- Multi Agency Geographical Information for the Countryside (MAGIC) website (<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>);
- Joint Nature Conservation Committee (<http://jncc.defra.gov.uk>);
- OS maps; and
- Aerial imagery.

Based on aerial imagery and mapping the following habitats were identified within 30m of the asset:

- Coronation Road and pavement (developed land; sealed surface) present along the entire asset;
- Scattered deciduous trees within 30m of the asset;
- Scattered scrub growing from and against the asset; and
- Mudflats along the northern edge of the asset.

Two Habitats of Principal Importance, river and mudflat habitats, were identified within 30m of the asset. The asset lies within Avon New Cut Local Nature Reserve. Northern Slopes Local Nature Reserve was also identified within 2km of the Site. No sites designated for their international or national importance were identified within 2km of the site. Four designated sites are hydrologically linked downstream of the Site. Table 9.2 below summarises the designated sites within 2km of the site or that are hydrologically linked.

Table 9.2: Designated sites within 2km or hydrologically linked downstream of the asset

Designated site name	Designation	Orientation and distance from the site at the closest point
Avon New Cut	Local Nature Reserve	On site
Northern Slopes	Local Nature Reserve	1.4km south
Avon Gorge Woodlands	Special Area of Conservation and Site of Special Scientific Interest	2.5km northwest and hydrologically linked

Designated site name	Designation	Orientation and distance from the site at the closest point
Horseshoe Bend	Site of Special Scientific Interest	6.5km northwest and hydrologically linked
Lamplighters Mash	Local Nature Reserve	7.5km northwest and hydrologically linked
Severn Estuary	Special Area of Conservation, Special Protection Area, Ramsar and Site of Special Scientific Interest	7.7km northwest and hydrologically linked

Source: MAGIC, 2023.

Based on the findings of the desk study, the following features have been identified as potential Important Ecological Features within the context of the site;

- Designated sites;
- Habitats of principal importance – river and mudflat habitat;
- Commuting, foraging and roosting bats;
- Nesting birds;
- Commuting otters; and
- Bony fish.

A full Preliminary Ecological Appraisal Report should be undertaken. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement. .

A Habitat Regulations Assessment is recommended to advise on potential impacts of the proposed works on statutory designated sites downstream of the asset.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on protected species should be included in a Reasonable Avoidance Measures Method Statement this should also include best practise measures and general construction safeguards.

9.1.9 Site Walkover

Site walkovers were completed in January 2022, June 2022 and September 2022, as well as the original drone survey in 2019.

During the January 2022 site walkover, it was clear that de-vegetation had been undertaken and tree stump plugs had been inserted into some of the buddleia. Images of the wall were obtained, and the wall appeared to be in a similar condition to 2019 where the upstream section was leaning forwards and the wall is being displaced.

During the June 2022 site walkover, no images were obtained. It was observed that at the base of the wall, weathered rock was visible which suggests the wall is founded on the rock.

There were areas of cracking along the wall and displacement of blockwork at the top. There is shrubbery growing in some of the cracks along the wall and vegetation growing out the top, in between the assets. The growth at the top of the asset was causing asset NCS21 to bow forwards.

During the September 2022 site walkover, some of the vegetation had regrown. Part of the wall shown in Figure 9.4 where the coping stones are missing was unstable. Images were obtained, and the wall appeared to be in a similar condition to the previous walkovers.

9.1.10 Drone Survey

In October 2022, a drone survey was completed of the asset. As shown in Figure 9.7, Figure 9.8, Figure 9.9 and Figure 9.10 the asset appears to be in a similar condition with no discernible changes to the face of the wall. There has been a loss of the copings shown in Figure 9.11 which occurred between the site walkover in January 2022 and the drone survey. The cause of this is unknown but given the condition appears similar across the remaining wall it is likely to have been as a result of vandalism.

Figure 9.7: NCS21 & NCS23 Wall deformation 2019



Source: Mott MacDonald 2019

Figure 9.8: NCS21 & NCS23 Wall deformation 2022



Source: Mott MacDonald, October 2022

Figure 9.9: NCS21 & NCS23 Leaning wall 2019



Source: Mott MacDonald 2019

Figure 9.10: NCS21 & NCS23 Leaning wall 2022



Source: Mott MacDonald, October 2022

Figure 9.11: NCS21 & NCS23 Lost copings



Source: Mott MacDonald, January 2022

9.1.11 NCS21 and NCS23 Summary

From the site visits, it is clear that the deformation of the wall and local masonry failure will require remediation. This is anticipated to be through the removal and reconstruction of asset throughout the entire area highlighted in Figure 9.5 and potentially to a greater extent. It is unlikely that the existing wall meets current design standards and as such it is not recommended to replace like for like unless additional mitigations (to reduce potential surcharge loads etc.) are considered. The failed length (that is leaning outwards) is a safety risk and warrants demolition and rebuild, by which point the entire asset should likely be replaced.

Vegetation removal will be required to complete works and an ecologist should be consulted prior to removal being undertaken. Care should be taken to not remove disturb the wall and facilitate a collapse.

Due to the nature of the defects and potential causes of sudden failure modes (e.g., vehicle loading, concentrated pedestrian loading, or a significant saturation event in the carriageway), it is recommended that the area in the vicinity is closed off and that the wall is repaired at earliest convenience.

A failure of the asset would require the closure of the footway and potentially Coronation Road while the extent of damage was being assessed, with potential long-term closures to follow.

9.2 NCS21 and NCS23 Monitoring

The defect area as highlighted in Figure 9.5 is significantly deformed and should be regularly monitored for additional movement.

There are several options for the monitoring of NCS13, these include:

- Regular visual monitoring with long lens photographs.
- Surveying with total station.
- Laser scanning.
- Real-time monitoring with sensor system.

Further details of these monitoring techniques can be found in Section 2.

In this instance, it is recommended that the asset is monitored visually at monthly intervals.

Regular visual monitoring will enable a visual record of the asset to be collated and pick up any further changes to the wall structure.

The other listed options could be considered; however, they are not deemed to be essential for this asset.

9.3 NCS21 and NCS23 Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 2No. Boreholes.
- Slit trench behind and perpendicular to the top of the wall to understand wall construction methodology.

9.4 NCS21 and NCS23 Repair Options

There is one primary repair method which should be considered for the asset repair. This method will stabilise the wall and footpath in the region local to the defect.

- Demolish failed section and replace with reinforced concrete retaining wall.

There would also be the possibility of demolishing the failed section of wall and reconstructing in masonry, however, this is unlikely to meet current design standards and would not be the recommended approach, particularly if the pavement above remains open to vehicles.

9.4.1 Safety Concerns

There are concerns over the stability of the wall and the parapet foundations, it is unknown whether they would be able to resist a vehicle loading, concentrated pedestrian loading, or a significant saturation event in carriageway (e.g., burst water main). Steps should be taken to prevent vehicle and pedestrian access to the pavement above the asset to reduce the risk of triggering a collapse.

Previous concerns have been raised to BCC regarding this section of wall, it was raised during the initial project through the reporting of assets in a serious or critical condition. Additionally, advise was given to cordon off the area in the Asset Prioritisation Report.

If the wall were allowed to continue to fail, there is also a risk to the parapet foundations.

9.4.2 Demolish Failed Section and Replace with Reinforced Concrete Retaining Wall

To repair the deformation in a way which would meet current design standards, the failed section should be demolished and be replaced with a reinforced concrete retaining wall. This would require excavations into the footpath and possibly beyond into the carriageway, which would require reinstatement.

To aid with construction times and to reduce disruption to the public, a precast solution could be sought, this would be subject to contractor engagement.

The lower section of wall would need to be assessed to determine whether it would be able to support the weight of the new structure constructed above.

An additional consideration is the appearance of the new wall. The adjacent bridge (Bedminster Bridge) is Grade II listed and the new wall would be subject to planning permissions. As a

potential solution, the original masonry once removed, could be clad onto the concrete wall to restore the appearance. Alternatively, masonry cladding, more in keeping with the stonework below could be clad onto the wall.

9.4.3 Deconstruct Failed Section and Like For Like Reconstruction

This method would entail the removal of vegetation, wall deconstruction, and reinstatement like for like in masonry blockwork.

As a like for like reinstatement is unlikely to adhere to modern design standards and loading, additional mitigations to reduce potential surcharge loadings would be necessary, such as bollards and/or barriers to prevent vehicular access. However, this would not address concentrated pedestrian loading.

The benefits of this methodology would come from a reduced requirement for ground investigations, reduced material costs, the ability to undertake the repair within BCC, and reduced design input in comparison to a new reinforced concrete retaining wall.

This is not the option recommended by Mott MacDonald as it is unlikely to meet design standards or be as robust as a new reinforced concrete retaining wall. However, due to potential cost and time savings, it is understood that it may be considered by BCC and therefore the associated risks should be considered.

9.5 NCS21 and NCS23 Recommendations

The asset has been ranked in Priority Group 1, see Section 12.

It is recommended that the existing failed length of wall is demolished and replaced with a new reinforced concrete retaining wall structure as a priority. The following actions should be enacted while a repair strategy is being finalised:

- Prior to remedial works, steps should be taken to prevent vehicle and pedestrian access – such as fencing, bollards, barriers, etc.
- Regular visual monitoring at monthly intervals should be undertaken to watch for any further changes to the asset.
- Regular vegetation clearance should be maintained in the vicinity of the defect with advice from an ecologist and landscape architect sought regarding a suitable management regime. Care should be given not to cause excessive movement of the wall, risking a collapse.

Note, there is potential for bat roosting and an ecologist should be consulted prior to any work being undertaken.

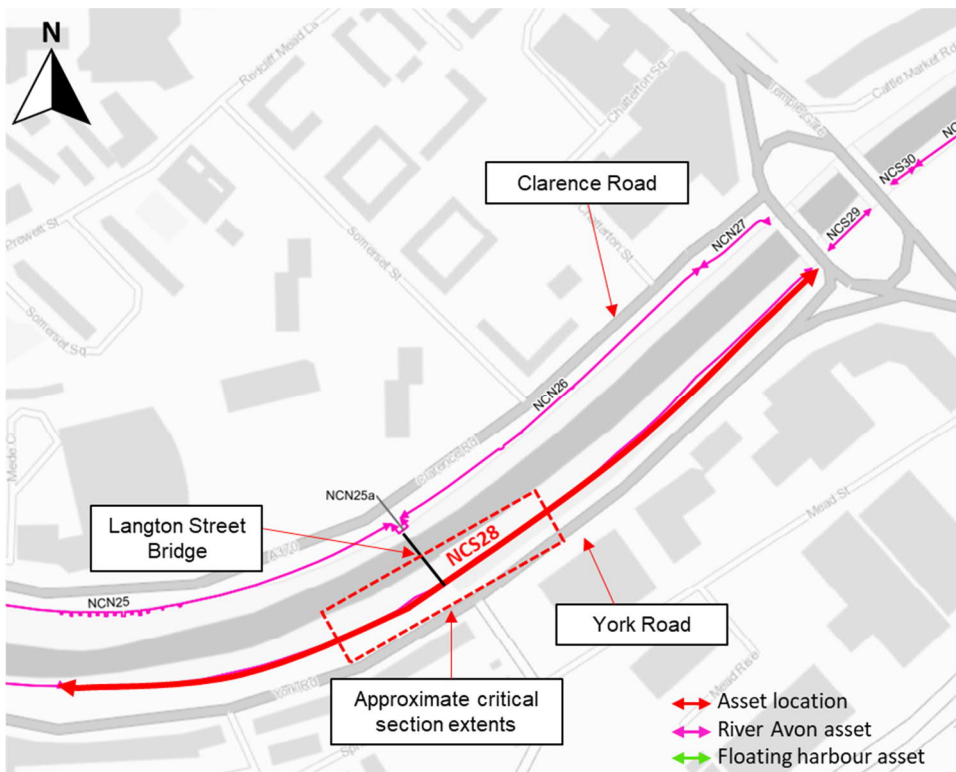
10 NCS28

10.1 Background information

10.1.1 Asset Location

Asset NCS28 is a masonry wall located on the south slope of the River Avon New Cut at approximate Eastings and Northings 359631, 172150. The asset is adjacent to the Bath Bridge roundabout that joins the A370, which bounds the asset and the A4. The A4 leads to Temple Meads station which is approximately 300m northeast of the asset. A train line runs from Temple Meads Station and follows a similar alignment to the A370 road, offset 200m due south, before moving behind the area of Bedminster. South of the A370 lies a petrol garage and a motor bike garage.

Figure 10.1: NCS28 Location plan



Source: Mott MacDonald

10.1.2 Asset Description

The exact makeup of the asset is unknown due to a lack of record information; however, it is believed to generally be a dry-stone wall that acts as both a retaining wall and a facing wall throughout its length. The asset is 485m long, however, the area of concern with regards to this project is a 100m section adjacent to Langton Street Bridge. This section is fronted by significant sediment build up in front of the wall. There are 13 No. buttresses over the critical 100m length.

There are several areas of substantial masonry loss and extensive globally deformed sections, particularly in the vicinity of Langton Street Bridge. The asset is generally in a poor condition

along the entire length with extensive mortar loss. It is noted that there is a failure of a Wessex Water outfall pipe slightly upstream of the Langton Street Bridge which may have been caused by displacement of the wall. Langton Street Bridge is approximately in the middle of the asset and crosses the River Avon. The bridge is a Grade II listed structure which requires protections and permission to remediate.

Figure 10.2: NCS28 Aerial image (c.1930)



Source: Bristol Archives catalogue

10.1.3 Asset Defects

The critical area of the asset is an approximate 100m section centred at the Langton Street Bridge, see Figure 10.3. There are numerous areas of deformation, with open joints and pointing loss. These areas can be seen in Figure 10.4 and Figure 10.9.

Using historic google street view images (not available for a commercial report), it appears that the foundation of the buttress marked in Figure 10.9 has failed and that this section of wall has deteriorated / deterioration has accelerated over the last 10-15 years. However, it is unclear whether the buttress failure is causing the global deformation in this section of wall, or because of the deformation.

There are depressions in the fill located behind the wall. These are likely as a result of sediment washing through the wall after the river overtopping the wall or rainfall events.

Below the upstream outfall, there has been a failure at the toe of the wall where masonry has been lost. There is an open joint rising up the wall originating in the vicinity of the lost masonry and extending approximately halfway to the outfall pipe, this is shown in Figure 10.13. It is not known whether the displacement of the wall caused the outfall pipe failure or vice versa.

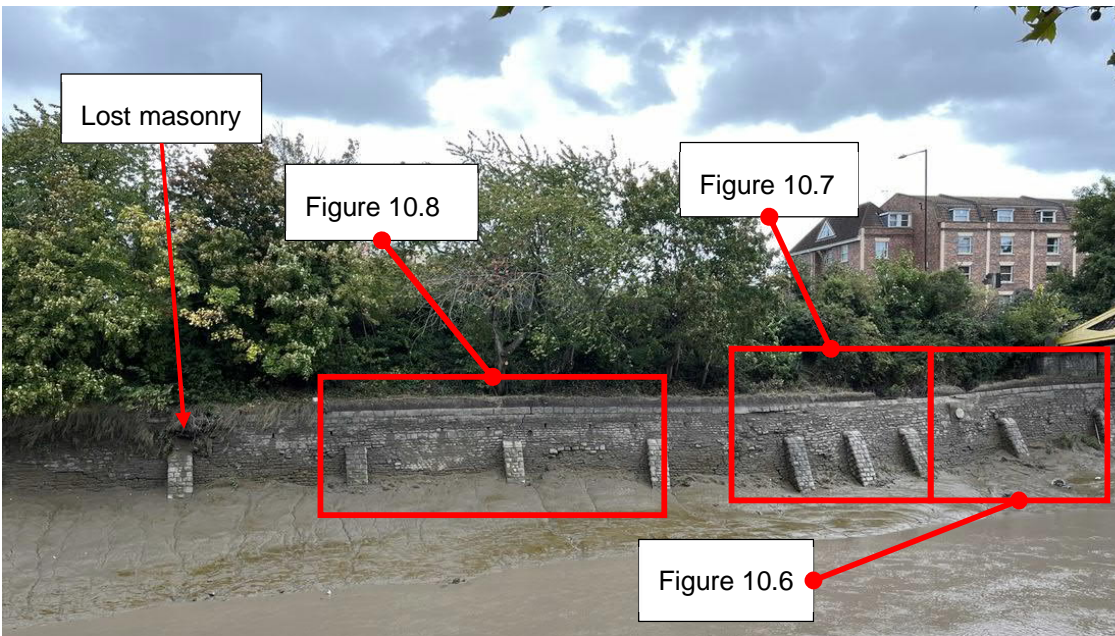
The toe of the wall in the area shown in Figure 10.3 varies but is approximately 3.5mAOD. The river level is anticipated to regularly rise above this level.

Figure 10.3: NCS28 Area of concern



Source: Mott MacDonald, September 2022

Figure 10.4: NCS28 Upstream area of deformation



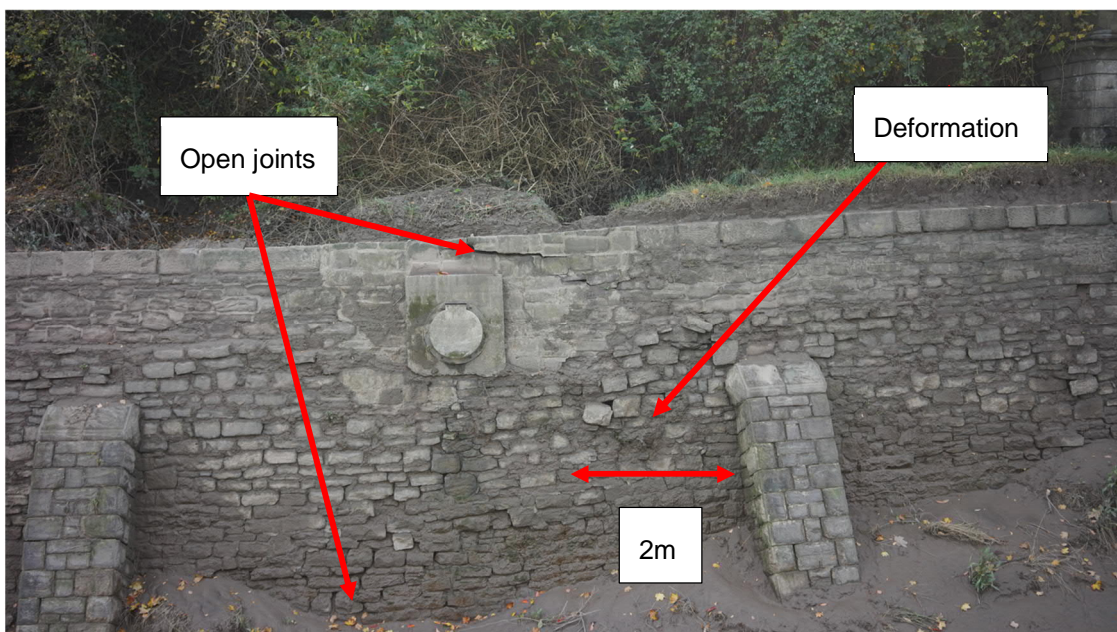
Source: Mott MacDonald, September 2022

Figure 10.5: NCS28 Upstream area of deformation view from bridge



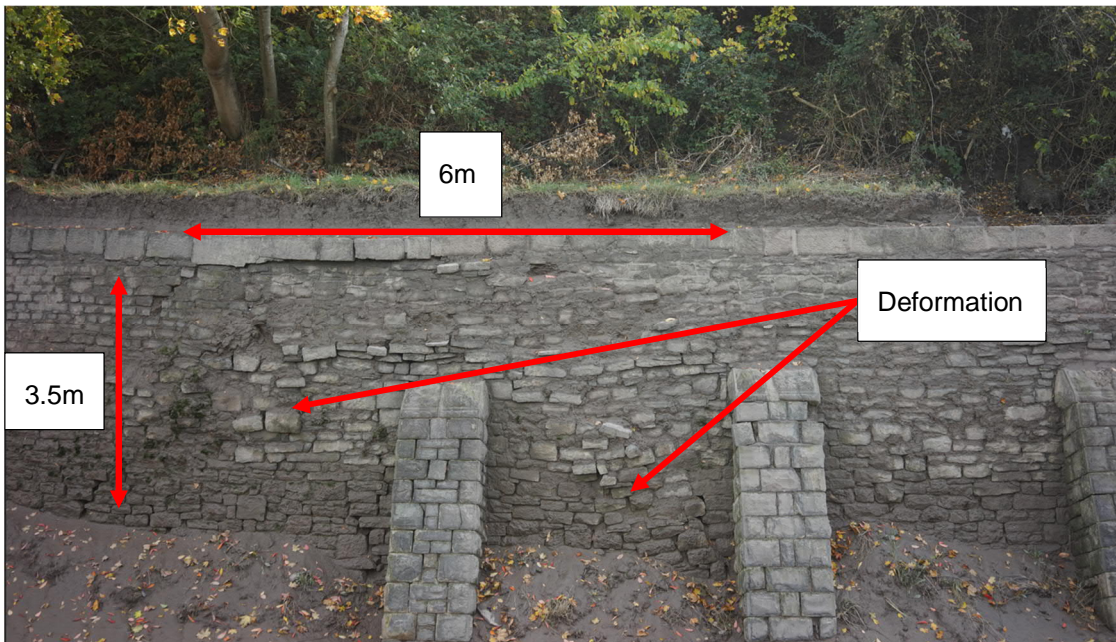
Source: Mott MacDonald, September 2022

Figure 10.6: NCS28 Upstream defects 1



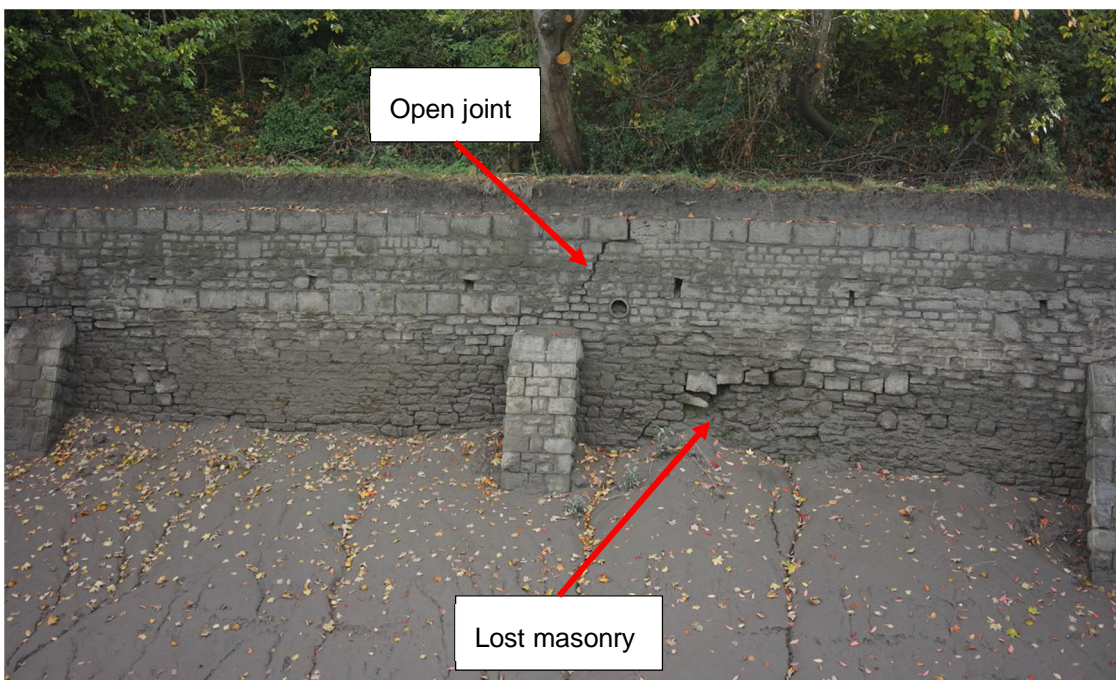
Source: Mott MacDonald, October 2022

Figure 10.7: NCS28 Upstream defects 2



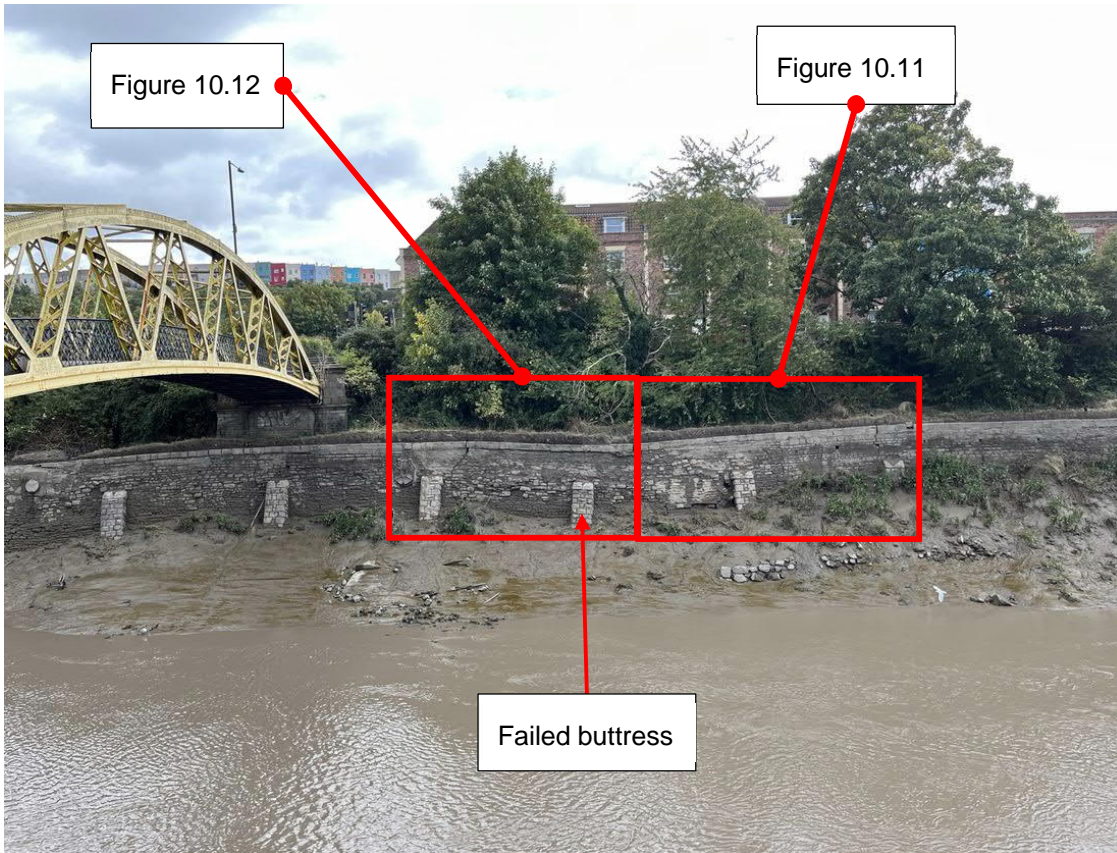
Source: Mott MacDonald, October 2022

Figure 10.8: NCS28 Upstream defects 3



Source: Mott MacDonald, October 2022

Figure 10.9: NCS28 Downstream area of deformation



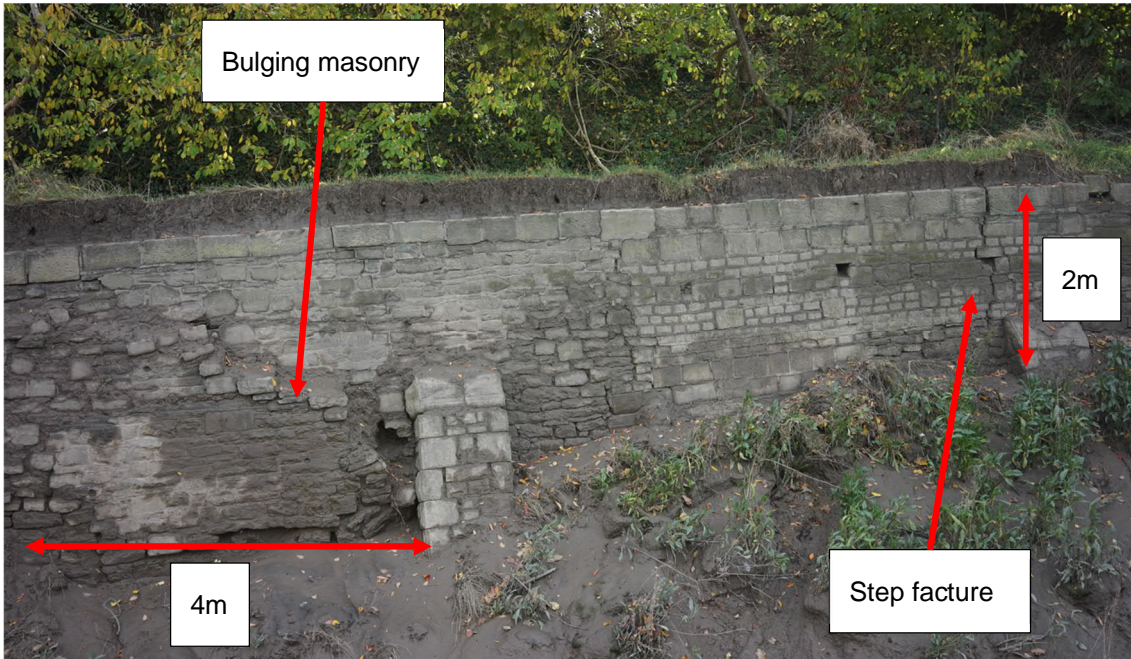
Source: Mott MacDonald, September 2022

Figure 10.10: NCS28 Downstream area of deformation view from the bridge



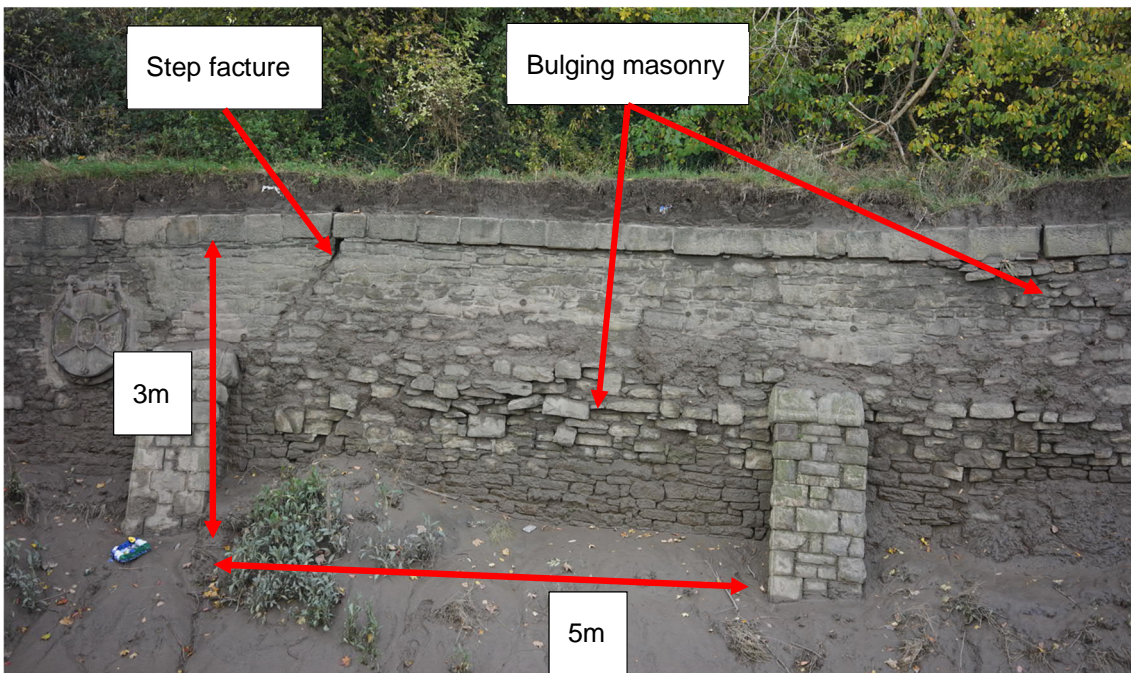
Source: Mott MacDonald, September 2022

Figure 10.11: NCS28 Downstream defects 1



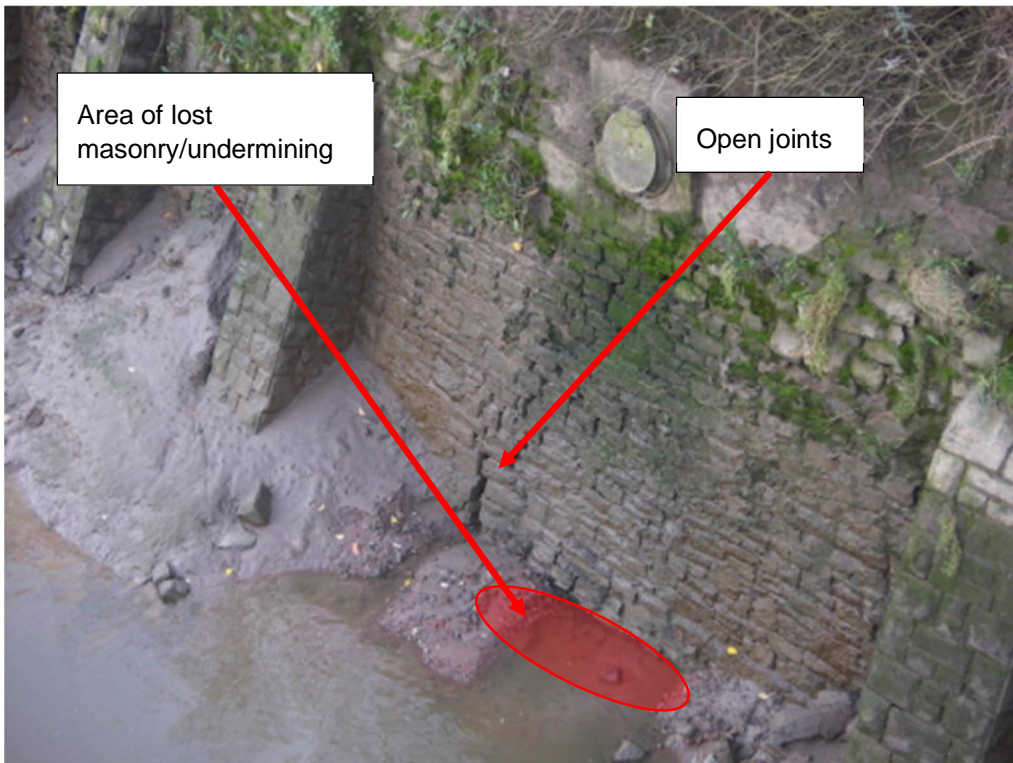
Source: Mott MacDonald, October 2022

Figure 10.12: NCS28 Upstream defects 2



Source: Mott MacDonald, October 2022

Figure 10.13: NCS28 Failure below outfall



Source: Bristol City Council

10.1.4 Historic Drawings

Contained within the Langton Street Bridge Conservation Statement [912] are historic drawings of the bridge. These drawings are not as-built drawings, and there are differences between the drawing and the approach parapets, so the accuracy of them cannot be relied upon. Based on scaling the drawings, which is also not reliable, the bottom of the abutment foundation could be at a depth of 16m from the top of the capping stone, this implies that the foundation could be approximately 6.5m below the current sediment level against the wall. The depth of the wall and wall foundation is not shown in the drawings.

10.1.5 Consequences of Asset Failure

If the asset fails in the critical area shown in Figure 10.3, there is the potential for a loss of support to the bridge abutment and the potential destabilisation/collapse of the bridge. There is also a risk of a loss of support to the area behind the asset resulting in a potential collapse of the footway and York Road.

If this were to occur, there would be significant reputation damage at the loss of Grade II listed Langton Street Bridge, and there would be major travel disruption as York Road is a main distribution route.

10.1.6 Historic Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the site. Table 10.1 presents a summary of history on site.

Table 10.1:NCS28 Summary of site history

Year	On site	Off site
1881-1882, published 1885	River Avon (New Cut) present York Road bounds the New Cut southern slope Clarence Road bounds the New Cut northern slope	Bath Bridge adjacent west of site Temple Tramway present over Bath Bridge running north to south of site Temple Gate Works north east of site Temple station north of site Housing developments around site Unnamed depot south of site, later named Pylle Hill Goods Depot
1902	No change	Temple Station now labelled as Temple Meads Joint Station
1912 Published 1918	No change	No significant change
1930 Published 1933	No change	No significant change
1938 Published 1945	No change	No significant change
1938 Published 1946	No change	No significant change
1938 Published 1947	No change	No significant change
1938 Published 1955	No change	Temple Meads Joint Station now labelled as Temple Meads Station
1938-1963 Published 1964	No change	Bath Bridge has been converted into a roundabout
Present day	No change	St Mary Redcliffe and Temple School replaced buildings and located directly north west of the asset

10.1.7 Geology

A review of BGS mapping [1] shows that Tidal Flat Deposits are likely to be present in the area. BGS Lexicon [4] describes Tidal Flat Deposits as *“mud flat and sand flat deposits, [that] are deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment. Normally a consolidated soft silty clay, with layers of sand, gravel and peat”*.

The asset lies on the boundary between Mercia Mudstone Group and Redcliffe Sandstone Member. BGS Lexicon describes Mercia Mudstone Group as *“dominantly red, less commonly green-grey, mudstones and subordinate siltstones with thick halite-bearing units in some basinal areas. Thin beds of gypsum/anhydrite widespread; sandstones are also present”*. Redcliffe Sandstone Member is described as *“distinctive fine- to medium-grained, deep red, calcareous and ferruginous [SANDSTONE]”*.

According to Geology of Bristol district: A brief explanation of the geological map 264 [2] ‘Redcliffe Sandstone Formation’ was deposited in an elongate depression between Bedminster and Winterbourne, and locally exceed 50m in thickness. The Redcliffe Sandstone passes laterally into red mudstones and is locally interdigitated with Mercia Mudstone Marginal facies’. Redcliffe Sandstone Formation is exposed in the New Cut along Coronation Road, Southville.

A review of BGS Geoindex [2] shows that there are no locally available boreholes to confirm ground conditions.

10.1.8 Mining

Bristol is known for its past as a Coal Mining area. A review of the Coal Authority interactive tool [5] shows that the asset is located in a general coal mining area, however, it is not within an

area of known or probable shallow coal workings, nor is there a coal stream nearby. Therefore, Coal Mining is unlikely to affect the asset or asset repairs.

10.1.9 Ecological Constraints

An ecological walkover survey was undertaken on 29 June 2022 by Mott MacDonald ecologists. The survey consisted of a walkover of the asset and a 30m buffer, where access permitted. The purpose of the survey was to identify the ecological constraints and risks of works. A summary of the Ecological Constraints Assessment produced following this survey is provided below.

Listed below are the habitats that were identified within the survey buffer;

- Semi-natural deciduous woodland, present in a 20m wide strip along the entire asset;
- Dense patches of mixed scrub and introduced shrub present along the edge of the asset closest to Coronation Road;
- Semi-improved grassland growing on a 2m wide strip along the masonry wall edge closest to the river; and
- Mudflats are present directly underneath the masonry wall along the river edge.

In line with policy and best practice, avoidance measures should be embedded into the design of the works. The following avoidance measures were identified;

- Works within the river and mudflat Habitats of Principal Importance should be avoided;
- Where possible trees and other vegetation should be retained;
- Artificial lighting should be avoided during the construction and operational phases of the development;
- Obstructions to the watercourse and riverbanks should be avoided during the construction and operational phase;
- Any retained trees should be assessed by an appropriately qualified arboriculturist to determine root protection areas and any exclusion zones required to mitigate for damage during demolition and construction; and
- If possible, the site compound should be situated at least 16m away from the river and riverbanks, if this is not possible, permission would be required from the Environment Agency.;

Table 10.2 below summarises the identified ecological constraints and the preliminary mitigation and/ or compensation recommendations.

Table 10.2: Ecological constraints and mitigation/compensation recommendations

Feature	Location description	Preliminary mitigation and/or compensation recommendations
Designated sites	Avon Gorge Woodlands Special Area of Conservation and Site of Special Scientific Interest, Horseshoe Bend Site of Special Scientific Interest, and Severn Estuary (Special Area of Conservation, Special Protection Area, RAMSAR and Site of Special Scientific Interest downstream of the Site. Avon New Cut Local Nature Reserve on site.	A Habitat Regulations Assessment is recommended. The county ecologist should be consulted regarding the proposed works within the Avon New Cut Local Nature Reserve.

Feature	Location description	Preliminary mitigation and/or compensation recommendations
Habitats of principal importance	River and mudflats within the site	The county ecologist should be consulted at the earliest opportunity if the habitats of principal importance are anticipated to be impacted to discuss the working methodology as well as any compensation, enhancement or restoration work.
Bats	Most trees on the asset offer low to moderate potential to support roosting bats due to the presence of potential roosting features and thick ivy cover	Night-time working should be avoided. A toolbox talk regarding bats should be given to all site personnel.
Reptiles	The scrub and grassland habitats within the riverbank offer suitable habitat for common reptiles	If any habitat removal affecting potential hibernacula (such as log piles or root systems) is required, this should occur during the reptile active season (April – October inclusive, depending on the weather) under supervision of an ecologist. Vegetation clearance should follow phased cuts in a directional manner to allow dispersal of active reptiles to neighbouring habitats. A toolbox talk regarding reptiles should be given to all site personnel.
Nesting birds	The scattered trees, scrub and rough grassland provide suitable habitat for nesting birds. A nest was also observed on one of the trees, although it was deemed unactive at the time of the survey	Vegetation clearance of habitat suitable for nesting birds should be undertaken outside of the nesting season (between March and August inclusive) in line with standing government guidance. If this is not possible, vegetation will need to be checked by an ecologist no more than 24 hours prior to removal. The feasibility of nesting bird checks will be subject to the judgement of a suitably qualified ecologist, who will determine whether the vegetation to be cleared can be safely and adequately searched.
Bony fish	The River Avon New Cut has potential to be used by different species of bony fish (including European eel) for commuting and foraging	Should the scope of works include significant disturbance that could impact fish, such as high noise and vibration levels, works may need to be timed to avoid fish migration periods. A toolbox talk regarding fish should be given to all site personnel.
Otters (<i>Lutra lutra</i>)	The River Avon New Cut has potential to be used by commuting and foraging otters	No mitigation or compensation measures specific to otters identified.

Source: Mott MacDonald, 2022.

Further ecological surveys are recommended due to the potential for protected and notable species in the area. A full Preliminary Ecological Appraisal Report should be undertaken. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on bats, fish, otters and reptiles should be included in a Reasonable Avoidance Measures Method Statement this should include best practise measures and general construction safeguards.

10.1.10 Site Walkover

Site walkovers were completed in January 2022, June 2022 and September 2022, as well as the original drone survey in 2019.

During the January 2022 site walkover, there was extensive vegetation coverage at the top of the wall. Images were captured at this time and the asset appeared in a similar condition to 2019.

During the June 2022 site walkover, due to vegetation and foliage coverage, no site observations were made.

During the September 2022 site walkover, vegetation clearance had taken place, and this enabled a full view of the wall. The wall looked to be in a worse condition than 2019, however, this could have been due to better coverage (full vegetation clearance had not taken place in 2019). Open joints were more exposed and visible, areas of deformation were less hidden behind vegetation. There were depressions visible behind the wall, both upstream and downstream of the bridge. There was pooled water visible in the depressions upstream of the bridge, see Figure 10.14. Water was seen discharging from the outfall.

Figure 10.14: NCS28 Upstream depressions behind wall



Source: Mott MacDonald, September 2022

10.1.11 Drone Survey

In October 2022, a drone survey was completed of the asset. Changes between Figure 10.15 and Figure 10.16 show a small amount of masonry loss adjacent to a buttress. There are minor changes between Figure 10.21 and Figure 10.22, the joint between blocks on one buttress appears to have widened and there is a new crack through a block on another buttress. The remaining length of wall within the critical area appears to be in a similar condition to how it was in 2019. There does not appear to have been any further loss of masonry, opening of joints, and the deformed sections appear in similar positions. However, it is difficult to determine changes as there was extensive vegetation growth covering sections of masonry during the 2019 survey as shown in the images. Deterioration appears to be ongoing but at a slow rate between 2019 and 2022.

Figure 10.15: NCS28 Wall deformation 2019



Source: Mott MacDonald 2019

Figure 10.16: NCS28 Wall deformation 2022



Source: Mott MacDonald, October 2022

Figure 10.17: NCS28 Open joint 2019



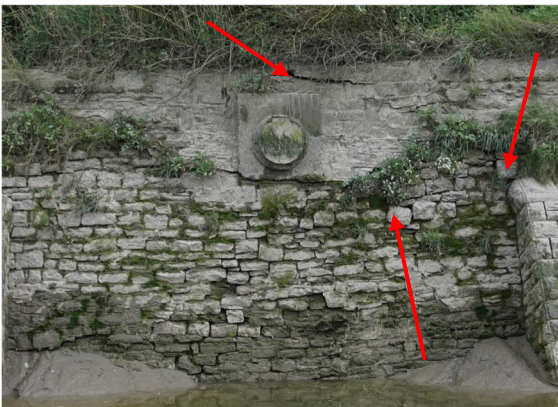
Source: Mott MacDonald 2019

Figure 10.18: NCS28 Open joint 2022



Source: Mott MacDonald, October 2022

Figure 10.19: NCS28 Outfall area 2019



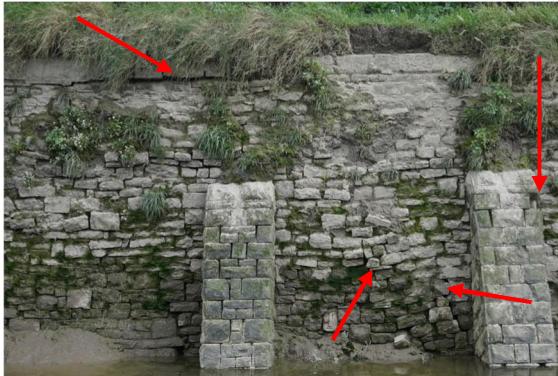
Source: Mott MacDonald 2019

Figure 10.20: NCS28 Outfall area 2022



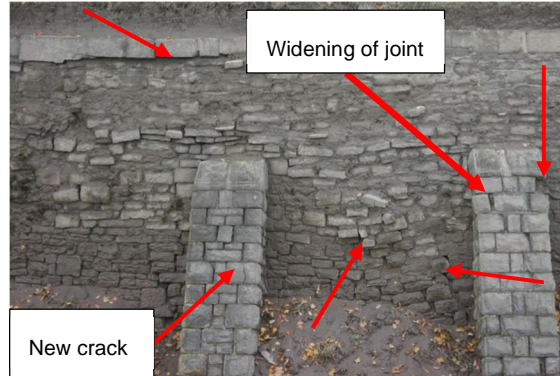
Source: Mott MacDonald, October 2022

Figure 10.21: NCS28 Wall deformation 2019



Source: Mott MacDonald 2019

Figure 10.22: NCS28 Wall deformation 2022



Source: Mott MacDonald 2022

10.1.12 NCS28 Summary

Within the critical area, NCS28 has significant areas of global and local deformation. There are several step fractures/open joints, as well as lost masonry, and pointing loss. The buttress marked in Figure 10.9 has apparently failed, potentially of inadequate foundations, this means the other buttresses in the area may also have inadequate foundations.

Without an understanding of the outfall pipe failure and the volume of water it carries, it is difficult to determine whether it will contribute towards a wider asset collapse. This should be further investigated using a CCTV survey. There is the potential for a build-up of water pressure behind the wall leading to a sudden failure.

There is a risk that the wall is providing lateral restraint in front of the southern bridge abutment and that a failure would destabilise the abutment.

The ground conditions in the vicinity of the asset are currently unknown, but it is anticipated that the asset is a retaining wall and is providing a supporting function to the fill behind it.

10.2 NCS28 Monitoring

In the vicinity of Langton Street Bridge, the asset exhibits several large open joints, fractures, and significant areas of deformation.

There are several options for the monitoring of NCS28, these include:

- Regular visual monitoring with long lens photographs.
- Surveying with total station.
- Laser scanning.
- Real-time monitoring with sensor system.

Further details of these monitoring techniques can be found in Section 2.

In this instance, it is recommended that the asset is monitored using a combination of regular visual monitoring at monthly intervals and real-time monitoring.

Regular visual monitoring will enable a visual record of the asset to be collated and pick up any further significant changes to the wall structure, such as the loss of discreet masonry blocks. Visual monitoring will not pick up gradual movement or subtle changes.

Real-time monitoring with a sensor system could be installed as this will be unimpacted by any environmental conditions and will provide accurate monitoring of any slope or wall movement. Real-time monitoring is expected to be of most use as it will give a picture of how the structure behaves under different conditions.

It would also be advised that Langton Street Bridge is monitored for movement using sensors, this would allow the correlation of data and to help understand the relationship between the bridge, the wall/bank, and any impact of differing real time conditions.

The other listed options could be considered; however, they are not deemed to be essential for this asset.

In addition to monitoring the wall, CCTV surveys of the two outfalls, and a functionality check of the flap valves should be undertaken.

10.3 NCS28 Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 8No. Boreholes (2No. required to confirm ground behind and around the footbridge area).
- 2No. Hand Pits

There is possibly scope for a trial pit adjacent to the bridge abutment to confirm foundation depth. However, this is likely to require significant temporary works and may be unnecessary depending on repair/reconstruction choice.

10.4 NCS28 Repair and Reconstruction Options

Due to the condition of the asset, the apparent modes of failure, and the significant degree of deformation, the reconstruction or replacement of the wall is recommended rather than a repair.

At the present moment, only a high-level option can be evaluated due to a lack of knowledge about the original modes of failure. From images gathered and outlined in the previous sections it appears that there are several modes of failure with the vicinity of the bridge.

The working environment presents a challenge, as the structure is still retaining a significant amount of fill and the deconstruction of the wall could cause a slope failure, leading to a collapse of the York Road footpath or carriageway. As such, ground investigations should inform the requirements for plant access (e.g., piling to create a working environment)

These considerations leave a few options such as:

- Piling behind the existing wall and allow the masonry wall to deteriorate.
- Piling behind the existing wall and undertake like for like masonry repairs of damaged sections.
- Construction of a replacement concrete retaining wall structure (likely on piled foundations).
- Wailing beam and anchors system, with repairs to open joints and missing masonry.

Ground investigation and stability assessment would be required to confirm ground properties for design, bank stability assessments, and temporary works and access constraints.

We have discounted the construction of significant structural works in front of the existing river wall on the basis that it will require EA approval for narrowing the channel width which is undesirable.

10.4.1 NCS28 Piling

Piles could be installed to create a new retaining structure and make the existing masonry wall redundant. Due to concerns over bank stability, additional piling may need to be carried out to support the carriageway/slope and create a safe working environment for plant to access down to the existing wall. Ground investigations would be needed to determine the type of piling that would be suitable for the ground conditions.

During pile design/installation, consideration should be given to the risk of vibrations causing the existing wall to collapse, leading to a bank failure.

There is likely to be a significant impact on the local community and road congestion. This would be due to plant and material use/storage. There would also be noise and visual impacts on local residents during piling works.

Once piles were installed and the risk to the carriageway mitigated, there would be the option to try and restore the existing masonry through local demolition and reconstruction. This would maintain the appearance of the original masonry walls, protecting the aesthetics of the section of river. Alternatively, as the masonry would no longer be performing a retaining function, the masonry could be allowed to deteriorate but there is a risk of poor perception from the public.

It is anticipated that the repair would require closure of Langton Street footbridge for some of the works.

Note, it is thought that it would not be possible to install piles beneath the bridge. The wall in this area may need localised repairs, or it may be possible to construct a tie-beam behind the wall if required.

A new piled retaining wall behind the existing river wall could also facilitate the construction of at grade access to the adjacent footbridge. This is understood this is a long-term strategic goal for BCC.

10.4.2 NCS28 Concrete or Masonry Retaining Wall and Demolition of Existing Wall

To demolish and replace the existing wall it is likely that significant construction plant would need to access the site area. This is likely to prove challenging due to concerns over wall/bank stability, and piling may still be needed in order to support the carriageway/bank during demolition works and to create a stable working area. This is likely to come with significant cost and disruption to the local transport infrastructure. Alternatively, access could potentially be achieved from the river itself, although there would still be significant cost and access difficulties due to the large tidal range and headroom clearances under the adjacent bridges.

Any new replacement wall will likely require a piled foundation. Construction in front of the existing wall would intrude into the river channel and would have additional complications due to the tidal ranges of the River Avon. Construction behind, or in place of, the existing wall would require the excavation of the currently retained material, which would in turn impact on bank stability and potentially the adjacent bridge foundations; this would likely require significant temporary works to support the bank and would ultimately likely favour piling behind the wall to make it redundant (as detailed above). In either case, ECI discussions are recommended in order to consider construction constraints and sequencing early on in the design.

Once the piled foundations are in place, a new concrete retaining wall would be constructed. To speed up the construction, the use of in-situ or preferably precast concrete panels should be investigated.

It would technically be possible to construct a masonry retaining wall (similar to the adjacent wall sections), however this would require a significantly longer construction period and more extensive temporary works.

During the installation of the piled foundations, there is a risk that vibrations could cause the existing wall to collapse, leading to a bank failure. This will need to be further investigated if this option is being pursued. There is likely to be a significant impact on the local community due to plant and material use/storage, as well as noise and a visual impact on local residents.

It is anticipated that the repair would require the closure of Langton Street Bridge for some of the works. A partial closure of York Road is also likely (subject to access for plant and construction vehicles/material).

10.4.3 Wailing Beam and Ground Anchors

Due to the cost and disruption that piling is anticipated to have, an alternative/temporary repair solution could be to install a wailing beam and anchor system to restrain the wall. In conjunction, local repairs would be undertaken to open joints and areas of lost masonry. Stand-alone pattress plates could be installed to discrete areas of deformation.

Ground investigations will be required to determine the feasibility and longevity of this option, as it would be unlikely to provide appropriate support if there has been a foundation failure.

10.5 NCS28 Recommendations

The asset has been ranked in Priority Group 1, see Section 12.

It is recommended that ground investigations and a desk study are undertaken to understand the ground properties and behaviour in the vicinity of the asset. This will provide the necessary information to develop a recommended design solution. Ground investigations will also provide information on the requirements for temporary works / plant access.

It is recommended that monthly visual inspections should be carried out and remote monitoring is conducted with tilt-meters installed within the area of concern to provide real time information. Displacement sensors could be installed across some of the areas of bulging masonry to detect deterioration. Final survey requirements should be determined with the monitoring contractor.

The installation of sensors to the bridge, and bridge abutment should also be considered so that the relationship between the bridge, the abutment, and the wall can be understood.

If movement is experienced, York Road footway and Langton Street Bridge may need to be closed in case of wall collapse.

The installation of sensors to the bridge should also be considered so that the relationship between the bridge and the wall can be understood.

While a repair solution is being evaluated, research should be conducted into the Langton Street Bridge abutment. A review of As-Built information should be performed.

There are two primary areas of defects, upstream and downstream of the bridge. It is considered likely that piling behind the wall to make the existing structure redundant will be the most suitable option to fully repair the asset. However, the disruption caused by piling may warrant an investigation into the practicalities of a wailing beam and anchor system (with miscellaneous masonry repair) as an interim measure. It is therefore advisable to undertake a high-level feasibility study investigating these options following completion of the ground investigations.

Note, there is potential for bat roosting and an ecologist should be consulted prior to any work being undertaken.

The failure of the outfall pipe needs to be investigated using CCTV and then addressed when remediation is undertaken, or it could present future difficulties to any actioned repair solution. The functionality of the flap valves should also be assessed.

11 S28b

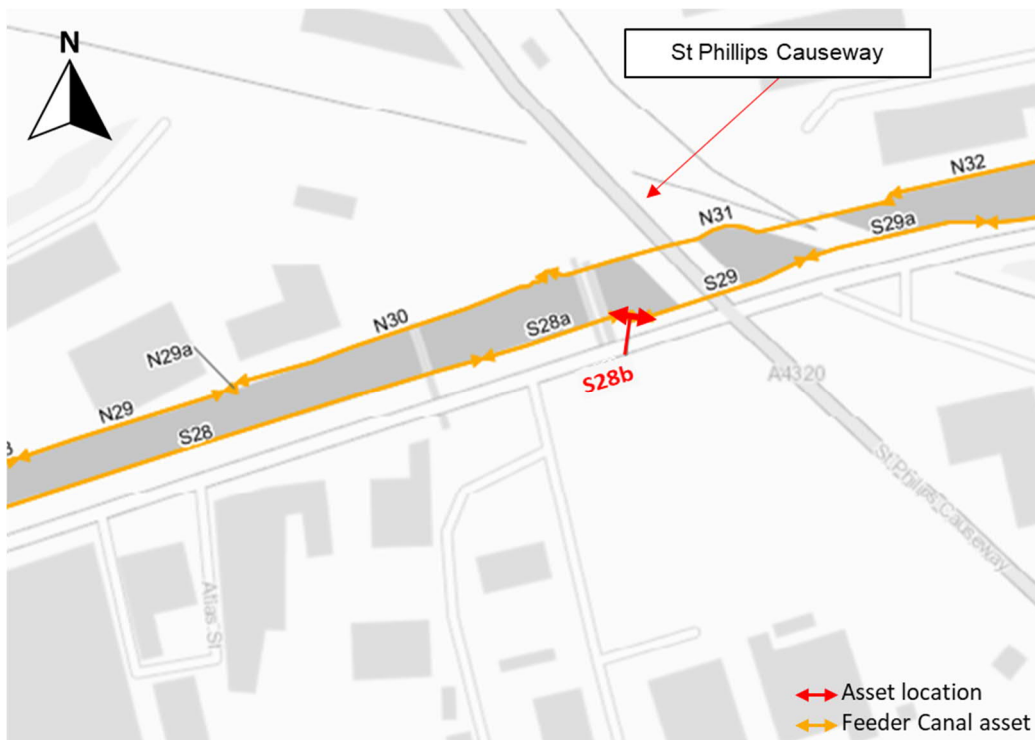
11.1 Background information

11.1.1 Asset Location

Asset S28b is located adjacent to Feeder Road, on the south bank of the Feeder Canal, at approximate Eastings and Northings 360750, 172561. Figure 11.1 shows the site location plan.

St Phillips Causeway, A4320, is an overpass road located adjacent east of the asset. There are two covered bridges not publicly accessible adjacent west of the asset and another public footbridge approximately 160m west of the asset. There is a railway line that passes over Feeder Canal and underneath St Phillips Causeway approximately 50m north of the asset.

Figure 11.1: S28b Location plan



Source: Mott MacDonald

11.1.2 Asset Description

The asset is a masonry wall, fronting an area of gently sloping public land and a carriageway, on the Feeder Canal. It is likely that the asset is a retaining wall due to the ground conditions in the area as discussed in Section 11.1.6 below.

11.1.3 Asset Defects

There is an open joint across the whole asset length, approximately 7.5m, due to the separation between the upper and lower sections. An image of the asset is shown in Figure 11.2 below. There is also an area of potential washout at the base of the wall where it abuts the adjacent sheet piles, see Figure 11.3.

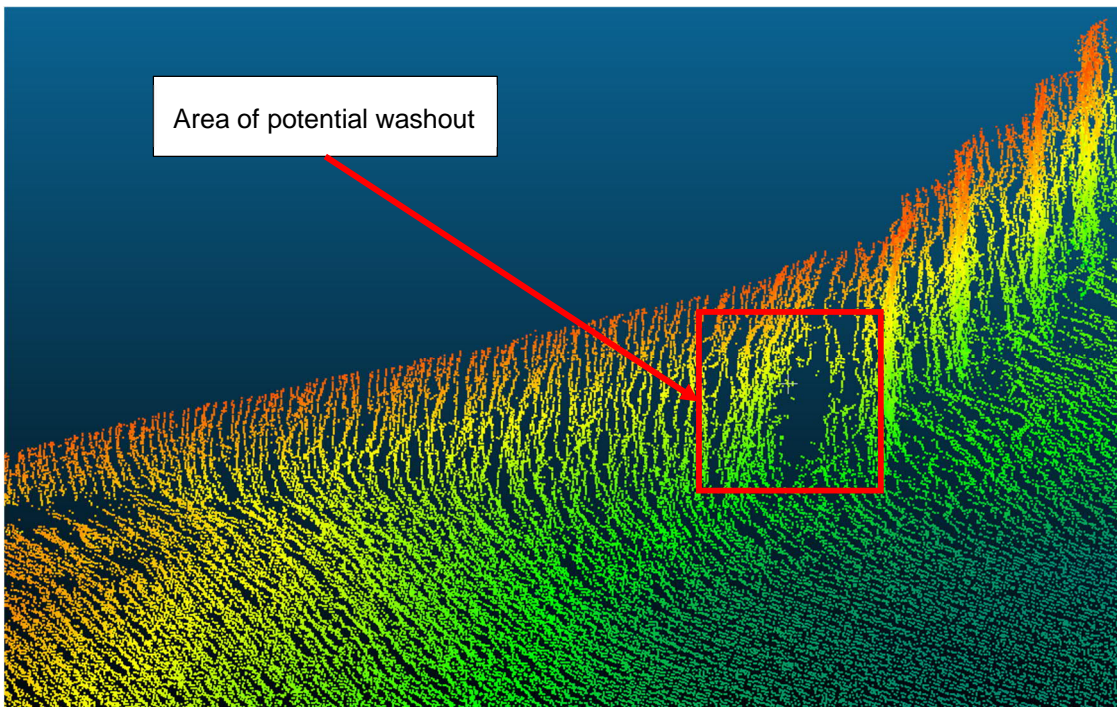
The footway is approximately 0.5m behind the asset and Feeder Road is approximately 3m behind the asset.

Figure 11.2: Asset S28b



Source: Mott MacDonald 2019

Figure 11.3: S28b Potential washout



Source: Mott MacDonald 2019

11.1.4 Consequences of Asset Failure

There will be a loss of support to the retained material resulting in a collapse of the footway and potentially a partial collapse of Feeder Road. There is the risk of travel disruption as Feeder Road is a link road.

11.1.5 Historic Mapping

A review of historic mapping was undertaken to assess the use and development of the asset and surrounding land, allowing for a more holistic understanding of the asset. Table 11.1 presents a summary of history on and off site.

Table 11.1: S28b Summary of site history

Year	On site	Off site
1881	Feeder Canal, Feeder Road and railway line present	Housing located north of site approximately 100m of the asset Avonside Tannery is located approximately 100m east of the asset, southside of the canal. Great Western Works is located approximately 100m east of the asset, northside of the canal
1881 to 1884	No change	Manure Works, Clay Pit, Glue Size & Hair Works located directly south of the asset, below Feeder Road
1902	No change	Bristol Loop Line added to the Great West Railway Allotment gardens located north of site Crane located south of the asset on Feeder Road Avonbank Electric Light works located directly south of Feeder Road Clay Pit, Glue Size & Hair Works no longer labelled
1912, published 1918	No change	Avonbank Electric Light Works no longer labelled
1912 to 1913 published 1920	No change	Avonside Glue Works labelled Great Western Railway Bristol Relief Line labelled south of site, connected to the Bristol Loop Line
1912 to 1913 published 1921	No change	No significant change
1938	No change	No significant change
1947 to 1963	No change	No significant change
Present day	No change	No significant change

11.1.6 Geology

A review of geological mapping [1] for the area shows that the site is likely underlain by superficial deposits of Tidal Flat Deposits. BGS Lexicon [4] describes Tidal Flat Deposits as *“mud flat and sand flat deposits, deposited on extensive nearly horizontal marshy land in the intertidal zone that is alternately covered and uncovered by the rise and fall of the tide. They consist of unconsolidated sediment, mainly mud and/or sand. They may form the top surface of a deltaic deposit. Normally a consolidated soft silty clay, with layers of sand, gravel and peat”*.

As Tidal Flat Deposits area typically very low strength, the asset is likely found on bedrock of Redcliffe Sandstone Member. BGS Lexicon [4] describes this as *“sandstone, distinctive fine- to medium-grained, deep red, calcareous and ferruginous. Commonly decalcified at shallow depths below the surface, giving rise to an uncemented sand”*.

A review of BGS Geoindex [2] shows that there are 12 boreholes available within 250m of site. The exploratory holes presented are anticipated to be sunk at ground level of the Feeder Canal and therefore most relevant for this asset. The exploratory holes are presented in Table 11.2.

Table 11.2: S28b Existing exploratory hole summary

Historic BGS Geindex borehole records

	ST67SW234	ST67SW235	ST67SW237	ST67SW236
Approx. distance from the site:	20m N	20m N	20m SW	50m NE
Made Ground		0m BGL Loose dark grey slightly clayey very ashy SILT	0m BGL Brown clayey topsoil with brick fragments, rootlets and occasional gravel, rootlets and occasional gravel 1m BGL Medium dense red brown silty clay with much brick fragments and peat	0m BGL Tarmac 0.1m BGL Reddish sandy stone fill 0.3m BGL Tarmac 0.3m BGL Concrete 0.6m BGL Reddish sandy stone fill 0.6m BGL Concrete 1.1m BGL Reddish sandy stone fill 1.2m BGL Concrete 1.4m BGL Reddish sandstone fill 1.5m BGL Concrete
Superficial deposits	0m BGL Soft grey clayey SILT 1.8m BGL Soft dark brown fibrous PEAT 2.8m BGL Soft grey slightly silty CLAY 4.2m BGL Brown mottled grey very clayey silty fine SAND 5m BGL Medium dense yellowish brown medium to coarse SAND 6.5m BGL Reddish brown mottled occasionally green very clayey slightly fine sandy SILT	3m BGL Medium dense dark grey very clayey ash and coarse SAND 6.3 Soft grey silty CLAY with occasional fine gravel and dark brown pseudo-amorphous PEAT 6.8m BGL Firm dark brown/black pseudo-amorphous PEAT 8.9m BGL Soft orangish brown very fine sandy silty CLAY 9.7m BGL Medium dense orangish brown SAND	2.3 m BGL dark brownish black PEAT 5.0m BGL Soft becoming firm grey occasionally mottled orange brown very silty CLAY with rootlets 6.5m BGL Dense greyish brown clayey silty SANDSAND 7.0m BGL Dense yellow brown fine to medium angular GRAVEL	-
Weathered Zone (Assumed Redcliffe Sandstone)	-		9.0m BGL Very stiff reddish brown occasionally mottled green clayey SILT with some rounded fine gravel	-
Redcliffe Sandstone Formation	6.5m BGL Reddish brown mottled occasionally green partially decomposed argillaceous slightly fine sand SILSTONE		-	-

11.1.7 Mining

Bristol is known for its past as a Coal Mining area. A review of the Coal Authority interactive tool [5], shows that the asset is located within the 'Abandoned Mine Catalogue' and is located approximately 200m northwest of a mine entry point. A mine entry point indicates the entrance into a mine working, for which there are two types: shafts and adits. Mine shafts are vertical or near vertical entrances to a mine whereas adits are a walkable entrance to a mine. It is unknown whether the mine entrance close to the asset is a shaft or adit.

11.1.8 Ecological Constraints

A desk study was undertaken in January 2023. This involved a search for designated sites and habitats to identify potentially important ecological constraints at the Site. Data to inform the desk study was obtained from the following sources:

- Multi Agency Geographical Information for the Countryside (MAGIC) website (<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>);
- Joint Nature Conservation Committee (<http://jncc.defra.gov.uk>);
- OS maps; and
- Aerial imagery.

Based on aerial imagery and mapping the following habitats were identified within 30m of the asset:

- Feeder Road (developed land; sealed surface) , present along the entire asset;
- Semi-improved grassland growing on the river bank;
- Scattered deciduous trees within 30m of the asset; and
- River along the northern edge of the asset.

One Habitat of Principal Importance, river habitat, was identified within 30m of the asset. The asset does not lie within or adjacent to a site designated for conservation. No sites designated for their international or national importance were identified within 2km of the site. Avon New Cut Local Nature Reserve lies 1.km west of the site and is also hydrologically linked downstream. Four designated sites are hydrologically linked downstream to the site. Table 11.3 below summarises the designated sites within 2km of the site or that are hydrologically linked.

Table 11.3: Designated sites within 2km or hydrologically linked downstream of the asset

Designated site name	Designation	Orientation and distance from the site at the closest point
Avon New Cut	Local Nature Reserve	1.2km west and hydrologically linked
Avon Gorge Woodlands	Special Area of Conservation and Site of Special Scientific Interest	4.2km west and hydrologically linked
Horseshoe Bend	Site of Special Scientific Interest	7.6km northwest and hydrologically linked
Lamplighters Mash	Local Nature Reserve	8.9km northwest and hydrologically linked
Severn Estuary	Special Area of Conservation, Special Protection Area, Ramsar and Site of Special Scientific Interest	9.3km northwest and hydrologically linked

Source: MAGIC, 2023.

Based on the findings of the desk study, the following features have been identified as potential Important Ecological Features within the context of the site;

- Designated sites;
- Habitat of principal importance – river habitat;
- Commuting, foraging and roosting bats;
- Nesting birds;
- Commuting otters;
- Bony fish; and

- Reptiles.

A full Preliminary Ecological Appraisal Report (PEAR) should be undertaken. Habitats should be classified using the UK habitats classification system. The report should include a Preliminary Roost Assessment (PRA) of all trees and structures within 20m of the proposed works (Collins, 2016), a Habitat Suitability Index (HSI) assessment of all waterbodies within 250m of the Site for great crested newts, and a walkover survey for invasive non-native plant species. This process may identify further ecological constraints as well as the need for further survey and mitigation measures.

A detailed habitat mitigation strategy should be developed to replace any habitats permanently lost as a result of the proposed works. The strategy would, as a minimum, replace lost habitat with habitats of the same or higher value. A Biodiversity Net Gain assessment can be used to quantify habitat value and should be undertaken to identify opportunities for biodiversity enhancement.

A Habitat Regulations Assessment is recommended to advise on potential impacts of the proposed works on statutory designated sites downstream of the Site.

A Construction Environmental Management Plan will likely be required to set out the methods to ensure the environmental impact of construction is minimised. Finally, subject to the results of the further surveys, measures to minimise impacts on protected species should be included in a Reasonable Avoidance Measures Method Statement this should also include best practise measures and general construction safeguards.

11.1.9 Site Walkover

Along with the original survey in 2019, a site walkover was conducted in June 2022.

During the walkover in June 2022, the defect was below the water line.

11.1.10 S28b Summary

The asset's function is not fully understood, although it is certainly providing some support to the adjacent bank and protects against washout. It is a reasonable assumption that it is also supporting the adjacent carriageway and public footway.

There is an open joint across the whole asset length 1.4m below the top of the wall, approximately 7.5m at an apparent separation of the upper and lower sections of wall. It is not understood whether this is due to an open joint / material loss, or possibly due to a loss of support for the wall due to settlement. There is also an area of potential washout at the base of the wall where it abuts the adjacent sheet piles.

It would be advisable to commission a dive survey and ground investigations for this asset in order to establish the nature and cause of the defect.

11.2 S28b Monitoring

Access limitations will restrict viewing angles for taking photographs from above the asset, which will limit information on global movement. Additionally, there is a perceived difficulty in accessing the opposite bank (steep and requiring access through Network Rail land), which increases the difficulty of traditional laser scanning and total station surveying.

It is recommended that the asset is monitored for global movement. This could be done in a number of ways, either through regular (3-4 month intervals) photogrammetric scanning completed by drone or from boat, or automatic monitoring.

11.3 S28b Ground Investigations

Ground investigations will determine ground properties and wall function. It is anticipated that the investigations for the asset will consist of:

- 2No. Boreholes.
- Dive survey to confirm defect extents.

11.4 S28b Repair Options

There are two primary repair options for the asset. These options are to be confirmed following a dive survey to determine the extent and severity of defects located below the waterline. The options would also be subject to the results of ground investigations.

- Shutter the defects and pump in concrete.
- Pile in-front or behind of the existing wall.

11.4.1 S28b Concrete Patch Repair

The concrete repair would be conducted using underwater concrete with anti washout properties or dry-bags for underwater installation. As concrete would be pumped into a watercourse, discussions with the EA would be necessary and any mitigations they require actioned.

To conduct the repair, the face of the asset would be shuttered to create the best seal possible and then suitable concrete would be pumped in to fill the void.

There are numerous different concrete construction methods within this area of Feeder Canal, and most of the repair would be below the waterline so the visual impact of this repair would be negligible. Additionally, there is no public access to the opposite bank.

It is possible that the current defects have been caused by settlement, and a concrete repair is likely to also be affected by settlement, rendering the repair inappropriate. Whether settlement is a risk should be confirmed through regular monitoring, the recommended dive survey and ground investigations.

11.4.2 S28b Sheet Piling

Sheet piles could be installed in-front or behind of the asset, this would provide a comprehensive repair solution enabling the existing asset to deteriorate.

Piling is unlikely to be cost efficient for such a discrete length of wall as it would require extensive design and mobilisation. It would also have a larger impact on the local community due to increased plant, materials use/storage and likely lane closures on Feeder Road and take longer to complete than a concrete repair. If settlement has caused the defects in the asset, a concrete repair is unlikely to be appropriate and sheet piling will be necessary.

11.5 S28b Recommendations

The asset has been ranked in Priority Group 2, see Section 12.

It is recommended that the asset is monitored for global movement, either through regular (3-4 month intervals) photogrammetric scanning completed by drone or from boat, or automatic monitoring.

It is recommended that ground investigations and a dive survey should be conducted. This will allow the extent and severity of the underwater defects to be understood and inform on the ground properties and whether there is an ongoing risk of settlement.

Following these investigations, the asset should be repaired to mitigate any ongoing risk to the carriageway.

12 Asset Prioritisation

The assets within scope of this project have been ranked in priority groups for repair, with Priority Group 1 being most urgently requiring repairs, see for Table 12.1.

Before repairs are undertaken, further investigations, such as ground investigations, slope stability analysis, and as-built drawing review should be conducted. These further investigations will facilitate repair design and provide information on ground properties, wall function, plant access suitability, slope stability, and the properties of adjacent structures.

Furthermore, monitoring programmes should be setup for all assets to track movement and watch for additional deterioration. Appropriate monitoring contractors should be contacted as soon as is practicable to begin discussions relating to monitoring requirements.

Table 12.1: Asset priority

Priority Group	Assets
1	NCS21/23 and NCS28
2	NCN16, NCS18 and S28b
3	NCS06 and NCS13
N/A	N06

The assets have been ranked in these groups order for the reasons outlined in the following sections.

12.1 Priority Group 1

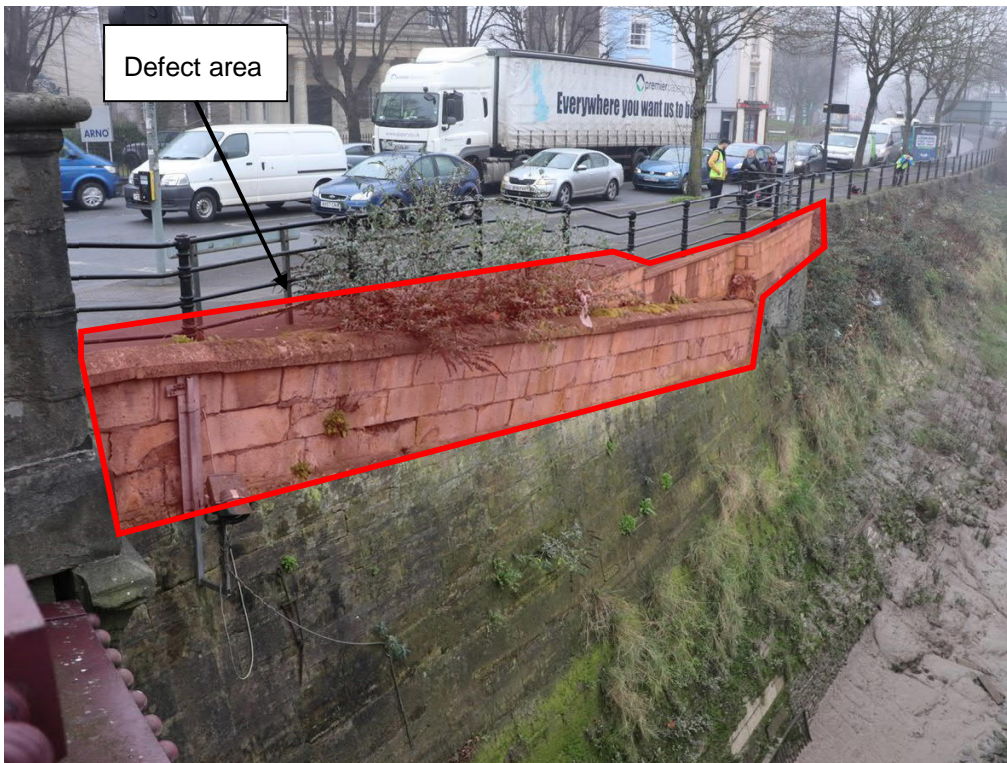
These are considered the most urgent assets for repair.

12.1.1 NCS21 & NCS23

There are significant concerns over the stability of the wall where it is supporting the adjacent footway (as highlighted in Figure 12.1). There is a clear risk that the wall is unlikely to resist vehicle loading, concentrated pedestrian loading, or a significant saturation event (e.g., burst water main). These modes of failure cannot be predicted and would come about as a sudden event with no prior indication of happening. Given the asset’s well trafficked location (and therefore inherent risk to members of the public), it is considered as being in the highest priority group for repair.

A failure of the asset would also require the closure of the footway (and potentially York Road) while the extent of damage was being assessed, with potential long-term closures to follow affecting the wider road network whilst repair activities are undertaken. Failure could also result in potential loss of life or serious injury and have financial, environmental and reputational damage to BCC and the local economy and South-West Region.

Figure 12.1: NCS21 & NCS23 Defect area



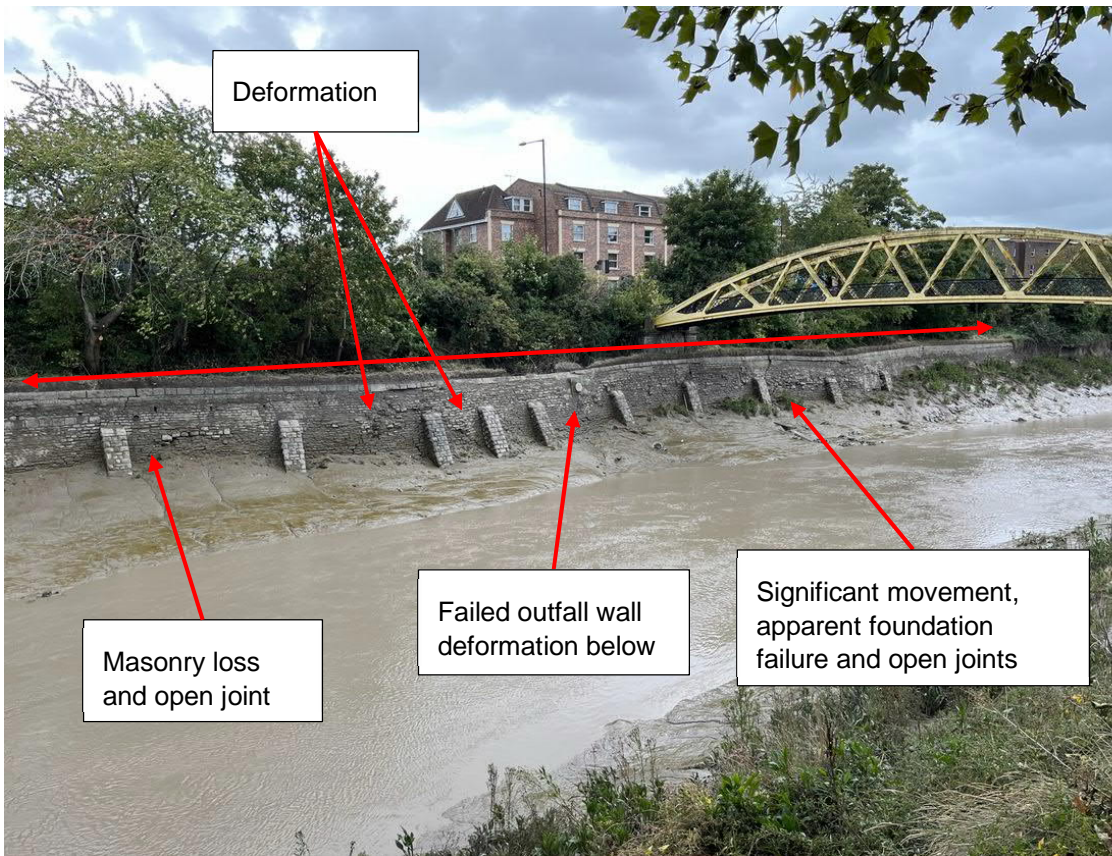
Source: Mott MacDonald 2022

12.1.2 NCS28

The asset likely functions as a retaining wall for the area of fill and slope behind. There are areas of significant global and local deformation across the area shown in Figure 12.2. Any further such deformation could result in a loss of support to the fill behind the asset. There is the potential for a sudden collapse of the asset, causing a loss of support to the slope, the footway and potentially the bridge. This may lead to potential long-term road closures affecting the wider road network whilst repair activities are undertaken. Failure could also result in potential loss of life or serious injury and have significant financial, environmental and reputational damage to BCC and the full local economy and South-West Region.

Due to the extent of movement which has already taken place, the apparent deterioration over the last 10-15 years (Section 10.1.3) and the risk of damage to the surrounding infrastructure, the asset is rated in the highest priority group to repair.

Figure 12.2: NCS28 Area of concern



Source: Mott MacDonald 2022

12.2 Priority Group 2

Repair strategies should be evaluated for these assets once Priority Group 1 asset repair programmes have begun.

NCN16 has been omitted from this section as it will likely be the first asset repaired due to BCC's desire to address this issue and a suitable contractor working adjacent to the site.

12.2.1 NCS18

The asset likely functions as a retaining wall, providing support to the bank behind, the slipway, and the landing stage area.

In the vicinity of the slipway, there are three collapsed sections (NCS18.A, NCS18.B and NCS18.D). If these are allowed to deteriorate further, the slipway may become too dangerous to use, limiting access to the bridge pier and the river and cause injury and potential death to the public.

There are several areas of lost masonry and deformation where the wall appears to retain the bank behind. These defects are considered to be a lower priority than slipway defects as it is thought that a slope failure, resulting in a loss of support to Coronation Road is unlikely in the short-term. However, if these wall failures are allowed to deteriorate, the washout of the slope will increase the long-term risk of a slope failure affecting the road network and potentially causing injury or death to the public. The overall risk of this occurring is lower as there should be signs of failure over a longer period of time that allows timely repairs.

Figure 12.3: NCS18 View from Gaol Ferry Bridge looking upstream



Source: Mott MacDonald 2022

12.2.2 S28b

The asset is likely retaining the footway and potentially the carriageway. If allowed to deteriorate further, there is a risk of the footway collapsing and a road closure affecting the road network in that area. Injury to the public may also potentially occur. There is a horizontal open joint across the face of the asset and a recess at the toe of the wall.

Figure 12.4: Asset S28b



Source: Mott MacDonald 2019

12.3 Priority Group 3

These are considered the assets with the lowest priority to repair.

12.3.1 NCS13

The asset likely functions at least partially as a retaining wall, providing support to the slope behind. The single collapsed section and areas of minor deformation in the region where the slope is directly supported by the wall do not appear to have deteriorated between 2019 and 2022. The slope also appears to have remained stable in the vicinity of these defects.

Figure 12.5: NCS13 Collapsed section



Source: Mott MacDonald 2022

12.3.2 NCS06

It is anticipated that the buildings in the vicinity of the wall have independent foundations and are not at immediate risk of collapse in the event of further short-term wall deterioration.

However, the Priority Group of this asset is likely to increase if:

- The building foundations are found to be dependent on the river wall and a concern develops over that section of the wall.
- The condition of the bank retaining wall significantly deteriorates.
- The slope stability assessment indicates there is a risk of collapse.

If any of these scenarios occur, repairs would become more urgent.

There are other masonry defects along the wall (as summarised in Section 6.1.3), however their significance to the asset are unlikely to have qualified NCS06 within the critical asset project scope.

12.4 N06

Following review of the dive inspection report by Edwards Diving Services (EDS), it was noted that the void detected on a MM site visit was not recorded, and that the report was unclear in relation to the arch defect locations.

It is recommended that BCC confirm with EDS that the entire asset was inspected and if so, clarify why no reference to this void was within the report. BCC should also seek clarification about the accessibility of the arches, whether the arch barrels were inspected, and where the recorded spalls are located.

Once confirmation has been sought, the void and the arch barrels should either be inspected or (if already inspected and in a good condition) the asset could be de-risked from the critical asset shortlist.

References

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6. Zetica, UXB risk map, <https://zeticauxo.com/downloads-and-resources/risk-maps> Accessed November 2022
7. Multi-Agency Geographic Information for the Countryside (MAGIC) [defra.gov.uk](https://defra.gov.uk/magic/) Accessed July 2022
8. Mott MacDonald (2022). SPI Asset Investigations and Repairs Asset NCN16. Doc.Ref.: 100105143-MMD-NCN16-XX-TN-CV-001, dated 23 November 2022
9. Architecton Limited (2014). Langton Street Bridge Conservation Statement for Bristol City Council.
10. Mott MacDonald (2022). BCC SPI Asset Investigations and Repairs – NCN16. Ground Investigation Specification and Bill of Quantities.
11. Edwards Diving Services (2021) A8379 Bristol Harbour Retaining Wall Diving Inspection.

Appendix A. Survey Quotations

A.1 Laser scanning and total station survey quote

Prices for laser scanning and total station surveys were provided by Anthony Brookes Surveys. These can be seen in Figure A.1 below.

Figure A.1: Anthony Brookes Surveys quote

Thank you for the invitation to tender.

Our prices to undertake a monitoring survey works at the above sites would be:

- **Setup site control and direct target installations (by provided rope access personnel)**
£ 520.00 per day
- **Surveying and processing retro targets into a comparison table**
 - Assets S28b, NCS06, NCS13 £ 440.00 per site
 - Assets NCS18, NCS21 combined with NCS23 £ 600.00 per site
 - Asset NCS28 £ 1340.00
- **Laser scanning and scans processing to point cloud**
 - Assets S28b, NCS06, NCS13 £ 720.00 per site
 - Assets NCS18, NCS21 combined with NCS23 £ 1020.00 per site
 - Asset NCS28 £ 2420.00
- **Preparing and drafting sections from scan data to provide comparison**
£ 640.00 per 20 sections

Value Added Tax at the standard rate of 20% would be added to these figures.

Within directing of the target installations we have allowed to advise on site where to install targets with the supplied rope access team and including provision of the targets and adhesive. It is planned to place targets at 1m intervals along the feature in two rows (low / high).

Surveying and processing the retro targets will include survey and compare results (in excel spread sheet) to the initial and previous readings.

Laser Scanning includes for site observations and control and processing the data to a pointcloud but without further analysis.

Sections drafted from scan data will allow us to compare them to the initial and previous readings in graphic form which will give you more complex view of asset changes. The tracing/comparing is quite time consuming so sections need to be chosen at key locations to avoid excessive time and cost.

Source: Anthony Brookes Surveys email extract, 17/11/2022

A.2 Real-time monitoring quote

A quote for sensor installation to provide real-time monitoring was obtained from James Fisher Strainstall, this can be seen in Figure A.2

Figure A.2: James Fisher Strainstall quote

Budgetary financial proposal

In order to provide an indication of possible pricing, we have considered the costs of sensors and nodes that may be required at a typical wall location.

Sensors and Wireless Nodes for one wall location:

We have assumed that each location may require 3 nr tilt nodes, 2 nr displacement measurements and 2 nr temperature measurements (with 1 associated analogue node).

This is estimated to be installed in one shift at site, with cost including installation in the order of £10,000 + VAT per wall location

Wireless Gateway

The price for one wireless gateway, installed at a nearby Bristol City Council location, is approximately £4,000 + VAT.

(Note that we expect 2 nr to be required if the monitoring locations are widely distributed along the New Cut).

System Design, Preparation, RAMS, Software Configuration, Project Management etc.

We have assumed that the effort required for this will be similar, regardless of the number of monitoring locations and estimate it to be in the range £10,000 to £12,000 + VAT

Ongoing Monitoring

The monthly charge for data transmission, storage and display on the SAMS platform will be in the order of £350- £500 per month.

Summary

If we assume that there are 8 river wall locations to be monitored simultaneously, we would expect the overall price to be in the order of £100,000 plus £5,000 per year.

(Note: quantity discounts would be available from the suppliers – these have not been included in the summary estimate).

Source: James Fisher Strainstall email extract, dated 01/11/2022

Appendix B. Geotechnical Risk Register

A geotechnical risk register has been compiled in **Table B.5**. Impact index, likelihood index, risk matrix and designer's actions are presented in Table B.1, Table B.2, Table B.3 and Table B.4 respectively.

Table B.1: Impact index

Impact			Cost (C)	Time (T)	Reputation (R)	Health & Safety (H&S)	Environment (E)
1	Very low	Negligible	Negligible	Negligible effect on programme	Negligible	Negligible	Negligible
2	Low	Significant	>1 % budget	>5 % effect on programme	Minor effect on local company image/business relationship mildly affected	Minor injury	Minor environmental incident
3	Medium	Serious	>10 % budget	>12 % effect on programme	local media exposure/ business relationship affected	Major injury	Environmental incident requiring management input
4	High	Threat to future work and client relations	>20 % budget	>25 % effect on programme	nationwide media exposure / business relationship greatly affected	Fatality	Environmental incident leading to prosecution or protestor action
5	Very High	Threat to business survival and credibility	>50 % budget	>50 % effect on programme	Permanent nationwide effect on company image/ significant impact on business relationship	Multiple fatalities	Major environmental incident with irreversible effects and threat to public health or protected natural resource

Table B.2: Likelihood index

Likelihood	Probability
Negligible / improbable	<1%
Unlikely / remote	>1%
Likely / possible	>10%
Probable	>50%
Very likely / almost certain	>90%

Table B.3: Risk matrix

		Impact				
		1	2	3	4	5
Likelihood	1	N	N	N	N	A
	2	N	N	A	A	H
	3	N	A	A	H	S

Impact						
	4	N	A	H	S	S
	5	A	H	S	S	S

Table B.4: Designer actions

Risk Level	Description	Action by Designer
N	Negligible	None
A	Acceptable	Check that risks cannot be further reduced by simple design changes
H	High	Amend design to reduce risk or seek alternative option. Only accept option if justifiable on other grounds
S	Severe	

Table B.5: Geotechnical risk register

Ref.	Hazard	Consequence	Impact	Likelihood	Risk	Risk type	Risk control measure	Impact	Likelihood	Residual risk
01	Rock instability and erosion of rock across site	Potential rock slope failure leading to wall collapse	4	2	H	H&S, C, T	Ground Investigation to determine rock joint strength and joint orientation to enable slope stability analysis and erodibility assessment	3	2	A
02	Wall foundation instability across site	Potential failure of wall foundation leading to wall collapse	4	2	H	H&S, C, T	Ground Investigation to confirm presence of and expose foundation	3	2	A
03	Uncertainty whether walls are retaining or facing and related forces on wall	Potential failure of wall leading to wall collapse	4	2	H	H&S, C, T	Ground Investigation to confirm thickness and nature of material behind wall	2	2	A
04	Chemically aggressive ground conditions	Chemical attack of buried concrete and steel. Degradation of buried structures and weakening after installation. Design does not meet design life or performance criteria.	4	2	H	H&S, C, T	Appropriate DS Class and ACEC Class designation using Ground Investigation information. Sediment Estuary water sample Subsequent incorporation into design	4	1	N
05	Failure of drainage system through and behind walls	Groundwater pressures build up behind the wall leading to collapse	4	2	H	H&S, C, T	Ground Investigation to confirm groundwater levels at various tide levels Structural inspection presence and condition of existing drainage	3	2	A
06	Long term impact of vegetation on slope and masonry walls	Presence of or removal of vegetation on slope behind wall, leading to wall collapse	4	2	A	H&S, C, T	Ground Investigation to confirm groundwater conditions on site and presence of shrink swell material Maintenance of vegetation	2	1	N

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Ref.	Hazard	Consequence	Impact	Likelihood	Risk	Risk type	Risk control measure	Impact	Likelihood	Residual risk
07	Slope failure	Slope collapse leading to wall collapse or road collapse	4	2	H	H&S, C, T	Ground investigation to determine slope properties to enable slope stability analysis	3	2	A

Appendix Aii – Original BCC Structural Recommendations

Asset ID	Location	Initial Asset Survey Repair cost estimate		Initial Harbour Asset Survey Recommendations	BCC Bridges and Highway Structures Department Recommendations Structural Repair or Replacement Costs
		Upper	Lower, £		
N06	Hotwells Road	2,683,556	2,422,023	<ul style="list-style-type: none"> Install and monitor survey points Dive inspection of affected arches 	<ol style="list-style-type: none"> Undertake Diving inspection on arches. Stabilise deformed arches and prop. Reconstruct arches as required. Undertake localised masonry repairs Investigate scour and undermining of wall. Install Scour protection measures. <p>Original BCC Estimate = £500,000.00</p>
NCN03a	Cumberland Road	548,750	495,270	<ul style="list-style-type: none"> Cordon off bridge to prevent pedestrian access (actioned) Investigation to determine the capacity of the girder and place load restrictions on the bridge. Action subsequent recommendations 	<ol style="list-style-type: none"> Totally Replace Girder Beam with new beam Undertake structural repairs to all elements Undertake full masonry repairs throughout Undertake Dive Inspection and Repairs. Waterproof and Resurface PROW. Install New Parapet Railing and transition. <p>Original BCC Estimate = £1,000,000.00</p>
NCN16	Cumberland Road	492,893	444,857	<ul style="list-style-type: none"> Install and monitor survey points Undertake repairs of the critical section 	<ol style="list-style-type: none"> De vegetate fully extent of asset and determine overall structural condition. Undertake full masonry repairs and all rebuilds of failed and collapsed areas. Underpin foundations areas where required and anchor into rock Replace full extent of copings along length. <p>Original BCC Estimate = £1,550,000.00</p>
NCS06	Coronation Road	151,458	136,697	<ul style="list-style-type: none"> Conduct investigation to gauge whether the asset is providing direct support to the building at the western end and to confirm the depth of foundations of the building behind 	<ol style="list-style-type: none"> De vegetate fully extent of asset and determine overall structural condition. Undertake full masonry repairs and rebuild of failed areas. Underpin foundations areas where required. Replace full extent of copings along length. <p>Original BCC Estimate = £550,000.00</p>
NCS13	Coronation Road	590,312	532,781	<ul style="list-style-type: none"> Install and monitor survey points Repairs to eastern section of the asset where the embankment is directly supported by the wall 	<ol style="list-style-type: none"> De vegetate fully extent of asset and determine overall structural condition. Undertake full masonry repairs and all rebuilds of failed and collapsed areas. Underpin foundations areas where required and anchor into rock Replace full extent of copings along length. <p>Original BCC Estimate = £850,000.00</p>
NCS18	Coronation Road	4,916,611	4,437,449	<ul style="list-style-type: none"> Install and monitor survey points Repairs to the areas of deformation and collapsed sections where the wall directly supports the embankment 	<ol style="list-style-type: none"> Devegetate but upper and lower level walls associated with old Slipway. Undertake full masonry repairs and all rebuilds of failed and collapsed areas. Underpin foundations areas where required and anchor into rock outcrop at lower level. Replace full extent of copings along length.

					Original BCC Estimate = £1,600,000.00
NCS2	Coronation Rd	459,887	415,068	<ul style="list-style-type: none"> Protect rear of the footpath with barrier Undertake vegetation removal at critical location and repairs to the area of deformation 	<ol style="list-style-type: none"> Remove extended Blockwork wall, railings, and associated footway construction. Construct structurally stable extended retaining wall and encompass river railing, parapets and connection to Bedminster Bridge and transitions to railings. Repoint adjacent masonry on lower section of masonry river wall.
NCS21 Continued	Coronation Road	459,887 Continued	415,068 Continued		Original BCC Estimate = £300,000.00
NCS23	Coronation Rd	92,509	102,498	<ul style="list-style-type: none"> Protect rear of the footpath with barrier Vegetation removal at critical location Repairs to the area of deformation 	<ol style="list-style-type: none"> Investigate suitability of installing Masonry Rock Anchors into retaining wall to stabilise movement and repair masonry throughout. Install anchor solution if suitable.
NCS28	York Rd	2,197,177	1,983,046	<ul style="list-style-type: none"> Confirm the depth of foundations for Langton Street footbridge Installation of survey points on the asset and bridge Installation of survey pegs on the fill behind the asset 	<ol style="list-style-type: none"> Remove vegetation throughout full length of wall and consider further options. Undertake further structural assessment in relation to full scale removal of vegetation. Underpin gravity retaining wall as is deemed necessary from Assessment. Undertake localise rebuild to wall as deemed necessary from assessment. Undertake full repointing of wall throughout Investigate further cause of Wessex Water Outfall failure and take appropriate action.
NCS30	Bath bridge	149,805	135,206	<ul style="list-style-type: none"> Install barrier to prevent pedestrian access Installation of props or ties to restrain the bulging area and carry out repairs / reconstruction 	<ol style="list-style-type: none"> De vegetate full wall to determine extent of movement and full arch deformation. Undertake structural assessment of deformed arches and retaining wall. Take down deformed arches and reconstruct in accordance with assessment. Undertake required masonry repairs
S28b	Feeder Rd	480,862	433,998	<ul style="list-style-type: none"> Install survey points to monitor the asset for movement 	<ol style="list-style-type: none"> Underpin base of wall and stabilise capping Beam. Undertake associated masonry repairs
TOTALS		£12.8M	£11.5M	Average Asset Survey total = £12.15 million	Structures recommendation full Total = £10.25 million with no Contingency addition

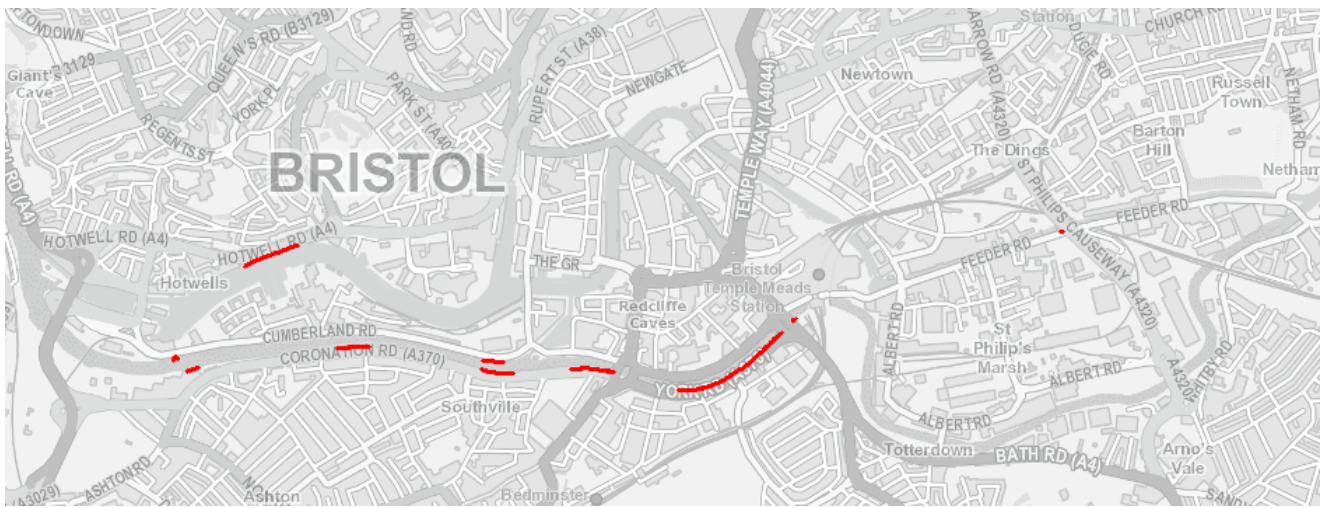
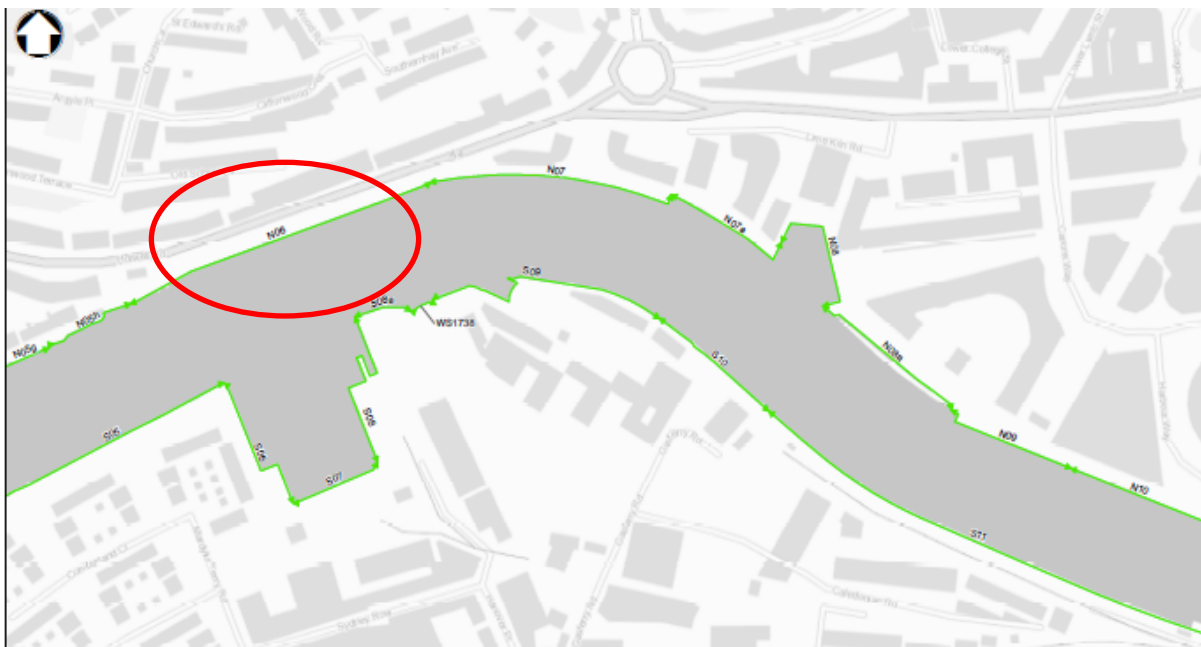


Figure 1. Location of all identified 11 highest priority assets (Refer to following Asset information)

Asset No. 1 - N06 – Harbour Wall, Masonry Arches deformed below waterline

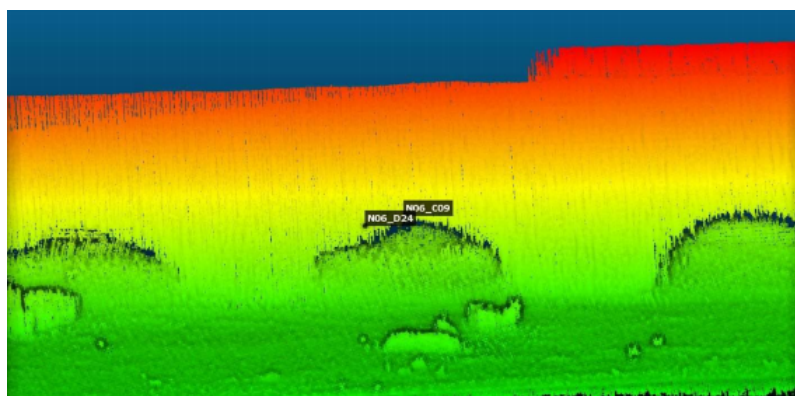
Location:

North side of the harbour, adjacent to Hotwells Rd, where the Grain Barge is moored



Defects

Deformation of underwater arches and areas of lost masonry, see image below showing deformation of arches.



Initial Harbour Asset Survey Recommendations

- Install and monitor survey points
- Dive inspection of affected arches

Structural Recommendation

- Undertake full diving inspection and stabilise Arch and install scour protection measures
- Estimated Cost = **£500,000.00**

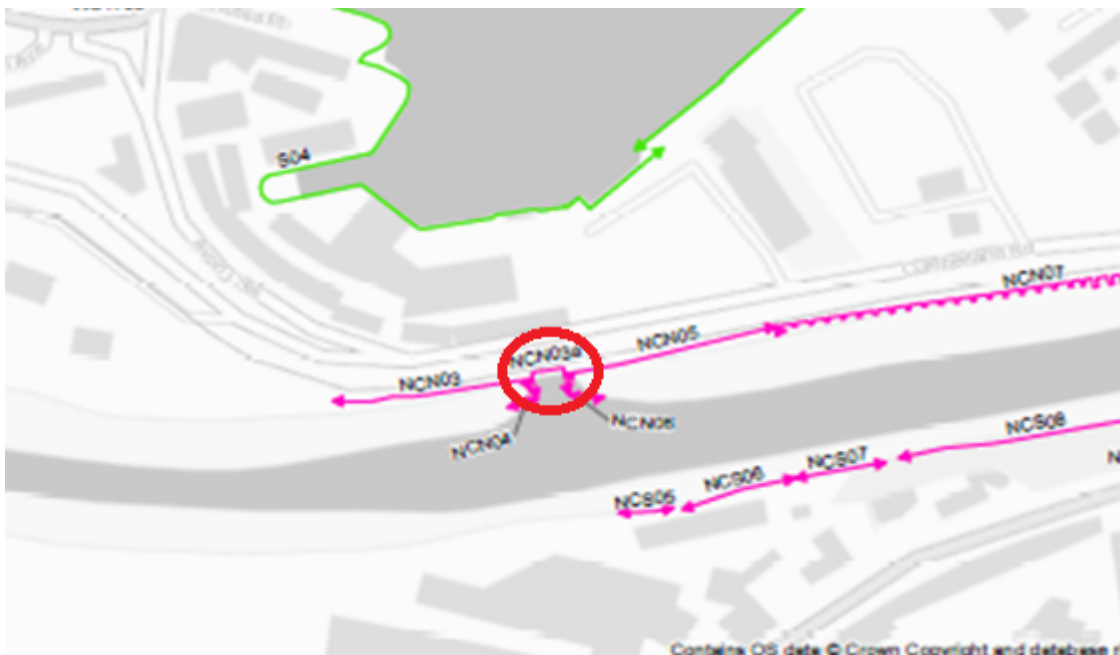
Consequence of failure

If the wall were to collapse, there is a risk that Hotwell Road will also be affected by a loss of support and lane closures would be necessary. There are boats moored along the asset in the vicinity of the critical defects and there is the potential for them to be damaged by falling masonry

Asset No. 2 - NCN03a Girder Bridge spanning over Outfall on Chocolate Path

Location:

Steel beam supporting chocolate path footbridge where it bridges the Underfall sluices



Defects

Severe corrosion of steel beam footbridge as shown in image below



Initial Harbour Asset Survey Recommendations

- Cordon off bridge to prevent pedestrian access (actioned)
- Investigation to determine the capacity of the girder and place load restrictions on the bridge. Action subsequent recommendations accordingly

Structural Recommendations

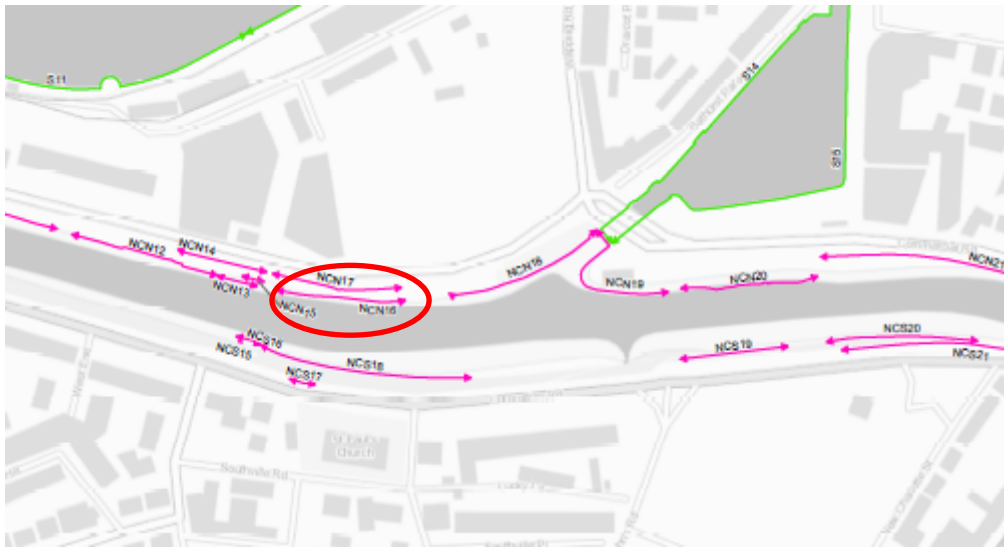
- Replace whole Structure. Estimated Cost = **£1,000,000.00**

Consequence of failure

Collapse of the structure poses serious risk to life, reputational risk, financial risk and loss of function of Underfall sluice gates. Loss of the sluice gates would result in a loss of the ability to control the water level in the harbour with far reaching consequences. Flooding and damage to property.

Asset No. 3 - NCN16 – Lower Level Masonry Retaining Wall on Cumberland Road

Location: Cumberland Road Adjacent to Bathurst Lock (now filled in)



Defects

The critical section of the asset is an area of lost masonry measuring 6m x 4.5m



Initial Harbour Asset Survey Recommendations

- Install and monitor survey points
- Undertake repairs of the critical section

Structural Recommendations

- Undertake full masonry reconstruction/masonry Repairs and underpinning at base
Estimate = **£1.550,000.00**

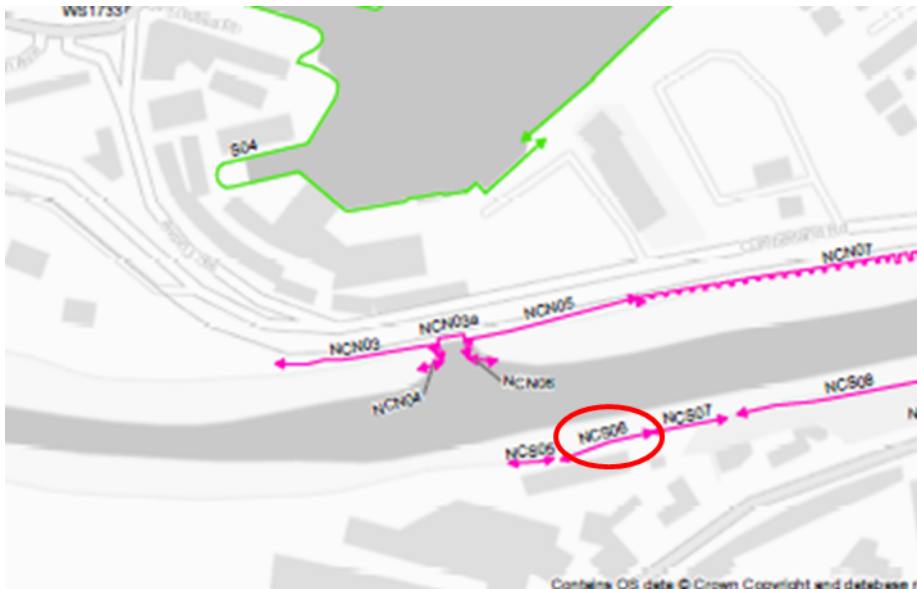
Consequence of failure

The failure of NCN16 could cause a failure in NCN17 resulting in a collapse of the footpath and partial collapse of Cumberland Road. There is a risk of major travel disruption.

Asset No. 4 - NCS06 – Lower level Stone Masonry Retaining Wall

Location

Riverside wall set back from Coronation road, adjacent to industrial / warehouse building



Defects

Several areas of collapsed wall along the length of the asset and the remaining masonry is generally in a poor condition as shown the image below.



Initial Harbour Asset Survey Recommendations

- Conduct investigation to gauge whether the asset is providing direct support to the building at the western end and to confirm the depth of foundations of the building behind.

Structural Recommendations

- Masonry Repair and rebuild along with some foundation underpinning
Estimated Cost = **£550,000.00**

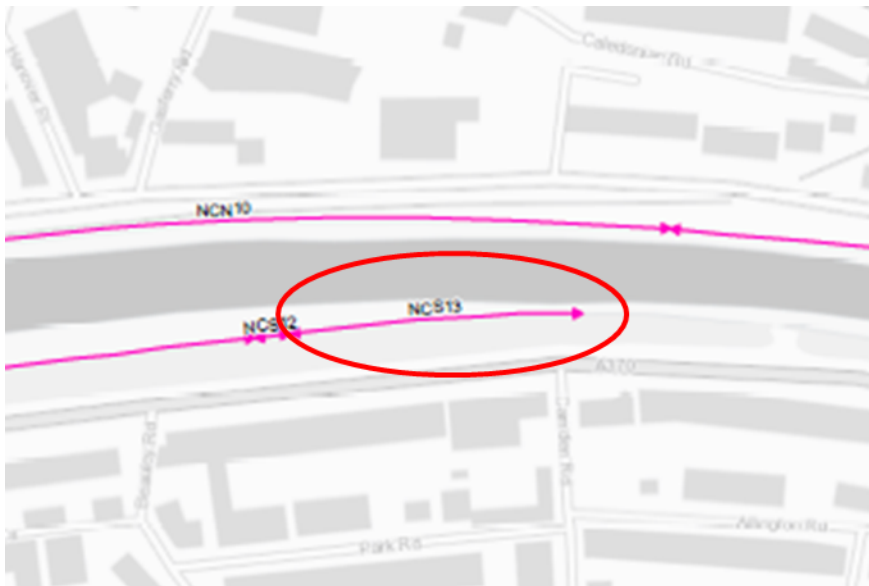
Consequence of failure

Potential for a loss of support to building foundations and the building could collapse, presenting risk to life.

Asset No. 5 - NCS13 - Lower Masonry Retaining Wall supporting Embankment

Location

Riverside wall adjacent to Coronation Road in vicinity of Camden Road



Defects

Numerous collapsed sections along the full length of the asset and the masonry is in a poor condition with deformations noted. Scour is affecting the rock outcrops which the asset is constructed on.



Initial Harbour Asset Survey Recommendations

- Install and monitor survey points
- Repairs to eastern section of the asset where the embankment is directly supported by the wall.

Structural Recommendations

- Masonry Rebuilds and repair along with some underpinning and rock anchoring at base.
Structural Estimate = **£850,000.00**

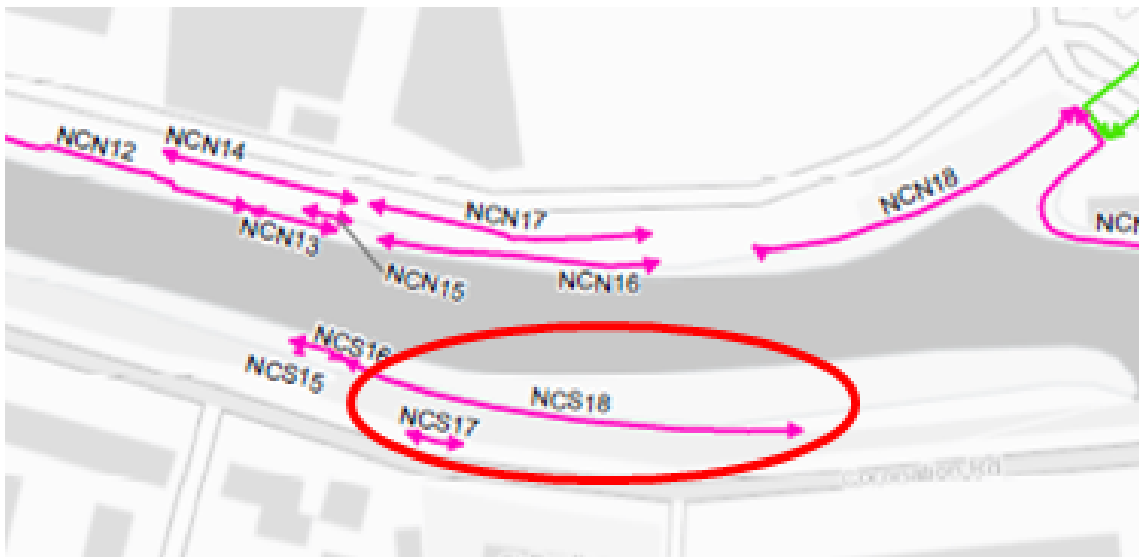
Consequence of failure

If there was a loss of support to the embankment, Coronation Road may be affected. There is a risk of major disruption to travel.

Asset No. 6 - **NCS18** – Lower Level Masonry Retaining Wall supporting slipway

Location

Adjacent to Coronation Road near Gaol Ferry Bridge



Defects

Several collapsed sections and areas of deformation along the length of the asset including slipway



Initial Harbour Asset Survey Recommendations

- Install and monitor survey points
- Repairs to the areas of deformation and collapsed sections where the wall directly supports the embankment.

Structural Recommendations

- Masonry Rebuilds and repair along with some underpinning and rock anchoring at base.
Structural Estimate = **£1,600,000.00**

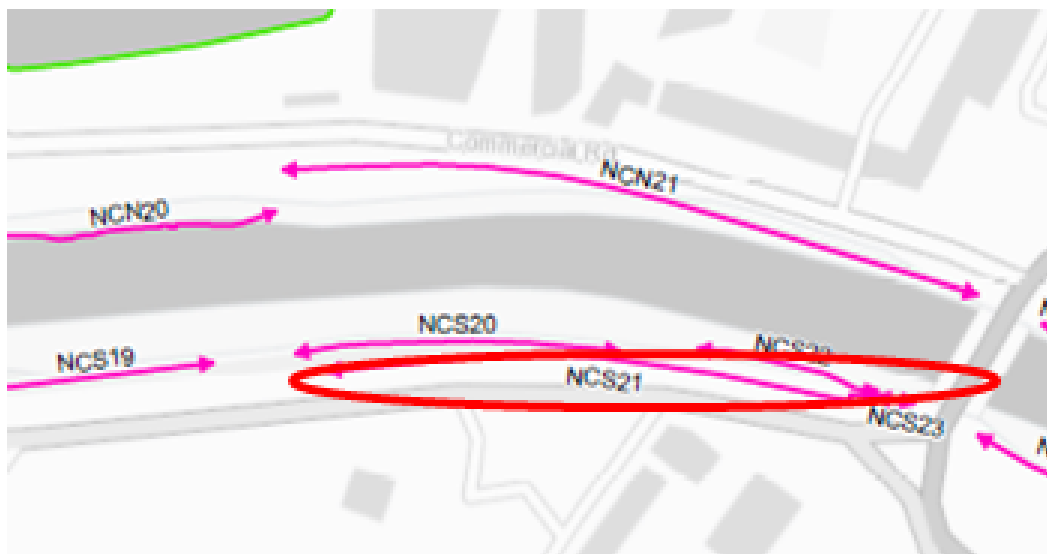
Consequence of failure

Coronation Road may be affected by a loss of support and failure. There is a risk of major travel disruption.

Asset No. 7 - NCS21 - Upper Blockwork extended Back of Footway River Wall

Location

Adjacent to Coronation Road east of Gaol Ferry Bridge



Defects

Significant deformed area situated at the eastern end of the asset



Initial Harbour Asset Survey Recommendations

- Protect rear of the footpath with barrier
- Undertake vegetation removal at critical location and repairs to the area of deformation.

- Remove upper Blockwork Wall and Railings and stabilise and then reconstruct.
Structural Estimate = **£300,000.00**

Consequence of failure

Loss of support/collapse of the footpath is likely in the event of a failure. Load restrictions and a partial closure would be necessary. There is a risk of major travel disruption.

Asset No. 8 - **NCS23** – Lower section of masonry wall supporting Asset : NCS21

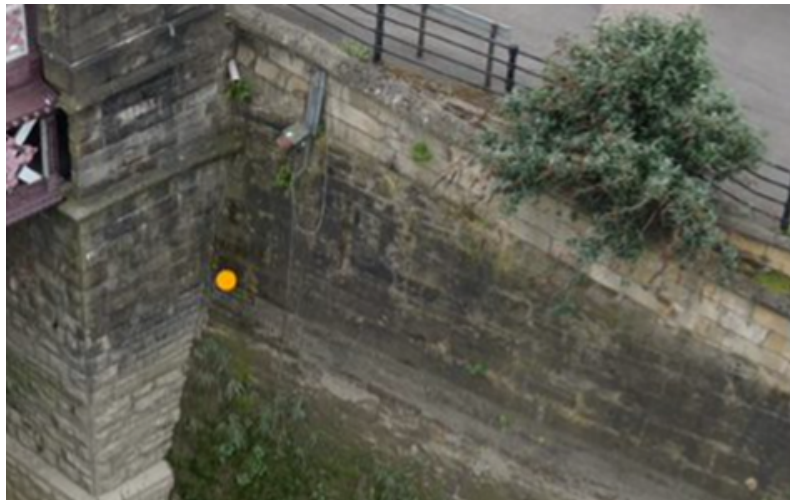
Location

Coronation Road adjacent to Bedminster Bridge Roundabout



Defects

Area of deformation at the crest of the wall adjacent to Bedminster Bridge roundabout



Initial Harbour Asset Survey Recommendations

- Protect rear of the footpath with barrier
- Vegetation removal at critical location
- Repairs to the area of deformation

Structural Recommendations

Stabilise lower level wall with rock anchors and repair masonry facing. Structural Estimate = **£400,000.00**

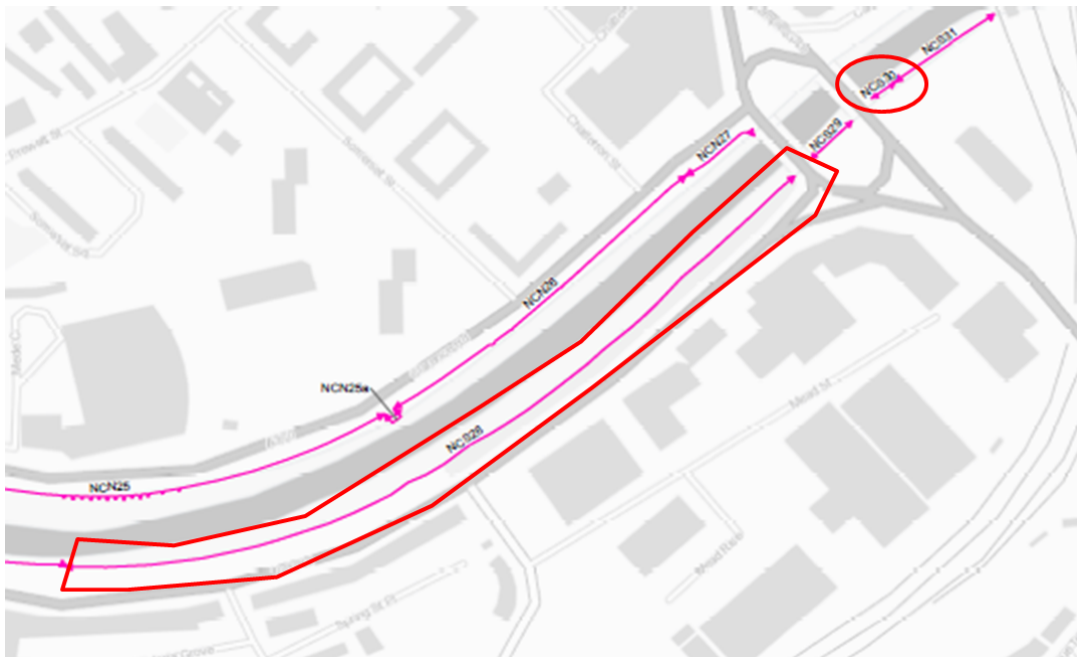
Consequence of failure

Loss of support/collapse of the footpath is likely in the event of a failure. Load restrictions and a partial closure would be necessary. There is a risk of major travel disruption.

Asset No. 9 - NCS28 – Lower retaining wall supporting York Road and Bridge

Location

York Road, critical location in vicinity of Langton Street footbridge



Defects

There are several areas of significant masonry loss and extensive deformed sections, particularly in the vicinity of Langton Street footbridge. The asset is generally in a poor condition along the entire length



Initial Harbour Asset Survey Recommendations

- Confirm the depth of foundations for Langton Street footbridge
- Installation of survey points on the asset and bridge

- Installation of survey pegs on the fill behind the asset

Structural Recommendations

Undertake full structural assessment and based on findings. Stabilise full extent of retaining wall
Structural estimate = **£2,750,000.00.**

Consequence of Failure

Immediate loss of support to York Road and to Abutments of Langton Court Road footbridge

Asset No. 10 - NCS30 - Upper level Masonry Retaining Wall & associated arches

Location

Immediately to the east of Bath Bridge Roundabout on south side of river



Defects

The arch adjacent to Bath Bridge Roundabout has failed from its springing point and the masonry is bulging significantly. There are also areas of collapsed masonry above this arch



Initial Harbour Asset Survey Recommendations

- Install barrier to prevent pedestrian access
- Installation of props or ties to restrain the bulging area and carry out repairs / reconstruction

Structural Recommendations

Undertake full assessment of deformed arches and take appropriate stabilisation measures and stabilise full masonry wall. Structural Estimate = **£300,000.00**

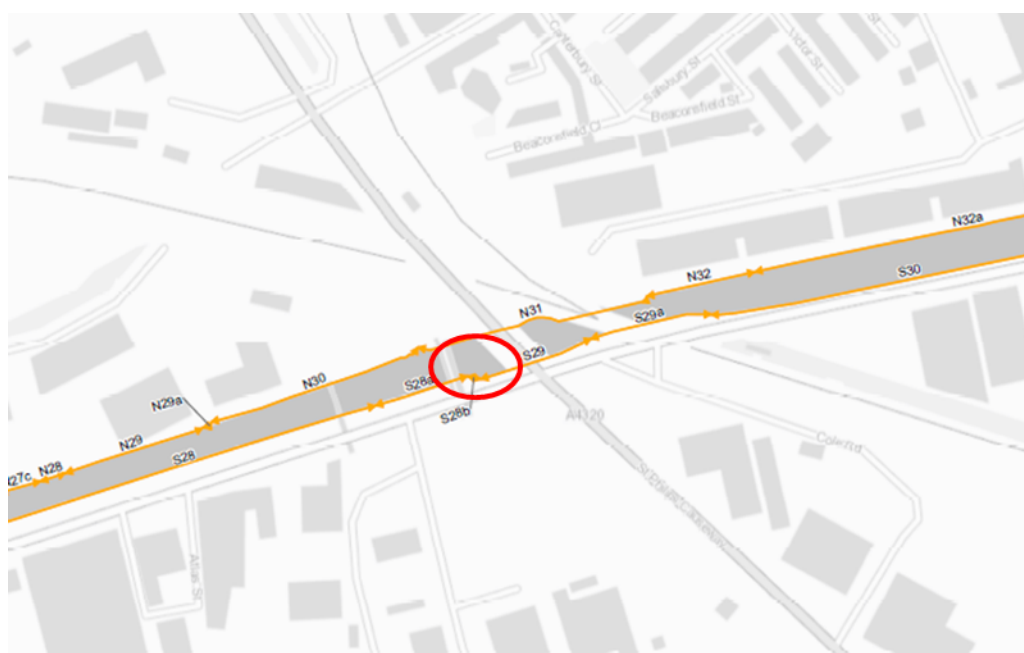
Consequence of failure

Collapse of the arch will cause a loss of support to the retained material leading to a collapse of Network Rail land, exposing the edge of the bridge abutment and is likely to affect the stability of Bath Road

Asset 11 - **S28b** - Feeder Road Canal Retaining Wall supporting Feeder Road

Location

North side of Feeder road (canal south bank), in vicinity of St Phillips Causeway flyover



Defects

There are large areas of lost masonry underwater at the western end and numerous capping beam failures along the length. There is an extensive amount of vegetation growth from gaps between the concrete planks. There are several large areas of deformation visible on the capping beam



Initial Harbour Asset Management Survey Recommendations

- Install survey points to monitor the asset for movement

Structural Recommendations

Underpin base of wall and stabilise retaining wall/ capping beam. Structural estimate = **£450,00.00**

Consequence of failure

Loss of support to the retained material would result in a collapse of the footpath and potentially a partial collapse of Feeder Road. Risk of minor travel disruption

Appendix A iii

1. NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall



This river retaining wall asset is showing substantial stability movement and condition depreciation of the south retaining wall over a distance of 100m, centred about the Langton Street Footbridge (Banana Bridge), but retaining the adjacent York Road. Whilst the failure of this river wall asset is unlikely to impact the footbridge or surrounding infrastructure, that potential of partial failure does immediately exist, so it does require immediate structural stabilisation attention, and would certainly require a partial closure of the adjacent Highway (York Road), in the event of any further displacement or observed movement. It is also worthy of note that the cost of mitigation will be substantially increased, should a full or partial collapse actually occur. This would be evidenced by the failure of Cumberland Road River Wall and the 12-million-pound stabilisation out turn cost, post failure.

2. NCN16 The Gateway/Slipway (Adjacent to Gaol Ferry Entrance Gate)



Whilst the (SP) Critical Asset Overview Report focused on the localised masonry defect to the West of this structural failure, this river wall will require full structural repair, the remaining 30m length of river wall collapse to the East is of a much more and far higher critical priority but has not been addressed fully in the (SP) Report. This 30m failure has exposed the existing sedimentary rock face on the river bank, so the structural reinstatement of the lower river retaining wall and the ultimate scour protection restatement, will ultimately support for the higher level secondary walls on Cumberland Road and thus is a very critical high priority.

3. **NCN21/23 Bedminster Bridge wingwall (Adjacent to Bedminster Old Bridge)**



This is purely masonry displacement (rotational hinging) in the adjacent bridge wingwall though vegetation growth and overburden, which is easily rectified via traditional masonry reconstruction methods. The remedial works are deemed to be high priority, as the failure to address this structural issue, could lead to a partial collapse, which could endanger the footpath and adjacent Bus Shelter users, and would make the repair costs substantially much higher, although the risk of such a collapse is considered medium to low at the present time.

Summary of the Identified workstreams & associated Current Investigation/Design Work Estimated Costs (From the £2.5m Capital funding)

1. NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall:	£435k.
2. NCN16 The Gateway/Slipway – Adjacent to Cumberland Road:	£514k.
3. NCN21/23 Bedminster Bridge wingwall – Adjacent to Coronation Road:	£150K
4. NCN-11 Gaol Ferry Rock Faces – Ecology/clearance/Survey and report (No design/GI)	£150k*
5. New Cut LIDAR survey/Data management:	£30k
6. Ecological Survey (Stage 1):	£20k
7. General De-vegetation (For LIDAR/Survey work):	£20k
8. BCC internal staff costs @ 15%	£200k
9. Initial Strategic Partner Report (Out-turn cost, including BCC staff costs)	£160k
10. Site welfare/accommodation (Preliminaries):	£45k
11. Diving surveys (Grain Barge and Feeder Canal)	£30k

Current total estimated/committed: £1.75m

*Item 4 (Gaol Ferry River Wall Rock Faces) the sum allows for the initial survey and reporting, which is a high-level overview, and the design of any remedial works/Ground Investigation, will be in the region of £300k (Additional to the above)

It is worthy of note that any remaining budget from the approved £2.5m (Over and above the £2m noted above) will be utilised in investigating additional collapses/defects, three of-which have been identified to the south bank, to the east of Vauxhall Footbridge subsequent to the Strategic Partnership Critical Asset Overview Report

Project Progress on Scoping the Preliminary D&B Design Investigatory Works (Identified 3 High Priority Assets)

The mobilising of a Principal Contractor and Principal Designer for this level of commission work, is a time-heavy task due to the requirement for the accurate investigatory scoping of the works, the availability and lead-times for the Contractor, the nominated Consultants and the specialist Sub-Contractors, and the gaining of the required ecological licences and associated Environment Agency (EA) permissions. However, in order to expedite the mitigation of these identified works as the Bedminster Bridge works and the required minor design input, it has been decided to prioritise these works to simply progress with construction and to mobilisation to site.

NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall & NCN16 The Gateway/Slipway (2 of the 3 High Priority Walls)

With regard to NCN-28 and NCN-16, Both of these projects are potentially highly complicated, as until we have completed Stages 1 & 2 of the D&B designs (Including the Ground Investigation) the extent of the works remains unknown, although the budget costs discussed to-date are based on a piled solution, such being the most obvious approach.

NCN-28 and NCN-16 Project Programme Timeline to date:

- The draft Scope document was issued on 25th July 2023 (Design Stages 1 & 2)
- The budget quotation was received on 7th September 2023 (Design Stages 1 & 2)
- The Purchase Order issued on 3rd October 2023 (Design Stages 1 & 2)

The Principal Contractor and Designer are now engaged and are preparing the Ground investigation Scope and Specification for Client approval, as well as engaging in a desk study and liaison with Statutory Undertakers, and external stakeholders.

Bedminster Bridge - NCN-21/23 (last of the 3 High Priority Walls) - Programme Timeline to date:

- The draft Scope document (Design and Construction) was issued on 25th July 2023
- The budget quotation was received on 7th September 2023
- The Purchase Order issued on 3rd October 2023.

This facilitates the Principal Contractor (AGCL), to officially appoint the Principal Designer (Hydrock Consultants) who have noted a two-month design time, so the programme is showing a site commencement date in early 2024, with a revised budget estimate in the region of £150k + Prelims and added 40% Contingency.

Summary of additional other Secondary Project Workstreams

- Light Detection and Radar (LIDAR), survey of the full entirety of the New Cut River – Full Scope document to be compiled and issued by end of November. This will enable ongoing movement monitoring and modelling.
- Monitoring of the remainder of the Cumberland Road Chocolate Path Wall - This will be covered using in-house personnel and equipment - Survey stations to be marked-out and baseline survey to be completed within three weeks.
- Gaol Ferry Rock Faces (Inspection and assessment) - Phase 1 Scope document (Site clearance) issued 3rd October 2023.

Appendix A - iv

Harbour River Walls Assets - Detailed Cost Estimates for each separate identified Site

NCS-28	Banana Bridge Wall construction	£6,000,000.00	Phase 1 - 4 of the design covered under P15148-1001 (Investigation)
NCN-16	Gaol Ferry Wall construction	£3,000,000.00	Phase 1 - 4 of the design covered under P15148-1001 (Investigation)
NCN21/23	Bedminster Bridge wing wall repair	£0.00	Covered under P15148-1001 (Investigation)
NCN-11	Gaol Ferry Rock Faces	£1,500,000.00	Site clearance and investigation/report covered under P15148-1001 (Investigation) - Construction works likely to involve the installation of RC scour walls
NCS-06	Bristol Metal Spraying – Masonry repairs		Ecology/Site clearance covered under P15148-1001 (Investigation)
	Access provisions (Cantilever scaffold/plant)	£5,000.00	
	Manpower (assuming 10 gang days)	£15,000.00	
	Materials	£2,000.00	
	Welfare	£2,000.00	
NCS-13	Camden Road - Masonry repairs		Ecology/Site clearance covered under P15148-1001 (Investigation)
	Access provisions (Cantilever scaffold/plant)	£2,000.00	
	Manpower (assuming 3 gang days)	£4,500.00	
	Materials	£1,000.00	
	Welfare	£1,000.00	
NCS-18	Gaol Ferry Bridge Ramp – Masonry repairs		Ecology/Site clearance covered under P15148-1001 (Investigation)
	Access provisions (Cantilever scaffold/plant)	£5,000.00	
	Manpower (assuming 10 gang days)	£15,000.00	
	Materials	£2,000.00	
	Welfare	£2,000.00	
S28b	Feeder Canal Barge Jetty		Investigation/Ecology/Site clearance covered under P15148-1001 (Investigation)
	Diving team for five days	£8,000.00	Assuming a simple infill repair methodology
	Materials	£2,000.00	
	Welfare	£1,500.00	
	Total	£10,568,000.00	

Equality Impact Assessment [version 2.9]



Title: Structural Repairs to Floating Harbour and New Cut River Walls	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Shaun Taylor
Service Area: Highways and Traffic	Lead Officer role: Highway Service Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Evidence Base:

Main Introduction

The purpose of this overarching proposal is to deal with the ongoing extremely poor existing structural condition of the identified River retaining walls within Bristol which not only support the Adopted Public Highway, harbourside, verges, quayside but also support the infrastructure contained within, including all services, embankments and tree lined footways and cycleways along the harbourside and the “New Cut” river.

Any potential structural failure Harbour and “New Cut” retaining river wall assets, could result in potential loss of life or serious injury, major flooding, adjacent property damage and immediate closure of the strategic Highway Network in the vicinity of failure with knock on associated Citywide traffic congestion impacts, with resultant financial, environmental, and corporate/reputational damage to the Authority and the overall full local economy and Southwest region.

Previously Capital funding was approved to undertake further research and investigation into the overall number and structural condition of these river walls with indication of level risk of potential failure and loss of the above riverwall and harbour assets. Below is a detailed history and summary of the previous condition reports undertaken in 2019/20 as well as further investigations undertaken by our Strategic Partner (SP) in 2023. These have been included here to give an overall detailed background on how this project has progressed to date in its scoping and investigatory phase, which is now enabling BCC to get a much better picture of the existing level of remaining risk, the strategic risk based approach and the overall likely long-term Capital costs and programme to resolve this issue and for BCC to comply with its overarching statutory duty in the matter.

The overall objective in this Overarching EQIA to progress with the overall Cabinet approval to continue with this Project to deal with these failing assets in a controlled and risk assessed priority manner. Below is a further detailed description of the Project to date and the previous levels of Cabinet Approvals already granted and for our new proposed tranche of work to progress with this ongoing Major Capital Project.

Overleaf is the background and executive summary to give the reader the extent of research and investigation that has brought this EQUIA to this point and to gain the required approval to proceed with this project.

Executive Summary of Findings from previous Decision Pathway (DP) Report Papers on this Project

From the original Floating Harbour and river asset condition survey undertaken in 2019/20 there are **194** retaining river wall assets identified within the Floating Harbour and New Cut waterways. The second Cabinet Decision paper further focused only on **11** highest priority retaining wall asset structures of **68** river retaining walls that were found to be in a critical or serious structural condition.

Ongoing deterioration of the New Cut River Walls and potential additional structural issues and failures

The “New Cut” river was constructed between 1804 and 1809 using materials and methodologies available at that time, which were mainly masonry and using hydraulic lime mortar, and these assets have endured and performed remarkably well, considering the lack of ongoing preventative maintenance undertaken over the many decades. It is however now highly apparent that the masonry Facing River Walls are deteriorating very rapidly, with three new breaches in recent years to the south bank, just East of Vauxhall Footbridge being noted since the issue of the original (SP) Condition Report in June 2023.

Therefore, in general all these New Cut River walls support Coronation Road and Cumberland Road, which are both major strategic highway routes, so as part of the current investigation works, which our Term Maintenance Contractors have been additionally commissioned to carry out a full-length de-vegetation and provide further estimate costs for a new photogrammetry/hands-on condition survey and further investigation/assessment to determine overall condition.

Consultant Strategic Partner (Asset Condition Report on New Cut River Walls – June 2023)

The BCC overview, considered, that this Condition Report, whilst being relatively generalised regarding the subject matter and providing no direct immediate recommendations, was very much biased towards creating ongoing investigatory workstreams and further ongoing investigations, through to the ongoing recommendation of further high-tech monitoring and geotechnical investigations, for the vast bulk of the high risk structures identified. It was immediately deemed by BCC as not being of good “Engineering Value” at this time, and was not dealing with the immediate real risk to the overall road Transport Network, thereby prolonging the ongoing continuing risk without putting in place suitable timely mitigation measures.

The BCC preference route here would be to intervene now with timely suitable proportional stabilisation measures (including targeted streamlined suitable investigations), to enable an appropriate proportional reduction of immediate river wall failure risk, rather than prolonged further ongoing investigations and monitoring.

Further failure “Risk Profiling” has been undertaken by BCC, based primarily on the information within the Condition Report, but also using BCC’s own extensive experience and expertise on these matters. BCC believe that there can now be a controlled “Risk Based” acceleration of the actual Works programme with the ultimate removal of the various identified critical risks by undertaking differing structural stabilisation routes, rather than to continue to monitor/investigate as recommendations in the Report, thereby removing each targeted critical structural risk as deemed appropriate, in good and appropriate time.

This is now the preferred project delivery route and BCC are recommending this route is taken, as this will allow the Authority, having now just critically risk reprofiled 8 of the 11 critical structures, BCC is then be left with three remaining high-priority River Wall structures as listed below:

1. NCN28 Langton Street Bridge/Banana Bridge River Retaining Wall – Retains York Road
2. NCN16 The Gateway/Slipway (Adjacent to Gaol Ferry Entrance Gate) – Retains Cumberland Road
3. NCN21/23 Bedminster Bridge wingwall (Adjacent to Bedminster Old Bridge) – Retains Coronation Road

Other Options available for the BCC as to reduce or remove overall risk to the Strategic Transport Network

Summary of Possible Options

<u>Summary of Possible Options</u>	<u>Capital Cost</u>	<u>Overall Risk Level</u>
Option 1 – Do Nothing	Zero Cost	High & unacceptable risk.
Option 2 – Do Minimum - (2023 into 2024) Over 1 Year (Per annum)	£80k	High but monitored risk.
Option 3 – Short term option – (2023 through to 2028), Over 5 years	£10.90m	High\Med controlled risk.
Option 4* – Medium Term Option – (2023 to 2028), Over 5 years	£11.00m	Med\Low Controlled risk.
Option 5 – Long term Consideration – (2023 –33), Over 10 years (Per annum)	£1.00m	Low controlled risk.

Overall Forecast Project Programme Finances

Identified Capital Funding Requirement to complete the New Cut River Walls Project - Recommended Option 4*

This (DP) Report has now identified Option 4 as the recommended option, and as noted under that option, there is now a forecast cost of **£10.90m**, which allows for the works to the three High Priority critical assets as identified in the Condition Report, and a preliminary sum for the anticipated works to the Gaol Ferry River Wall Rock Faces, along with further additional other priority 2 river facing wall structural investigations.

However, it has also now become apparent that the Underfall Sluice Bridge (originally descope from the River Walls Project), will now need to be re-introduced back into the scope of this project, as BCC Docks have been granted a **£1.80m** Grant from the Environment Agency (EA), to undertake flood defence mitigation works, which encompass this currently sub-standard structure. These works are due to commence in 2024, therefore the structural works to the Underfall Bridge will need to be rescope back in and included within the forecasted costs, with an anticipated cost of **£1.00m** (Including the full assessment, design, and construction).

Final Summary of Capital Budget now required to complete full Programme of New Cut River Wall Works

- | | |
|--|-----------------|
| • Recommended Option 4. | £10.90m* |
| • Reintroduction of Underfall Sluice footbridge bridge | £1.00m |

Total Estimated Costs at this juncture of the project

£11.90m

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	

Additional comments:

As this overall major Project progresses, Various distinct individual sites will be prioritised and dealt with as separate Sub Projects, so in affect the potential of EQIA effect will be variable in term of programme time and extent. It is therefore proposed to undertake separate EQIA's for each sub-Project on an ongoing basis, as the overall major Project progresses.

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes No [please select]

BCC have not yet identified any major overall Project specific distinct and clear Equality Impact criteria at this stage of this overall major Project as the current Project is now only at an "enabling scoping Investigatory phase", so as such at this point of progress each separate river wall structure as is described within the overall Project Reporting will have to have a site specific separate Structure sub Project EQIA undertaken, purely based on the unique site specific river wall conditions, specific design and construction requirements, which have yet to be fully understood, developed, designed and further detailed.

Currently this Project is very at an early Project enabling and investigation stage, so therefore there is no generic overarching Project Equality Impact Assessment at this present time as currently there are too many unknown "variables" yet to be detailed and Project specific details made known BCC are to progress overall Main Project.

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Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: 
Date: 9/1/2024	Date: 9 Jan 2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.



Environmental Impact Assessment [version 1.0]

Proposal title: New Cut River Walls – Stabilisation Project	
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input type="checkbox"/> Full Business Case	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Changing <input type="checkbox"/> Already exists / review
Directorate: Growth and Regeneration	Lead Officer name: Chris Dooley
Service Area: Highways and Traffic	Lead Officer role: Bridges and Highways Structures Manager

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council’s policies and supports the council’s strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

Ongoing structural stabilisation repairs and/or rebuilding of identified high risk river walls supporting the public highway along the New Cut River corridor, as identified within the Cabinet Decision paper.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If ‘No’ explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If ‘Yes’ complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No [please select]

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If ‘Yes’ please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable [please select]

If ‘No’ explain why environmental impacts have not been considered as part of the options appraisal process.

The options presented in this paper detail the overall approach, relative costs, impacts on structural integrity of the harbour and New Cut river wall assets, and knock on effects on associated transport networks of several options. The environmental impacts of specific works will be assessed throughout the full design process following further investigatory work.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our corporate environmental objectives and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future. **Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.**

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)

Structural integrity works require hard engineering solutions in most cases and offer very limited opportunity for substituting materials or practices for less carbon intensive approaches. Ensuring structural integrity of the harbour and new cut river wall assets is a strategic necessity to protect life and the transport network from potentially significant damage.

ENV1 Carbon neutral: Emissions of climate changing gases

BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving net zero by 2030.

Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes

Benefits

Whilst even a pre-emptive approach will likely require large volumes of steel and concrete, stabilising will in most cases be less carbon intensive than remedial works following structural collapse, which as demonstrated by the Cumberland Road project, can require significant amounts of new steel and concrete.

Extending the lifetime of the full complex of river wall structures within and along the New Cut River Corridor transport road and footway systems which supports active travel for citizens.

Enhancing actions

Some of the projects have the potential to incorporate new cycle paths. This will be further investigated through the design phases.

Persistence of effects: 1 year or less 1 – 5 years 5+ years

<p>to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>	<p>Given the scale and nature of the required works it is very likely that significant quantities of steel and concrete will be required. The proposal is at a very early stage for all but one of the identified work packages and so specific designs and material requirements are not yet known.</p>
	<p>Mitigating actions</p>	<p>As part of the investigation and design phases, detailed assessments of materials will be carried out. During procurement of works suppliers will be asked to provide quotes for the provision of low carbon concrete and low carbon steel if available and suitable for the project.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input checked="" type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Ecological surveys will be required in some areas providing detailed assessments and required mitigation actions.</p> <p>A structural collapse would likely cause significant disturbance of riverbed silt and negatively impact ecology, stabilising works will significantly reduce this risk.</p>
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Vegetation clearance is required in specific areas to allow additional condition surveys, however these areas are relatively small and quick recovery is expected based on species present.</p> <p>Machinery will generate noise during works.</p>
	<p>Mitigating actions</p>	<p>Mufflers will be used on plant where possible.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	

<p>less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Adverse impacts</p>		
	<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>			
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>Refurbishing these assets will make it more resilient to instances of extreme heat/cold and increase river tidal levels.</p> <p>Reduce the risk of failure of these river walls and to maintain the transport infrastructure as well as reduce the risk of flooding by maintain existing assets.</p>	
	<p>Enhancing actions</p>		
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>		
	<p>Mitigating actions</p>		
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>			
<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air,</p>	<p>Benefits</p>		
	<p>Enhancing actions</p>		
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		

water, or land and what steps will be taken to prevent pollution occurring. Further guidance <input type="checkbox"/> No impact	Adverse impacts	Structural integrity works require hard engineering solutions in most cases and offer very limited opportunity for substituting materials or practices for less carbon intensive approaches. There is the potential for debris, and spills of liquid fuels, oils or paint to enter the river during works.
	Mitigating actions	Enclosed scaffolding to catch all debris and taken away from site. Particular care to be given by contractors when dealing with elements that have possible loose materials. Particular care to be taken when using any equipment or materials that require liquids. Spill kits and procedures to be prepared and available on site.
	Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	

Step 3: Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project’s implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Incorporation of possible incorporation of additional cycle routes to be included in design specifications where possible.	Chris Dooley	2024 - 2028
During procurement of works breakdown of materials use to be included as a requirement. Request for quotes to include low carbon concrete and steel where available and suitable.	Chris Dooley	2024 – 2028
Contracted works to demonstrate detailed plans for pollution prevention approaches and responses before works begin.	Chris Dooley	2024 –2028

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the ‘evidence base’ section of the decision pathway cover sheet.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
BCC’s Environmental Impact Assessment has determined significant beneficial impacts from the proposal: Stabilising works will improve the resilience of the harbour / new cut assets which will come under increasing pressure as the frequency of extreme temperatures and flood events increases.
Summary of significant adverse impacts and how they can be mitigated:

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.

BCC's Environmental Impact Assessment has determined significant negative impacts from the proposal: Stabilising and remedial works will likely require significant quantities of steel and concrete that have large carbon emissions associated. Detailed assessments of the quantities will be made as the project develops and opportunities for provision of lower carbon materials will be investigated through the procurement process.

Environmental Performance Team Reviewer: Daniel Shelton	Submitting author: Chris Dooley
Date: 11.12.23	Date: 11.12.23

Decision Pathway – Report

PURPOSE: For noting

MEETING: Cabinet

DATE: 06 February 2024

TITLE	Bristol’s first Citizens’ Assembly recommendations – Final Update 03		
Ward(s)	Citywide		
Author: Tim Borrett	Job title: Director: Policy, Strategy and Digital		
Cabinet lead: Cllr Ellie King	Executive Director lead: Stephen Peacock, Chief Executive Officer		
Proposal origin: Councillor			
Decision maker: For noting			
Decision forum: For noting			
Purpose of Report:			
<ol style="list-style-type: none"> 1. To provide a final update to Cabinet on consideration of the recommendations and actions put forward by the Citizens’ Assembly. 2. To present the Citizens’ Assembly tracker to Cabinet to demonstrate how progress against these actions has been measured. 3. To update Cabinet where and how the Citizens’ Assembly has influenced other activities and the 2023–24 Business Plan. 			
Background			
<ol style="list-style-type: none"> 1. In January 2020, Full Council decided to trial deliberative democracy processes in 2020/21. This work was led by Cllr Asher Craig and Cllr Paula O’Rourke, recognising that it was cross-party support in the council chamber that facilitated the investment in new forms of engagement. 2. Using a sortition process, a representative cross-section of the city was identified. The 60 members of Bristol’s Citizens’ Assembly convened over 30 hours from January to March 2021 to hear detailed evidence and deliberate three topics under the overarching question “How do we recover from COVID-19 and create a better future for all in Bristol?”. This question and the three themes that were pulled out for deliberation were based on a broader survey, in which we heard about the experiences of thousands of people in the city and how these had been impacted by the pandemic. 3. A report was presented to Full Council on 6 July 2021 that described the process and the resulting 17 recommendations, comprising 82 actions, and rationale produced by the Assembly. For the remainder of this report, ‘Recommendations’ is capitalised to denote reference to the one or more of the 17 formal recommendations in the Citizens’ Assembly report, and ‘Actions’ is capitalised when referring to any of the 82 actions. 4. Since being presented to Full Council, the recommendations were used to shape Council’s updated Corporate Strategy 2022–27. They have also been used and embedded in the Council’s annual service and business planning process. The report of the Citizens’ Assembly’s Recommendations and proposed Actions have been shared with the One City Economy Board and other One City Boards for consideration and in preparing the 2023 refresh of the One City Plan. 5. The first update on Bristol’s first Citizens’ Assembly recommendations went to Cabinet on 18 January 2022 and the second update to Cabinet on 2 August 2022. This report provides a third and final update for Cabinet to note. 			
Insights and influence of the Citizens’ Assembly			
<ol style="list-style-type: none"> 1. The Citizen’s Assembly has impacted the council’s approach to deliberative democracy and participatory 			

budgeting. The Community Resilience Fund applied deliberative democratic and participatory decision-making processes to award the CRF funding of £4m to Voluntary Community Social Enterprise (VCSE) organisations from across Bristol. The Council worked with TPX Impact to engage communities at a neighbourhood level in the spending of money set aside as part of the Fund, and we are exploring how this process can be applied in other areas. Drawing on lessons learnt from undertaking the Citizens' Assembly, the CRF embedded evaluation into its process and maintained more direct engagement with participants.

2. The Recommendations have been used to inform our Corporate Strategy and Business Planning. In our most recent business plan 2023-24, which was approved at Cabinet in April 2023, included actions directly responding to Citizens' Assembly Recommendations or Actions, for example:
 - Increase provision and availability of supported housing, Housing First and move on accommodation. Service users will include single homeless clients, ASC service users and Care leavers, via a joined-up approach between key council services. This will be supported by the Government's Single Homelessness Accommodation Programme.
 - Use income generated from the Clean Air Zone, that will improve air quality in the city, to help fund transport projects that have safe and active travel at their heart.
 - Develop active travel programmes and Liveable Neighbourhoods to ensure we are making best use of the public realm. This will include trialling elements of the East Bristol Liveable neighbourhood scheme.
 - Develop the Building Bristol initiative that supports local developers with employment and skills plans. This will help ensure developments deliver employment, apprenticeships, work experience and training through construction projects. Activity will include developing a revised charging model, developing a new 'buddy' scheme, and integrating the initiative into major developments.
3. The recommendations of the Citizens' Assembly have also been included in the One City Plan redraft where appropriate, and influenced the One City post-Covid Economic Recovery and Renewal Strategy.

Next Steps

1. This will be the final report and tracker of the Citizens' Assembly in this form.
2. The Council is currently drafting its Business Plan for 2024–25 which will be published in April 2024 and as before, where feasible, Actions and Recommendations from the Citizens' Assembly will be embedded into this plan.
3. In May 2022, Bristol voted in a referendum to move from the existing mayoral model to a committee model of governance. This will take effect from 5 May 2024.
4. The Actions and Recommendations from the Citizens Assembly can continue to inform any future review of key corporate strategies, planning and delivery plans, subject to the views of a new council administration.

Lessons Learned

4. As the third and final Citizens Assembly update of this administration, officers have been asked to provide reflections on the Citizens Assembly process and lessons learned should future administrations undertake similar initiatives:
 - a. While the actual Citizens Assembly was fully funded and resourced, the recommendations and actions were not individually costed, nor were the resource requirements on individual services to support delivery. A future similar exercise needs to consider evaluation and resource for follow-up activity.
 - b. Future Citizen Assemblies may benefit from a tighter scope for discussion. To better support the deliverability of subsequent recommendations and actions. The question posed to Bristol's first Citizens Assembly was, "*How do we recover from COVID-19 and create a better future for all in Bristol?*". This was a broad subject matter that encompassed a significant area of work for the council and wider city. Of the 82 actions agreed, the majority (75 of 82) have been assessed to determine whether and how they can be taken forward. However, we have not been able to fully assess and agree a way forward for seven actions. This is either due to their complexity, capacity

within the council, balancing them against other priorities, or which require formal governance before they can be taken forward.

- c. The total number of actions and activities that such a broad question produced presented challenges in delivering against them all. A tighter and more focused scope could lead towards SMART (Specific, Measurable, Achievable, Relevant and Time-bound) objectives.
- d. To ensure citizens have clear expectations of what the council can deliver, future Citizen Assemblies should be more clearly confined to what the Council and partners can legally do. Of the 82 Actions there were 12 Actions deemed as not feasible for the Council to deliver on the basis that they would require a change in national policy, legislation or regulation. The legal parameters in which the Council operate could have more clearly been articulated as part of the Citizens' Assembly to support expectation management with citizens and partners.
- e. The main avenue for the Council to update on progress against recommendations and actions was through Cabinet updates. While this is an important process to ensure progress and accountability, any future Citizens Assembly should plan, cost and resource a detailed communications plan to accompany the activity.

Further information

1. Information about the actions and updates in activity is available in appendix Ai (overall information about the actions) and Aii (a tracker containing all the Actions and updates).

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Notes the final update report and influence of the Citizens' Assembly 2021
2. Notes the Citizens' Assembly tracker and other detailed information included at Appendix Ai and Aii.
3. Notes how the Recommendations have been embedded into the most recent Business Plan for 2023–24.
4. Notes the lessons learnt for future initiatives like the Citizens' Assembly

Corporate Strategy alignment:

1. The Corporate Strategy emphasises that all Bristol citizens have a role to play in shaping the city. The deliberative democratic process of a Citizens' Assembly puts this emphasis into practice and demonstrates how citizens can feel empowered to make fundamental changes to the city.
2. The recommendations of the Citizens' Assembly, as outlined in the above section, has directly fed into the themes and specific priorities throughout the new Corporate Strategy 2022–27 and the 2023–2024 Business Plan.

City Benefits:

1. This assembly has given BCC new ways and approaches of listening to the diverse views of the people of Bristol, capturing these and feeding them into the city's recovery and renewal planning.
2. Citizens' Assembly provided invaluable public opinion on the questions facing us on health and wellbeing, transport, and climate change which has informed several Bristol City Council and One City Strategies

Consultation Details:

1. As part of a Bristol City Council programme of citizen engagement called 'Your City Our Future', a series of focus groups during July was followed by a citywide survey of citizens during August and September, which received over 6,500 responses.
2. The Council has sought to work with communities to ensure their diverse perspectives, ideas and priorities. The Citizens' Assembly was a trial in deliberative democracy. Bristol's Citizens' Assembly brought together 60 residents from Bristol - reflective of Bristol's local diversity in terms of age, sex, disability, ethnicity, geography, deprivation, and employment.
3. The Corporate Strategy 2022–27, which used the report of the Citizens' Assembly within its evidence base, was subject to public consultation in August 2021.

Background Documents:

[Corporate Strategy 2022-27 \(citizenspace.com\)](#)
[Bristol City Council Business Plan 23-24](#)
[Bristol's first Citizens' Assembly – Outcomes Progress Report 1](#)
[Bristol's first Citizens' Assembly – Outcomes Progress Report 2](#)
[How do we recover from Covid-19 and create a better future for all in Bristol? Report from Bristol Citizens Assembly](#)

Revenue Cost	£ n/a	Source of Revenue Funding	n/a
Capital Cost	£ n/a	Source of Capital Funding	n/a
One off cost <input type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>
Required information to be completed by Financial/Legal/ICT/ HR partners:			
<p>1. Finance Advice: This report provides an update on the recommendations and actions put forward by the Citizens' Assembly, how these actions will be measured going forward and how the Citizens' Assembly has influenced the 2023-24 Business Plan. There are no financial implications as a result of this report. Any funding required to progress the individual actions referred to in this report will need to follow the appropriate decision pathway and governance route.</p>			
Finance Business Partner: Kathryn Long, Finance Business Partner (Resources), 04 January 2024			
<p>2. Legal Advice: There are no specific legal implications arising from this report.</p>			
Legal Team Leader: Husinara Jones, Team Manager/Solicitor, 20 December 2023			
<p>3. Implications on IT: I can see no implications on IT in regard to this activity.</p>			
IT Team Leader: Alex Simpson, Lead Enterprise Architect, 19 December 2023			
<p>4. HR Advice: No HR implications evident.</p>			
HR Partner: Kirstie Macrae, HR Consultant, 28 December 2023			

EDM Sign-off	Tim Borrett: Director, Policy, Digital and Strategy	24 January 2024
Cabinet Member sign-off	Cllr Craig Cheney: City Economy, Finance & Performance	08 January 2024
For Key Decisions - Mayor's Office sign-off	Mayor's Office	08 January 2024

Appendix A – Further essential background / detail on the proposal Ai. Citizens' Assembly actions update, January 2024 Aii. Citizens' Assembly action tracker	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	NO
Appendix E – Equalities screening / impact assessment of proposal	NO
Appendix F – Eco-impact screening/ impact assessment of proposal	NO
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO



Summary information on progress of Actions identified during the Citizens' Assembly

1. The Citizens' Assembly produced 17 Recommendations. Each Recommendation has a rationale and there are a total of 82 associated Actions which Assembly members felt would:
 - a) rapidly reduce the impact of our homes on climate change,
 - b) make changes to our neighbourhoods to make traveling easier, healthier and better for the environment,
 - c) tackle health inequalities in Bristol.

2. At the time of writing (January 2024), following engagement with council officers, 75 of the 82 Actions have been fully assessed. Pending further changes, of these:
 - i) 13 Actions have been agreed in principle and, subject to any necessary Cabinet or budget approvals, will be progressed as set out.
 - ii) 29 Actions have been agreed in principle but are delivered by proxy or alternative activity which closely aligns to the intention of the recommended action.
 - iii) 21 Actions are being taken forward in part.
 - iv) 7 Actions are still under assessment to identify the appropriate service or partner to deliver them.
 - v) 12 Actions have been currently deemed not feasible for the Council to deliver on the basis that they would require a change in national policy, legislation or regulation.

3. In addition to the 10 Actions in the second Cabinet update that were deemed not feasible, two further Actions have now been assessed and deemed not feasible for the Council to deliver. This includes:
 - **Action:** Bring the buses back into public ownership e.g Reading buses to improve provision for everyone including a single flat fare (regardless of peak or off peak times) that covers all public and active transport (e.g. funding for bike storage) in West of England Combined Authority (WECA) by 2023.
 - **Outcome:** The Council does not have the required powers to bring forward a municipal bus company, despite support for public ownership.

4. There remain 13 Actions agreed in principle and, subject to any necessary Cabinet or budget approvals. A notable example of this includes:
 - **Action:** Require local planning agreements such as Section 106 and Master Plans to prioritise communities' health needs.
 - **Outcome:** Public health teams and TRUUD (Tackling the Root causes of Unhealthy Urban Developments) worked closely with the Local Plan team on integrating health into the new Plan. This has now been published for formal comment, as required by regulations, ahead of examination during 2024. The Plan is currently on target for adoption in Spring 2025.

5. There are 29 Actions that were agreed in principle but are delivered by proxy or alternative activity. An example of this includes:

-
- **Action:** Investigate Scandinavian housing models and conduct a feasibility study to ensure inclusion, address homelessness and improve the efficiency of poor housing stock where necessary.
 - **Outcomes:** Progress with the development of modern methods of construction (MMC) homes in Bristol continues with planning consent achieved for the Council's own MMC sites at Bell Close, Romney House and Marshall Walk. These all have commenced development by the end of 2023/24 and will complete in 2024/25. The Derby Street Solohaus project with the Hill Foundation is on site and completes in September. This will deliver eight modular single person pods in partnership with Places for People Living Plus. Innovative MMC continues to develop across Bristol to support the delivery of affordable housing, and within the Council there is a new focus on accelerating the delivery of new homes for a range of affordable housing uses. This includes the meanwhile use of future development sites as the location for de-mountable, modular homes to use as Temporary Accommodation and with EDEROTH, an affordable housing developer, on Housing Revenue Account (HRA) sites identified, as part of the Smart Cities Climate Challenge programme, delivering 29 homes over six sites (subject to planning).
6. As of January 2024, there are 7 Actions which are still under review. These include:
- **Actions:** Make existing charities and youth organisations the first point of contact for young people and families. Fund these local and grassroots groups to provide well trained youth leaders to build relationships in the community and deliver a wider range of joined up services.
 - **Outcomes:** Physical opening of three Family Hubs has now been achieved. Family Hubs will further develop to offer services for young people to 18yrs or 25yrs and recommissioning of youth services is now being progressed to support smaller organisations.

A tracker (Appendix Aii) was produced to follow up progress on the Recommendations and Actions. Included in the tracker:

- The overall Recommendations
- The One City Plan Goals which relate to each Recommendation
- Each specific Action that relates to the overall Recommendations
- The Senior Recommendation sponsor for each Recommendation
- The Director, Cabinet Member and management owner of each individual Action
- The current proposal for each Action
- Whether the Action is considered a council, city-wide or partner responsibility.
- Final update carried out during December 2023 - January 2024.

Appendix Aii - Citizens Action Tracker

Ref	Recommendation	Related One City Plan Goals	Senior Recommendation Sponsor	Specific Action	Director for Action	Cabinet Member (s)	Topic	External partner BCC collaborating with	Assessment of proposed Action	January 2024 update	Notes/Comments
1	1. Council is to lead on training and upskilling the workforce by securing investment, ensuring high standards, harnessing innovation and making the most of local creativity and	<p>While there are some One City Plan Goals that are related to creating skills pathways into green industries - the City Office has no power over Council policies</p> <p>Goal 04 Year: 2021 Develop in partnership a regional redundancy support programme particularly for affected sectors to recover (e.g. tourism, hospitality and culture), provide retraining to support growing sectors (e.g. healthcare and the green economy) and support entrepreneurship</p>	John Smith	Support people currently in relevant industries (building, energy, advice, etc.) to reskill through accredited and subsidised training courses, on the job training	Alex Hearn	Craig Cheney	Climate Change & Housing	WECA	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	BCC has launched our Bristol business and enterprise support service (BrisBES) and through this and our engagement work with the WECA Growth Hub sign post and refer businesses and residents to relevant green skills programmes and support around embedding greener business practices. Future Proof has been supported over last 2 years in the West of England by government and WECA, and will be further supported by the new £1M Retrofit West Business Support Project over 2024-26. BCC has engaged with WECA on this and, specifically, the Green Business Grant scheme including free carbon audits and Retrofit West (both commissioned by WECA) have been extended and/or expanded, the Green Business Grant scheme is £2M up to March 2025.	The West of England Combined Authority (WECA) is the regional strategic lead body for business and skills and is the commissioner of the Adult Education Budget and programmes such as Workforce for the Future. The Council will engage with regional colleagues about the potential for broadening the scope of this scheme. WECA is funding an expansion of the Future Proof skills programme delivered by The Green Register and Centre for Sustainable Energy.

2	<p>entrepreneurship such that the green industry is measurably prepared to carry out required improvements within 5 years.</p>	<p>Goal 42 Year: 2023 Jobs continue to increase to address the climate and ecological emergencies, particularly: renewables, sustainable architecture, retrofitting, communications, technology and innovation, green tech and distributed energy management</p> <p>Goal 405 Year: 2043 Every neighbourhood in the city supports interesting, active jobs maintaining the local green infrastructure</p>		<p>Encourage new people to come into the industry – develop, organise and promote a BTEC/accredited course for people to be trained in conjunction with each new policy and innovation; including quality apprenticeships and outreach activities; focus promotion at under-represented groups (but don't exclude anyone)</p>	Reena Bhogal -Welsh	Asher Craig Craig Cheney	Climate Change & Housing	City of Bristol College	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>The Employment Skills and Lifelong Learning Team have been awarded funding through the Impact Fund programme to develop a pilot an 18 month neighbourhood retrofit programme, starting in February 2024. This programme will help residents to understand and engage with retrofit and to train/re train and apply for retrofit jobs. This programme will also support local employers link up with training provider, business and employment support services, and community partners.</p>	<p>Bristol City Council can influence the green skills pipeline and support diverse recruitment through a number of interventions: use of our apprenticeship levy; job matching through our One Front Door; young careers pathways through Bristol WORKS and post 16 engagement. The Building Bristol initiative will be launched in April/May 2022 so that employment and skills plans are created for all major developments - at construction and end use phase - this can include green skills as new infrastructure and job roles come on stream. The City of Bristol College is a lead partner as a major supplier of vocational training and apprenticeship training. These actions will all be dependent upon employer/supplier demand for green skills.</p>
3				<p>Prioritise support to local (focus within Bristol) companies and SMEs – incentives for training, with reskilled companies becoming ambassadors of change.</p>	Alex Hearn	Craig Cheney	Climate Change & Housing	WECA, UWE, YTKO, City of Bristol College and Business West.	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>BCC has launched our Bristol business and enterprise support service (BrisBES) and through this and our engagement work with the WECA Growth Hub sign post and refer businesses and residents to relevant green skills programmes and support around embedding greener business practices. Future Proof has been supported over last 2 years in the West of England by government and WECA, and will be further supported by the new £1M Retrofit West Business Support Project over 2024-26. BCC has engaged with WECA on this and, specifically, the Green Business Grant scheme including free carbon audits and Retrofit West (both commissioned by WECA) have been extended and/or expanded, the Green</p>	<p>WECA is the regional strategic lead body for business and skills and is the commissioner of the Adult Education Budget and programmes such as Workforce for the Future. The Council will engage with regional colleagues about the potential for broadening the scope of this scheme. Workforce for the Future has multiple delivery partners and operates at a regional level. Some projects are attracting high take up by Bristol-based SMEs, eg, Skills for Clean Growth (UWE), Modern Methods of Construction (YTKO), South</p>

								Business Grant scheme is £2M up to March 2025.	Bristol Talent Pathway (BCC - ESL). SMEs / self-employed completing training will be promoted as champions via BCC web pages, project sites, networking & promotional events, case studies, eg. Bristol Climate Ask, Bristol Housing Festival, ESL /Learning City, Original by Bristol, One City etc.
4			Collaborate with other organisations to set high quality green standards for companies and require approval/accreditation on retrofit/energy improvements	Alex Hearn	Kye Dudd	Climate Change & Housing		Action not feasible (explain in Notes)	Standards for energy efficiency retrofit are set nationally and these will be used for future Government funding.
5			Learn from other cities and countries where green technologies are the norm and report on what regulatory frameworks and investment plans could be applied to the Bristol region	Alex Hearn	Kye Dudd	Climate Change & Housing	ICLEI	Agreed as set out	We will work with the International Network for Sustainability and International Council for Local Environmental Initiatives to identify good practice internationally.

6	2. Council to take leadership and responsibility for meeting its emissions targets in the housing stock by working in partnership with the business, education and community sectors, creating a programme of implementation to drive community changes.	<p>Goal 15 Year: 2021 Continue to deliver new net zero carbon homes and begin delivery of retrofitting for existing housing stock to meet Bristol's Climate and Ecological Emergencies</p> <p>Goal 49 Year: 2023 Collaboration across the city ensures the integration of climate and ecological standards in the strategic overarching development framework to guide housing, employment and infrastructure (Joint Spatial Plan)</p> <p>Goal 86 Year: 2025 Work on decarbonising Bristol's housing stock is well underway with strong retrofitting industries having been developed, ready to accelerate progress towards Bristol's carbon neutral ambitions</p>	Alex Hearn	Initiate talks with business, education and community partners and work with them to establish and deliver a plan on achieving the targets on home improvements (net zero), ensuring it's not left to individuals	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed as set out	<p>BCC is developing a Climate Investment Plans for the city working with partners. This plan will set out the priorities for action, the available national funding, and work we will undertake to enable additional public, private and household investment in decarbonisation of heating.</p> <p>Alongside this BCC has also led a successful funding bid to Innovate UK for further planning work with 3 communities to address this issue.</p>	<p>BCC is developing plans Climate Investment Plans for the city working with partners. This plan will set out the priorities for action, the available national funding, and work we will undertake to enable additional public, private and household investment in decarbonisation of heating.</p> <p>BCC has also led a successful funding bid to Innovate UK for further planning work with 3 communities to address this issue. This project is currently being called Mission Net Zero Demonstrator</p>
7		<p>Goal 104 Year: 2026 Climate resilience has been built into housing planning and policy to ensure that Bristol's housing stock is becoming resilient to extreme weather events, in line with the city's 2030 ambitions</p> <p>Goal 152 Year: 2029 100% of Bristol City Council and Housing Association homes are rated as high energy performance (C+) where not listed buildings</p>			Focus support in areas of high deprivation, fuel poverty and poor quality housing, to ensure fairness, while promoting successful schemes as good practice	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Under Assessment	In developing the plans and project in Action 6, we will consider the suggested action in more detail.

8		Goal 176 Year: 2030 Bristol's housing stock is zero carbon and supports a diverse ecological environment following the ambitions set out in the Climate and Ecological emergencies"		Identify a singular, independent, existing non-profit agency to take on oversight	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Under Assessment	In developing the plans and project in Action 6, we will consider the suggested action in more detail.	In developing the plans and project in Action 6, we will consider the suggested action in more detail.
9				Monitor performance and publicly report on progress against targets, every 6 months, with the opportunity for Council scrutiny: reporting must be something visual and easy to understand.	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Under Assessment	In developing the plans and project in Action 6, we will consider the suggested action in more detail.	In developing the plans and project in Action 6, we will consider the suggested action in more detail.
10	3. Create innovative financing options including grants, and/or loans to support home owners and landlords to improve the energy efficiency of every home in Bristol.	Goal 100 Year: 2026 The number of fuel poor homes in Bristol has significantly reduced, with improved energy efficiency of homes and increased access to advice services Goal 133 Year: 2028 An extensive Heat Network provides district heating via a network of underground pipes, which are connected to a number of zero carbon energy centres Goal 315 Year: 2038 Local energy storage solutions help manage peak energy use periods across the local network Goal 241 Year: 2034 Every public building in the city meets the highest standard of energy efficiency Goal 152 Year: 2029	Donald Graham	Provide interest free loans for home sustainability improvements. With repayment over the long term, possibly linked to Council tax. Principles should be similar to a student loan, only paid back when you earn over a certain threshold.	Donald Graham	Tom Renhard	Climate Change & Housing	Lendology Home Loans	Taking forward in part (specify which elements in Notes)	Loans are already available to install energy efficiency measures for homeowners using low interest options available enabling repayment over 15 years. Eligibility to access loans is only available to those able to repay. Without regular repayments the loan fund would become unsustainable. This has been the case with other LA run loan schemes in England. The current loan scheme has been in operation since 2006 and is sustainable with a range of low interest loans available to suit clients with a range of repayment options available. The City Council is unable to provide grants for energy efficiency in homes at the scale needed to meet the Net Zero goals. We will aim to ensure that Bristol residents are aware of and are able to access grants. We will encourage Government to provide further grants to meet the scale of the challenge. For example, we are currently running the Bright Green Homes project which at 21/12/21 had delivered 120 new measures (insulation or solar pv) to homes with low incomes and energy efficiency ratings. Total grant funding is £3.4m, shared with North Somerset Council.	The Q3 report in 2023-24 is that during this period '18 home improvement loans have been drawn down through our Loan partner Lendology with a value of £67K. The loans are repayable based on the ability of a household's ability to repay the loan at a fixed rate of 4% over the lifetime of the loan. All home loans have interest added as the City Council is unable to fund interest free loans. The only interest free loans available are to bring long term empty properties back into use and allocated through the Refugee Team, with the interest paid from various external funding sources focussed only on this client group..

11	<p>100% of Bristol City Council and Housing Association homes are rated as high energy performance (C+) where not listed buildings</p> <p>Goal 135 Year: 2028 Smart energy technology is installed in over 75% of homes in Bristol to support the efficient use of energy, particularly from sustainable sources and contribute to ending fuel poverty"</p>	<p>Provide grants for lower income households. Prioritise grants to ensure equality (means tested). Set clear and transparent criteria around the grant system. Assure safeguards are in place for fair accountability.</p>	Donald Graham	Tom Renhard	Climate Change & Housing	No	Action not feasible (explain in Notes)	Action not feasible - see notes	BCC does provide grants to households as part of a regional or national scheme. There are currently no national or regional schemes available. We will continue to seek from HM Government national grants and loans to support decarbonisation by households, taking into account their income and the degree of improvements made.
12		<p>BCC to define, create and regulate different levels of financial options for home efficiency improvement. The standard option should be for home improvement to achieve the target of net zero by 2030. Beyond this there will be a range of interest charged options as a choice for those that wish to make improvements past the base level.</p>	Donald Graham	Tom Renhard	Climate Change & Housing	No	Action not feasible (explain in Notes)	Action not feasible - see notes	BCC does provide grants to households as part of a regional or national scheme. However, there are currently no national or regional grant schemes. We will continue to seek from HM Government national grants and loans to support decarbonisation by households, taking into account their income and the degree of improvements made. The local loan scheme has a range of loan products available but the interest rate is fixed to be slightly lower than market rates but to enable the loan products to be run on a cost neutral basis to the providers and the City Council.
13		<p>Provide a central channel/platform for tenants to communicate with Council that they want to make sustainability improvements so that the Council can require and support the landlord to do this.</p>	Donald Graham	Tom Renhard	Climate Change & Housing	No	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	This action has been complete. There is a dedicated role in housing, coordinating action to ensure private rented homes meet or exceed minimum EPC standards. If concerns are raised about energy standards and the EPC level is below the minimum standard, action will be started. There is no dedicated channel for these enquiries. The City Council also proactively inspect private rented homes. Where energy efficiency levels	

										fall below the legal minimum level, action is taken to improve standards.	
14				BCC to explore establishing a centralised green housing fund to supply the above.	Denise Murray	Craig Cheney	Climate Change & Housing		Action not feasible (explain in Notes)	Action not feasible - see notes	BCC does provide grants to households as part of a regional or national scheme. However, there are currently no national or regional schemes. We will continue to seek from HM Government national grants and loans to support decarbonisation by households, taking into account their income and the degree of improvements made.
15	4. Reduce the fragmentation of all the different sustainability schemes and initiatives by creating and promoting an independent One Stop Shop that contains	None	Alex Hearn	Create a One Stop Shop for sustainability improvements that is both a website and physical shop with showrooms.	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority https://www.retrofitwestadvice.co.uk/	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority

16	objective, trustworthy information, in order to provide support right through the process.			Create a staged approach to achieving sustainability improvements, beginning with a home survey (like the Cold Homes Energy Efficiency Survey Experts thermal imaging survey). Results to be integrated into the One Stop Shop process.	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority. This service allows householders to build their own retrofit plans	See Action 15
17				Market the One Stop Shop through a city wide marketing campaign. Promote the One Stop Shop as part of the wider Net Zero brand/identity. Have an annual festival, or presence/stall, touring van with volunteers from each community at local community events.	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority. This service is promoted under its own brand for the West of England. Proposal for an annual festival is not being taken forward. Community champions will be trained in some communities as part of the project referred to in Action 6 - Mission Net Zero Demonstrator	See action 15 and 6
18				Involve young people in the One Stop Shop through creating an education pack for information to bring the One Stop Shop and its principles into schools.	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority, as part of this work Young people will be engaged as part of the project referred to in Action 6 Mission Net Zero Demonstrator	See action 15 and 6

19	5. The Council should introduce a set of tiered Bristol standards (tiers from minimum requirements to best practice aspiration standards) relating to energy consumption and efficiency for all retrofits, building improvements, developments and new builds (domestic and commercial) that are clear and well communicated, and linked to planning regulations.	<p>There are a number of goals regarding energy efficiency as can be seen above - but none regarding a specific tier system that links to planning.</p> <p>Goal 61 Year: 2024 The new planning policy (Local Plan) is adopted with strong policies on carbon neutrality, climate resilience and standards of design for wildlife, water, waste and resources, and wellbeing</p> <p>Goal 49 Year: 2023 Collaboration across the city ensures the integration of climate and ecological standards in the strategic overarching development framework to guide housing, employment and infrastructure (Joint Spatial Plan)</p> <p>Goal 104 Year: 2026 Climate resilience has been built into housing planning and policy to ensure that Bristol's housing stock is becoming resilient to extreme weather events, in line with the city's 2030 ambitions</p>	Alex Hearn	Develop and introduce standards for all existing properties (e.g. for home-owners, landlords, and social housing) and to be incorporated into new building regulations.	Donald Graham	Tom Renhard	Climate Change & Housing	N/A	Taking forward in part (specify which elements in Notes)	<p>In progress, we are progressing Local Plan policies for new buildings to set zero carbon standards. The Local Plan has been published for people to comment formally as required by regulations ahead of examination during 2024. On target for adoption in spring '25. (All material published here: https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-policy-and-guidance/local-plan/local-plan-review) We are working with Department of Energy Security and Net Zero on decarbonisation of existing buildings at scale via Heat Network Zoning.</p>	<p>Standards for energy efficiency retrofit are set nationally and these will be used for future Government funding.</p> <p>These standards relate to the energy performance of the Building - Energy Performance Certificates, and to retrofit works - the Publicly Available Specification 2035 or PAS2035.</p> <p>Building regulations are set nationally and we cannot vary them locally.</p> <p>Going forward we can create Local Plan policies for new buildings to set zero carbon standards. Policies are in development to achieve this.</p> <p>Going forward we can set standards for the development of new Council homes and for their refurbishment.</p> <p>These should be come two actions for development of place and local housing supply respectively.</p>
20					Implement a set of standards which are required of all landlords and rented properties; these should be higher than current standards i.e. to rent a property out it should have to meet a minimum environmental standard.	Donald Graham	Tom Renhard	Climate Change & Housing		Taking forward in part (specify which elements in Notes)	N/A [action not feasible]

										licensing schemes cover approximately 10,000 rented homes.
21			Establish a system for the Council to conduct checking and signing-off that the standards have been met.	Donald Graham	Tom Renhard	Climate Change & Housing	Acorn, Bristol Shelter, CHAS	Taking forward in part (specify which elements in Notes)	This action is still progressing. In property licensing areas, landlords are required to provide evidence their accommodation meets the minimum EPC level and standards. Properties are inspected during the licensing period to confirm standards are being complied with. By the end of Q3, over 1,500 license inspections had been undertaken. Proposals are going to February Cabinet to consider whether to extend licensing into additional areas later in 2024.	
22			Communicate independent and trustworthy information about different types of energy and environmental improvements, their impacts on the environment and the investment costs, running costs, and savings to allow comparison of different options and possibilities. (The One Stop Information Centre could do this.)	Alex Hearn	Kye Dudd	Climate Change & Housing	Centre for Sustainable Energy	Agreed as set out	A one stop retrofit advice service for the West of England has been created with funding from the Combined Authority https://www.retrofitwestadvice.co.uk/ . This service allows householders to build their own retrofit plans. This is more appropriate than creating Bristol standards.	

23				Create a 'green dot' or similar branding/logo to show you meet the standards as a trader, landlord, property owner or builder, with builders being trained to understand and meet these.	Donald Graham	Tom Renhard	Climate Change & Housing	N/A	Action not feasible (explain in Notes)	Action not feasible - see notes	Standards for energy efficiency retrofit are set nationally and these will be used for future Government funding. These standards relate to the energy performance of the Building - Energy Performance Certificates, and to retrofit works - the Publicly Available Specification 2035 or PAS2035.
24	6. Develop a pilot programme for a street or neighbourhood to showcase what could be achieved if a citywide approach to reaching net zero was taken, with control, coordination and cooperation at a local level.	While there are a number of goals related to achieving net zero in housing, transport etc, there are no plans to develop a specific test bed to be used to demonstrate this. Goal 15 Year: 2021 Continue to deliver new net zero carbon homes and begin delivery of retrofitting for existing housing stock to meet Bristol's Climate and Ecological Emergencies	Alex Hearn	Introduce an awareness campaign so that local people can understand what is proposed and can come forward and bid to be the pilot project – the enthusiasm and desire to do it has to come from them. Consult local people as a key element in getting everyone together and working with them, identifying small and big wins, and what is realistic for people, including clear information about the investment costs, running costs and savings.	Alex Hearn	Kye Dudd	Climate Change & Housing	TBC	Taking forward in part (specify which elements in Notes)	BCC is developing a Climate Investment Plans for the city working with partners. This plan will set out the priorities for action, the available national funding, and work we will undertake to enable additional public, private and household investment in decarbonisation of heating. Mission Net Zero Demonstrator will develop community climate investment plans with 3 communities drawing directly upon the recommendation.	This recommendation should be considered as a whole as one potential project. BCC to investigate potential funding opportunities for a street or neighbourhood retrofit demonstrator.
25		A citywide programme is in place to ensure all transport in Bristol is zero carbon by 2030 Goal 334 Year: 2039 The Bristol Health and Social Care sector is pioneering carbon neutrality work within the wider health community with an aim towards net carbon negative		Select a street / neighbourhood that enables a combination of owner occupied, social housing and private rental buildings to showcase what can be achieved across all of these types of property. Use existing methods of energy saving and have a clear timeframe for implementing the changes (e.g. 2 years).	Alex Hearn	Kye Dudd	Climate Change & Housing		Under Assessment	BCC is developing a Climate Investment Plans for the city working with partners. This plan will set out the priorities for action, the available national funding, and work we will undertake to enable additional public, private and household investment in decarbonisation of heating. Mission Net Zero Demonstrator will develop community climate investment plans with 3 communities drawing directly upon the recommendation.	Part of 24.

28				Hold a big party and week-long open event at the end of every street improvement pilot, to celebrate and also open it up for others to come and see, create a buzz, ensure it is joyful and fun, people are excited to do it, and that these kinds of changes are ambitious but doable.	Alex Hearn	Kye Dudd	Climate Change & Housing		Under Assessment	The actions will be determined by the communities we work with	Part of 24.
29	7. Create an inclusive, transparent and accountable process where the Council engages together with citizens, businesses and stakeholders to better communicate our climate commitments through a sustainable transport system.	There are no OCP goals that specifically refer to community/business/stakeholder engagement with regards to the transport system, there are goals related to community engagement and the transport system separately: Goal 143 Year: 2028 The first mass transit route is completed, transforming the movement of people across the city Goal 179 Year: 2030 Completion of the second mass transit route to transform movement of people across the city	Alex Hearn	Appoint a champion to work with the chair of the One City transport board to have responsibility for these recommendations, with a focus on accessibility in local communities.	Tim Borrett	Marvin Rees Don Alexander	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	The One City Operations and Stakeholder Manager has worked with the Chair to create a Task and Finish group on accessibility and a Transport sub-group focused on equalities to further embed accessibility from the widest set of considerations.	Whilst there is no issue with this idea in principle, we are currently (Q4 21/22) refreshing several One City boards and ways of working - including the stronger inclusion of Mayoral Commission input. It is likely that through this process independent input, expertise, and challenge would be provided via the Disability Commission. August 2023 Update - as anticipated, this was completed by proxy action with a member of the Mayor's Disability Commission appointed to the Board during the 2022 refresh of membership. This action is now complete.
30		Goal 250 Year: 2034 Completion of all four mass transit links to Bristol Airport, North Fringe, East Fringe, Bristol to Bath to transform movement of people across the city Goal 342 Year: 2039 Transformational use and growth in public transport		Set yearly targets based on these recommendations, and assess them quarterly, with the One City commissioner/czar/champion reporting to One City board and Council on progress.	Alex Hearn	Craig Cheney Ellie King	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	One City has a governance board which had its TOR and performance matrix. This monitors the One City Approach rather than the outcomes of One City Plan and Goals.	This was given full consideration during performance target identification and setting for 2022/23, with chosen measures linked to the top priorities of our Corporate Strategy and Business Plan 22/23; documents which are informed by the Citizens Assembly recommendations. The Performance Framework is approved, targets have

		as a result of the bus deal and delivery of Mass Transit									been set and updates will be publicly available every quarter when they are reported to Cabinet and published on the Performance pages of our website.
31			Widen One City partners to include all employers with over 300 staff by promoting the benefits of being involved.	Tim Borrett	Marvin Rees	Climate Change & Transport		Action not feasible (explain in Notes)	Action was not feasible at last review - see notes. Opportunity to review this action in Q3 2024 with governance board and capacity of the team.	This was considered during a refresh of the One City operating model in early 2022, but unfortunately there is not enough staff capacity in the function to set up and manage this wider network.	
32			Establish a working group with key Council services and utility suppliers e.g water, gas, broadband etc. to find ways of utilising maintenance budgets to focus on improving neighbourhoods.	Patsy Mellor	Don Alexander	Climate Change & Transport		Action not feasible (explain in Notes)	Action not feasible - see notes	Maintenance budgets are used to fulfill statutory duties with a clear asset management approach used. Those areas of the highway that need repairing most are prioritised but funding is limited and below life cycling expectations and showing condition of the highway is deteriorating. There is therefore no capacity to focus maintenance budgets on improving local neighbourhoods. Utilities will have a similar approach repairing their assets on a needs basis and we have no influence on their programmes but can control to a limited extent when programmed works are undertaken. The service works already closely with the utility companies with a view to co-ordinating repairs wherever possible so that disruption is kept to a minimum. Emergency repairs be they Highways or	

											<p>Utilities need to be done as and when they occur, for obvious reasons.</p>
33				<p>Publish a clear and concise breakdown of how the transport budget is formed and what organisations contribute to it and how it is spent.</p>	<p>Alex Hearn Patsy Mellor</p>	<p>Don Alexander</p>	<p>Climate Change & Transport</p>		<p>Agreed in principle but delivered by proxy or alternative activity (explain in Notes)</p>	<p>The Transport Capital Programme is approved yearly at Cabinet and includes a list of project and initiatives that the team is delivering against. Going forward, much of this reporting is likely to occur at WECA level.</p>	<p>The Transport Capital Programme is approved yearly at Cabinet and includes a list of project and initiatives that the team is delivering against. Going forward, much of this reporting is likely to occur at WECA level.</p>

34	8. Urgently reduce air pollution levels caused by vehicle use to safe and legal levels.	<p>Goal 18 Year: 2021 Clean Air Zone progressed with proportional supporting measures to encourage a reduction in traffic entering the city, allowing businesses and residents to adapt and the start of improved air quality</p>	John Smith	Focus funding to areas with high air pollution levels.	Alex Hearn	Don Alexander	Climate Change & Transport		Taking forward in part (specify which elements in Notes)	Funding has been secured for delivery of a Clean Air Zone in the central part of the city where pollution levels are highest. Funding comes with requirements attached in regard to what it can be spent on - this can make it difficult to focus on specific areas but air quality is one of the parameters we use for assessing where best to spend money.	The Bristol Clean Air Zone will improve air quality for those communities with the highest levels of pollution. In this way, funding is being directed to those communities. It is also important to note that there are other factors beyond air quality that we need to consider in prioritising funding, such as deprivation, safety and access to services.
35		<p>Goal 72 Year: 2024 Enhanced suburban rail services delivered including the Severn Beach line, Henbury Spur and Portishead line, improving rail usage, leading to better passenger satisfaction and contributing to the Clean Air Strategy</p>		Publish air pollution levels in neighbourhoods in clear, concise and accessible way e.g signs with pollution levels on.	Alex Hearn	Don Alexander	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	This action is still in progress; Air quality monitoring is undertaken by Sustainable City and Climate Change Service and results will continue to be communicated alongside information on the Clean Air Zone quality data.	In progress; Air quality monitoring is undertaken by Sustainable City and Climate Change Service and results will be communicated alongside information on the Clean Air Zone
36		<p>Goal 144 Year: 2028 The average journey time in Bristol has improved by 10% since 2018 as levels of congestion have decreased, improving air quality and the ease of movement in the city</p> <p>Goal 170 Year: 2030 Bristol has achieved the World Health Organisation (WHO) targets for air quality</p> <p>Goal 223 Year: 2033</p>		Promote innovative ways to increase carbon effective planting by investing in existing green spaces and better utilising available space in all buildings businesses and houses, etc (e.g living roofs on bus stops).	Donald Graham	Don Alexander	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	A cross-directorate working group is developing activity programme for putting in place necessary policy documents and strategy to maximise delivery as soon as Biodiversity net gain comes into operation from January '24. The carbon benefits of this are insignificant and the action is being implemented for biodiversity and community benefits. Bristol has employed a Biodiversity net gain officer to support this work	In developing the Bristol Green Infrastructure Strategy we will investigate ways in which plants and nature can be incorporated. Planting will not have a significant benefit for carbon capture or air quality improvements and so planting should be undertaken for amenity and wildlife benefits and be an integral part of street layout changes as part of liveable neighbourhoods.

37		Bristol's air quality is no longer considered a contributor to premature deaths and annual mean Nitrogen Dioxide levels are below 30ug at all city locations		Work with all schools to implement 'Bristol School Streets' - roads being closed during pick up and drop off times.	Reena Bhogal -Welsh	Asher Craig Don Alexander	Climate Change & Transport	Educational establishments	Taking forward in part (specify which elements in Notes)	We continue to work with schools across the city to deliver School Streets Schemes. General funding levels will allow roughly 4 schools per year to be delivered. Additional funding was provided in 2022 through a budget amendment which enabled 2 more schools to be resources allow. This budget amendment is now permanent, so going forward we expect to deliver improvements to 6 schools per year on average.	Bristol has delivered a number of school streets projects already and has plans for another 4 locations in the coming academic year. It is important to note that some locations will not be suitable for timed or permanent closures given the impact on the surrounding network. Further rollout of this programme will be dependent on funding.
38	9. By 2030, make Bristol the best city internationally to travel around, by prioritising sustainable, safe, healthy, accessible alternatives to the car for all.	<p>Goal 02 Year: 2021 Introduce free bus travel for all 16 to 18 year olds to help connect and reconnect young people with the city</p> <p>Goal 16 Year: 2021 Continue the reduction in car traffic and support the revitalisation of city centre, hospitality, retail, culture and night-time economy, by expanding active travel and public transport options and providing ongoing funding of essential transport</p> <p>Goal 340 Year: 2039 City waterways and rivers are being better utilised for sustainable and healthy methods of travelling across the city</p> <p>Goal 324 Year: 2038 Trials to improve alternatives to car use are expanded onto more major transport corridors to better manage efficient</p>	John Smith	Reduce the number of car journeys in Bristol, with year on year targets, so that at least 80% of journeys in 2030 are by active travel and public transport by: a. Increasing provision of affordable buses; b. Establishing a city wide bike, e-bike and cargo e-bikes, e-scooters scheme and car share schemes; c. Transferring 3-5% of road space to cycling, walking and green space every year; d. Transferring 3-5% of street car parking spaces in the city over to cycle parking and shared green space every year; e. Developing a school transport scheme (e.g. yellow school buses, e-scooters and more secure bike storage in schools).	Alex Hearn	Don Alexander	Climate Change & Transport	Yes WECA E-scooter operators e-bike operators car club operators Bus operators	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Enhance Partnership is in place and working to improve bus service provision across the region. A new concession has been let for the provision of e-scooters and e-bikes across the region.	<p>Our plans for increasing provision of affordable buses is set out in full in the recently published Bus Service Improvement Plan (BSIP). The Bus Deal committed to Increase the modal share of bus to 20% of all journeys in Bristol by 2031.</p> <p>Car Club schemes are already in operation in the city and are conditioned as part of new developments. Their further expansion is somewhat dependent on the commercial interests of operators. Similarly, the proposal for e-scooters is being fulfilled through the current trial - with wider rollout and adoption dependent on Government's decision regarding their long term legality.</p> <p>E-bikes and cargo bikse are supported by the Council but will need to be delivered and operated by a partner with a commercial interest in operating a scheme. While we agree in principle with transferring roadspace</p>

	<p>and reliable movement of people</p> <p>Goal 216 Year: 2032 Autonomous robotic vehicle trials are carried out to improve alternatives to car use on selected major transport corridors to better manage efficient and reliable movement of people</p> <p>Goal 504 Year: 2048 Travel by the city's waterways and rivers is viewed as the norm and contributes to healthy outcomes for citizens</p>								<p>to more sustainable forms of travel, the target as it is written could be considered arbitrary. More importantly, we need to ensure schemes are effective at promoting alternatives be that through roadspace reallocation, better service level provision, or other means (e.g. pricing) We support reallocating car parking spaces to cycle parking and green space. Again, we would challenge the target, instead looking at what the specific needs are/demand is in each community</p> <p>With regards to school travel we have several existing offers and initiatives in place to promote sustainable journeys including the school streets programme, behaviour change projects and grants for better onsite facilities. The BSIP (mentioned above) will also seek to improve services across the network and reduce fares for children. Bristol City Council is also implementing the Mayors manifesto commitment to provide free travel for students under 25 and apprentices.</p>
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39			Bring the buses back into public ownership e.g Reading buses to improve provision for everyone including a single flat fare (regardless of peak or off peak times) that covers all public and active transport (e.g. funding for bike storage) in West of England Combined Authority (WECA) by 2023.	Alex Hearn	Don Alexander	Climate Change & Transport	WECA	Action not feasible (explain in Notes)	Action not feasible - see notes	Under current legislation it is not possible to establish a municipal bus company.
40			Create a budget to invest in active travel, with annual incremental targets so that by 2030 it is equal to what is spent on roads, with a dedicated fundraising unit. a. Funding for segregated cycle lanes, b. Subsidised bikes (free to people on low incomes/benefits), secure bike storage (residential and in the centre) c. training people to ride bikes safely, d.maintenance and continued improvements of active travel infrastructure	Alex Hearn	Don Alexander	Climate Change & Transport	WECA	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Active Travel funding has been secured by BCC for works in the Old City and scheme development. We have also secured funding from WECA for bike hangars to be installed around Council housing sites.	The recently announced City Region Sustainable Transport Settlement for the West of England area contains a significant allocation for active and sustainable transport. Outside of this five-year allocation from Government, the Council is intending to pursue other Government grants for walking and cycling improvements as and when they are announced. Increasing spending year on year is not possible to guarantee, as transport funding is largely allocated to the Council by WECA, often passporting available Government funding.
41			Ensure more remote and deprived areas are served by public and active transport network; increase the number of interchanges to support connectivity around the city without having to go via the centre.	Alex Hearn	Don Alexander	Climate Change & Transport	Yes WECA E-scooter operators e-bike operators Car Club operators Bus operators	Agreed as set out	Improving access to public transport and active travel in deprived areas is well supported in sub-regional and local transport policy. Documents such as our Local Cycling and Walking Infrastructure Plan and Bus Service Improvement Plan detail how we will improve provision to these areas. BCC is working with WECA to deliver 'Mobility Hubs' across the city (which	

									will include services such as bike hire, car clubs and e-scooters) will also improve connectivity to public transport operating on our key transport corridors. BCC is working with WECA to establish a low carbon mass transit system for the city region which will service remote and deprived areas. WESTLink introduced by WECA using BSIP funding. This mitigates the loss of some supported services by providing on demand local bus services for residents in some of the affected areas as well as wider trips into the outer parts of the region.	
42			Bristol City Council and WECA to establish a disability and mobility working group, with the aim of increasing provision to all areas of the city and ensuring that transport is truly accessible (e.g enforcing Equality Act compliance).	Alex Hearn	Don Alexander Asher Craig	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Bristol City Council and WECA continue to engage with and consult disability groups in the planning, design and delivery of transport schemes. Disability groups are well represented on the One City Transport Board and the lead officer of the Board is in the process of setting up a Disability, Equality and Inclusion working group to oversee the outputs of the Board	This action would need to be considered by Strategic Transport colleagues and the central Equalities team understands that very similar work may already be planned. This is being explored further and this action will be updated once there is clarity on this.
43	10. Fundamentally reimagine the places we live so that they are people centred (i.e. create liveable neighbourhoods).	Goal 35 Year: 2022 An increase in short walking and cycling journeys benefits residents' health and wellbeing and contributes to improved community resilience, a thriving local economy and reduced transport emissions, resulting in more liveable neighbourhoods	Demonstrate the benefits of liveable neighbourhoods by implementing 5 pilot schemes in the most deprived neighbourhoods in place by end of 2021	Alex Hearn	Don Alexander	Climate Change & Transport		Taking forward in part (specify which elements in Notes)	East Bristol Liveable Neighbourhood is progressing towards a trial scheme before moving forward to assess the benefits and implement a permanent scheme. South Bristol Liveable neighbourhood is now underway looking at scope and wider impacts to inform cllrs and identify the best way forward	The Council has begun delivery of a pilot Liveable Neighbourhood in East Bristol with plans for a second pilot area to be delivered by 2024. The delivery (and relative success) of these two pilot projects will help inform whether a wider programme of Liveable Neighbourhoods is progressed across the city.
44		Goal 50 Year: 2023 The delivery of Liveable Neighbourhoods and Neighbourhood Development has empowered people within their neighbourhoods and fostered wellbeing and community across Bristol	Implement a city-wide community consultation plan which educates about liveable neighbourhoods so that by the end of 2022 all residents have the opportunity to commit to make their neighbourhood a liveable neighbourhood	Alex Hearn	Don Alexander	Climate Change & Transport		Taking forward in part (specify which elements in Notes)	This action is progressing.	Neighbourhoods & Communities can advise Strategic City Transport and Communications who to work with and where to share information about Liveable Neighbourhoods in areas where there is greatest inequity. Neighbourhoods & Communities cannot lead

	Goal 75 Year: 2025 The consideration of Children's rights when planning homes, transport and infrastructure is the standard in Bristol, supporting the delivery of liveable neighbourhoods and the child friendly city		and to define their neighbourhood's particular priorities (e.g. reducing through-traffic, parks and green spaces, play streets).							the consultation. This needs to be led by Bristol City Council who have the resource, expertise and are making an offer to citizens. Neighbourhoods & Communities can help to get the word out and put Bristol City Council in touch with relevant community and voluntary organisations that may be able to help. Working with and through local ward Councillors will also be vital.
45			Introduce, by law or through policy changes, a presumption that all neighbourhoods should be liveable to allow communities to make the changes they would like to see, for example through removing bureaucracy to closing streets for playing out or street gatherings and through streamlining planning and consultation processes and training community liaison officers to.	Alex Hearn	Don Alexander	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Highway law is dictated by the Department for Transport and their current position is to no progress new liveable neighbourhood interventions. Legislation still exists however that enables authorities to close roads permanently and temporarily.	Local communities can call for changes to their local neighbourhood through the existing Area Committee process. Looking forward, the Council has begun delivery of a pilot Liveable Neighbourhood in East Bristol with plans for a second pilot area to be delivered by 2024. The delivery (and relative success) of these two pilot projects will help inform whether a wider programme of Liveable Neighbourhoods is progressed across the city which would include many of the elements raised in the recommendation.
46			Create and maximise green space, greenery and pocket parks in existing neighbourhoods, ensuring that transport infrastructure repairs, maintenance and new transport schemes must improve the amount and quality of green space available where possible by using the Highways Maintenance budget.	Alex Hearn	Kye Dudd and Don Alexander	Climate Change & Transport		Taking forward in part (specify which elements in Notes)	All transport projects look to deliver enhanced green space as they are developed. This is not always possible but improvements are provided where possible.	The Council has begun delivery of a pilot Liveable Neighbourhood in East Bristol with plans for a second pilot area to be delivered by 2024. These projects will explore how we can provide more greenspace, parklets and play space in our local communities as well as improve accessibility.

47				Creatively reintroduce and support local services and utilising existing services and local businesses, ensuring that they are accessible (e.g. local police, public access to school libraries and mobile libraries).	Alex Hearn	Ellie King and Nicola Beech	Climate Change & Transport	All city partners, particularly the public realm. Disability Equality Commission	Taking forward in part (specify which elements in Notes)	In progress	
48	11. Get people involved and engaged in the planning and implementation of transport initiatives. Make the process accessible, responsive and fun!	Goal 17 Year: 2021 Co-design, with community organisations, the development of transport schemes to support our response and recovery to COVID-19	John Smith	Offer multiple options, modes and levels of participation in the process in order to promote engagement with diverse opinions.	Alex Hearn	Don Alexander	Climate Change & Transport		Agreed as set out	Transport engagement activities are undertaken for new and existing transport schemes, such as liveable neighbourhoods, pedestrianisation schemes, Clean Air Zone and active travel fund projects. Improving access to public transport and active travel in deprived areas is well supported in sub- Part of this work will fall under the behaviour change campaign work to implement the Clean Air Zone. BCC will undertake a post Clean Air Zone implementation benchmarking exercise to see if this is needed. This action is embedded into business as usual.	
49		Goal 197 Year: 2031 A not-for-profit platform connects creative / technology driven start-ups with investors and mentors, which provides income streams for civic projects and community ventures		Put transparent and publicly accessible evidence-based data at the forefront of communication around decision-making, and in communications with the public use data that makes an impact (e.g. case studies, the average Bristol car journey is less distance than a hedgehog typically walks in a night, 80% of public space is given over to roads).	Alex Hearn	Don Alexander	Climate Change & Transport		Agreed as set out	The council continually looks for how to improve communications and accessible communications as part of its ongoing Public Sector Equality Duty. Data used to inform decision making is presented through our policies plans and strategies as well as Cabinet Report papers - but the recommendation is noted to draw on more evidence in future consultation exercises.	

50			Introduce a city-wide reduced-traffic festival closing road networks in local high streets, with linked funding for communities to implement their own road closures and associated car-free events (e.g. street parties, community gardening) in order to promote reduced car use.	Alex Hearn Patsy Mellor	Don Alexander Ellie King	Climate Change & Transport		Action not feasible (explain in Notes)	Work is underway to reprocur provision of the Council's open data platform and consideration will be given in that project to whether further data sets can be made available.	
51			Engage businesses in alternative transport initiatives, using data and examples of schemes implemented elsewhere in the UK to demonstrate the benefits; pedestrianisation is good for business.	Alex Hearn	Don Alexander Craig Cheney	Climate Change & Transport		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	The Council transport team has a business engagement unit that provides employers with a range of support including match-funded grants, travel planning, and advice. We will work with the One City Transport Board and local Business Improvement Districts to communicate the latest data, relevant case studies, and best practice. Economic Development / High Streets Recovery team has produced a business information booklet on the support available to high street businesses including sustainable transport initiatives - via BCC High Streets web pages.	The Council transport team has a business engagement unit that provides employers with a range of support including match-funded grants, travel planning, and advice. More could be done to present relevant data to businesses in Bristol promoting the benefits of sustainable travel improvements. To this end we will work with the One City Transport Board and local Business Improvement Districts to communicate the latest data, relevant case studies, and best practice. Economic Development / High Streets Recovery team has produced a business information booklet on the support available to high street businesses including sustainable transport initiatives - via BCC High Streets web pages.

52				Engage directly and specifically with the transport issues faced by children and young adults in education, many of whom are feeling forgotten about and are disengaged from society as a result of COVID-19.	Alex Hearn Reena Bhogal -Welsh	Don Alexander Asher Craig	Climate Change & Transport		Agreed as set out	The Council has a schools engagement programme that been operating for several years which aims to support parents, children and schools in promoting sustainable transport and raising awareness of relevant initiatives and consultations. The Council is doing more to engage children and young people more effectively in transport projects. To this end we will work with relevant stakeholder groups to improve and refine our engagement methods.	
53	12. Prioritise a healthy and inclusive environment for all Bristol citizens and require businesses to act with corporate social responsibility.	Goal 22 Year: 2022 Work with key industry sectors and business leaders to improve opportunities for underrepresented groups through inclusive recruitment practice, monitoring workforce data, and enabling community development of key policy areas such as environmental sustainability interventions	Alex Hearn	Require local planning agreements such as Section 106 and Master Plans to prioritise communities health needs.	Alex Hearn	Nicola Beech Ellie King	Health & Social Care	One City Boards	Agreed as set out	This is being taken as set out and will be measured in community health and wellbeing outcomes. Health and social value being visible in planning, licensing, and development decisions.	
54		Goal 51 Year: 2023 The work of the History Commission, Culture Board and Homes Board has integrated the city's history into the fabric of the city Goal 59 Year: 2024 Bristol's skills provision reflects the economy's required skills and key inward investment opportunities, while also focusing on inclusivity and an equitable distribution of workers across key employment areas (e.g. low carbon industries and		Investigate scandinavian housing models and conduct a feasibility study to ensure inclusion, address homelessness and improve the efficiency of poor housing stock where necessary.	Donald Graham	Tom Renhard	Health & Social Care		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Progress with the development of MMC homes in the City continues with planning consent achieved for the Council's own MMC sites at Bell Close, Romney House and Marshall Walk which all have commenced development by the end of 2023/24 and will complete in 2024/25. The Derby Street Solohaus project with the Hill Foundation is on site and completes in September. This will deliver 8 modular single person pods in partnership with Places for People Living Plus. Innovative modern methods of construction continue to develop across Bristol to support the delivery of affordable housing and within the council there is a new focus on accelerating the delivery of new homes for a range of affordable	Through the work of an Innovate UK pilot, we have gained some experience of the use of Modern Methods of Constructions (MMC) homes; for example Boklok and Hope Rise are based on learning from Scandinavian models. There are a further seven pilot sites in the programme for MMC build. BCC is implementing its own heat network and BCC has started to explore a Housing First model, based on Helsinki that focuses on providing homeless people with a permanent home first before tackling wider support issues.

		<p>the healthcare sector)</p> <p>Goal 74 Year: 2025 Inclusion and school attendance rates is on track to be in line with the top quarter of best performing local authorities by 2028</p> <p>Goal 184 Year: 2031 Bristol's cultural and creative industries are actively contributing to inclusive growth across all of Bristol, breaking down barriers for those from underrepresented groups in the sector through partnerships with UWE, Rising Arts Agency, Accentuate and others</p> <p>Goal 278 Year: 2036 Bristol's inclusive approach to tackling the climate and ecological emergencies is recognised as world-leading</p> <p>Goal 518 Year: 2049</p>							<p>housing uses, including the meanwhile use of future development sites as the location for de-mountable, modular homes to use as temporary accommodation and with EDEROTH on HRA sites identified as part of the Smart Cities Climate Challenge programme, delivering 29 homes over 6 sites (subject to planning).</p>	
55			<p>Inclusive and affordable access to green spaces, sports fields, outdoor gyms with free exercise activities and educate people on where these are and how to use them.</p>	Patsy Mellor	Ellie King	Health & Social Care	Communities and businesses	Agreed as set out	<p>This work is largely business as usual and ongoing.</p> <p>The Parks and Green Spaces Strategy has recently gone out to public consultation and have a number of themes which with support this actions, which include;</p> <ol style="list-style-type: none"> 1. Nature and Climate, 2. Children and Young People 3. Community Participation 4. Health and Wellbeing 5. Culture 6. Skills and Employment <p>The work on Health and Wellbeing project is continuing and we are working to extend the project by a further 12 months.</p>	

56		<p>Everyone in Bristol feels that they belong; as an inclusive city, settled communities and newcomers alike feel a common purpose, and a shared understanding of each other, with community tensions drastically reduced</p> <p>Goal 524 Year: 2050 Everyone in Bristol can contribute to a sustainable, inclusive and growing economy from which everyone benefits</p>		<p>Legally protect, maintain and commit to increasing green spaces and community facilities (such as toilets) and create an affordable bus route to join communities to green spaces.</p>	Alex Hearn	Marvin Rees Don Alexander	Health & Social Care		Taking forward in part (specify which elements in Notes)	<p>Provision of and protection of existing green spaces will be addressed through the new Local Plan's policies. Bus service provision is managed by the West of England Combined Authority. The council provides funding to the CA to deliver supported bus services and manage public transport operations across the city. Funding is limited and constrained by government budget cuts so it is not possible at this time to provide additional supported bus services.</p>	<p>Provision of and protection of existing green spaces will be addressed through the new Local Plan's policies.</p>
57				<p>Conduct a feasibility study to determine if developers and businesses could be made to invest a set proportion of profits back into the community and to be accountable for this.</p>	Alex Hearn	Nicola Beech Craig Cheney	Health & Social Care		Action not feasible (explain in Notes)	Action not feasible - see notes	<p>It is not possible for a local authority to determine how businesses allocate their profits. However, there is a lot of other work underway to encourage diversity and inclusion across all sectors - and we will continue to promote and champion this across all sectors.</p>
58	<p>13. Empower local communities in the decision making process to deliver the services and activities that they want in order to</p>	<p>Goal 01 Year: 2021 Delivery of the Belonging Strategy actions begins so that all children and young people in Bristol feel that they belong and their voices are heard in the city</p> <p>Goal 21 Year: 2022 The voices and needs of children and young people with Special Educational Needs and Disabilities (SEND), as well as the voice of their families, have been</p>	Christina Gray	<p>Create a support plan made available for all Bristol citizens who require one based on a person centered approach.</p>	Christina Gray	Ellie King	Health & Social Care		Action not feasible (explain in Notes)	Action not feasible - see notes	<p>Bristol City Council is unable to provide individual lifestyle services because of capacity and resource. Our focus is on city wide health and the conditions which support health and healthy choices. We will continue to direct citizens to resources which are available nationally and ensure these are accessible. We provide specific lifestyle services to help people stop smoking as well as in relation to healthy weight for families and adults.</p>

59	promote healthy lifestyle choices.	<p>firmly embedded within city decision making</p> <p>Goal 127 Year: 2028 Programmes to engage young people and citizenship has resulted in 16 year olds receiving the vote and an increased number of 11 – 18 year olds turning out for the Bristol Youth Vote</p> <p>Goal 177 Year: 2030 All communities in Bristol feel that that their story and narrative is being told, their quality of life is improving and their contributions to the city are being recognised</p> <p>Goal 218 Year: 2033</p>		Create local representative groups (using sortition, just like the citizens' assembly) to let communities take control of issues, directly connecting community groups to power (the Council and relevant partners).	Christina Gray	Ellie King	Health & Social Care	VCSE	Taking forward in part (specify which elements in Notes)	<p>Creating representative groups as suggested requires a council decision and dedicated resources. The participatory decision-making process for Community Resilience Fund is now complete. 100 citizens took part from diverse backgrounds. We did not use sortition but did take positive action working with and through the City Councils Community Development Team and community and voluntary sector partners to reach people who would not otherwise take part. There is useful learning through this experience to apply to any future developments. BCC Communities Team works with neighbourhood communities to encourage and enable community empowerment and community action on the things they care about.</p>	Creating representative groups as suggested requires a council decision and dedicated resources.
60		<p>All communities in Bristol are able to participate in the development and delivery of city-wide and local learning and skills programmes</p> <p>Goal 248 Year: 2034 The number of citizens feeling involved in decision making in their neighbourhoods has increased by 20%</p> <p>Goal 292 Year: 2037 All Council-funded and community-led programmes commit to ring-fencing 5% of funding to project evaluation, to understand the impacts on communities</p>		Fund and support existing community led organisations that are getting results and mirror their effective practices with new areas and communities.	Christina Gray	Ellie King	Health & Social Care	Bristol Funders Network	Agreed as set out	This action is in progress and has been embedded in business as usual activity.	<p>The principle of sharing what works is a core element of the way the City Council works with and funds community and voluntary sector organisations.</p> <p>BCC is seeking to fund what works but also support the development of ideas and reach communities experiencing the greatest inequity. We take an asset based community development approach which means we want to fund/build the capacity of communities to collaborate and find the solutions that work for them. What works well for one community may not work well in another or may not be the priority for</p>

										<p>another community.</p> <p>However, this is led by and for the community and voluntary sector through VCSE infrastructure organisations such as Black South West Network and Voscur.</p> <p>Good ideas that are making a difference do proliferate because citizens and communities see that it is working and re-create it in a way which works for them.</p>
61			<p>Create a child and youth panel to include young people in the decision making process in establishing drop-in centres and re-establishing youth clubs. Provide support from professionally trained youth workers and relevant young people from the community to share their experience.</p>	Fiona Tudge	Asher Craig	Health & Social Care	Communities, VCSE, police, schools	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>Youth Services have been recommissioned via a grants process undertaken in collaboration with the local youth and play sector. This has resulted in a greater number of existing communities led organisations receiving funding. Professional Area Forums have been established, and area forums (which young people will sit on) are being set up from March 2024.</p>	<p>This is business as usual in part and intersects with Family Hubs, Youth Zones, Targeted Youth Support and Prevention Violence.</p>

			Community kitchens/shops/gardens should be funded to showcase and celebrate good affordable food (e.g. The Grand Iftar in Easton). These hubs can be used as a social/cultural space as well as promoting healthy eating through classes and by example.	Christina Gray	Ellie King	Health & Social Care	Bristol Food Network	Taking forward in part (specify which elements in Notes)	<p>Bristol City Council is no longer the primary, or only funder of this type of activity. Bristol City Council will use its convening and partnership powers to leverage resource. Food Policy is a high corporate priority and will continue to be so.</p> <p>We have adopted a food equality strategy and action plan. BCC is working closely with feeding bristol and other partners who focus on food to reduce inequality in food provision and access.</p>	
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63	14. Increase access to diverse and high quality employment opportunities to close the gaps within health inequalities.	See above for OCP goals regarding increasing uptake into the workforce	Reena Bhogal-Welsh	Incentivise businesses with good quality, accredited apprenticeships, training and career pathways through match-funding of wages, contributing towards training/college, support with access costs, and strengthening what currently exists, target areas of high deprivation with rent subsidies to create hubs where needed	Reena Bhogal-Welsh	Asher Craig	Health & Social Care	DWP, West of England Combined Authority, Further Education Colleges, Western Training Provider Network	Taking forward in part (specify which elements in Notes)	<p>The Employment Skills and Learning Team has continued to progress inclusive career pathways and apprenticeships in Bristol's most 'under-served' communities. In addition to On Site and the South Bristol Talent Pathway programmes, we are also running targeted sector based programmes with employers in the following areas:</p> <ul style="list-style-type: none"> i) Parks and Green Spaces ii) Health and Social Care iii) Food Sector iv) Retrofit v) Driving <p>These programmes contain a number of core elements - Pre-16 careers insights and experience of work; post 16 work placements; pre-recruitment training; providing job coaching for potential applicants from priority communities; providing apprenticeship advice and levy funding.</p>	The DWP Kickstart scheme provides wage subsidies for local businesses that create 6 month paid jobs for young people on Universal Credit. The last jobs will be filled at the end of March 2022. Bristol City Council is a managing agent for Kickstart and has filled 160 jobs, with another 100 in progress. Bristol City Council is also using our apprenticeship levy to create high quality apprenticeships in the Council, and also through our levy sharing activity. The West of England Combined Authority is funding Western Training Provider Network to co-ordinate levy sharing in the West of England and to support SME businesses to employ apprenticeships. The use of rent subsidies to subsidise apprenticeship costs would need to be approved by BCC/Landlord Services.
64					Initiate PR exercise around different types of jobs – better promotion of jobs that are seen as lower skilled (e.g. carpenter vs desk jobs) but aren't	Tim Borrett	Asher Craig	Health & Social Care		Action not feasible (explain in Notes)	Action not feasible - see notes

65				Raise aspirations in children and young people: better connect all primary and secondary schools with businesses to increase exposure to different opportunities e.g through internships and or work experience, practical experience	Reena Bhogal -Welsh	Asher Craig	Health & Social Care	Local schools and education settings Local employers CEIAG providers	Agreed as set out	<p>Bristol WORKS has gone from strength to strength, working closely with the West of England Careers Hub, with increased funding for targeted and specialist experience of work programmes targeting young people most at risk of becoming NEET. In 22/23, the team delivered 6757 experiences of work with partner education settings and employers. This included specialist activities for Disabled young people with SEND and Children in Care/Care Leavers.</p> <p>The WE Work for Everyone Programme has also provided supported internships for young people with Learning Difficulties aged 18-25.</p>	
66				Increase support to existing career advice services in school and adult education, emphasising development of soft skills or non-academic subjects as a route into real world opportunities	Reena Bhogal -Welsh	Asher Craig	Health & Social Care	National Careers Service WECA/CEC	Agreed as set out	<p>In 2023 the Council's Employment, Skills and Learning Service was reassessed and achieved the Matrix standard for our delivery of Information, Advice and Guidance. The accreditation report commended the ESL team for the the wide range of high quality IAG services provided, in particular:</p> <ul style="list-style-type: none"> i) One Front Door - supporting job seekers to access learning and work ii) Future Bright - providing in work career coaching for progression iii) Community Learning - with advice embedded into all courses to support learner progression iv) Apprenticeships - IAG at entry into learning and to support progression into work v) Pre-16 - CEIAG Network and experience of work opportunities provided vi) Post 16 - introduction of new young career coach service vii) Targeted/Specialist programmes - MIMOMU supporting rough sleepers; Adder Project supporting offenders recovering from drug and alcohol misuse; WE WORK for Everyone supporting Disabled people with Learning Difficulties 	<p>Bristol WORKS is working in partnership with West of England Combined Authority/Careers and Enterprise Company to improve Careers Education, Information, Advice and Guidance for young people pre-16 who are most at risk of becoming not in education, employment, or training.</p> <p>BCC Community Learning service is providing information, advice and guidance, and informal learning opportunities to support adult learners develop their confidence, transferable skills, readiness to learn and progression pathways to further learning, work and volunteering</p> <p>BCC Employment Support Team providing career coaches across</p>

67				Language barriers create a vocational-conversion package that enables those with high-skills but limited English to access the market whilst upskilling minimising the potential negative health impacts for this group	Reena Bhogal -Welsh	Asher Craig	Health & Social Care	City of Bristol College ACH	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	Health & Wellbeing Board and Economy Board had a workshop to explore how to attract greater diversity into the health and care sectors. City Partners have shared that there is an issue with the capacity to deliver English as a second language as there is high demand, but insufficient funding.	There is an English for Speakers of Other Languages Network which has produced a West of England Strategy which is being transferred to West of England Combined Authority as lead agency. Locally there is work underway on this action and involving other local partners such as ACH. The City of Bristol College would be a major partner as they hold adult education budget funding for accredited English for Speakers of Other Languages. BCC Community Learning can contribute through linking up community-based English for Speakers of Other Languages provision and English for Speakers of Other Languages conversation clubs.
68	15. Increase awareness and access to health information, education and services targeted according to local need.	Goal 11 Year: 2021 Support community assets (such as community centres / groups) to reduce social isolation and improve mental wellbeing, focusing particularly on communities with mental health inequalities	Christina Gray	Put in place local and direct management of health needs utilising existing data (e.g. target GP funding based on local area need, instead of per capita).	Christina Gray	Ellie King	Health & Social Care	BNSSG HT	Taking forward in part (specify which elements in Notes)	This action sits with the new ICS and Integrated Care Partnerships. The provision of health information and advice takes place in many ways and levels - both around topics and touch points. BCC does not have the power to target GP funding based on our own identified local need.	What is described here is an individualised approach and sits in population health management. This needs to be embedded in the make every contact count approach. Public Health leads system level initiatives such as Thrive and Food Equality.
69		Goal 19 Year: 2022 All young people are able to access a range of activities that supports both their mental and physical health outside of school that is suitable to their needs, including activities such as sport, outward bound courses, forest schools and cycling		Engage with a diverse range of community leaders (faith leaders, community organisation leaders, play professionals, etc.) to better understand different communities. Find out what's not working so far and how to improve e.g listening exercises, local citizen's assemblies etc then tailor local health	Christina Gray	Ellie King	Health & Social Care	Healthier Together	Agreed as set out	This is in progress and has been embedded as business as usual activity.	This is core business for the City Councils community development team. The team is connected to the Integrated Care system Locality Partnerships through the locality boards and a Community Health Action Network convened by the Director of Public Health. There are also three voluntary sector lead partners feeding in to Healthier Together This is

	<p>Goal 30 Year: 2022 Health and care services for children and young people are improved in order to tackle Adverse Childhood Experiences (ACEs), through the ongoing delivery of the Belonging Strategy</p>		related policy accordingly.							an ongoing process with partners and communities. The Mayor and Cabinet meet regularly with community leaders. BCC community development team works with diverse communities.
70	<p>Goal 101 Year: 2026 Vaccination uptake continues to be maximised in communities experiencing inequalities in health</p> <p>Goal 84 Year: 2025 The gap in healthy life expectancy between the most and least deprived areas of Bristol has been reduced by 10% since 2020, for both men and women</p>		Replicate and communicate good practice. Identify which services and organisations are already out there and doing a good job and what more is needed then replicate good practice.	Christina Gray	Ellie King	Health & Social Care	Healthier Together	Taking forward in part (specify which elements in Notes)	Replicating and communicating good practice is part of ongoing work. The localities are members of the health and wellbeing board and fully embrace asset based community working and based on need identified in the localities Joint Strategic Needs Assessment.	This is a core part of ongoing change processes across the system.
71	<p>Goal 272 Year: 2036 Every citizen in Bristol has the opportunity to learn something new to improve their health and wellbeing</p>		Utilise 91 Ways as a facilitator of good nutrition through the sharing of food heritage-embed into school curriculum (Bristol One Curriculum)	Reena Bhogal-Welsh	Ellie King Asher Craig	Health & Social Care	One Bristol Curriculum Group	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	The healthy schools programme is designed to ensure healthy food becomes embedded in school culture. The Bristol One Curriculum is not a BCC led project.	The Bristol One Curriculum is not a Bristol City Council led project. Any work to integrate 91 Ways into the Bristol One Curriculum will need to be led and overseen by the Bristol One Curriculum Steering Group.
72	<p>Goal 317 Year: 2038 Inequalities in mental health problems for BAME communities are no longer disproportionate compared to the city as a whole</p> <p>Goal 316 Year: 2038 Hospital admissions from people in the most deprived areas for long term conditions such as diabetes and respiratory</p>		Individuals with complex needs: provide funding for homelessness organisations for post-COVID-19 recovery strategy.	Donald Graham	Tom Renhard	Health & Social Care		Taking forward in part (specify which elements in Notes)	We have successfully applied for RSI 5-7 2022-2025 (services that prevent and relieve rough sleeping), Additional Pressures Funding (to reflect increasing numbers of people coming onto the street) and funding for people coming out of prison to access private sector tenancies (Accommodation for ex-Offenders), this equates to around £4.5 million per year. Most of this grant funding is going to VCS homelessness organisations. We have also supported funding applications to grass roots VCS organisations like Caring in Bristol, In Hope and Churches Winter Night shelter to provide more	Clients with complex needs are included in our proposals for RSI 5-7 (3 year funding). Proposals are being developed with homelessness organisations. Majority of grant funding will go to homelessness organisations. The changing futures programme will focus on system change for clients with multiple disadvantages.

	<p>disease have halved from the 2018 level</p> <p>Goal 389 Year: 2042 Inequalities in early cancer diagnosis have been significantly reduced</p> <p>Goal 425 Year: 2044 The strong and persistent link between social inequalities and disparities in health outcomes has been addressed as recommended by the Marmot Review 2010</p> <p>Goal 444 Year: 2045 The gap in healthy life expectancy has significantly reduced between the most deprived and most affluent areas in Bristol</p> <p>Goal 479 Year: 2047 Hospital admissions from people in the most deprived areas for long term conditions such as diabetes and respiratory disease are at a third of the 2018 level</p>							<p>bed spaces in the city through the Winter transformation Fund. We collaborate closely with the Changing Futures programme and other commissioners to increase engagement and access to services for people experiencing Multiple Disadvantage.</p>	
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73	<p>16. All departments of the Council must take on the mandate to reduce health inequalities and improve the health of all citizens in the city with a focus on accountability, partnership and transparency when measuring and using public health data.</p>	<p>There are many OCP goals related to health inequality (see below) - however none have power over Council policy and departments</p>	<p>Tim Borrett</p>	<p>Every Council department takes responsibility for the health of Bristol citizens – where necessary budgets and resources need to come together to facilitate such decisions.</p>	<p>Christina Gray Tim Borrett</p>	<p>Ellie King</p>	<p>Health & Social Care</p>	<p>Communities and faith groups</p>	<p>Agreed in principle but delivered by proxy or alternative activity (explain in Notes)</p>	<p>Complete, closed.</p>	<p>Health in all policies is included as a principle in the Council's Corporate Strategy and further work to embed this is underway through a review of policy functions in the Council.</p> <p>August 2022 update - The Council's Policy and Public Affairs team is restructuring to place dedicated capacity to overseeing Health In All Policies and ensuring that consideration of health impacts are systematically applied across the Council. This will be an area of ongoing practice and improvement.</p> <p>July 2023 update - Health in all Policies has dedicated capacity within the council's central policy function, and there is an ongoing watching brief. This action is considered closed as it is a perpetual activity.</p> <p>August 2023 - as per July 2023; now closed.</p>
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74				<p>Establish an information network relevant to all stakeholders and users, (including those with protected characteristics), using faster, better data. Use a flow of information which is available to as many people as need it, including community groups. This will promote holistic decision-making and joined up budgets.</p>	Tim Borrett	Marvin Rees Ellie King	Health & Social Care		<p>Agreed in principle but delivered by proxy or alternative activity (explain in Notes)</p>	<p>We have taken this action forward through our collaboration with the Changing Futures programme and other commissioners to increase engagement and access to services for people experiencing Multiple Disadvantage.</p>	<p>Whilst this sounds simple, the logistics and costs of establishing and maintaining it could be prohibitive. However, we are always looking for new ways to effectively share information with communities and stakeholders, and will keep this under consideration through the People and Communities Working Group. It should certainly be possible to fulfil this in part by mapping community-level contacts and updating our distribution databases for news and marketing material (as long as new contacts' consent is given for this).</p> <p>August 2022 - Internal work to review communications and engagement roles and structures, along with ongoing work in Communities and Public Health to reimagine grass-roots community partnership, means this will be delayed until 2023 (aside from tactical 'quick wins' to share information with a wide range of stakeholders when issuing news updates).</p> <p>Update Jan 2024: Participation in Changing Futures programme, specifically aimed at improving local services for people experiencing multiple disadvantage: www.changingfuturesbristol.co.uk</p>
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75				Work together internally and actively listen to community organisations and partners to create, gather and use data with clear information flows up and down, using all forms of media appropriate for the different social groups within Bristol.	Christina Gray	Ellie King	Health & Social Care	Communities and faith groups	Taking forward in part (specify which elements in Notes)	This action is in progress and has been embedded as business as usual activity for the council.	This can be embed in Joint Strategic Needs Assessment and apply Joint Strategic Needs Assessment across all areas of busines. There is no additional resource so it will require use of and opening channels
76				Allocate funds to preventative measures – we recognise that prevention and small actions now pay dividends later.	Christina Gray Denise Murray	Ellie King Craig Cheney	All	City Funders	Taking forward in part (specify which elements in Notes)	Complete	Preventative investment would be directly linked to a health in all policy approach and is about how the Council and partners invest and leverage. The action is to develop approaches and tools by which this may happen. However, with limited funds and a legal requirement to meet statutory and regulatory obligations (which typically prioritise 'response' over 'prevention'), there are practical limits on when, where, and how much the Council can directly invest in prevention in all its forms.

77			Establish an independent body to review health inequality information. Use information such as the One City Plan to provide data metrics, and in combination with the citizens assembly reflect and report on health inequalities – disseminate information on relevant media and audiences.	Christina Gray	Ellie King Asher Craig	All	HWBB and Healthier Together	Taking forward in part (specify which elements in Notes)	Health inequalities information is being disseminated via the Joint Strategic Needs Assessment and the Health and Wellbeing Board Annual Report	
78			Ensure that Bristol continues to improve its inter-racial coherence and fairness in health provision by ensuring meaningful BAME representation and where necessary over-representation in all quarters of health research, data use, management and information dissemination	Christina Gray	Ellie King Asher Craig	Health & Social Care	NHS - healthier Together OHID & DHLUC	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>Race and health inequality prevalent across Bristol is being addressed through an established multi-agency and multi-sector Race and Health Equity Group.</p> <p>This group now established and running since late 2022 enables the group partners to take a priority based approach to collectively working to tackle Bristol's key challenges using public health, medical and community based intelligence and data.</p> <p>The group works to ensure areas of under and over representation in areas of race and health inequality are tackled on a city-wide scale with key research, data, good practice and learnings shared to help drive the group's responses.</p>	<p>We are ensuring that Bristol City Council continues to lead race equality and health work linking with NHS England inequality programme, Office for Health Improvement and Disparities and Department for Levelling Up, Housing and Communities inequality programmes. We will ensure that the Race and Health Challenge Group is established, and the Race Equality Commission and leadership groups are supported.</p> <p>August 2022 update: The Race & Covid group is evolving to become the Health Equity and Race Group, and is both instigating and considering research relating to race and health. Research bids have been jointly undertaken with community groups to ensure appropriate ownership and delivery. The group will also influence the new BNSSG Independent Advisory Group on Race and Health. Public health funding is providing policy capacity to</p>

										<p>directly support implementation of the Council's "health in all policies" approach.</p> <p>During 2023 the group has been focusing on race and health inequality in relation to maternal mortality and related experiences, looking at local and national research and opportunities to improve experiences and outcomes. In November 2023 the group will carry out an agreed annual review of priorities and will also consider all other potential key areas of race and health inequality to also focus on as part of the group's work during 2024.</p>
79	<p>17. Invest in an equitable start to life from pre-birth to young adults (up to 25)</p>	<p>Goal 19 Year: 2022 All young people are able to access a range of activities that supports both their mental and physical health outside of school that is suitable to their needs, including activities such as sport, outward bound courses, forest schools and cycling</p> <p>Goal 21 Year: 2022 The voices and needs of children and young people with Special Educational</p>	<p>Reena Bhogal-Welsh</p>	<p>Address food poverty in children by increasing access to and awareness of culturally diverse nutritional food throughout the school year to avoid attention and learning deficits and improve mental and physical health. A strategy should be in place to achieve this by Christmas 2021.</p>	<p>Reena Bhogal-Welsh</p>	<p>Asher Craig Ellie King</p>	<p>Health & Social Care</p>	<p>Agreed in principle but delivered by proxy or alternative activity (explain in Notes)</p>	<p>A One City Food Equality Strategy for Bristol was published in 2022 and runs until 2032. Alongside this, a One City Food Equality Action Plan was adopted in 2023 which runs until 2026. These look to address food poverty in children.</p>	<p>The Holiday Activities and Food programme is funded to support the most vulnerable pupils during the summer, winter, and Easter holidays. The food and physical activity focus can incorporate some aspects of this action utilise an existing funded programme. BCC made £660,000 available from the Household Winter Hardship Fund for pupils on Free School Meals food for food vouchers for October 2021 and February 2022 half terms.</p>

80	<p>Needs and Disabilities (SEND), as well as the voice of their families, have been firmly embedded within city decision making</p> <p>Goal 37 Year: 2023 All children have access to healthy food at school, with school meals meeting the highest nutritional standards and with improved access to growing food opportunities for children in schools and food education</p>	<p>Make existing charities and youth organisations the first point of contact for young people and families. Fund these local and grassroots groups to provide well trained youth leaders to build relationships in the community and deliver a wider range of joined up services.</p>	Reena Bhogal -Welsh	Asher Craig/ Ellie Craig	Health & Social Care	Police, NHS, VCSE, Bristol Funders	Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>We have developed collaborative commissioning processes with VCS and young people to develop specification of contracts. Recommissioning of youth services is now being progressed to support smaller organisations. Youth and community teams supporting communities and grass roots organisations to deliver youth work and develop youth leaders, including direct support to Youth Council. Since 2021 3 Family Hubs has now been established in the city. Family Hubs will further develop to ensure offer services for young people to 18yrs of age or 25yrs.</p>	<p>Children and Young People Community grant funding currently sits separately from wider population programmes.</p>
81	<p>Goal 39 Year: 2023 The city is supporting Bristol's early years and childcare sector to deliver the best possible start for Bristol's children, including an affordable municipal childcare offer</p> <p>Goal 109 Year: 2027 There are no children or young people living in temporary accommodation in Bristol</p> <p>Goal 163 Year: 2030 A 30% reduction has taken place since 2020 in the gap between children in the most deprived areas and children in the rest of the city achieving a good level of development at early</p>	<p>Invest in children and young people's mental health using technologies appropriate to them, which are easily found and advertised digitally, which have an immediate response, and use local organisations to deliver.</p>	Reena Bhogal -Welsh	Asher Craig Ellie King	Health & Social Care		Agreed in principle but delivered by proxy or alternative activity (explain in Notes)	<p>All three organisations commissioned within the Childrens Community Health Partnership contract to provide mental health support in Bristol have accessible online information about their service, including lots of information about keeping healthy as well as mental health and how to get support. They all have pages co-created by and for young people with relevant information. KOOTH offers online mental health support and is used widely by young people aged 11-18 in Bristol. Services are advertised digitally in schools and Off the Record and Kooth are present on social media platforms. Support for people with lower level mental health needs is offered by the public health school nursing service and they also offer digital support, including sign posting. An online directory for mental health support for children and young people acrosss BNSSG has also been produced for young people and parents and was updated in August 2023.</p>	<p>It is likely that elements of this are already addressed within the Thrive mental health programme but we will consider what more might be possible. It is likely any use of technology platforms would be best provided by existing, trusted, healthcare providers to which people can be signposted - rather than duplicating this locally.</p>

82		<p>years foundation stage</p> <p>Goal 145 Year: 2029 A higher proportion of young people from disadvantaged backgrounds now go onto post 16 and post 18 education</p> <p>Goal 235 Year: 2034 Accredited, online, modular education courses is available to everyone in the city</p> <p>Goal 199 Year: 2032 200 Bristol companies have pledged to provide quality work experience to children in the city who traditionally have less access to such opportunities</p> <p>Goal 273 Year: 2036 Through focussed work in particular with care leavers and traditionally excluded groups, Bristol is now a city where no young people (aged 15-24 years) are involuntarily not in education, employment or training (Not in Education, Employment, or Training)</p> <p>Goal 254 Year: 2035 Free, good quality pre-school education is available for all</p> <p>Goal 236 Year: 2034 All children with behavioural problems have</p>		<p>Advocate to educate parents and train teachers, support staff and peers in schools (or home-school settings) to recognise challenging lives and have difficult conversations about mental health to catch issues early.</p>	<p>Reena Bhogal -Welsh</p>	<p>Asher Craig Ellie King</p>	<p>Health & Social Care</p>	<p>Health, Schools</p>	<p>Under Assessment</p>	<p>The Bristol Healthy Schools team lead on providing information, guidance and resources about mental health and wellbeing in schools. Schools and settings are signposted to locally produced and Public Health England resources, which include practical strategies for teachers to employ to meet the needs of children presenting with mental health needs. These are communicated via the BCC website and regular Headteacher Bulletins. Workstreams relating to infant mental health and the Home Learning Environment currently sit under the Bristol Family Hubs development. With a focus on advice and guidance for families, the roll out of a programme of evidence-based training for parents and carers is underway. Three physical Family Hubs have now been established, located in Hartcliffe, Southmead and Barton Hill, providing both virtual and in-person support for families. The roll out of Trauma Informed Practice training across early years settings and schools is equipping practitioners and teachers with the skills to tailor their provision and employ appropriate strategies to manage children and young people's mental health needs and behaviours. Sitting under the Council's Belonging Strategy, trauma-informed practice is recognised as a critical strategy following the pandemic, notably for teenagers and babies born during the Covid years. In Early Years, the roll out of the 'Five to Thrive' approach focuses on building secure attachments from birth, supporting both the mental health of babies/toddlers and their parents/carers. A team of 23 'Five to Thrive' champions is now established, including representatives from health, education and children's social care to ensure a coordinated, integrated approach to tackling this issue.</p>	<p>Work on this has already progressed through a range of additional resources, training and interventions such as:</p> <ul style="list-style-type: none"> - use of wellbeing grant to roll out mental health training across schools - specific training for Learning Support Assistants - school-based mental health first aiders - joint programmes between schools and Children's mental health services <p>Expansion of projects and school-based roles will also continue in line with DfE funding and local priorities.</p>
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	<p>the necessary support in place as early as possible, through earlier assessment and intervention</p> <p>Goal 325 Year: 2039 75% reduction in the gap in levels of development at early years between children who live in the most deprived areas of Bristol</p> <p>Goal 345 Year: 2040 The educational attainment gap is not linked to protected characteristics</p> <p>Goal 344 Year: 2040 Every child who is educated in Bristol is given equal opportunity of paid employment in the city irrespective of the neighbourhood they grew up in or any protected characteristics (such as race, religion or belief, disability, sex, sexual orientation or gender reassignment)</p> <p>Goal 523 Year: 2050 Every child in Bristol has the best possible start in life, gaining the support and skills they need to prosper in adulthood</p> <p>Goal 471 Year: 2047 Children's access to learning, and their attainment potential, are not determined by where they live in the city</p>								
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Decision Pathway – Report

PURPOSE: For noting

MEETING: Cabinet

MEETING DATE: 6 February 2024

TITLE	2023/24 P9 Finance Exception Report		
Ward(s)	N/a		
Author: Jemma Prince	Job title: Finance Business Partner – Financial Planning, Reporting and Strategy		
Cabinet Lead: Councillor Craig Cheney: Cabinet Member, City Economy, Finance and Performance	Director Lead: Denise Murray – Director of Finance		
Proposal origin: Other			
Decision maker: Cabinet Member			
Decision forum: Cabinet			
Purpose of Report:			
<p>The Council budget for 2023/24 was agreed by Full Council 21 February 2023. This report provides information and analysis at Period 9 (December 2023 extrapolated) on the Council’s financial performance against the approved budget and forecast use of resources for the financial year.</p> <p>In addition, this report also serves as a mechanism for any finance approvals or adjustments that are required on the Council’s approved budget.</p>			
Evidence Base:			
<p>The 5 year budget was approved by Council in February 2023.</p> <p>The Council operates Directorate cash limited budgets and Executive Directors are responsible for ensuring that appropriate action is taken to contain both revenue and capital spending in line with the directorate’s overall budget limit. Budget holders forecasting a risk of overspend which can potentially be brought back in line with their budget should, in the first instance, set out in-service options for mitigation. Where these options are considered undeliverable or pressures cannot be contained across the directorate the budget scrutiny process will be triggered and a request may be made for the Executive to consider granting a supplementary estimate redirecting funds from an alternative source.</p> <p>The Council’s overall annual revenue spend is managed and monitored across a number of areas and at Period 9 the forecast financial outturn for 2023/24 is as follows:</p> <p>The General Fund</p> <ul style="list-style-type: none"> • The General Fund is currently forecasting a risk adjusted overspend of £5.5m, 1.1%, on the approved budget of £483.5m. This forecast is unchanged from Q3/P8 and it is expected that this forecast pressure will be mitigated in full before close of the current year (details are provided in Appendix A1). • The General Fund savings programme for 2023/24 agreed by Council and included in the General fund budget above is £26.2m (23/24 savings £16.2m and £10.0m carried forward from prior years still requiring delivery). In addition to this £26.2m, there are an additional net £9.3m of savings undelivered at 2022/23’s full year outturn and £1.8m of additional savings activity approved since the start of 2023/24 so that a total £37.3m savings are being tracked in the current financial year. Currently £6.7m (18%) of these £37.0m savings are reported as being at risk. • A number of these savings delivery risks are captured in the forecast outturn above or in the directorate risk and opportunities logs; however, it should be noted that not all risks are formally acknowledged in the outturn and as such these represent an underlying additional risk. 			

The Ring-fenced Accounts

- Housing Revenue Account (HRA) is forecasting an overspend of £2.1m (1.6%) on the £137.4m approved gross expenditure budget.
- The Dedicated Schools Grant (DSG) revised budget, including amounts recouped by the Education and Skills Funding Agency for Academies, is £452.3m against which it continues this month to forecast a £16.4m (3.6%) mitigated in-year deficit. This in-year forecast overspend, when combined with the prior year's carried forward deficit of £39.7m, brings the forecast total accumulated carried forward in to 2024/25 deficit £56.1m.
- The Public Health Grant allocation for 2023/24 is £35.7m and no variation is forecast.

Capital Programme

- The latest revised Capital Programme total budget for 2023/24 is £266.7m reflecting an increase of £5.2m in the General Fund budget since Q3/P8. This increase in budget follows recent Cabinet approvals and delegated decisions to revise the capital programme. Details are in Appendix A1, Section 6.1. The General Fund is forecasting an underspend of £5.4m against its revised GF budget of £153.9m (and 2.0% of Total Capital Programme budget) and the HRA is forecasting an underspend of £5.0m against its revised budget of £108.5m (and 1.9% of Total Capital Programme budget). There is no forecast variance against the remaining budget balance for corporate contingency and funds of £4.3m.

Further Risks & Opportunities

- Further risks and opportunities to the Council have been identified which could materialise during the financial year. These are a combination of costs, savings delivery, income generation and funding opportunities. These risks and opportunities arise within the Resources Directorate and Growth and Regeneration Directorate and currently present a net £0.6m. Should these risks materialise it is expected that mitigations will be identified to offset them in full.

Decisions to approve

N/A

Cabinet Member / Officer Recommendations:

That Cabinet notes:

- The General Fund forecast £5.5m adverse outturn variance against the approved budget for 2023/24.
- The performance on delivery of savings (as summarised in Section 3).
- The General Fund additional net risk of £0.6m against which Executive Directors plan to mitigate in full (as summarised in Section 4).
- A forecast overspend of £2.1m within the HRA and that over- or under-spends that materialise on the HRA will be funded by a transfer from or to the HRA general reserve at the end of the financial year.
- A forecast in-year deficit of £16.4m accumulating to a total £56.1m carried forward deficit in the DSG for 2023/24.
- A breakeven position on Public Health services.
- A forecast £10.4m underspend against the revised Capital Programme's Budget (Section 6).

Corporate Strategy alignment:

This report sets out progress against our budget, part acting in line with our organisational Theme of Effective Development Organisation, making sure that we are financially competent and resilient, offering good value for money (page 58).

City Benefits:

Cross priority report that covers whole of Council's business

Consultation Details: N/a

Background Documents: N/a

Revenue Cost	See above	Source of Revenue Funding	N/A
Capital Cost	See above	Source of Capital Funding	N/A

One off cost <input type="checkbox"/>	Ongoing cost <input type="checkbox"/>	Saving Proposal <input type="checkbox"/>	Income generation proposal <input type="checkbox"/>
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Required information to be completed by Financial/Legal/ICT/ HR partners:
1. Finance Advice: The resource and financial implications are set out in the report.
Finance Business Partner: Jemma Prince, FBP – Financial Planning, Reporting & Strategy, 25 th January 2024
2. Legal Advice: Cabinet is asked to note financial performance as at P9 against the approved budget. The report, including the detail set out in the Appendix, will assist Cabinet to monitor the budget position with a view to meeting the Council’s legal obligation to deliver a balanced budget.
Legal Team Leader: Nancy Rollason, Head of Legal Service, 25 th January 2024
3. Implications on IT: Whilst the process of financial monitoring has no IT implications itself, the council continues to carry business continuity and cyber-security risks and the council’s overall financial position (and its capacity for change management) makes it likely that this will continue in-year.
IT Team Leader: Tim Borrett, Director: Policy, Strategy and Digital, 25 th January 2024
4. HR Advice: As this report is for Cabinet’s information and no additional savings are proposed that have an impact on the employment of BCC staff, there are no HR implications of the recommendations.
HR Partner: James Brereton, Head of Human Resources, 26 th January 2024

EDM Sign-off	Stephen Peacock	17 th January 2024
Cabinet Member sign-off	Councillor Craig Cheney: Cabinet Member, City Economy, Finance and Performance	25 th January 2024
For Key Decisions - Mayor’s Office sign-off	Mayor’s Office	29 th January 2024

Appendix A – Further essential background A1: Period 9 2023/24 – Finance Exception Report	YES
Appendix B – Details of consultation carried out - internal and external	NO
Appendix C – Summary of any engagement with scrutiny	NO
Appendix D – Risk assessment	NO
Appendix E – Equalities screening / impact assessment of proposal	NO
Appendix F – Eco-impact screening/ impact assessment of proposal	NO
Appendix G – Financial Advice	NO
Appendix H – Legal Advice	NO
Appendix I – Exempt Information	NO
Appendix J – HR advice	NO
Appendix K – ICT	NO
Appendix L – Procurement	NO

Bristol City Council

Period 9 2023/24 - Finance Exception Report

1. REVENUE SUMMARY POSITION

- 1.1. This report relates to the Period 9 full year forecast for 2023/24 (December 2023 extrapolated). It is an exception report and as such is intended to focus on key financial issues for the Council including movements since Period 8 as reported to January's Cabinet. It is not a full financial forecast for each division and no significant variances have been identified or accelerated by budget holders beyond those issues highlighted in this report.
- 1.2. The Council operates Directorate cash limited budgets and Executive Directors are responsible for ensuring that appropriate action is taken to contain both revenue and capital spending in line with each directorate's overall budget limit. Budget holders forecasting a risk of overspend which can potentially be brought back in line with their budget should, in the first instance, set out in-service risks and opportunities for mitigation. Where these are considered undeliverable, or pressures cannot be contained across the directorate, the budget scrutiny process will be triggered so that a deep dive can be performed and, where appropriate, request may be made for the Executive to consider granting a supplementary estimate redirecting funds from an alternative source.
- 1.3. As part of this Q3/Period 8 report, the Children and Education Directorate forecast a pressure of £18.5m which has been assessed as non-containable within the directorate. In order to ensure that the directorate remains within its budget spend authority, both £1.7m contract inflation as originally budgeted for Children and Education Directorate (approved at Full Council 21 February 2023) and an initial supplementary estimate of £11.5m (approved at Full Council 31 October 2023) will be transacted in Period 10. A further supplementary estimate is then to be recommended to Full Council alongside the Budget Report for 2024/25 in February 2024 to offset the balance of the forecast pressure.
- 1.4. The forecast outturn position on the Housing Revenue Account (HRA) is a £2.1m (1.6%) adverse variance. Details are set out in section 5.2 below.
- 1.5. The Dedicated Schools Grant (DSG) continues to forecast a £16.4m deficit (3.6%) against the revised gross budget of £452.3m. This would bring the cumulative deficit at this year end to £56.1m. This forecast includes the mitigating effect of a transformational programme of savings scheduled to deliver £2.1m in the current year. Details are set out in section 5.3 below.
- 1.6. The Public Health (PH) Grant is forecast to break-even as set out in section 5.4 below.

2. GENERAL FUND REVENUE POSITION

- 2.1. The assessment at Period 9 shows the Council's scheduled General Fund currently forecasting a risk adjusted overspend of £5.5m. This is a 1.1% adverse variance on the approved gross budget of £483.5m.
- 2.2. This £5.5m forecast overspend is driven by emerging pressures within the Adult and Communities Directorate which represent £2.2m (1.1% of its revised budget of £194.3m) plus £0.5m within Resources Directorate (1.1% of its revised budget of £47.2m) and £2.8m within Growth and Regeneration Directorate (4.5% of its revised budget of £62.4m). These directorates are expected to mitigate their pressures in full, either on a one-off or recurrent basis before the full year outturn. The £18.5m Children and Education Directorate pressures are expected to be mitigated by the £18.5m funds held in abeyance in Corporate Directorate.

Table 1: P9 2023/24 Summary Full Year General Fund Revenue Forecast

Period 9 - Summary	Approved budget	Revised Budget	P9 Forecast	P8 variance	P9 movement variance	Total Variance YTD P9	Total Variance %
	£000s	£000s	£000s	£000s		£000s	
8 - Adult & Communities							
14 - Adult Social Care	155,990	173,415	177,583	4,168	0	4,168	2.4%
36 - Communities and Public Health - General Fund	6,196	6,469	6,329	(140)	0	(140)	-2.2%
57 - Commissioning, Contracts Quality and Performance (Adults)	10,519	14,461	12,590	(1,870)	0	(1,870)	-12.9%
Total 8 - Adult & Communities	172,705	194,345	196,502	2,158	0	2,158	1.1%
9 - Children & Education							
15 - Children and Families Services	88,708	89,674	103,631	13,957	0	13,957	15.6%
16 - Educational Improvement	21,644	22,556	27,102	4,546	0	4,546	20.2%
1B - Transformation - Our Families Programme	0	0	0	0	0	0	0.0%
Total 9 - Children & Education	110,352	112,230	130,733	18,503	0	18,503	16.5%
2 - Resources							
21 - Policy, Strategy and Digital	21,008	21,383	21,401	18	(0)	18	0.1%
22 - Legal and Democratic Services	14,575	15,607	16,405	798	0	798	5.1%
24 - Finance	6,142	6,903	6,783	(120)	0	(120)	-1.7%
25 - HR, Workplace & Organisational Design	3,155	3,188	3,104	(84)	0	(84)	-2.6%
26 - Management - Resources	181	110	0	(110)	0	(110)	-100.0%
Total 2 - Resources	45,061	47,191	47,693	502	(0)	502	1.1%
4 - Growth & Regeneration							
37 - Housing & Landlord Services	20,559	21,651	21,651	0	0	0	0.0%
46 - Economy of Place	3,328	3,057	3,059	2	0	2	0.1%
47 - Management of Place	(2,334)	(1,643)	(1,090)	553	0	553	-33.7%
4A - Management - G&R	(170)	(338)	(338)	0	0	0	0.0%
4B - Property, Assets and Infrastructure	40,011	39,702	41,954	2,252	0	2,252	5.7%
Total 4 - Growth & Regeneration	61,395	62,429	65,236	2,807	0	2,807	4.5%
SERVICE NET EXPENDITURE	389,512	416,194	440,164	23,970	(0)	23,970	5.8%
X2 - Levies	11,071	6,071	6,071	0	0	0	0.0%
X3 - Corporate Expenditure	49,634	15,605	15,605	(0)	0	(0)	0.0%
X4 - Capital Financing	23,866	21,933	15,985	(5,948)	0	(5,948)	-27.1%
X6 - Year-end Transactions	0	12,320	(235)	(12,555)	0	(12,555)	-101.9%
X9 - Corporate Allowances	9,440	11,400	11,400	(0)	0	(0)	0.0%
Total Corporate	94,011	67,329	48,826	(18,503)	0	(18,503)	-27.5%
TOTAL REVENUE NET EXPENDITURE	483,523	483,523	488,990	5,467	0	5,467	1.1%

2.3. Adults, Communities and Public Health Directorate

Adult Social Care

- 2.3.1. The Adult Social Care position at Period 9 forecasts an overspend of £2.0m, unchanged from Period 8. The forecast variance is due mainly to forecasts in the Adult purchasing budgets.
- 2.3.2. The Adult purchasing budgets are under significant pressure in relation to both the increasing number of people being supported and the cost of these supporting care packages. A resulting pressure of £13.6m is partially offset by increases in contributions from those clients drawing on care and support services, plus forecast underspends on both employee costs, grants and other non-adult purchasing costs (net). These combine to total £8.6m.
- 2.3.3. Forecast savings and planned mitigations including those from the transformational work progressing with Peopletoo are expected to deliver £3.0m towards the offset of the balance. However, there currently remains a £2.0m net pressure which the directorate continues to work towards mitigating.

Public Health (General Fund)

- 2.3.4. The Public Health (General Fund) at Period 9 continues from Period 8 to forecast an underspend of £0.1m.

2.4. Children and Education Directorate

- 2.4.1. There are a wide range of national and local challenges being experienced within the Children and Education directorate and the emerging risks have deepened since P8. However, following the deep dive, review work is ongoing in the directorate to establish opportunities to manage and mitigate these pressures and the associated risk of further deterioration. Recognising the tension between service improvements and financial pressures, designing effective services with, and for, children and families; and efficiency of delivery and best value will improve as a result.

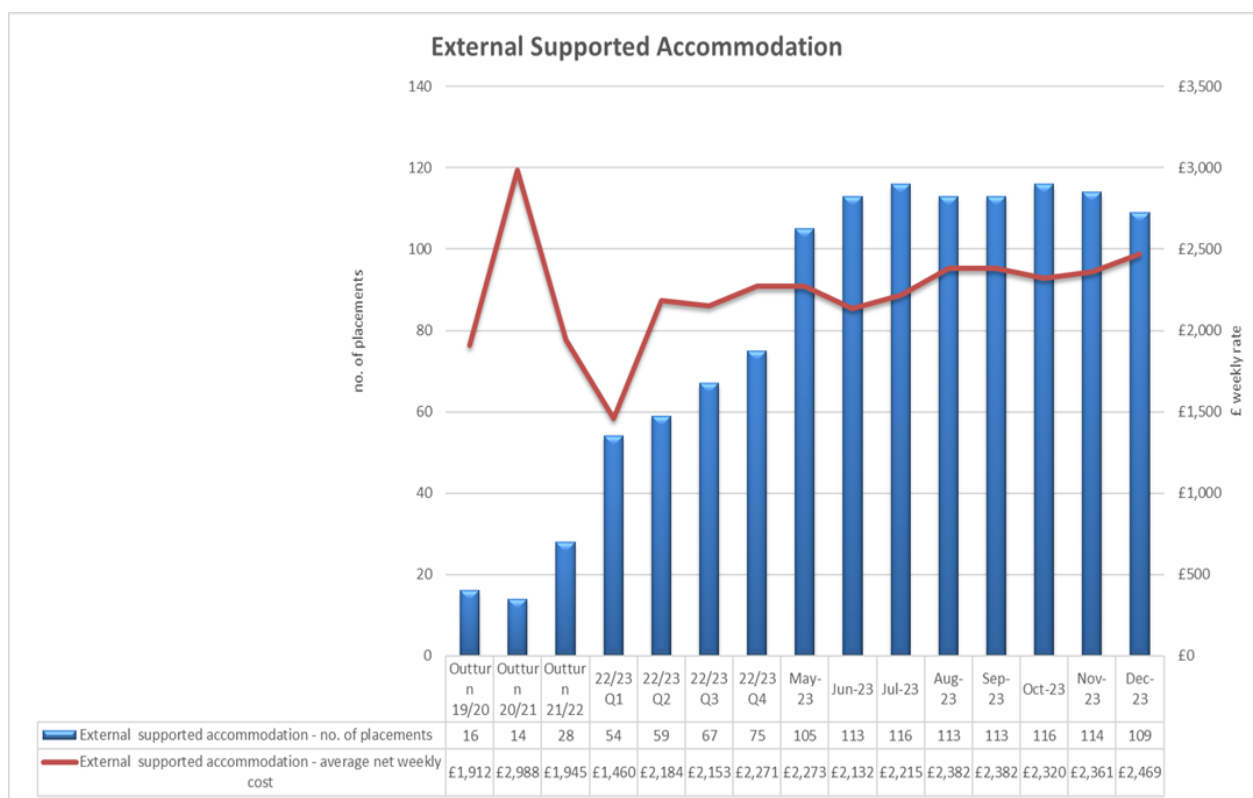
2.4.2. Children and Families

The Children and Families Service is forecasting a pressure of £14.0m (15.5%) on a revised budget of £89.7m. This pressure is predominantly due to the changing complexity and mix of social care placements. The tables below provide further detail on the forecast pressure, latest placement numbers and associated costs.

Table 2: P9 2023/24 Children and Families Revenue Expenditure Forecast

Children's and Families		Revised Budget 2023/24	P09	Variance	Change from last month
		£000s	Forecast		
			£000s	£000s	£000s
Placements					
	External Supported Accommodation	5,448	13,994	8,546	-44
	In House Fostering	6,606	6,205	-401	119
	Independent Fostering Agencies	6,775	7,541	766	-43
	Inhouse Supported Accommodation	99	17	-82	-11
	RO & SGO	5,683	5,855	172	30
	Out Of Authority - Placements	15,770	24,213	8,443	0
	Parent & Baby Unit - Citywide	571	1,304	734	7
	Secure	148	408	260	-21
	Children's Homes	4,229	3,674	-555	147
	Post Adoption	381	248	-133	-0
Total placements		45,709	63,459	17,750	184
	Other non-placement related budgets	43,964	40,171	-3,793	-184
Total Children & Families		89,674	103,630	13,957	-0

Table 3: External Supported Accommodation – Placement and Costs



2.4.3. Educational Improvement

The Educational Improvement Service is forecasting an adverse variance of £4.5m (20.2%) on a revised budget of £22.5m. This pressure continues to be as a result of the increasing number of children with Education Health and Care Plans (EHCPs) requiring transport to school and the growing number reliant on having to travel longer distances from home.

2.5. Resources Directorate

2.5.1. The Resources Directorate is currently forecasting a full year overspend of £0.5m (1.1%) against a revised budget position of £47.2m. There has been no movement in the forecast from Period 8. The net position for risks and opportunities is a £0.6m risk. It is anticipated that the directorate will identify a range of one-off mitigations for both these budget pressures and potential risks before the full year outturn.

2.6. Growth and Regeneration Directorate

2.6.1. The Growth & Regeneration Directorate is reporting a forecast overspend of £2.8m (4.5%) against its revised budget position of £62.4m. The forecast overspend includes a £2.2m overspend against corporate energy costs and a £0.6m overspend against street lighting costs. Both overspends are driven by the higher than expected cost of electricity and gas in 2023-24. There are further emerging pressures associated with Temporary Accommodation and the delivery of savings required by the Property Programme which are currently under detailed review. Following this, it may be necessary incorporate these in to the forecast at P10. However, it is

anticipated that the directorate will identify a range of one-off mitigations before the full year outturn.

3. SAVINGS PROGRAMME – SUMMARY

Table 4: Summary of Savings Delivery

Directorate	Total Savings due in 23/24 £m	Other approved changes £m	Savings with net cost in 23/24 £m	Account for savings that were one-off only in 22/23 £m	Rollover of undelivered savings from previous year £m	Net - savings as per Budget 23/24 £m	2023/24 Savings reported as safe		2023/24 Savings reported as at risk	
							£m	£m	£m	%
Children's & Education	3.5	-0.4	-0.4	0.0	-0.1	2.6	2.6	0.9	26%	
Adults, Community & Public Health	10.5	-0.3	-0.6	0.0	-2.4	7.1	8.3	2.2	21%	
Resources (& Shareholding)	9.6	-0.3	0.0	-0.2	-3.1	6.0	9.0	0.6	6%	
Growth & Regeneration	13.8	-0.9	0.0	-0.2	-2.2	10.5	10.7	3.0	22%	
Total	37.3	-1.8	-1.1	-0.4	-7.8	26.2	30.6	6.7	18%	

- 3.1. The General Fund savings programme for 2023/24 agreed by Council and included in the budget was £26.2m (comprising 23/24 savings £16.2m; and £10.0m carried forward from prior years still requiring delivery). In addition to this £26.2m, there was an additional net £9.3m of savings undelivered declared in the 2022/23's provisional outturn report which went to Cabinet in May. A further net £1.8m approved savings activity since the start of 23/24 brings the total savings tracked for delivery in the current financial year to £37.3m.
- 3.2. As at Period 9, £30.6m (82%) of savings are considered safe and £6.7m (18%) are reported at risk and are being monitored and reviewed for delivery or in-year mitigation where possible. These saving delivery risks are captured in either the forecast outturn above or in directorates' risk and opportunities logs where mitigation is still expected.
- 3.3. Whilst there are £6.7m of savings reported as at risk these are being reviewed for mitigation and management with the expectation of reducing the potential under delivery. Furthermore, the council does retain an optimism bias, set against the delivery of savings, which is held corporately at £8.1m.

4. RISKS AND OPPORTUNITIES

- 4.1. There are other financial risks and opportunities to the Council which have been identified and could materialise during the financial year. These are not reflected in the forecast overspend outlined in section 2.1. They are a combination of costs, savings delivery, income generation and funding opportunities.
- 4.2. The table below summarises these risk and opportunities. These represent the weighted additional net potential risk of £0.6m.

Table 5: Risks and Opportunities Summary

Directorate	<u>Total Risk</u> <u>£'000</u>	<u>Total Opportunity</u> <u>£'000</u>	<u>Net</u> <u>Risk/(Opportunity)</u> <u>£'000</u>
Adult	0.0	0.0	0.0
Children & Education	0.0	0.0	0.0
Resources	988.0	(421.0)	567.0
G&R	13,249.0	(13,249.0)	0.0
Corporate	0.0	0.0	0.0
Total	14,237.0	(13,670.0)	567.0

4.3. The net position on risk and opportunities does not yet present a forecast financial pressure as these are either not considered likely to materialise or mitigations are in development and anticipated to be implemented. However, if mitigations are not identified then the likelihood of these risks will inevitably increase and could transition into an actual financial pressure which would add to the current overspend position being reported.

5. RING-FENCED BUDGETS

5.1. There are several funds held by the Council where the Council must ensure that the income or grant is ringfenced and only spent in specific service areas. The forecast outturns for these ringfenced budgets are summarised in the table below.

Table 6: P9 2023/24 Summary Full Year Ring-Fenced Fund Forecast

Period 9 - Summary	Approved budget	Revised Budget	P9 Forecast	P8 variance	P9 movement variance	Total Variance YTD P9	Total Variance
	£000s	£000s	£000s	£000s	£000s	£000s	%
Total Housing Revenue Account	137,365	137,365	139,494	(240)	2,369	2,129	1.6%
Total Dedicated Schools Grant	453,226	452,326	468,722	16,396	(0)	16,396	3.6%
Total Public Health Grant	0	(0)	0	0	0	0	0.0%
Total Ring-fenced Budgets	590,591	589,691	608,216	16,156	2,369	18,525	3.1%

5.2. Housing Revenue Account

- 5.2.1. The Housing Revenue Account (HRA) is currently forecasting an adverse outturn of £2.1m when compared to budget. There is an overall deterioration of £2.3m from P8 due to an increase in the forecast costs of the evacuation of Barton House of £2.6m and an increase in impairment provision of £0.1m. These are partially offset by a reduction of £0.4m in forecast repair costs.
- 5.2.2. The main drivers of this overall forecast position compared to revised budget are adverse variances of £0.3m for Income (due mainly to project delays preventing scheme handovers as planned and in turn having an adverse impact on dwelling rent income forecast), £1.2m overspend on Supervision and Management (mostly due to planned programme overheads), £1.4m increase in impairment provision forecast and £6.8m on Repairs & Maintenance expenditure (with £5.3m forecasted for Barton House Evacuation and £1.5m for associated works significant overspends forecasted for adaptation works, relet repairs and fire safety works), and £0.3m in respect of Council Tax payable on void properties. These are expected to be partially offset by favourable variances of £0.9m against energy costs in communal areas and £7.0m additional investment income receivable as a result of increased interest rates. Any overspend reported at the year end 31 March 2024 will be contained within the HRA general reserves.
- 5.3. **Dedicated Schools Grant**
- 5.3.1. The Dedicated Schools Grant (DSG) is reporting a £16.4m mitigated deficit against the revised gross budget of £452.3m.
- 5.3.2. Full Council in February 2023 approved a DSG budget of £453.2m (or net amount £197.6m after deduction for academies recoupment, NNDR and direct funding of high needs places by ESFA). Revised allocations in July 2023 re-set the budget to £452.3m (£196.6m net).
- 5.3.3. This in-year forecast overspend, when combined with the prior year's carried forward deficit of £39.7m, brings the forecast total accumulated carried forward in to 2024/25 deficit to £56.1m.

Table 7: P9 2023/24 Summary DSG Fund Full Year Forecast

Bristol Dedicated Schools Grant 2023/24	2022/23 B/f Balance	Gross DSG Funding / Budget 2023/24	P09 Gross DSG Forecast Outturn	In-year Variance As At P09	Cumulative C/f Forecast Position As At P09
	£'000				
Schools Block	(787)	323,851	323,851	(0)	(787)
De-delegation	(527)		(1)	(1)	(528)
Central School services Block	8	2,717	2,709	(8)	

Early Years	(605)	37,432	38,344	912	307
High Needs Block	42,520	86,675	103,230	16,625	59,145
High Needs Transformation	(928)	1,627	2,677	980	52
Funding	0	(452,302)	(452,302)	0	0
Total (Unmitigated position)	39,680		18,508	18,508	58,188
Mitigations (budget vs. forecast in 2023-24)		(3,180)	(2,112)		(2,112)
Total - Mitigated position	39,680		16,396	18,508	56,076

5.4. The Public Health Grant

5.4.1. Public Health (PH) Grant of £35.7m was awarded for 2023/24 by Public Health England (PHE). At the end of Period 9 Public Health reports no forecast variance to this budget.

6. CAPITAL SUMMARY

6.1. The Capital programme budget at Period 9, excluding capital contingencies and other technical adjustments, has increased by £5.2m from £257.2m to £262.4m. This increase is as a result of Cabinet approvals and delegated decisions. These are summarised below:

- £3.6m of the £9.8m HUGs 2 (Homes Upgrade Grant) for energy efficiency measures in homes (Cabinet 24th January 2023).
- £1.4m WECA grant allocated for Portway Park and Ride Rail Platform (Cabinet 7th March 2023).
- £0.2m re-profiling of transport schemes.

6.2. The budget comprises £153.9m for General Fund (excluding the corporate and other technical adjustments) and £108.5m for the HRA. The forecast variation against budget at Period 9 is a £10.4m underspend, representing a £5.4m underspend on General Fund and a £5.0m underspend on the HRA.

Table 8: P9 2023/24 Capital Programme Forecast Summary By Directorate

Approved Budget (Feb 23)	Budget Changes upto P9	Directorate	Revised Budget	Actual Spend to date	Budget Spend to date	P9 Forecast Outturn	Variance
£m	£m		£m	£m	%	£m	£m
2.6	(1.6)	Adults & Communities	1.0	0.3	31%	1.2	0.2
24.7	(8.2)	Childrens & Education	16.5	9.3	56%	16.6	0.1
7.7	(2.1)	Resources	5.6	2.4	42%	4.0	(1.6)
114.5	16.3	Growth and Regeneration	130.8	69.5	53%	126.7	(4.1)
149.5	4.4	GF service Total	153.9	81.5	53%	148.5	(5.4)
133.3	(24.8)	Housing Revenue Account	108.5	52.2	48%	103.5	(5.0)
133.3	(24.8)	HRA service Total	108.5	52.2	48%	103.5	(5.0)
282.8	(20.4)	HRA & GF Service Total	262.4	133.7	51%	252.0	(10.4)
15.3	(11.0)	Corporate Contingencies & Funds	4.3	0.0	0%	4.3	0.0
298.1	(31.4)	Capital Programme Grand Total	266.7	133.7	50%	256.3	(10.4)

Last Year 2022/23 Comparison at end of Period 9

300.5	(68.9)	Capital Programme Grand Total	231.6	123.3	53%	217.7	(13.9)
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Actual Expenditure achieved - 2022/23 Outturn Report £199m

- 6.3. The spend for the first nine months of the year (£133.7m) is low compared to the annual budget (51%) which suggests that a large number of schemes in the programme will need to be re-profiled into future years. Should this trajectory follow the same path over the remaining months of the year this predicts a spend deficit of £84.1m (32%) compared to the latest budget (£262.4m). However, this does not take account of the council's pattern of higher expenditure towards the end of the financial year that would indicate an outturn in the region of £210m (20% slippage compared latest budget).
- 6.4. The £10.4m forecast variation reflects re-profiling and alignments with the latest expected programme delivery schedule. The programmes to which these primarily relate are summarised within Table 9 and amount to £10.3m.
- 6.5. The current forecasts remain challenging and there remains an element of risk in terms of delivery including external factors such as developer and partner led projects meeting delivery milestones and the awarding of contracts and funding agreements. Should these be delivered as planned then this will be evidenced by an acceleration of spend over remaining months of the financial year.

6.6. **Table 9: Capital Programme re-profiling by value**

Gross Expenditure by Programme		Current Year (FY2023) - Period 9				Performance to budget	
Ref	Scheme	Budget	Expenditure to Date	Forecast	Variance	Expenditure to date	Forecast
						%	
£000s							
Growth & Regeneration							
PL18	Energy services - Renewable energy investment scheme	6,596	1,655	4,366	(2,230)	25%	66%
PL24	Bristol Beacon	22,469	18,667	20,649	(1,821)	83%	92%
PL04	Strategic Transport	11,220	4,532	10,042	(1,177)	40%	90%
PL05	Sustainable Transport	2,235	1,006	1,472	(763)	45%	66%
CRF3	Covid Recovery Fund – Economic Infrastructure	1,223	411	698	(525)	34%	57%
GR03	Economy Development - ASEA 2 Flood Defences	7,600	2,040	8,392	792	27%	110%
GR01	Strategic Property – Temple Meads Development	6,026	3,515	8,151	2,125	58%	135%
Total Growth & Regeneration		57,369	31,825	53,770	(3,599)	55%	94%
Resources							
RE01	ICT Refresh Programme	500	0	150	(350)	0%	30%
RE07	Digital Transformation Programme - Networks	3,507	1,866	2,129	(1,378)	53%	61%
Total Resources		4,007	1,866	2,279	(1,728)	47%	57%
Total General Fund service Total		61,376	33,691	56,049	(5,327)	55%	91%
Housing Revenue Account							
HRA1	Planned Programme - Major Projects	50,213	26,861	49,361	(853)	53%	98%
HRA2	New Build and Land Enabling	56,465	25,214	52,316	(4,149)	45%	93%
Total Housing Revenue Account		106,679	52,075	101,677	(5,002)	49%	95%
HRA & GF Service Combined Total		168,055	85,766	157,726	(10,329)	51%	94%

7. OTHER DECISIONS

N/A