

Cabinet Agenda



Date: Tuesday, 3 November 2020

Time: 4.00 pm

Venue: Virtual Meeting - Zoom Committee Meeting
with Public Access via YouTube

Distribution:

Councillors: Mayor Marvin Rees, Nicola Beech, Craig Cheney, Asher Craig, Kye Dudd, Helen Godwin, Helen Holland, Anna Keen, Steve Pearce and Afzal Shah

Issued by: Corrina Haskins, Democratic Services
City Hall, College Green, Bristol BS1 5TR
E-mail: democratic.services@bristol.gov.uk
Date: Monday, 26 October 2020



Agenda

PART A - Standard items of business:

1. Welcome

2. Public Forum

Up to one hour is allowed for this item

(Pages 5 - 7)

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 is **12 noon on Monday 2nd November 2020**. These should be e-mailed to:
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. A written reply will



be provided within 10 working days of the meeting.

- The deadline for receipt of questions is **5.00 pm on Wednesday 28th October 2020**. These should be e-mailed to: democratic.services@bristol.gov.uk

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. Climate and Ecological Emergency Programme

(Pages 8 - 81)

9. Managing the Development of Houses in Multiple Occupation - Supplementary Planning Document

(Pages 82 - 202)



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- 10. Next Steps Accommodation Funding to Tackle Rough Sleeping**
(Pages 203 - 225)
- 11. Emergency Active Travel Fund**
(Pages 226 - 248)
- 12. Bristol Credit Union - Merger**
To Follow
- 13. Print and Mail Strategic Review**
(Pages 249 - 262)
- 14. Data and Insights Delivery Partner and Procurement Approach**
(Pages 263 - 266)
- 15. Implementation of a Supplier Early Payment**
(Pages 267 - 300)
- 16. Budget Monitoring Outturn Report P6**
(Pages 301 - 344)
- 17. Extension of Contract for Provision of Sexual Health Services**
To Follow

PART C - Non-Key Decisions

- 18. Director of Public Health Annual Report 2019-20 Investing In Bristol's Mental Wealth**
(Pages 345 - 373)



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 <https://www.bristol.gov.uk/council-meetings>

Covid-19: changes to how we hold public meetings

Following changes to government rules, we will use video conferencing to hold all public meetings, including Cabinet, Full Council, regulatory meetings (where planning and licensing decisions are made) and scrutiny.

Councillors will take decisions remotely and the meetings will be broadcast live on YouTube.

Members of the public who wish to present their public forum in person during the video conference must register their interest by giving at least two clear working days' notice to Democratic Services of the request. To take part in the meeting, you will be required to register for a Zoom account, so that Democratic Services is able to match your named Zoom account to your public forum submission, and send you the password protected link and the instructions required to join the Zoom meeting to make your statement or ask your supplementary question(s).

As part of our security arrangements, please note that we will not permit access to the meeting if your Zoom credentials do not match your public forum submission credentials. This is in the interests of helping to ensure a safe meeting environment for all attending or observing proceedings via a live broadcast.

Please note: Members of the public will only be invited into the meeting for the duration of their submission and then be removed to permit the next public forum participant to speak.

Changes to 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. For copyright reasons, we are unable to reproduce or publish newspaper or magazine articles that may be attached to statements.
- **Your intention to attend the meeting must be received no later than two clear working days in advance. The meeting agenda will clearly state the relevant public forum deadlines.**



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, published on the website and 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.
- Public Forum will be circulated to the Committee members prior to the meeting and published on the website.
- If you have arranged with Democratic Services to attend the meeting to present your statement or ask a question(s), you should log into Zoom and use the meeting link provided which will admit you to the waiting room.
- The Chair will call each submission in turn and you will be invited into the meeting. 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, and you may need to be muted if you exceed your allotted time.**
- If there are a large number of submissions on one matter, a representative may be requested to speak on the group's behalf.
- If you do not attend the meeting at which your public forum submission is being taken your statement will be noted by Members.

For further information about procedure rules please refer to our Constitution
<https://www.bristol.gov.uk/how-council-decisions-are-made/constitution>

The privacy notice for Democratic Services can be viewed at www.bristol.gov.uk/about-our-website/privacy-and-processing-notice-for-resource-services

Webcasting/ Recording of meetings

Members of the public attending meetings or taking part in Public forum are advised that all virtual public meetings including Full Council and Cabinet meetings are now broadcast live via the council's [webcasting pages](#). The whole of the meeting will be broadcast (except where there are confidential or exempt items).

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.





Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|---|---|--|--|
| TITLE | Climate and Ecological Emergency Programme | | |
| Ward(s) | Citywide | | |
| Author: Alex Minshull | Job title: Sustainable City and Climate Change Manager | | |
| Cabinet lead: Cllr Shah | Executive Director lead: Stephen Peacock | | |
| Proposal origin: Mayor | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: Cabinet | | | |
| Purpose of Report: | | | |
| Cabinet is asked to: | | | |
| <ol style="list-style-type: none"> 1. Note the successful progress made in the implementation of the Mayor’s Climate Emergency Action Plan (July 2019). 2. Note that the council and partners have developed 2 key new One City strategies this year: <ol style="list-style-type: none"> a. One City Climate Strategy (February 2020) b. One City Ecological Strategy (September 2020) 3. Approve the Climate and Ecological Emergency Programme as Bristol City Council’s initial response to these strategies. 4. Approve spend of £0.92m from the Climate Change Reserve in financial year 2020/21 towards the delivery of the Programme. 5. To grant delegated authority to the Executive Director of Growth and Regeneration, in consultation with the Cabinet Member for Finance, and the Section 151 Officer, to approve future spend from the Climate Change Reserve, up to £3m in total, in line with the programme outlined in the FBC and subject to substantial progress in line with the key milestones being reported annually. | | | |
| Evidence Base: | | | |
| <ol style="list-style-type: none"> 1. Bristol City Council declared a Climate Emergency in November 2018 and the Mayor published his initial Action Plan in July 2019. Bristol declared an Ecological Emergency in February 2020. 2. The City Council has funded the development of 2 strategies as a result. These have been agreed by the One City Environment Board, co-chaired by the Mayor. <ol style="list-style-type: none"> a. One City Climate Strategy b. One City Ecological Strategy 3. The Mayor has endorsed both these strategies and has committed to: <ol style="list-style-type: none"> a. Ensuring that Bristol City Council (BCC) is carbon neutral for direct emissions by 2025 b. Supporting and co-ordinating delivery of the strategies c. Developing BCC Action Plans setting out how the Council will contribute to the implementation of these strategies | | | |
| Cabinet Member/Officer Recommendations: | | | |
| That Cabinet: | | | |
| <ol style="list-style-type: none"> 1. Note the successful progress made in the implementation of the Mayor’s Climate Emergency Action Plan (July 2019). 2. Note that the council and partners have developed 2 key new One City strategies this year: <ol style="list-style-type: none"> a. One City Climate Strategy (February 2020) | | | |

- b. One City Ecological Strategy (September 2020)
3. Approve the Climate and Ecological Emergency Programme as Bristol City Council's initial response to these strategies.
 4. Approve spend of £0.92m from the Climate Change Reserve in financial year 2020/21 towards the delivery of the Programme.
 5. Authorise the Executive Director of Growth and Regeneration, in consultation with the Cabinet Member for Finance, and the Section 151 Officer, to approve future spend from the Climate Change Reserve, up to £3m in total, in line with the programme outlined in the FBC and subject to substantial progress in line with the key milestones being reported annually.

Corporate Strategy Alignment:

1. The key actions in this Programme are set out in the Corporate Plan and the adopted documents referred to in the evidence base.

City Benefits:

1. Ultimately, the Programme will reduce the city's carbon and ecological footprint contributing to a more sustainable world for all.
2. The Programme will contribute to making Bristol a more climate resilient city.
3. The Programme includes the Council making an appropriate contribution to enabling action by city partner and citizens; this will not only reduce emissions and environmental harm but contribute to the achievement of other Council objectives on energy, travel, air quality, health etc.
4. The Programme aims to attract external funding to contribute to the goals of the strategies.

Consultation Details:

1. The approved business plan for the Sustainable City and Climate Change Service includes the core actions above.
2. The strategies were developed with a wide range of partners.
3. Specific projects in the Programme will undertake appropriate consultation with stakeholders.

Background Documents:

- The [Mayor's Climate Emergency Action Plan](#)
- The [One City Climate Strategy](#)
- The [One City Ecological Strategy](#)
- Full Business Case Appendices

| | | | |
|---|---|---|---|
| Revenue Cost | New Costs £3m Existing Revenue £1.05m over 4 years | Source of Revenue Funding | Climate Change Reserve £3m Agreed Service Revenue budget 20/21-23/24 |
| Capital Cost | £ N/A | Source of Capital Funding | N/A |
| 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 programme already has approved revenue funding of up to c£1.05m (over a 4 year period) to fund Sustainable City and Climate Change activities.

This report seeks approval to spend the 0.92M to deliver the action plans and other year 1 priorities. It also seeks delegated authority be granted to the Executive Director of Growth and Regeneration, in consultation with the the Cabinet Member for Finance, and the S151 Officer for the approval of all future drawdowns from the £3m Climate Change Reserve.

The approval of this report does not constitute a new funding pressure for the Council, as funding was set aside

as part of 2020/21 budget setting. Any additional spend over and above existing budgets will need to be brought back to Cabinet for approval.

See Appendix G for further Finance comments.

Finance Business Partner: Kayode Olagundoye, Interim Finance Business Partner, Growth and Regeneration, 26 October 2020

2. Legal Advice: Legal advice should be sought in relation to any procurement and related considerations arising from the implementation of the Programme as outlined in the Full Business Case. Any contracts must be awarded in accordance with the Public Contracts Regulations 2015 and the Council’s internal procurement rules. The recommendation seeks approval for future spend from the Climate Change Reserve, notwithstanding that it may involve spend above the key decision threshold.

Legal Team Leader: Husinara Jones, Solicitor, 22 October 2020

3. Implications on IT: No anticipated impact to IT Services

IT Team Leader: Simon Oliver, Director Digital Transformation, 6 October 2020

4. HR Advice:

The report identifies additional resource which will be required to deliver the actions and outcomes within the business case, summarised in section 20.2 of the business case. This is in addition to existing staff who are currently allocated to the project. Recruitment will progress on approval of the business case. There are no other HR implications evident.

HR Partner: Celia Williams, 5 October 2020

| | | |
|--|----------------|-------------------|
| EDM Sign-off | G&R EDM | 16 September 2020 |
| Cabinet Member sign-off | Cllr Shah | 5 October 2020 |
| For Key Decisions - Mayor’s Office sign-off | Mayor’s Office | 5 October 2020 |

| | |
|---|------------|
| Appendix A – Further essential background / detail on the proposal <ul style="list-style-type: none"> Update on Mayor’s Climate Emergency Action Plan - Appendix A1 Programme Summary – Appendix A2 Full Business Case - Appendix A3 | 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 – see business case in Appendix A2 | NO |
| Appendix E – Equalities screening / impact assessment of proposal | YES |
| Appendix F – Eco-impact screening/ impact assessment of proposal | YES |
| Appendix G – Financial Advice | YES |
| Appendix H – Legal Advice | NO |
| Appendix I – Exempt Information | NO |
| Appendix J – HR advice | NO |
| Appendix K – ICT | NO |
| Appendix L – Procurement | NO |

Mayor's Climate Emergency Action Plan Update

Compiled by: Climate Change Team, Bristol City Council, 21 October 2020



Contents

1. Introduction
2. Update on key actions listed in the Mayor's Climate Emergency Action Plan
3. Update on further specific actions listed in the Mayor's Climate Emergency Action Plan
4. Conclusion

Key reference: [Mayor's Climate Emergency Action Plan](#), 2019

1. Introduction – Bristol City Council’s Action on Climate Change

We've been working hard over the past 15 years to help the city reduce its contribution to climate change and to prepare for the impacts of climate change. You can read more about Bristol City Council’s action on climate change [here](#). Here’s a brief summary.

Following November 2018, when the City Councillors and Mayor declared a Climate Emergency, Bristol City Council began developing an initial plan of action. In July 2019, the Mayor produced his initial response: the Mayor’s Climate Emergency Action Plan. It set out a number of actions. This report provides a progress update on Bristol City Council’s contribution to those actions.

In parallel, the Mayor commissioned the Bristol Green Capital Partnership to create and develop a an independent advisory committee - the Bristol Advisory Committee on Climate Change - and a new city board - the Environment Board. The Board commissioned a climate strategy. The advisory committee reviewed the strategy and the evidence base. More information on the Environment Board can be found [here](#). More information on the advisory committee can be found on the [One City website](#).

The Mayor’s Climate Emergency Action Plan provided funding to work with partners and stakeholders to develop the climate strategy for the city. The result was the [One City Climate Strategy: A strategy for a carbon neutral, climate resilient Bristol by 2030](#). It was released on 26 February 2020. It is a city-wide, shared vision and not owned by any single organisation. The strategy is comprehensive, addressing both the direct and indirect sources of the emissions that are responsible for climate change. It looks at the wider carbon footprints of residents and businesses caused by the things we buy from around the world.

The strategy considers some of the ways to reduce this broader footprint. The strategy also outlines some of the necessary actions to reduce emissions as well as actions to adapt to extreme weather events as a result of climate change, which are expected to increase in the future. However, it makes clear that to achieve these goals, Bristol needs action from the UK Government and the wider world.

The Mayor formally endorsed the One City Climate Strategy on behalf of Bristol City Council on 3 March 2020. We're now preparing an action plan and have proposed a funded programme of work to ensure we meet our part in delivering the strategy.

Meanwhile, we continue to play our part through our corporate environmental performance. Bristol City Council runs an Environmental Management System to manage and reduce our environmental impacts. The system is externally certificated to the ISO 14001:2015 standard. Key environmental impacts are considered as part of the system including our energy use, waste generation, travel and resource use. The latest BCC environmental performance data is summarised on our [webpage](#). The highlights for the year were a **77% carbon reduction** – since 2005 baseline and **20 GWh energy generation** from solar, wind and biomass - enough to power 24,000 homes for a month.

Most recently, Bristol City Council funded the creation of a **new Climate Change Team**. The team works alongside the Sustainable City Team to form the Sustainable City and Climate Change Service.

2. Update on key actions listed in the Mayor's Climate Emergency Action Plan

In July 2019, the Mayor produced his initial response to the Climate Emergency: the [Mayor's Climate Emergency Action Plan](#) which set out a number of actions. This report provides a progress update on Bristol City Council's contribution to those actions. Firstly, we consider progress on the Key Actions outlined which were:

We will:

- *Call on government for increased powers and resources and to lead through national policies, taxation etc*
- *Develop and deliver a One City Climate Strategy, working with City Office Partners*
- *Deliver a climate change public engagement programme*
- *Call on government to review the societal impacts of achieving net-zero carbon*
- *Urge all public sector organisations in Bristol to commit to at least 30% of their fleet using non-fossil fuel by 2026*
- *Commit to the Council being carbon neutral for our direct emissions by 2025*
- *Quantify the Council's indirect emissions*
- *Train city leaders, councillors and council staff in climate change to enable them to respond to the climate emergency in everything they do*
- *Deliver significant low carbon energy infrastructure in the city*

Taking these in turn, the progress that has been achieved is as follows:

Call on government for increased powers and resources and to lead through national policies, taxation etc

Bristol has joined the Place Based Climate Action Network, represented by BGCP. The network meets annually, with the last meeting being held in January 2020. There are mechanisms in place for cities to share best practice throughout the year.

As the Core Cities Board Member for Low Carbon, Mayor Marvin Rees led work to develop a [declaration: What the Core Cities Need from Government](#) which articulates Core Cities' needs. The Low Carbon, Energy and Resilience Hub group of officers from Core Cities is chaired by Bristol City Council and has met frequently and regularly including to come together to recommend to Government how it should respond to the economic recovery. We have seen funding for climate-related measures in the Chancellor's Plan for Jobs. In addition, the group is looking at how the cities may be involved in the forthcoming United Nations Conference of the Parties known as COP26 scheduled for November 2021.

Develop and deliver a One City Climate Strategy, working with City Office Partners

[Bristol's Environmental Sustainability Board](#) came together to develop a climate strategy for the city. The result is the One City Climate Strategy released on 26 February 2020.

- [One City Climate Strategy: A strategy for a carbon neutral, climate resilient Bristol by 2030](#)

As stated in the introduction, the strategy is a city-wide, shared vision and not owned by any single organisation. The strategy is comprehensive, addressing both the direct and indirect sources of the emissions that are responsible for climate change. It looks at the wider carbon footprints of residents and businesses caused by the things we buy from around the world. The strategy considers some of the ways to reduce this broader footprint. The strategy also outlines some of the necessary actions to reduce emissions as well as actions to adapt to extreme weather events as a result of climate change, which are expected to increase in the future. Finally, the strategy recognises that to achieve these goals, Bristol needs action from the UK Government and the wider world.

As mentioned above, an independent advisory committee, the Bristol Advisory Committee on Climate Change, reviewed the strategy and the evidence.

The Mayor formally endorsed the One City Climate Strategy on behalf of Bristol City Council on 3 March 2020.

Research commissioned for the new strategy included:

- [An assessment of Bristol's resilience to climate change](#)
- [A pathway to achieving carbon neutrality by 2030 for the city's direct emissions](#)
- [The carbon footprint of the economy of Bristol](#)
- [A report on consumption-based greenhouse gas emissions for Bristol](#)

Bristol City Council played a key role in the production of the strategy by funding the above research and providing a project manager to coordinate the production of the strategy.

Deliver a climate change public engagement programme

This has been developed and a website created as a hub for public engagement. It will be launched in November 2020 to coincide with this annual progress report. It aims to inspire and answer the question: What's the most effective thing I could be doing for the climate? It will be further developed over the coming months and years based on user feedback. The website was entirely produced in-house by Bristol Design and funded by Bristol City Council. There were some delays to this project in Spring-Summer 2020 when Bristol City Council staff were also handling work on our Covid-19 response.

This is part of a wider communications and engagement plan for the One City Climate Strategy which Bristol City Council has offered to lead. The plan draws upon advice from leading climate change communications experts as well as from equalities and community engagement perspectives and will be reviewed by the Bristol Advisory Committee on Climate Change before it is finalised.

In addition, Bristol City Council supported the successful Bristol bid to the Big Lottery's Community Action Fund led by Bristol Green Capital Partnership. This £375,000 project will support 6 communities to develop their own Climate Action Plans. It was one of only 19 successful bids drawn from 600 applications for this funding.

Call on government to review the societal impacts of achieving net-zero carbon

Dialogue with government is ongoing. Working through the Core Cities network, as described above, remains an important means of calling on government to consider the many aspects of achieving net zero carbon in practice.

Urge all public sector organisations in Bristol to commit to at least 30% of their fleet using non-fossil fuel by 2026

This was done via the One City Connectivity Board which leads on transport matters.

Commit to the Council being carbon neutral for our direct emissions by 2025

This was done by the Mayor and is now a corporate target. Further information on this is given in section 3, below.

Quantify the Council's indirect emissions

As part of the One City Climate Strategy work, Bristol City Council commissioned a technical report which estimated the Scope 3 emissions generated by the organisation. It gives an estimate that the Council's indirect Scope 3 emissions are 10 times greater than our direct Scope 1 and 2 emissions. This initial estimation led to two facilitated workshops held with Bristol City Council staff in early March 2020 (pre-pandemic) to engage colleagues and consider how best to proceed to tackle indirect emissions.

The report and results of the workshops now form the basis of further work which Bristol City Council intends to undertake to reduce the indirect emissions. We have quantified a proportion of our scope 3 emissions where the requisite data is available and will continue to build this data each year. And as part of the Climate and Ecological Emergency Programme we will be initiating projects to address the Scope 3 emissions arising from our Investment Property Estate (i.e. that property not used directly by BCC for service delivery), procurement and our capital programme.

Train city leaders, councillors and council staff in climate change to enable them to respond to the climate emergency in everything they do

This has been in progress since 2019 starting with participation in a national pilot for Local Authorities arranged by the Department for Business, Energy, Industry and Skills in association with the Carbon Literacy Project. Bristol City Council has had a Learning and Development Advisor in post since January 2020 dedicated to this task. Face-to-face learning of a more Bristol-centric course was trialled in early 2020 and, due to the Covid-19 pandemic, e-learning packages have since been created and the first of these has been launched to a pilot group of colleagues – including the Cabinet Lead - with full launch in November to coincide with this annual progress report.

Deliver significant low carbon energy infrastructure in the city

Information about large scale energy infrastructure projects and the City Leap project can be found on our [Energy Service website](#).

3. Update on further specific actions listed in the Mayor's Climate Emergency Action Plan

In addition to the Key Actions further action has been taken in a number of areas as set out below.

In response to the Climate Emergency declaration the Mayor is committing to a new target for the Council's direct emissions to be carbon neutral by 2025.

The new target for Bristol City Council's direct emissions to be carbon neutral by 2025 was endorsed in the July 2019 Mayoral Climate Emergency Action Plan.

So far the city council has reduced emissions by almost 80% from its baseline year. A plan is being developed to ensure we achieve the remaining reductions in the most sustainable way possible. This will form part of the Climate Programme. This will include a comprehensive review of the whole council operational property estate.

The commitment can be found in the current One City Plan:

<https://www.bristolonecity.com/about-the-one-city-plan/>

The Mayor will also quantify the emissions generated directly or indirectly on behalf of the Council

Bristol City Council has taken action to quantify our emissions. As part of our participation in the Environmental Management System ISO 14001, we report all our direct emissions, including an estimate of those generated indirectly for us.

As mentioned above, as part of the One City Climate Strategy work, we commissioned a technical report which estimated the indirect emissions generated by Bristol City Council. This was completed in December 2019. We estimate that our indirect emissions are 10 times greater than our direct emissions.

We have quantified a proportion of our indirect emissions where the requisite data is available and will continue to build this data each year.

As part of the Climate and Ecological Emergency Programme we will be initiating projects to address the Scope 3 emissions arising from our Investment Property Estate (i.e. that property not used directly by BCC for service delivery), procurement and our capital programme.

On single use plastic:

- **Develop a BCC guidance document on how to minimise single use plastics**
A Bristol City Council working group was formed to look at what more we should do on single use plastics. However, work on this has been interrupted by the Covid-19 pandemic.
- **Develop an action plan to phase out single use plastics as quickly as possible across**

council activities, for example in parks, markets and events

This was progressing well until the onset of the Covid-19 pandemic but the work is now paused. At the beginning of the year we had started developing a plastic reduction plan for Bristol and were focusing in particular on reduction measures within our BCC estate. The Mayor signed the Oslo Declaration in October 2019 to demonstrate commitment to curbing plastic waste and littering and we were working internally to implement action.

- **Work with partners to champion and drive forward reuse initiatives and help raise awareness to the issues around single-use plastics and disposables.**

Bristol City Council plans to develop a plastic reduction pledge and aim to support city wide reuse schemes. However, since March 2020, progress has slowed as mentioned above.

- **Improve recycling facilities in council offices, in particular, City Hall and 100 Temple Street**

In March 2020, Bristol City Council staff were finalising plans to introduce new recycling facilities in City Hall and 100 Temple Street. This work has now been put on hold.

Invite partners in the city to also declare Climate Emergencies and to set out a timetable for their own organisations to become carbon neutral and climate resilient

The Mayor made this invite through the publishing of the Mayoral Climate Emergency Action Plan and the development of the One City Climate Strategy. We are aware of the following organisations that have declared a Climate Emergency (updated 21 October 2020).

- University of Bristol
- University of the West of England
- North Bristol NHS Trust
- University Hospitals Bristol NHS Trust
- Bristol City Council
- We The Curious
- Watershed
- Bristol Old Vic
- Bristol Beacon
- The Diocese of Bristol
- Greenhouse PR
- Pukka Herbs Ltd
- Bristol Fair Trade Network
- Icon Films
- SS Great Britain
- Ecotricity
- WECA

- Bristol Quakers
- Stride Treglown
- Bates Wells
- Anatomy Studio
- The Future Economy Group

Create a Carbon Impact “Budget” which will set out the carbon impacts of all major projects

A new Climate and Environmental Impact Assessment tool has been developed by the Bristol City Council Climate Change Team and is being tested with colleagues at present. This will be applied much earlier in the development of initiatives than present system and therefore we anticipate it enabling more effective management of the impacts.

Further work to understand the carbon budgeting process will take place as part of the Climate Change Programme. As mentioned above, indirect (Scope 3) emissions have been estimated for key areas of capital projects and procurement. A project to understand these better and to reduce them will form part of the Climate Programme.

Encourage organisations in the city to put in place mechanisms in their business planning processes to identify the actions that they can take now and in the next few years to deliver significant reductions in their emissions

The Mayor has issued an open invite to city organisations through the Climate Emergency Action plan and an open letter sent in September 2020. This conversation will be continued through the City Boards and delivery of the One City Climate Strategy.

The Mayor will ensure that the council accounts for its own emissions and the City’s emissions to internationally recognised standards. The Council will also assess vulnerability to climate change. This information will be published openly through the Carbon Disclosure Project

As part of our participation in the internationally recognised Environmental Management System ISO 14001, we report all our direct scope 1 and 2 emissions, including an estimate of those generated indirectly for work undertaken on our behalf. We have quantified a proportion of our scope 3 emissions where the requisite data is available and will continue to build this data each year.

As part of the evidence base for the One City Climate Strategy Bristol City Council funded a preliminary Climate Resilience Assessment which can be found [here](#).

We account for the City’s emissions annually through the Carbon Disclosure Project, as well as reporting our vulnerability to climate change. The 2019 data can be found here: <https://data.cdp.net/browse>. 2020 data has been submitted and Bristol highlighted as a good

practice case study, particularly with regard to how the city integrates the achievement of climate goals and wider policy goals. For example, the Climate Change Team Manager participated in a Carbon Disclosure Project hosted webinar to explain how Bristol tackles the co-benefits of climate action.

Recently, Bristol City Council's Sustainable City and Climate Change Service was successful in making a funding bid to the UK Research Institute to host an embedded researcher from prestigious Tyndall Centre based at the University of Manchester. The aim is to improve the coordination between scientific progress and the needs of industry to address real-world problems. The researcher will be working with us to produce an Urban Heat Resilience Plan for Bristol. The completed plan will enable us to develop strategies which will aim to protect the health of our citizens and reduce the risk of heat to them. Our researcher begins work with Bristol City Council at the end of 2020.

Commission the Bristol Green Capital Partnership to create and develop a new Environmental Sustainability Board to bring city organisations together under the City Office

The One City Environment Board is formed of key leaders in the city from a wide range of partners who have led the development of the One City Climate Strategy, as well as helped to integrate climate change into the One City Plan and the Economic Recovery Statement of Intent. The Board meets quarterly with the first meeting being in July 2019. More on the involvement of the Board in the One City Climate Strategy is outlined in sections 1 and 2, above.

The Mayor has already invited other leaders in the city to join him in a climate change training course, and will roll this out to senior managers and key staff within the city. The Mayor also offered this to all Councillors.

Many City Leaders and Stakeholders attended the Climate Reality presentation in November 2019.

As mentioned above, a dedicated Learning Advisor was appointed and a pilot session of Carbon Literacy training was delivered to 35 staff members from across the council in February 2020. Climate Awareness training will be available and suitable for all BCC staff, while dedicated workshops focusing on Climate Leadership will be offered to senior managers and Councillors starting in late 2020, with a full 2 year training project in development as part of the climate programme. The new Cabinet lead for sustainability and climate change, Councillor Shah is one of the colleagues who has received the pilot training package for review before it is released to the whole organisation.

Commission a two stage technical assessment of how Bristol can become a carbon neutral city.

Create the One City Climate Strategy for Bristol through the City Office boards

Universities of Bristol and UWE to create an Advisory Committee on Climate Change to provide this to the Boards, City Office and Council.

These 3 items were all done as part of the production of the One City Climate Strategy, as noted above.

The Mayor allocated funding to commission the 'CO2 Emission Baseline and Gap Analysis', which assessed the current plans and potential scenarios locally and nationally to understand how close they will bring us to achieving carbon neutrality for our direct emissions as a city. This was followed by a more detailed study completed in December 2019, which describes the additional action which we need to take to close the gap between the existing scenarios and achieving carbon neutrality by 2030.

To ensure the One City Climate Strategy was based on the most comprehensive and current information about the city's current emissions, we also commissioned an analysis of the carbon footprint of the economy of Bristol and the city's consumption based greenhouse gas emissions. This robust and city specific evidence base reinforces our position as a leading Local Authority taking strong action against climate change

The Mayor also provided human and financial resources for the development of the One City Climate Strategy, built on the evidence base. It was adopted by the Board in February 2020 and endorsed by the Mayor March 2020 and is available here: <https://www.bristolonecity.com/wp-content/uploads/2020/02/one-city-climate-strategy.pdf>

Promotion of the strategy and development of delivery plans has been delayed due to Covid-19.

The Mayor invited Professor Jo House of the University of the Bristol and Professor Jim Longhurst of UWE to create the Bristol Advisory Climate Change Committee. This has been formed of leading experts from academia, industry, public sector and community organisations. Its purpose is to provide independent advice to the One City Office and City Council. Their first annual report will be published in November 2020.

Continue with the City Leap Project

The project to create the City Leap Energy Partnership is proceeding and likely to be concluded by Summer 2021. The procurement process and details have been revised, on the basis of feedback from bidders and the council's decision to sell Bristol Energy. Procurement is continuing.

Work with Business West and the Economy Board to help businesses to develop in low carbon business models and to secure investment to enable them to reduce their own carbon footprints and build climate resilience

Business West have stated an ambition to become carbon neutral by 2025. They intend to demonstrate leadership and act on behalf of the business community to support transitioning to Net Zero. They have signed up to the International Chamber of Commerce Climate Coalition and are a founding partner of the Bristol Green Capital Partnership. They recently changed the name of their Planning and Transport Group to include Climate and are about to set up a Climate Advisory Board to act as a critical friend and provide technical expertise to incorporate the climate in how they act/lobby on behalf of business.

They will encourage businesses towards Net Zero through sharing their own journey to Net Zero and by actively seeking contracts to deliver business support relating to climate change. A growing number of their staff have skills and expertise in Climate Change, so this is becoming increasingly embedded across all their work. They are part of the Green Capital Climate Leaders Programme (as are Bristol City Council) and are exploring a tool to share with SMEs.

Work with the West of England Combined Authority and neighbouring councils to align the existing funding we have for employment training and skills to ensure that we enable everyone to benefit from the opportunities this creates

Discussions are ongoing with an update expected in late Autumn 2020.

Work with Bristol Energy Co-operative and others as part of the City Leap Partnership to investigate options to enable more local people to invest in carbon neutrality solutions through mechanisms such as Green Bonds

We are developing an ongoing working relationship with the cities energy networks through Bristol Energy Network to support in the development and deployment of domestic retrofit and community energy

Continue with home energy efficiency projects in council owned homes and private homes, this includes: Warm Up Bristol and REPLICATE Projects providing subsidised energy efficiency refurbishment to homes, the Wessex Loan fund providing low or zero interest rate loans for energy efficiency, and grants for private sector landlords

Working with Warmer Homes Advice and Money (WHAM), which is an organisation made up of Centre for Sustainable Energy, Citizens Advice, Talking Money and We Care. WHAM focus on supporting people in Fuel Poverty by providing debt and energy advice and referring them to services which can improve the condition and energy efficiency of their home, such as the council's Domestic Energy Service.

Bristol City Council's Energy Service domestic team have also been leading on the Fuel Poverty action plan and in the co-ordination of the No Cold Homes group. The "No Cold Homes" group is a collective of organisations in the city who have a common interest in reducing fuel poverty. The Fuel Poverty action plan is intended to inform and sit alongside the Decarbonisation of Heat strategy that will be produced as part of the Climate Emergency Action Plan, to ensure we consider the social and economic consequence to citizens as we move towards a carbon neutral Bristol.

151 homes have received retrofit measures through the REPLICATE scheme with some also having received smart home appliances.

Scale up the home energy efficiency programme through the City Leap Energy Partnership

As per the above, work to procure the City Leap partner is still underway.

To increase renewables on homes, we will:

- **Continue with the REPLICATE project**

As part of the Retrofit homes offer we installed 65 boilers, 65 measures of loft insulation as well as 30 solar photovoltaic panels. At the Lawrence Hill bus depot we have also installed a photovoltaic solar panel array, which consists of 484 panels. This work has now concluded.

- **Run a small solar panel trial in BCC social housing this year with Bristol Energy**

We have installed 3 x 4kW solar photovoltaic panels and battery kits on social housing. The project was suspended at start of lockdown in March and now reconfigured. A further 5 systems (of 4kW PV + batteries), will be installed in care home or similar by December 2020.

- **Ensure that all new homes built by the City Council directly or through grant funding of registered providers of affordable homes meet current planning policy to reduce carbon emissions by 20%**

The Affordable Housing Funding Policy requires that all schemes funded by the Council are fully compliant with the Council's planning policy. The Policy is currently under review and so this requirement in respect of meeting the heat hierarchy could be made more explicit.

- **Demonstrate innovative technology in new developments**

A new housing development at Ashton Rise delivers heat to homes through a Ground Source Micro heat network. This was complemented by a fabric first approach to the construction and will reduce energy costs for residents, making the scheme very sustainable. Following delivery of this development all current projects proposed under the Housing Delivery Account programme will be heated by either air or ground source heat pumps.

- **Provide additional grants of up to £10,000 per home for non-profit making housing organisations to provide sustainable energy systems for their homes.**

Bristol City Council has approved a sustainability grant of £526,620 to United Communities to enable 67 affordable flats to be upgraded to Passivhaus accreditation standard. A further grant of £500,000 has been approved which will enable United Communities to meet the Council's heat hierarchy policy on 50 affordable flats at Midland Rd and enable the scheme to be linked up in the future with the Heat Network.

Bristol City Council has a pipeline of potential sustainability grant submissions on four housing projects amounting to over 100 affordable homes, either awaiting approval or grant submissions that are expected within the next few months.

The Mayor will ensure that the consultation responses are carefully considered and that the emerging local plan adequately addresses these issues and carefully consider the responses to the Local Plan

A new local plan for Bristol is in preparation and is currently proposed to be adopted by late 2023. Responses to the March 2019 consultation on the local plan review will be carefully considered in preparing the next consultation stage.

The timetable for development of the plan has changed due to delays in the creation of West of England planning documents.

The government has recently consulted on changes to the planning system that may alter the scope of what local plans can include; issues relating to zero carbon development will be addressed as far as possible under this changed policy context.

The Mayor will continue to progress towards a bus deal, with improved bus prioritisation and park and rides, and a mass transit system

The Mayor and First Group signed the Bus Deal in Autumn 2019 and work has begun on engaging with residents along the length of the first priority route for investment – bus route number 2. At the West of England Combined Authority level Bristol is working with neighbouring councils to develop options for a sub-regional mass transit system including a review of existing bus priority infrastructure and Park and Ride sites.

GENERATING CLEAN, RENEWABLE ENERGY IN THE CITY

- **Continue developing the City Leap Energy Partnership to develop district heating and to exploit the renewable energy sources in the city, ensuring that we get local benefit from these resources.**

As above, the City Leap procurement is in progress.

- **Continue exploring a wide range of technologies,**

Bristol City Council continues to generate clean energy from renewable sources, including wind, solar and heat pumps. We are investing in a large water source heat pump to draw heat from the harbour water for our expanding heat network and are exploring the use of geothermal and heat pumps for future expansions.

- **Work with local community energy co-operatives and similar groups**

Bristol City Council is developing an ongoing working relationship with the city's energy networks through Bristol Energy Network to support in the development and deployment of domestic retrofit and community energy.

The Mayor will work closely with the West of England Combined Authority and our neighbouring local authorities to ensure that the Joint Spatial Plan, Joint Transport Plan and investment in skills fully contribute to decarbonising the region and building resilience

Following the withdrawal of West of England Local Authorities from the Joint Spatial Plan process, the Mayor is pressing ahead with our neighbouring councils and WECA to develop the Spatial Development Strategy which will help the city plan for new development in the area. The Joint Local Transport Plan 4 was adopted earlier this year outlining the key objectives, challenges and investment priorities for transport in the sub-region.

Other notable Bristol City Council projects include:

ENERGY

- Schools Energy Efficiency Scheme
- Harbour Water Source Heat Pump
- Energy Saving Partnerships
- Heat Decarbonisation Study
- City Hall Battery

HOUSING

- Ground Source Heat Pumps

TRANSPORT

- Road Closures
- Old City Pedestrianisation
- Electric Vehicle Centre of Excellence

4. Conclusion

In conclusion, Bristol remains a city at the forefront of global climate action. Progress has been made on many fronts including a fundamental piece of work to produce a One City Climate Strategy establishing the framework within which all city stakeholders can act to achieve the city's climate goals. Bristol City Council capacity has been enhanced since April 2020 with a new, dedicated Climate Change Team and funding for a further programme of work has been requested from the Climate Reserve Fund. But action is not limited to this team. Wider Bristol City Council teams are running a variety of climate-related projects. Progress against the Mayor's Climate Emergency Action Plan is demonstrated in this report in numerous areas.

BCC Climate and Ecological Emergency Programme

Summary

1. Our Approach

Bristol City Council is a leading voice in the UK's local authority-level response to the climate and ecological emergencies.

Building on a successful track record we were the first council to declare a Climate Emergency and we helped mobilise the whole sector through the Local Government Association. Over 16 city organisations have joined us in declaring climate emergencies and committing to action.

In February 2020 the Mayor and city partners also declared an Ecological Emergency in recognition of urgent need for nature recovery, in the city and globally.

The One City Approach

To address challenges like global emergencies of climate and ecological systems, we know that we need to come together as One City. The Mayor has created the One City approach to tackle these and other strategic challenges for the city. The One City Approach brings together a huge range of public, private, voluntary and third sector partners within Bristol. They share an aim to make Bristol a fair, healthy and sustainable city.

<https://www.bristolonecity.com/>

A Strategic Approach

In response to any major emergency one needs a clear strategy, supported by many organisations. To address the twin emergencies of climate and ecology the Mayor has worked with One City Partners to create two key strategies:

1. One City Climate [Strategy](#)
2. One City Ecological Emergency [Strategy](#).

These two strategies have been built on a substantial research and evidence base and with a wide range of partner involved.

The creation of these strategies has been made possible by the city council's contribution of funding and many partners' contributions and expertise.

An Integrated Approach

To deliver on the goals of the strategies the council needs to translate these into specific action plans it can build into its work. The first of these was the Mayor's Climate Emergency Action Plan July 2019. This set in train some initial projects to start to enact the Council Motion. The key projects were:

- To develop the One City Climate Strategy, built on robust research and an evidence base. Completed.
- To train council staff on climate change to enable them to contribute effectively to the delivery of the strategy. We have developed training modules, tested them with colleagues, moved them on-line in response to Covid and launched them. Further modules will be developed.
- To engage with communities in the city. We have created the Climate Hub Website

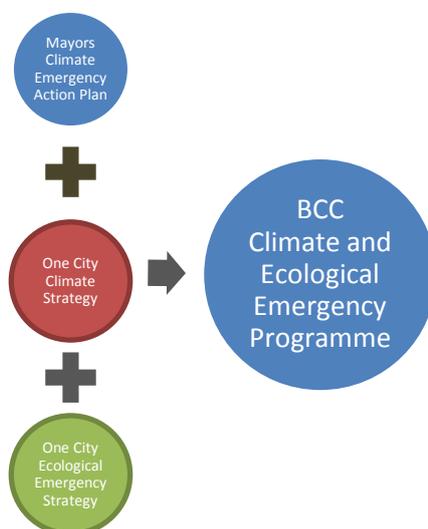
and supported the successful Bristol consortium bid to the Big Lottery, Community Action Fund which has secured funding for 6 communities in the city to develop their own climate action plans.

These projects have all completed their key phase of delivery and will be continued and developed through the Climate and Ecological Emergency Programme.

2. The Climate and Ecological Emergency Programme

This Programme of work is comprised of projects and on-going work to make a rapid, impactful and affordable response to the Climate and Ecological Emergencies over the next 3 years. Specifically:

- A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan
- B) Enabling delivery the Mayor's and council's commitments under the:
 - o One City Climate Strategy; and
 - o One City Ecological Emergency Strategy.



Programme Principles

The Programme has been developed with some key principles, which draw upon the agreed principles of the One City Climate Strategy:

1. **Strategic and evidence based:** The programme focuses on the Priorities of the agreed climate and ecological strategies. Projects in the programme support key strategic initiatives of the city council, for example the City Leap Programme, helping to accelerate investment in decarbonisation of the council's property estate. The programme also adds momentum to successful initiatives such as the Going for Gold sustainable food project, helping this to contribute to reductions in the carbon footprint of the city's food system. Several of the projects will enable us to improve our understanding of problems and opportunities thereby enabling more effective action.
2. **Transformative.** Using the programme's resources to multiply our impact. Every pound spent by the programme will lever additional funding and action by council services, partners and communities. We aim to directly lever £3 for every £1 we spend through the programme and influence much more. Through initiatives like training council staff we will give them the skills and confidence they need to embed

climate change in everything we do.



3. **Collaborative:** The strategies have been developed through collaboration and their successful realisation relies on that collaboration continuing through the One City Approach and more specific co-ordination, networking and support. By definition collaboration involves more than one party, but the city council will, through this programme provide support to key networks and contribute to specific initiatives. We are confident that partners around the city will join us in support this collaborative process.
4. **Fair:** A fair and just response to the climate and ecological emergencies is critical in itself and for achieving successful outcomes. The programme will ensure that the effects of each project are carefully considered and also includes specific work areas to increase inclusion and diversity in the environmental arena and to actively support communities with small grants funding.
5. **Learning and flexible:** The programme will learn from its actions and those of others to improve delivery of subsequent phases and it will be flexible to respond to changing circumstances and opportunities, whilst maintaining its focus on the strategic goals.

Programme Objectives

The programme has 3 key objectives:

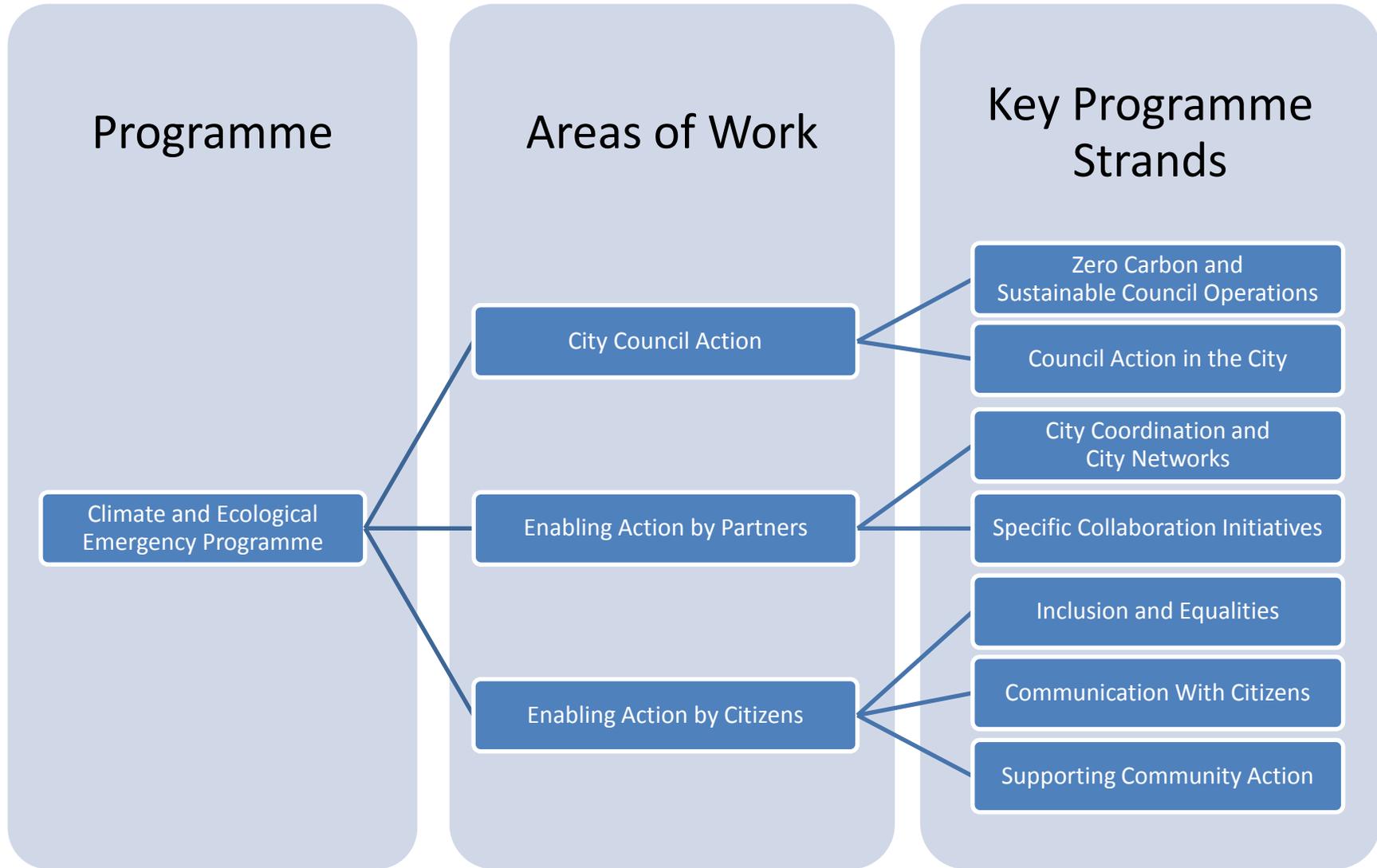
- Effective co-ordination of Bristol City Council delivery and partnership working with appropriate good governance
- Bristol City Council leads by example effectively meeting commitments for its own operations and by aligning its plans, services, projects and investments to the strategies
- Bristol City Council influences and enables inclusive, substantial, citywide collaboration and action by many partners and a diverse range of citizens.

Programme work areas, strands and projects

The programme is built in three key work areas each building on the previous.



Under these work areas the programme has 7 strands of work:



The Programme is then comprised of 20 projects. Some of these are very clearly defined and delivery can commence immediately, whilst others are outlined in the programme and details can be developed following consultation with stakeholders.

| City Council Action | |
|--|---|
| Zero Carbon and Sustainable Council | P1: Sustainable BCC Estates Project: Undertake detailed analysis and produce a strategic implementation plan that will enable the Council to meet the carbon neutrality, climate resilience and ecological targets for both its operational and investment estates. |
| | P2: Sustainable Procurement Project: Develop a sustainable procurement policy and strategy and integrate into procurement team and practices and initial promotion to key suppliers. |
| | P3: Sustainable Capital Programme Project: Undertake a detailed analysis of the carbon footprint, climate resilience and ecological impacts of a sample of existing typical projects in the Council's building programme and develop recommendations and provide training and support for staff. |
| | P4: Climate Change Training Project: Enhance BCC officers, managers and politicians awareness, understanding and capability to enable them to effectively address climate change through their work. |
| Council Delivery in the City | P5: Heat Decarbonisation Delivery Plan: Develop a OCCS Heat Decarbonisation Delivery Plan to create a clear, agreed set of priorities and projects for investment by City Leap Partnership, utilities and others |
| | P6: OCCS Summer Over- Heating Resilience Plan: Develop a plan to understand and address the risks to human health and city infrastructure and services from overheating to enable more effective targetting. |
| | P7: OCCS Delivery Plan - Sustainable Food and Bite Back Better: A project to develop the success of Going for Gold into a strategic approach to reduce the carbon and ecological footprint of the city's food system. |
| | P8: Ecological Emergency Strategy & BCC Action Plan: Develop the BCC Action Plan to implement this strategy, implement initial actions and develop business cases and external funding bids for investment. |
| | P9: 100 House Retrofit Project: Pilot project testing whole-house retrofit on 100 homes for those in Fuel Poverty and linking with government energy grants |
| Enabling Action by Partners | |
| City Coordination and City Networks | P10: Co-ordination of partner action on the strategies: Multi-stakeholder engagement, management and visualisation, One City Environment Board, Bristol Advisory Committee on Climate Change |
| | P11: Maintaining capacity of key non-for-profit networks: Contribute to thriving networks of organisations committed goals of the strategies |
| Specific Collaboration Initiatives | P12: Bristol Climate Leaders Project: Contribute to a network of organisations providing peer to peer support to enable organisations to become Carbon Neutral and climate resilient. |
| | P13: Climate Risks and Extreme Weather Management Project: To assess future risks to key infrastructure, assets and services and develop business case for investments. Install new monitoring network. |
| Enabling Action by Citizens | |

| | |
|------------------------------------|--|
| Inclusion and Equalities | P14: Inclusion and equalities projects to engage with key communities, including but not restricted to Black and Green (B&G) Ambassadors Project. A package of projects to engage with a range of communities including, but not restricted to, the Black and Green Ambassadors Project. Led by BGCP and Ujima Radio this project will recruit, mentor and support 9 emerging leaders with environmental and social justice ambitions |
| Communication With Citizens | P15: Integrated Council Communications: Integrate and align existing BCC communications and behaviour change activities with the Climate Strategy – for example, to encourage more sustainable travel |
| | P16: Bristol Climate Action Hub and Sustainable Food Websites: Develop and promote an effective climate change website, for general citizen engagement and update sustainable food website. |
| | P17: Communications and Engagement activities including deliberative democracy related to climate change. Aiming to increase citizen and partner action and targeted initiatives to reach the whole community, understand community priorities and understand and address barriers for specific communities. |
| | P18: The One City Climate Communications Toolkit: Create the tools and resources that will enable an impactful, coherent, inclusive and effective programme of C&E by partners across the city. |
| Supporting Community Action | P19: Community-Led Action: Support community led action on climate change project in which 6 communities will develop their own local climate action plans. |
| | P20: BCC Community Action Grants – A small grants scheme to help communities in the city with climate action – both planning and delivery. The focus is on empowering communities and enabling them to secure funding/ investment from elsewhere. |

3. Resources

Alongside the adoption of the strategies the Mayor proposed a budget which was approved by the City Council in February 2020 to increase the city council's climate change and ecological resources. This budget increased £150k in 2020/21 and a further £150k in 2021/22) has enabled the creation of a small Climate Change Team in the city council, the appointment of an Ecological Emergency Project Manager and funding for on-going secretariat support of the One City Environment Board and the Bristol Advisory Committee on Climate Change.

The agreed budget also allocated £3m of funding from Council Reserves to enables us to deliver a more substantial programme of specific projects.

This programme includes the on-going work of the team and the additional projects funded from reserves. This equates to funding in years 2020/21 to 2023/24 of £4.05m.

4. Governance and Co-ordination

The Governance model is built on the principles of the ISO14001, the international standard for environmental management systems (EMS), to which BCC is independently certified. Action on climate change and ecology will be form an integral part of the goals for our management system.

Drawing upon this, BCC will put in place effective governance of its own activities in respect of delivering the climate and ecological strategies. This is particularly important given the cross cutting nature and wide range of services which need to be involved.

The Executive Director for Growth and Regeneration is responsible for the Council's response to the strategies. Each Director and Head of Service is responsible for the alignment of activities in their portfolios with the goals of the climate strategy.

The programme forms part of the G&R Portfolio and new governance arrangements are being put in place for that. Operational co-ordination group(s) may be formed from officers as appropriate to ensure that the Programme and associated action plans are delivered effectively.

The One City Environment Board will establish Co-ordination Groups to support the delivery of the strategies, drawn from its members, those of other boards and other partners as appropriate. The City Council's Sustainable City and Climate Change Service will support these groups within available resources.

5. Review and Progress Reporting

At a city level progress towards the goals and objectives of the strategy will be monitored annually by the Co-ordination Groups and reported to the One City Environment Board, and other boards as appropriate. All boards may receive or request progress reports on the implementation of any Delivery Plans relevant to their area.

Within the City Council an annual report on the progress of the city council's action plans and the programme will be reported to Council in line with commitments made in the Mayor's Climate Emergency Action Plan.

A. PROJECT SUMMARY INFORMATION

| | | | |
|-------------------------------|--|--------------------------------------|--|
| Project Name: | Climate and Ecological Emergency Programme | | |
| Project ID (if known): | 20ST112 | | |
| Cabinet Member: | Councillor Shah (from 14/09/20 - previously the Mayor) | Lead Officer (Sponsor): | Zoë Willcox |
| Directorate(s): | G&R lead with the involvement of all directorates | Associated service areas: | Sustainable City and Climate Change Service lead |
| Report lead author(s): | Full Business Case: Alex Minshull, Sustainable City and Climate Change Manager; Alex Ivory, Climate Change Team Manager; Kathy Derrick, Sustainable City Team Manager | | |
| Report recipients: | Cabinet | | |

B. ORGANISATIONAL CONTEXT

| | |
|---|--|
| Alignment to corporate theme(s): | <ul style="list-style-type: none"> • The Mayor adopted his Climate Emergency Action Plan in July 2019 • The One City Environment Board adopted the One City Climate Strategy on 26 February 2020 and the One City Ecological Strategy on 22 September 2020 • The Mayor endorsed the strategies at Cabinet in March and October and announced that BCC will develop and implement its own Delivery Plan to ensure we meet our part in delivering these strategies • The Council's and Service's Business Plans include actions to implement the above and budget was allocated in February 2020 • At Cabinet on 28 April 2020 the Mayor stated: <i>"With the Bristol One City Climate Strategy already agreed, we have set out a pathway for environment change, including sustainable and affordable homes, a mass transit system, biogas buses and city centre housing to encourage more cycling and walking. Working with UK core cities and those from around the world, we can change our current economic models – placing the focus on building inclusive, environmentally-friendly places, where no one is left behind. There is no going back."</i> |
| Project category: | <input type="checkbox"/> Saving delivery <input type="checkbox"/> Compliance / Statutory <input checked="" type="checkbox"/> Risk reduction <input checked="" type="checkbox"/> Cost avoidance <input checked="" type="checkbox"/> Improved outcomes <input checked="" type="checkbox"/> Enabling <Other> |
| Council Budget saving delivery: | If the proposal relates to a saving already approved within the approved Council's Budget please complete this section, otherwise mark N/A. N/A |

C. DOCUMENT CONTROL

| Sections complete: | <input type="checkbox"/> Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------|---|---|----------|---------|-----------|-------------|------|-----|--|-------------|----------|-----|-----------------------------------|----------------------|----------|------|-----------------------------------|---|----------|------|-----------------------------------|--|----------|------|--|-------------------------------|----------|--------------|--|---|----------|
| Document status: | <input type="checkbox"/> Draft <input checked="" type="checkbox"/> Final | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Document owner: | Alex Minshull | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Version control | <table border="1"> <thead> <tr> <th>Version</th> <th>Author(s)</th> <th>Description</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>0.1</td> <td>Alex Minshull, Sustainable City and Climate Change Service Manager</td> <td>First draft</td> <td>20/09/20</td> </tr> <tr> <td>1.0</td> <td>Alex Minshull, Service Manager</td> <td>Completed full draft</td> <td>01/10/20</td> </tr> <tr> <td>1.01</td> <td>Alex Minshull, Service Manager</td> <td>Leverage factor adjusted to be in line with ELENA programme.</td> <td>05/10/20</td> </tr> <tr> <td>1.02</td> <td>Alex Minshull, Service Manager</td> <td>Addressing further comments particularly on communications aspects</td> <td>09/10/20</td> </tr> <tr> <td>1.03</td> <td>Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager</td> <td>Including updates to benefits</td> <td>12/10/20</td> </tr> <tr> <td>2.0 Final</td> <td>Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager</td> <td>Final draft with complete set of internal approvals and re- profiled budget</td> <td>23/10/20</td> </tr> </tbody> </table> | | | Version | Author(s) | Description | Date | 0.1 | Alex Minshull, Sustainable City and Climate Change Service Manager | First draft | 20/09/20 | 1.0 | Alex Minshull, Service Manager | Completed full draft | 01/10/20 | 1.01 | Alex Minshull, Service Manager | Leverage factor adjusted to be in line with ELENA programme. | 05/10/20 | 1.02 | Alex Minshull, Service Manager | Addressing further comments particularly on communications aspects | 09/10/20 | 1.03 | Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager | Including updates to benefits | 12/10/20 | 2.0 Final | Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager | Final draft with complete set of internal approvals and re- profiled budget | 23/10/20 |
| Version | Author(s) | Description | Date | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.1 | Alex Minshull, Sustainable City and Climate Change Service Manager | First draft | 20/09/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.0 | Alex Minshull, Service Manager | Completed full draft | 01/10/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.01 | Alex Minshull, Service Manager | Leverage factor adjusted to be in line with ELENA programme. | 05/10/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.02 | Alex Minshull, Service Manager | Addressing further comments particularly on communications aspects | 09/10/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.03 | Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager | Including updates to benefits | 12/10/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.0 Final | Alex Minshull, Service Manager/ Alex Ivory, Climate Change Team Manager | Final draft with complete set of internal approvals and re- profiled budget | 23/10/20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

FULL BUSINESS CASE

Project context summary:

This proposal seeks to make a rapid, impactful and affordable response to the Climate and Ecological Emergencies over the next 3 years. Specifically:

A) Continued delivery of the Mayor's existing commitments in his [Climate Emergency Action Plan](#)

B) Enabling delivery the Mayor's and Council's commitments under the [One City Climate Strategy](#) and the [One City Ecological Emergency Strategy](#)

Furthermore, where possible, the Programme will seek to align the Council's and city's work on climate change with the Covid-19 recovery and seek to maximise equalities benefits.

A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan and Ecological Emergency Declaration, including:

- Developing the Council's programme to become Carbon Neutral for direct emissions by 2025 and reducing indirect emissions
- Integrating climate considerations into every decision, project and policy
- Supporting colleagues through training, systems and advice
- Public communication and engagement
- Work with other local authorities to lobby government for additional resources, legislation et cetera to create the right enabling conditions so that Bristol can achieve the goals of the One City Climate Strategy. This includes influencing future Covid19 recovery policies and investment
- Co-ordination of BCC and wider partner actions in response to the Ecological Emergency declared by the Mayor in February 2020
- Co-ordination of BCC action in the Going for Gold Sustainable Food Project (a One City 2020 priority project) to reduce indirect emissions of Carbon from our food system

B) Enabling delivery the Mayor's commitments under the One City Climate Strategy and One City Ecological Emergency Strategy

- Key BCC contributions to the achievement of the goals of the new One City Climate Strategy, namely carbon neutrality and resilience to the impacts of climate change, by:
 - Driving and co-ordinating the delivery of the One City Climate Strategy on behalf of the city, working with the City Office and One City Boards
 - Developing and co-ordinating the implementation of an Engagement and Communication Delivery Plan under the One City Climate Strategy on behalf of the city
 - Developing and co-ordinating a Heat Decarbonisation Delivery Plan under the One City Climate Strategy, securing resources from Government to contribute
 - Developing and co-ordinating delivery of a BCC Action Plan to deliver the BCC contribution to both the strategies; this will integrate any outstanding actions in the Mayor's Climate Emergency Action Plan, above
 - Seeking additional funding for implementation from external sources

Any key changes since Outline Business Case approval:

No key changes. The FBC develops the Recommended Option from the OBC - Option 4. BCC Leading by Example plus a One City Approach - Enabling action by Partners and Citizens

Recommended option:

The Programme set out in this business case was developed through the Outline Business Case where it was described as: Option 4. BCC Leading by Example plus a One City Approach - Enabling action by Partners and Citizens.

Recommended option delivery timescale:

Main project Nov 2020 to March 2024 with preparatory work April 20-Nov 20

Anticipated cost/benefit profile for preferred option delivery:

| £ thousands | 20/21 | 21/22 | 22/23 | 23/24 | Total |
|----------------------------------|--------------|--------------|------------|------------|--------------|
| New costs | 902 | 1,035 | 697 | 366 | 3,000 |
| Opportunity costs - Known | 150 | 300 | 300 | 300 | 1,050 |
| Ongoing dis-benefit | - | - | - | - | - |
| Total | 1,052 | 1,335 | 997 | 666 | 4,050 |

| Confidence level | Supporting commentary |
|------------------|--|
| 90% | The programme is very flexible and if overspends are necessary in some projects to achieve the desired quality then revisions can be made to other project budgets to bring the total spend in line with the budget. |

Identified sources of funding (including any shortfall):

- £1,050,000 – Revenue funding (20/21-20/24)
- £3,000,000 – Climate Change Reserve

Contributions from partners are anticipated to expand the programme but these are not included above.

Other anticipated key measureable (non-financial) benefits:

- There are a range of non-financial benefits – see table in section 18.5, below.

Learning from previous work

- The Programme has been built on the Sustainable City and Climate Change Service's experience of delivery in this field and developed with colleagues in other services to achieve successful integration into the Council and wider city. It has also drawn upon the Core Cities Climate Officer network
- The Programme Manager has reviewed lessons learned and benefits realisation with Change Services colleagues

Any decisions/endorsements already secured:

At their meeting on 16 September 2020, EDM gave their approval for the lead authors to move to producing a FBC for Option 4 of the OBC, subject to the Reserve funding remaining available

Suggested project tolerances:

The in-flight aspect of the Programme is currently being managed as part of the G&R Portfolio, reference GR_003.

Decisions requested for Full Business Case sign-off:

- Cabinet are requested to approve the Full Business Case at their meeting on 3 November 2020

| | |
|--|---|
| New costs to deliver project: | £3,000k |
| Known Opportunity costs to deliver project: | £1,050k |
| Funding required: | £4,050k |
| Funding source(s): | New Costs from Climate Change Reserve, Opportunity Costs from Climate Change and Sustainable City Service Budget over 4 years |
| Est. timescale for project delivery: | 3 years |

17. Project overview

1. Our approach

Bristol City Council is a leading voice in the UK's local authority-level response to the climate and ecological emergencies.

Building on a successful track record, we were the first council to declare a Climate Emergency and helped mobilise the whole sector to follow suit through working with the Local Government Association. Numerous prominent Bristol-based organisations including both the University of Bristol and the University of the West of England, the Diocese of Bristol, We The Curious, Bristol Water and the Environment Agency have joined us in declaring a Climate Emergency and committing to action.

In February 2020, the Mayor and city partners also declared an Ecological Emergency in recognition of urgent need for nature recovery both in the city and globally.

Building on the One City approach

To address challenges like global emergencies of climate and ecological systems, we know that we need to come together as One City. The Mayor has created the One City approach to tackle these and other strategic challenges for the city. The One City Approach brings together a huge range of public, private, voluntary and third sector partners within Bristol. They share an aim to make Bristol a fair, healthy and sustainable city. See <https://www.bristolonecity.com/> This approach has been extended to the climate and ecological emergencies which are now addressed in the One City Climate Strategy and One City Ecological Emergency strategy, respectively.

A strategic approach

In response to any major incident, one needs a clear strategy, supported by many organisations. To address the twin emergencies of climate and ecology the Mayor has worked with One City Partners to create two key strategies:

1. One City Climate [Strategy](#)
2. One City Ecological Emergency [Strategy](#)

These two strategies have been built on a substantial research and evidence base and with a wide range of partner involved. The creation of these strategies has been made possible by the city Council's contribution of funding and many partners' contributions and expertise.

An integrated approach

To deliver on the goals of the strategies the Council needs to translate these into specific action plans it can build into it work. The first of these was the Mayor's Climate Emergency Action Plan July 2019. This set in train some initial projects to start to enact the Council Motion. The key projects were:

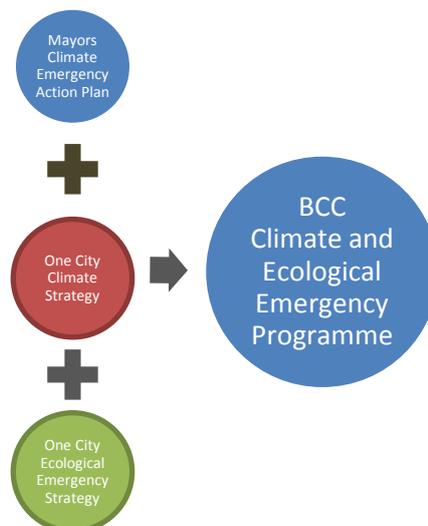
- To develop the One City Climate Strategy, built on robust research and an evidence base (completed)
- To train Council staff on climate change to enable them to contribute effectively to the delivery of the strategy. We have developed training modules, tested them with colleagues, moved them on-line in response to Covid-19 and launched them. Further modules will be developed
- To engage with communities in the city. We have created the Climate Hub Website and supported the successful Bristol consortium bid to the Big Lottery Community Action Fund which has secured funding for 6 communities in the city to develop their own climate action plans

These projects have all completed their key phase of delivery and will be continued and developed through the Climate and Ecological Emergency Programme.

2. The Climate and Ecological Emergency Programme

This Programme of work is comprised of projects and ongoing work to make a rapid, impactful and affordable response to the Climate and Ecological Emergencies over the next 3 years. Specifically:

- A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan
- B) Enabling delivery the Mayor's and Council's commitments under the:
 - One City Climate Strategy; and
 - One City Ecological Emergency Strategy (represented visually, below)



Programme principles

Bristol's One City Climate Strategy is guided by the following principles:



Consequently, the Programme has been developed with some key principles which draw upon these agreed principles of the One City Climate Strategy:

1. **Strategic and evidence-based:** The programme focuses on the Priorities of the agreed climate and ecological strategies. Projects in the programme support key strategic initiatives of the City Council, for example the City Leap Programme, helping to accelerate investment in decarbonisation of the Council's property estate. The programme also adds momentum to successful initiatives such as the Going for Gold sustainable food project, helping this to contribute to reductions in the carbon footprint of the city's food system. Several of the projects will enable us to improve our understanding of problems and opportunities thereby enabling more effective action.
2. **Transformative:** Using the programme's resources to multiply our impact. Every pound spent by the programme will lever additional funding and action by Council services, partners and communities. We aim to directly lever £3 for every £1 we spend through the programme and influence much more. Through initiatives like training Council staff we will give them the skills and confidence they need to embed climate change in everything we do. This multiplier effect may be represented visually, below:



3. **Collaborative:** The strategies have been developed through collaboration and their successful realisation relies on that collaboration continuing through the One City Approach and more specific co-ordination, networking and support. By definition collaboration involves more than one party, but the City Council will, through this programme provide support to key networks and contribute to specific initiatives. We are confident that partners around the city will join us in support this collaborative process.

4. **Fair:** A fair and just response to the climate and ecological emergencies is critical in itself and for achieving successful outcomes. The programme will ensure that the effects of each project are carefully considered and also include specific work areas to increase inclusion and diversity in the environmental arena and to actively support communities with small grants funding.
5. **Learning and flexible:** The programme will learn from its actions and those of others to improve delivery of subsequent phases and it will be flexible to respond to changing circumstances and opportunities, whilst maintaining its focus on the strategic goals.

Programme objectives

The programme has 3 key objectives:

1. Effective co-ordination of Bristol City Council delivery and partnership working with appropriate **good governance**
2. Bristol City Council **leads by example** effectively meeting commitments for its own operations and by aligning its plans, services, projects and investments to the strategies
3. Bristol City Council influences and **enables inclusive, substantial, citywide collaboration and action** by many partners and **a diverse range of** citizens.

Where possible, integration with the plans for Covid-19 Recovery will be achieved. Opportunities to do so are reflected in the [Economic Recovery and Renewal Strategy](#).

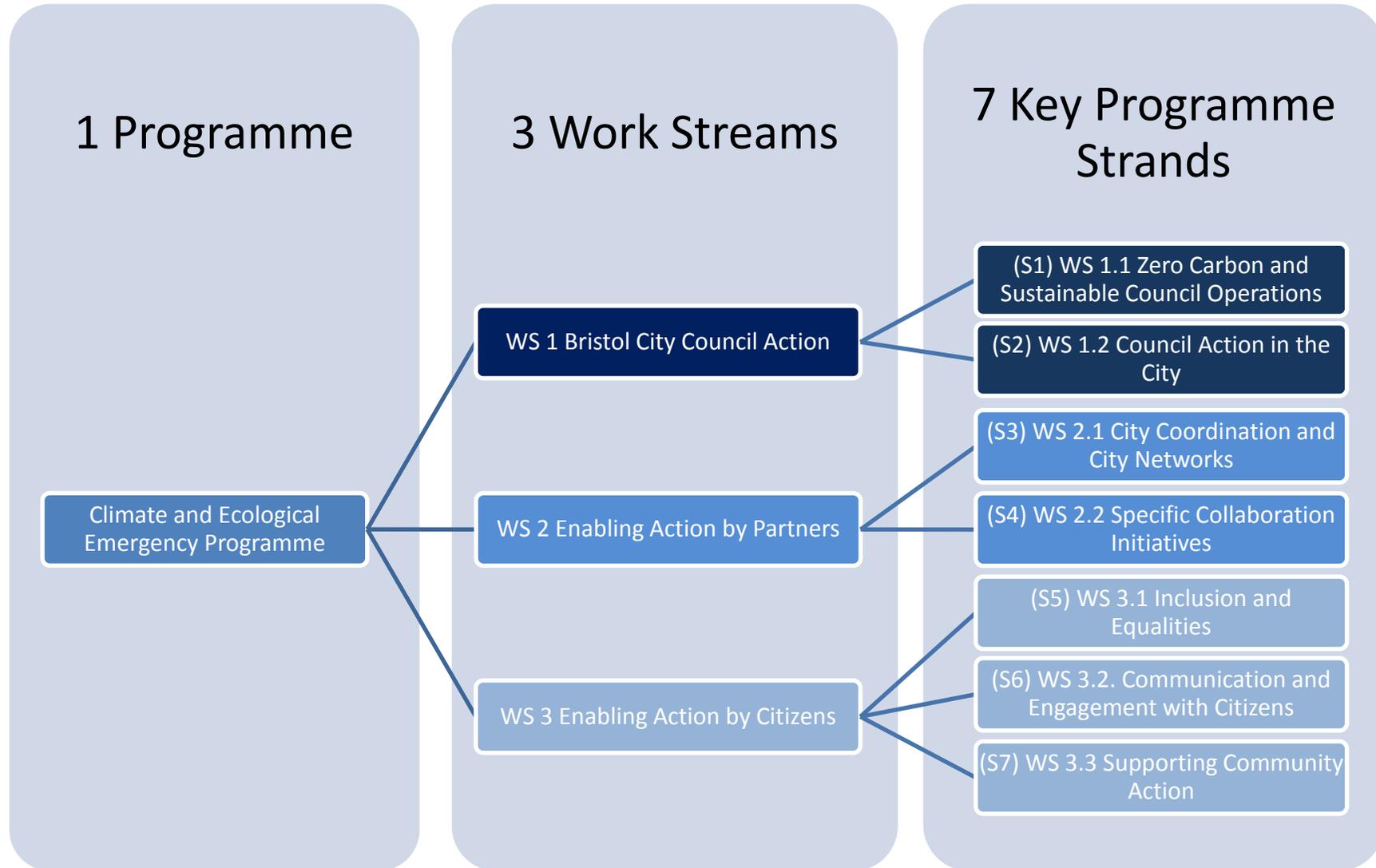
Furthermore, the Programme will operate in a way which fully supports our Equalities aims and obligations, the selected option (proceeding to Full Business Case) being the one which maximised equalities benefits.

Programme work streams, strands and projects

The programme is built in a hierarchy of 3 key work streams: each building on the previous with the base being the highest level of priority to action.



Under these 3 work streams (WS) the programme has 7 strands (S). Sub-work streams are also indicated to group the strands (eg WS 1.1):



The Programme is then comprised of 20 individual projects (P) (see below, Financial and Non-financial Benefits table for further description of the projects). Some projects are already very clearly defined and are either in-flight - such as work commenced to deliver the Mayor's Climate Emergency Action Plan eg P16 - or delivery could commence immediately whilst others are outlined in the programme and details would be developed following consultation with stakeholders.

In addition to these projects, the City Council is delivering a wide range of other activities to address climate change and ecological emergencies. These wider actions will form part of the Council's Action Plan but will not be formally part of this Programme governance and funding arrangements, see Out of scope, below.

18. Preferred Option Detailed Case

18.1 Project scope

1. Scope

The scope has been subject to minor changes to reflect the adoption of the One City Ecological Emergency Strategy which occurred between the submission of the Outline Business Case and the drafting of the Full Business Case.

| In Scope |
|--|
| <p>A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan B) Enabling delivery the Mayor's and Council's commitments under the One City Climate Strategy and the One City Ecological Emergency Strategy.</p> <p>Furthermore, where possible, the programme will seek to align the Council's and city's work on climate change with the Covid-19 recovery and vice versa.</p> <p>A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan and Ecological Emergency Declaration, including:</p> <ul style="list-style-type: none"> • Developing the Council's programme to become carbon neutral for direct emissions by 2025 and reducing indirect emissions • Integrating climate considerations into every decision, project and policy • Supporting colleagues through training, systems and advice • Public communication and engagement • Work with other local authorities to lobby government for additional resources, legislation et cetera to create the right enabling conditions so that Bristol can achieve the goals of the One City Climate Strategy. This includes influencing future Covid-19 recovery policies and investment • Coordination of BCC and wider partner actions in response to the Ecological Emergency declared by the Mayor in February 2020. • Coordination of BCC action in the Going for Gold Sustainable Food Project (a One City 2020 Priority Project) to reduce indirect emissions of Carbon from our food system. <p>B) Enabling delivery the Mayor's commitments under the City Climate Strategy and One City Ecological Emergency Strategy</p> <ul style="list-style-type: none"> • The BCC contribution to the achievement of the goals of the new One City Climate Strategy, namely carbon neutrality and resilience to the impacts of climate change, by: • Driving and co-ordinating the delivery of the One City Climate Strategy on behalf of the city, working with the City Office and One City Boards. • Developing and co-ordinating the implementation of an Engagement and Communication Delivery Plan under the One City Climate Strategy on behalf of the city. • Developing and co-ordinating a Heat Decarbonisation Delivery Plan under the strategy, securing resources from Government to contribute. • Developing and co-ordinating delivery of a BCC Action Plan to deliver the BCC contribution to other delivery themes and enabling conditions of the strategy. This will integrate any outstanding actions in the Mayor's Climate Emergency Action Plan, above |

| | |
|---|--|
| <ul style="list-style-type: none"> Seeking additional funding for implementation from external sources. | |
| Out of scope | Any risks/consequences associated with “Out of scope” items |
| Implementation of delivery plans on climate change or ecology. These sit with other BCC teams and partners. | <p>The delivery of change needs colleagues and partners to integrate climate and ecology into everything they do. The Programme will provide support, training and facilitate this but, ultimately, these other teams/partners will be responsible for delivery.</p> <p>Some of our in-flight projects and contracts were approved prior to this work and are not aligned to climate and ecological action. These may have to continue without alignment to the Programme or pause until they are in a position consistent with the Programme.</p> <p>The scale of action needed (as defined in the 2 strategies) is not possible in the current conditions - eg without further national funding and regulatory changes - hence the work to lobby government to create the conditions that will enable Bristol to meet its goals. These enabling conditions are described in the One City Climate Strategy.</p> |
| The City Council is delivering a wide range of other activities to address climate change and ecological emergencies, including work in Transport, Energy and Parks Services, but also in services such as the Museum Service, which is planning a new climate-related exhibition in 2022. These wider actions will form part of the Council’s Action Plan but will not be formally part of this Programme governance and funding arrangements. | That actions taking place across the council are not co-ordinated effectively. This is to be addressed through the programme internal BCC co-ordination and Governance arrangements. |

18.2 Project objectives

The programme has 3 key objectives:

1. Effective co-ordination of Bristol City Council delivery and partnership working with appropriate **good governance**
2. Bristol City Council **leads by example** effectively meeting commitments for its own operations and by aligning its plans, services, projects and investments to the strategies
3. BCC **influences and enables inclusive, substantial, citywide** collaboration and action by many partners and a **diverse** range of citizens.

In addition, where possible, the programme will seek to align activity with the economic recovery post-Covid-19 and seek to maximise equalities benefits.

| | Specific | Measureable | Timebound |
|----------|--|--|---|
| 1 | Good governance. There is effective co-ordination, BCC delivery and partnership working in line with the One City approach... | ...with a formal governance or co-ordination structure in place which has been approved at an appropriate level in BCC and the City Office/Boards and with | ...in place by December 2020 and a Monitoring Framework leading to a first report by November 2021. |

| | | | |
|---|---|---|--|
| | | mechanisms to monitor progress against the goals of the Strategies... | |
| 2 | BCC leads by example effectively meeting commitments for its own operations, for example to be carbon neutral for direct emissions by 2025, and by aligning its plans, services, projects and investments to the Strategies... | ...with approval of BCC Action Plans for Climate Change and Ecological Emergency with effective monitoring in place for emissions and other key indicators and with Action Plans externally audited and verified to comply with ISO 14001.... | ... and agreed by March 2021 with emissions monitoring in place by November 2020 and others following before November 2021 and with an annual audit. |
| 3 | BCC influences and enables inclusive, substantial, citywide action by many partners and a diverse range of citizens... | ... with monitoring mechanisms as per 1.2 above plus tracking of engagement with and action by partners, evaluation of communications and engagement activities to demonstrate impact and reach to a wide range of citizens... | ... and with annual reporting of progress in November. |

18.3 Quality expectations

An annual report on the progress of the programme will be reported G&R Board as part of the governance of the G&R Portfolio. This will draw upon the benefits set out in the Section 18.5. (The Programme is currently referenced in the G&R Portfolio as GR_003)

18.4 Summary Costs and Benefits

| £ thousands | 20/21 | 21/22 | 22/23 | 23/24 | Total |
|----------------------------------|--------------|--------------|------------|------------|--------------|
| New costs | 902 | 1,035 | 697 | 366 | 3,000 |
| Opportunity costs - Known | 150 | 300 | 300 | 300 | 1,050 |
| Ongoing dis-benefit | - | - | - | - | - |
| Total | 1,052 | 1,335 | 997 | 666 | 4,050 |

18.5 Benefits

Financial benefits:

| Description | Metric | Owner | Assumption(s) |
|--|--|--|--|
| Investment in infrastructure and projects | £. Target is 20x the BCC spend on that element | Sustainable City and Climate Change Manager and relevant Project Owners – See table, below | That developing the plans and business cases enables investment. The factor of 20 is the same as used for the European Local Energy Assistance Programme (ELENA) |
| Co-financing of projects within the programme. | £. Target is 1x the BCC spend on that element | | That partners contributions would have been unlikely to have been achieved without the BCC input |
| Overall leverage | £. Target is 3x BCC Spend on the Programme | | |

Financial and Non-financial Benefits:

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|------------------------------------|--|--|---|--|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| 1. BCC Action | | | | | | |
| 1.1 Zero Carbon and Sustainable Council Operations - 3 key projects (P1-P3) plus a training project (P4) | P1: Sustainable BCC Estate | A detailed plan and business case for investment in the BCC property estate linking with initiatives such as City Leap and Future Parks programmes | An increased proportion of the BCC estate is carbon neutral and climate resilient | Approval of the BCC Sustainable Property Estate Plan and Business Case for investment | Head of Property | That this plan will enable and accelerate investment |
| | | Updated procurement policy and procedures and integration into practice | A significant reduction in BCC Scope 3 carbon emissions | £ invested in decarbonisation, resilience and ecological measures. Target £5m | Head of Property, Head of Energy, Head of City Leap Programme | That this spend can be identified separately from general estate investment |
| | | Assessment of capital projects, impacts and opportunities for process and outcome improvement | An increase in effective integration of climate and ecological matters into projects at the earliest appropriate stage within BCC portfolio, enabling better outcomes, reduced risk and avoidance of costs | Scope 1 & 2 emissions – Target = Zero by 2025 | Sustainable City and Climate Change Manager, Head of Property, Head of Energy, Head of City Leap Programme | |
| | P2: Sustainable Procurement | Training and professional development for project managers and others | | Adopted Sustainable Procurement Policy and Implementation Plan | Head of Procurement | That this will lead to reductions in the environmental and carbon footprint of Bristol City Council’s procured goods and services |

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| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|--|---|---|--|--|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| Page 46 | P3: Sustainable Capital Programme | | | Demonstrable changes to the delivery of capital projects | Sustainable City and Climate Change Manager | That improvements are possible and able to be demonstrated qualitatively or quantitatively |
| | | | | Estimated Scope 3 emissions | Sustainable City and Climate Change Manager, Head of Property, Head of Procurement | That we can estimate our scope 3 footprint with sufficient accuracy to see changes That our supply chain is able to deliver reductions for BCC |
| | P4: Climate Change Training Project | Provide training to enhance BCC officers, managers and politicians' awareness, understanding and capability to enable them to effectively address climate change and ecological issues through their work | An increase in the number of initiatives demonstrating effective integration of climate and ecological matters into BCC work enabling better outcomes, reduced risk and avoidance of costs across all areas of BCC work | No. of staff taking climate change training modules. Target = average of one per employee | Sustainable City and Climate Change Manager | Some staff will undertake all of the modules due to their role/interests; others, none |
| | | | | No. of staff taking relevant CPD training. Target = 100 p.a. | Sustainable City and Climate Change Manager | That we can capture this data from training plans or other sources. |
| | | | | Post training knowledge/ confidence survey indicators | Sustainable City and Climate Change Manager | That a sufficient number of participants undertake post-course surveys |
| 1.2 Council Action in the City (P5-P10) | (Delivery plans for...) | Develop delivery plan to create a clear, agreed set of priorities and projects for investment, change or delivery | An increase in substantial private sector and government investment in projects in the city | External funding for plan development. No of climate related investments with clear alignment to the post-Covid-19 economic recovery. See also below | | |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|---|---|--|--|---|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| Page 47 | P5: Heat Decarbonisation Plan | Develop delivery plan to create a clear, agreed set of priorities and projects for investment, change or delivery | An increase in substantial private sector and government investment in projects in the city | Heat Decarbonisation Plan approved. | Head of Energy | That creation of the plan leads to greater and more rapid implementation of projects. |
| | | | | £ invested in heat decarbonisation projects. Target £5m | Head of Energy, Head of City Leap Programme | That this data can be capture from project plans/implementation. |
| | | | | Tonnes CO2 saved by heat decarb projects | | |
| | P6: Summer Over-Heating Resilience Plan | Develop Climate Atlas GIS database and plan for resilience to summer overheating | An increase in knowledge and preparedness for summer overheating. A reduction in harm to human health | Delivery of plan | Sustainable City and Climate Change Manager | That the knowledge gained can be effectively deployed to reduce harm |
| | P7: Sustainable Food Plan and Bite Back Better | Develop delivery plan to create a clear, agreed set of priorities and projects for investment, change or delivery | An increase in substantial private sector and government investment in projects in the city | Sustainable Food City Gold Status achieved | Sustainable City and Climate Change Manager | That achievement of the award reflects improved performance |
| | | | | Sustainable Food Plan approved | | That the plan has effective support in the city and can contribute to change |
| | | | | £ - External funding and partner contributions to the delivery of the plan | | That these metrics can be measured and reported effectively |
| | P8: BCC Ecological Emergency Action Plan and | Develop delivery plan to create a clear, agreed set of priorities | An increase in substantial private sector and government | BCC Ecological Emergency Action Plan | Sustainable City and Climate Change Manager | That the plan has effective support in the city and can contribute to change |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|---------------------------------------|---|---|---|----------------|--|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| | implementation co-ordination | and projects for investment, change or delivery | investment in projects in the city | £ - External funding and partner contributions to the delivery of the plan | | That these can be measured and reported effectively |
| | P9: 100 House Retrofit Project | 100 House Retrofit Project: | The project will be used to inform a bid in April into the Green Homes Grant Local Authority Delivery (LAD) | No. of homes retrofitted = 100 Successful Bid to HMG Funding programme - £500k | Head of Energy | That undertaking the pilot project will lead to a better and more successful bid |

2. Enabling Partner Action (building on work area 1, above)

| | | | | | | |
|---|---|---|---|--|---|---|
| 2.1 City Coordination and City Networks | P10: City Coordination | Co-ordination of delivery of One City Climate Strategy and Ecological Emergency Strategies. | An increase in initiatives brought forward by partner organisations which build support for more ambitious climate and ecological action. An increase in investment (leverages small BCC expenditure effectively) | No. of partners actively participating in the delivery of the strategies | Sustainable City and Climate Change Manager | That we are able to influence the achievement of the goals by active co-ordination and facilitation. |
| | P11: Maintaining capacity of key non-for-profit networks | Continue support for key networks including but not restricted to Bristol Green Capital Partnership and Bristol Food Network. This builds a broad base of organisations committed to climate and ecological action in Bristol. And for specific initiatives | | No of members of BGCP and other key networks Perception surveys of the capacity of businesses and organisations to respond to the climate/ ecological emergencies | Sustainable City and Climate Change Manager | That increased membership of these networks leads to greater action in the city That reliable data can be gathered and that capacity leads to action |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|--|---|---|--|-------|--|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| | | working with “leaders” or key infrastructure bodies | | £ - External funding secured by these networks | | That our contribution to core costs enable’s these networks to secure other funding more effectively |
| 2.2 Specific Collaboration Initiatives | P12: Bristol Climate Leaders Project | | No. of organisations participating in Climate Leaders project and their combined carbon reductions (tonnes) | That membership of the Climate Leaders project increases action by participants | | |
| | P13: Climate Risks and Extreme Weather Management Project | | Climate Risks and Extreme Weather Plan approved | That the plan will encourage use of citywide climate scenarios in all future planning | | |
| | | | £ invested by BCC and partners to manage climate risks through future-proofing key assets and manage extreme weather events | | | |
| | | | | Meteorological monitoring network operational – citywide network of weather stations and sensors | | |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|---|---|---|---|--|--|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| 3. Enabling Citizen Action | | | | | | |
| NB Projects in Work Stream 3.3 may be taken out of scope if necessary in order of descending priority due to higher priority project overspend or other scope changes | | | | | | |
| 3.1 Inclusion and Equalities | P14: Inclusion and equalities projects to engage with key communities, including but not restricted to Black and Green (B&G) Ambassadors Project | A package of projects to engage with a range of communities including, but not restricted to, the Black and Green Ambassadors Project. Led by BGCP and Ujima Radio this project will recruit, mentor and support 9 emerging leaders with environmental and social justice ambitions | An increase in the involvement of Black, Asian and minority ethnic groups and other equalities groups/networks in the climate and environmental agendas, leading to a stronger mandate, enhanced understanding of diverse perspectives, opportunities and barriers and, ultimately, the development of more appropriate solutions and action. | Other funding secured by project partners | Sustainable City and Climate Change Manager Bristol Green Capital Partnership Chief Operating Officer | That the projects serve to increase involvement/representation of Black, Asian and minority ethnic groups and other equalities groups in the climate and ecological agenda |
| | | | Increased profile of environmental activity led by people who describe themselves as Black, Asian or of minority ethnicity; increased opportunities for | New metrics will be designed for the new inclusion projects | | That the data on Black, Asian and minority ethnic groups and other equalities groups participation and influence can be reliably gathered |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|---|---|---|---|---|---|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| | | | people who describe themselves as BAME to participate in the green economy and to influence environmental policy-making | | | |
| 3.2 Communication with Citizens Page 51 | P15: Integrated Council Communications and Engagement (C&E) | Integrate and align existing BCC communications and behaviour change activities with the CE and EE strategies, support with specific campaigns/actions and facilitate an effective programme of C&E by partners across the city | An increase in gearing ratio in relation to value of existing BCC spend to deliver strategy outcomes. | Illustrative examples of joined up communications, reported annually | Sustainable City and Climate Change Manager | That integrating communications increases effectiveness |
| | P16: Bristol Climate Action Hub website and Going 4 Gold website | | Increased citizen and partner action and targeted initiatives enable us to reach the whole community, understand community priorities and understand and address barriers for specific communities. This includes contributing to the deliberative democracy project as it relates to the scope of the programme. | Number of page imprints and click-throughs (websites), where available Amount of social media activity generated by web content, where available | | That visiting the website leads to action |
| | P17: Communications and Engagement activities including deliberative democracy related to climate change | | | Campaign specific metrics to be developed but could include the qualitative feedback and evaluation by key and trusted partners as critical friends, such as ESB and BACC and | | That suitable data on impact can be collected |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|--|--|--|--|--|--|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| | | | | their constituent organisations. Also Climate Outreach and CAST. | | |
| | P18: One City Climate Communications Toolkit | | | No. of organisations actively using the toolkit | | That use of the toolkit increases effectiveness |
| | P19: National Lottery Community Action Fund Project | BCC will support a project with 6 communities in Bristol, with initial funding from the National Lottery (£375k) to create innovative solutions to climate change, with clear co-benefits. BCC will seek to facilitate delivery of these plans | <p>An increase in leveraging Lottery and other funding to enable community led action, helping to deliver the One City Climate Strategy bottom up.</p> <p>An increase in reported sense of empowerment in communities in relation to climate action (where this can be measured or surveyed for example as part of the BCC Quality of Life survey)</p> <p>An increase in acts/initiatives involving learning and</p> | <p>Community Action Plans for the 6 communities are co-produced with active engagement and input from citizens</p> <p>Co-benefits will be measured in the CAF evaluation and will include skills, jobs, health and Quality of Life response data.</p> <p>External funding secured for implementation of the plans</p> <p>Reduced CO₂ emissions from the participating neighbourhood –</p> | <p>Sustainable City and Climate Change Manager.</p> <p>Bristol Green Capital Partnership Chief Operating Officer</p> | <p>That creation of the plans and their delivery leads to reduction in emissions and increases in resilience</p> <p>That the project increases inclusion of target communities in the climate and ecological agenda</p> <p>That the Quality of Life survey can be used to gather data on neighbourhoods</p> |
| | | | | | | |

| Enabling changes | | Business changes | Benefits | Metric | Owner | Assumptions |
|---|----------------------------------|--|---|--|---|---|
| Programme Work Stream (WS) reference no. | Project (P) reference no. | | | | | |
| | | | sharing within Bristol communities and amongst nationwide cohort of funded projects, enabling greater insight into different perspectives, existing best practice, barriers and solutions | modelled | | |
| 3.3 Supporting Community Action-including grant-giving Page 53 | P20: BCC Community Action Grants | A new set of small grants to support community led action, targeted to communities which most need support | | Increased self-reported knowledge and action on climate change in these neighbourhoods | Sustainable City and Climate Change Manager | That funding of community-led projects increases inclusion and action and that these can be measured. That communities are willing to take part |
| | | | | Number of successful projects completed | | |
| | | | | Match funding/volunteer time secured by funded projects | | |
| | | | | Metrics on inclusion and diversity to be developed | | |

18.6 Costs & Funding Sources

| Funding source | Budget Holder | Cost-Code | Financial Year (or recurring) | Amount £k |
|----------------------------|---------------|-----------|-------------------------------|--------------|
| BCC Revenue | Alex Minshull | 11188 | 20/21-23/24 | £1,050 |
| BCC Climate Change Reserve | | | | £3,000 |

| | |
|---|---------------|
| Total funding required (ref S15.3) | £4,050 |
| Total funding secured | £4,050 |
| Variance | £ |
| Variance commentary: N/A | |

18.7 Key Risks and Issues

The Programme RAID log has been updated by the Programme Manager and is included in the appendices.

18.7.1 Risk Impact Analysis

The Programme carries inherent risk including the risk of launching the programme in the current context of pandemic and Climate and Ecological Emergencies. All of these factors add instability to the operating environment of the programme. However, should the programme be approved it could be said that these risks have been accepted. The other inherent risk is associated with the novel elements of the programme where non-traditional methods are necessary in order to achieve the outcomes we seek eg in innovative methods of public engagement. These are limited elements of the programme and the risks associated with them would be discussed with the Programme Board, should the proposal be approved. Further comments on risk tolerance is included below in section 20.1. In summary, critical risks would be escalated to the Programme Board who may choose to further escalate to the Corporate Leadership level. Significant risks would be escalated to the Corporate Leadership level. More information is included in the RAID, see above.

18.8 Contingency Planning

No specific contingency budget has been included at the Programme Level. Each project will be expected to manage its budget effectively and make appropriate contingency. The programme is very flexible and if overspends are necessary in some projects to achieve the desired quality then revisions can be made to other project budgets to bring the total spend in line with the budget.

19. Delivery Approach

19.1 Implementation Approach

The Programme contains over 20 specific projects and activities. There will be a phased initiation of these projects to enable them to be managed within the available programme/project management resource. Some projects will be short lived and complete within 6 months whilst others will last the full 3 years of the programme and may continue beyond the programme. Each project will select the appropriate style of project management and will provide monthly or quarterly progress reports to the Programme Manager to enable the Highlight reporting to be complete and accurate.

19.2 Benefits Realisation Approach

The Programme Manager has experience of mapping, managing and realising benefits. It is anticipated that the benefits realisation approach will follow the standard Portfolio, Programme, Project Management (PPPM) practice. The Programme Manager has secured pro bono services of an experienced PPPM professional and Benefits Manager to run an online benefits mapping and dependency exercise should the Programme be approved. There is also provision in the programme budget (resource at Project Manager level) to provide sufficient capacity for benefits realisation.

This was further discussed following Programme Assurance by Change Services. The assurance noted: *“There are opportunities to build on the Benefits identification work already in place which can help enable the delivery of the significant number of benefits already identified.”* The Programme Manager has discussed a further version of the benefits map (not included here) with senior practitioner, Charlotte Hopkins, and has invited Charlotte to observe the planning benefits mapping workshop at Programme inception, should the Programme be approved.

19.3 Procurement Approach

The programme will procure professional services and small amount of goods and supplies. It will also make grants to not-for-profit organisations. Each project will seek appropriate support from the Services and Resources Category Manager for any required tender exercises. We may also be able to utilise the Strategic Partner once awarded where necessary to give support and expertise in this area. Any procurement exercise will adhere to Bristol City Council’s internal Procurement Rules and PCR 2015 regulations.

19.4 Communications and Engagement Approach

A communications plan based on stakeholder analysis at the programme level has been included in the appendices.

19.5 Timeline and Key Milestones

| Key Milestones | Target Date |
|--|-------------|
| Full Business Case sign off | 03/11/2020 |
| Key milestones have been identified for each project and there will be an annual progress report in November each year | 03/03/2021 |

| | | |
|--|--------------------------|---|
| Programme User(s) | Represented on G&R Board | G&R Board Members |
| Programme Supplier(s)/ Programme Director | Alex Minshull | Sustainable City and Climate Change Service Manager |
| Programme Manager | Alex Ivory | Climate Change Team Manager |

The Programme has a wide range of projects with different user groups. The principle governance will therefore be at a project level, with programme level governance between the Programme Manager, Senior Supplier/Programme Director and Programme Executive Director. The programme level Users will be represented by the G&R Board as a whole with programme level issues escalated to that Board, and similarly any concerns of the Board Members can be raised with the Programme Executive Director at that Board. This reflects the diverse nature of the programme and the extent to which it is integrating into Services.

Project Board meeting regularly?

Yes. Quarterly Programme Board meetings scheduled monthly from October.

Project Board ToR's agreed and relevant?

To be agreed. This was further discussed following Programme Assurance by Change Services. The assurance noted: *"The Governance at both Programme & Project levels hasn't been fully drawn up within the Business Case. This will play a key role in ensure the success of the Programme and each of the Projects it contains."* Discussions are ongoing with advice received and discussed with head of profession, Tara Dillon, as to how to prepare an appropriate means of light-touch programme governance.

20.1 Project Tolerances & Controls

Tolerances are indicated here as initial suggestions but would be agreed finally by the Programme Board at inception, should the approval be given to proceed.

| Tolerance areas | Project level tolerance | Escalation route | Control & tracking document(s) |
|---|--|---------------------------------|--|
| Time +/- amounts of time on target completion | 6 months | Programme Board | Programme Plan/Sub-project Plans Highlight Report |
| Cost +/- amounts of planned budget | No specific contingency budget has been included at the Programme level. Each project will be expected to manage its budget effectively and allocate appropriate contingency (10% as a guide). The proposed programme is very flexible and if overspends are necessary in some projects to achieve the desired quality then revisions can be made to other project budgets to bring the total spend in-line with the overall budget | Programme Board | Project Plan Highlight Report Workpackage Document |
| Quality Defining quality targets in terms of ranges | Overall: Quality criteria – that is to say the degree to which each project achieves the envisaged outcomes - would be agreed for each of the programme projects at inception. These will be based on the financial and non-financial benefits table. Financial benefit tolerance will be 25% and others are largely qualitative | Programme Board | Requirements Document Highlight Report Product Description |
| Scope Permitted variation of the | Scope: £99k tolerance as measured by budget The Programme Manager and Senior Supplier can agree changes in scope by £99k according to the | Programme Board in Consultation | Project Plan Business Case Highlight Report |

| | | | |
|--|---|---|--|
| scope of a project solution | Council's Financial Scheme of Delegation but would escalate any larger changes | with the Executive Member | Workpackage Document |
| Benefits +/- amounts of planned benefit delivery | The benefits map will be revised and considered at inception | Programme Board | Business Case Highlight Report |
| Risk | As per the risk guidance, Critical risks would be escalated to the Programme Board who would decide on the appropriate escalation route | Programme Board /Corporate Leadership Board | RAID Log Contingency Plan Highlight Report Workpackage Document |

20.2 Project Team Resource Requirements

| Role | What they will do | FTE | Years | £k Cost per FTE Year | Total Cost | Opportunity / New Cost | Funding source(s) |
|---|---|-----|-------|----------------------|------------|------------------------|------------------------|
| Climate Change Team Manger | Manage the team and the Programme | 1 | 3.5 | 66 | 231 | Opportunity | Revenue Budget |
| Technical Project Manager | Provide domain expertise and project management for the following projects: | | | | | | |
| | Sustainable Estate Project | 1 | 2 | 50 | 100 | New | Climate Change Reserve |
| | Sustainable Capital Programme Project | 1 | 1 | 55 | 55 | New | Climate Change Reserve |
| | Sustainable Food Project | 1 | 4 | 55 | 220 | Opportunity | Revenue Budget |
| | Ecological Emergency Project | 1 | 3.5 | 55 | 192.5 | Opportunity | Revenue Budget |
| | BCC Climate Action Co-ordination | 1 | 4 | 55 | 220 | Opportunity | Revenue Budget |
| | One City Climate Strategy Co-ordination and partner/citizen engagement | 1.5 | 2.75 | 55 | 227 | New | Climate Change Reserve |
| Technical/ Project Support Officer | To provide support to the programme | 2 | 2.7 | 33 | 181 | New | Climate Change Reserve |
| Climate Change Learning and Development Advisor | To develop and manage the training programme | 1 | 2 | 34 | 68 | New | Climate Change Reserve |

| | |
|-----------------------------------|---------------|
| Total opportunity costs | £864 |
| Total new costs | £630 |
| Total resource costs | £1,494 |
| Total funding being sought | £1,494 |

21. Equalities Impact Assessment (EqIA) Summary of Impact and Key Mitigation

An equalities impact assessment has been undertaken. Through the Outline Business case Options Appraisal the equalities aspects were considered for each option. Option 4, the preferred option developed in this business case, was the option with the greatest positive equalities impact and this was a key part of the reason for recommending it.

The equalities impacts have been assessed Project by Project:

- Two have been identified as having negative risks – from changes in procurement and from the implementation of projects to reduce the carbon emissions from heating buildings.
- Several projects have been assessed as Neutral, but this assessment will be reviewed as the projects develop and appropriate mitigation put in place should negative impacts be identified.
- More than half the projects have identified positive benefits or benefit potential and the focus here will be ensuring and maximising delivery of those positives.

The equalities assessment has identified those projects which pose risks of harm, ensured we consider the seemingly neutral projects more critically and have identified the areas of positive potential to be maximised.

Key mitigation measures will be:

- All project managers and staff directly working on the programme will receive appropriate equalities training.
- Equality considerations have been more overtly incorporated into the objectives and reporting on progress on these will form part of the programme governance highlight reporting.
- Targeted investment to enable community groups, with a particular focus on equalities communities and groups.

22. Eco-Impact Assessment Summary of Impact and Key Mitigation

An eco-impact assessment has been included in the appendices.

The significant impacts of this proposal are the substantial reduction on in greenhouse gas emissions, increases in climate resilience and improvements in wildlife. However, the scale of the changes which the strategies seek to achieve, and the Programme aims to accelerate, are very substantial and therefore will use materials, generate waste and change the appearance of the city.

The proposals will mitigate the impacts by ensuring that impacts are considered in the development of projects in the programme and that Council colleagues are trained in the relevant issues to be able to minimise adverse impacts.

The net effects of the proposals are positive.

23. Privacy-Impact Assessment Summary of Impact and Key Mitigation

Initial screening at Mandate stage did not raise any significant issues. There have been no substantive changes since this screening. The Programme Manager worked with James Gay to revise the initial screening which has been included in lieu of a full PIA as one was not deemed to be required for this proposal.

24. Full Business Case - sign off

| Name | Job Title | Date circulated |
|---------------|--|------------------------|
| Alex Minshull | Sustainable City and Climate Change Manager (Senior Supplier/Programme Director) | 01/10/2020 |
| Zoë Willcox | Service Director, Development of Place (Programme Sponsor/SRO) | 01/10/2020 |

| | |
|----------------------------------|------------|
| Decision making authority | Cabinet |
| Date seeking endorsement | 03/11/2020 |

APPENDIX

A. Required commentary and recommended consultation

(NB. Mandate and OBC stage checklists have been removed for ease of reference)

| FULL BUSINESS CASE | | |
|---|--|------------|
| Recommended bodies/individuals for consultation ahead of submission to the relevant decision making Board: | Commentary (if any) | Date |
| Cabinet Lead - Cllr Shah | Supportive of the Preferred Option and recommended to Cabinet. | 29/09/2020 |
| Executive Director Meeting (EDM) | Supportive of the Preferred Option subject to Council resources being available from Reserves. | 16/09/2020 |
| Professional Views | Commentary | Date |
| MANDATORY – and must include confirmation of funding source(s) Finance Business Partner Kayode Olagundoye | Received from Kayode Olagundoye: “The programme already has approved revenue funding of up to c£1.05m (over a 4 year period) to fund Sustainable City and Climate Change activities. This FBC seeks approval to spend the up to £3m from the Climate Change Reserve. It seeks approval to spend £0.7m to deliver the action plans and other year 1 priorities, and delegated authority for the Executive Director of Growth and Regeneration, in consultation with the Cabinet Member for Climate, Ecology and Sustainable Growth, the Cabinet Member for Finance, and the S151 Officer for all future drawdowns from the £3m Climate Change Reserve. The approval of this FBC does not constitute a new funding pressure for the Council, as funding was set aside as part of 2020/21 budget setting. Any additional spend over and above existing budgets will need to be brought back to Cabinet for approval.” | 20/10/2020 |
| MANDATORY FOR ALL FOR ALL FBCs WITH A RESOURCE REQUEST PMO Lee Ford | Received from Lee Ford: “As there is no demand on Change Services resources in this business case, my endorsement is unnecessary in this instance.” | 07/10/2020 |
| MANDATORY FOR ALL FBCs Director Digital Transformation Simon Oliver | Simon Oliver confirmed: No anticipated impact to IT Services | 06/10/2020 |
| HR Business Partner | Received from Celia Williams: | 05/10/2020 |

| | | |
|--|--|------------|
| Celia Williams | “The report identifies additional resource which will be required to deliver the actions and outcomes within the business case, summarised in section 20.2 of the business case. This is in addition to existing staff who are currently allocated to the project. Recruitment will progress on approval of the business case. There are no other HR implications evident.” | |
| Change Services View Sam Marsh | Received from Sam Marsh: “This is a wide ranging and ambitious programme that challenges the Council and the city to meet its commitments to the Climate Emergency Action Plan, One City Climate Strategy and Ecological Emergency Strategy. The benefits of the work are well articulated but at the time of reviewing the full programme plan and risk log were not yet available. Before sign off, attention should be given to the full list of opportunity as well as new costs associated with the programme to ensure it is set up for success.” | 01/10/2020 |
| IT View Simon Oliver | Included in the above (Digital) | 09/10/2020 |
| Enterprise / Solution Architecture View | N/A | N/A |
| Property and FM View Jaime Blakeley Glover | Received from Jaime Blakeley-Glover: “The business case provides really important detail on plans and funding to enable the Council to make progress on its Climate and Ecological targets. From a Property perspective we are supportive of the level of ambition and have worked collaboratively with colleagues involved in the production of the FBC to identify funding requirements for the initial study and additional resource. This resource is critical to making progress on further reducing carbon on the estate. It is important to note that proposals that relate to Property will enable a proposed plan to be developed but subsequent delivery will require significant additional funding and resource to be provided and the management of potential trade-offs with other strategic objectives.” | 08/10/2020 |
| Legal View Husinara Jones | Received from Husinara Jones: “No legal issues arise out of the approval of the Business Case for the Climate Change Programme and progression to the development of a Full Business Case for the Programme. Implementation may give rise to procurement and related | 05/10/2020 |

| | | |
|---|--|------------|
| | considerations which can be advised on once further detail is available.” | |
| Commissioning & Procurement View Niotia Ferguson | Received from Niotia Ferguson: “The FBC indicates that Consultancy and Procurement support is likely to be required throughout the life of the Climate Change Programme. The Services and Resources Category will provide Procurement Support to any required tender exercises that are required. We will also be able to utilise the Strategic Partner once awarded where necessary to give support and expertise in this area. Any procurement exercise will adhere to Bristol City Council’s internal Procurement Rules and PCR 2015 regulations.” | 05/10/2020 |
| Information Security View | N/A | N/A |
| Statutory Data Protection Officer View (if PIA applicable) | Received from James Gay: “We can confirm no PIA is needed at this stage, as you have indicated once the projects move into design stages (especially for grants, communication works) we should revisit the Screening Form to see if there are any increases in personal data processing.” | 01/10/2020 |

B. Mandatory Project Documents

| Document Name | Stage required | Document Exists? (Yes/ No) | Document Owner | Hyperlink to document |
|---|----------------|----------------------------|----------------|---|
| EQIA Relevance Check | Mandate | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Outline Business Case\PIA Screening and Outline Business Case Options questions - Climate Change Programme 120520 - approved by Data Team |
| Mandate Information Governance (IG) Relevance Check | Mandate | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Mandat |

| | | | | |
|-------------------------------|--------------------|---|---------------|--|
| | | | | e for climate prog 2020 and related docs\Mandate Information Governance Relevance template.docx |
| Options Appraisal | OBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Outline Business Case\EDM Papers\Options appraisal - climate programme v1. Final for EDM.docx |
| PIA screening questionnaire | OBC | Y | Alex Ivory | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Mandate for climate prog 2020 and related docs\PIA Screening and Outline Business Case Options questions - Climate Change Programme 120520 |
| Project Financial Spreadsheet | OBC & FBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\Climate and EE Programme Financial Spreadsheet 0.1.xlsx |
| RAID Log | OBC & FBC | Y | Alex Ivory | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\FBC CEE Prog RAID log v0.1 |
| Project Plan | MANDATE, OBC & FBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Proje |

| | | | | |
|--|-----------|-----|--|---|
| | | | | ct documents\Full Business Case\Cabinet Papers\FBC Appendices\Project Plan v0.1 |
| EQIA | OBC & FBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\ CEEP Appendix E EqIA Full v0.3 |
| EcoIA | OBC & FBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\ CEEP Appendix F Environmental Checklist - Final |
| Privacy Impact Assessment (NB this was a revision of the screening document on the advice of James Gay) | FBC | Y | Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\Cabinet Papers\FBC Appendices\Appx 6 CEEP PIA screening revised for FBC stage 011020 |
| Programme Board Terms Of Reference | OBC & FBC | Y | BCC standard template – under discussion – Alex Minshull | S:\SUSTAIN\Sust City\Climate Emergency\Project Management\Project documents\Full Business Case\Cabinet Papers\FBC Appendices\Appx 7 BCC Standard Prog Board ToR |
| Solution Design | FBC | N/A | N/A | N/A |

C. Timeline of approvals and any associated conditions

| # | Meeting | Date | Action / Decision / Condition | Date for completion (If applicable) | Owner |
|---|---------|------------|---------------------------------------|--|-------|
| 1 | EDM | 16 Sept 20 | Decision: Proceed to FBC for Option 4 | For Cabinet on 3 Nov 20 | AM |
| 2 | Cabinet | 3 Nov 20 | Pending | 21 Oct 20 | AM |

Bristol City Council Equality Impact Assessment Form



| | |
|------------------------------|--|
| Name of proposal | Climate Change and Ecological Emergency Programme |
| Directorate and Service Area | Growth and Regeneration, Sustainable City and Climate Change Manager |
| Name of Lead Officer | Alex Minshull |

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

Our climate is changing due to the burning of fossil fuels and other changes for example to how we use land. This changing climate is changing weather patterns with adverse impacts on people and this will get worse in the coming years. Climate Change and other changes caused by people have also led to a huge reduction in wildlife and harm to natural systems.

These two sets of problems have led the council and partners to declare Climate and Ecological Emergencies. In response to these the city has adopted strategies on these two subjects.

This proposal seeks to make a rapid, impactful and affordable response to the Climate and Ecological Emergencies over the next 3 years. Specifically:

A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan

B) Enabling delivery the Mayor's and council's commitments under the [One City Climate Strategy](#) and the [One City Ecological Emergency Strategy](#)

The programme has 4 key objectives:

1. Effective co-ordination of BCC delivery and partnership working with appropriate **good governance**.

2. Bristol City Council **leads by example** effectively meeting commitments for its own operations and by aligning its plans, services, projects and investments to the strategies
3. **BCC influences and enables inclusive, substantial, citywide collaboration and action** by many partners and a diverse range of citizens.

The programme will operate in a way that is fully consistent with the public sector equality duty and this has been recognised in the selection of the programme option at Outline Business Case stage, the preferred option selected being the only one with significant positive equalities benefits.

One of the underlying principles of the Programme is Fairness.

The Programme of work being proposed here includes over 20 individual projects and activities. They can be classed in 3 groups:

- Council Action in our own operations and in the city
- Enabling action by partners
- Enabling action by citizens

A full list of the Projects is included as Appendix 1 and an assessment of the equalities impacts of each has been made. They can be categorised as being of several types:

- **Technical studies** into council operations, climate change or ecological issues, which will result in a proposal for further action. For example we will look at how we can improve wildlife on council property and make proposals to do this in subsequent action plans.
- **Development of plans** for action in the city, for example a communications plan or a plan to change heating systems in buildings. Each of these plans will be developed and consulted upon in the appropriate way and approved through council processes.
- **Funding for community and not for profit groups in the city.** This is intended to enable organisations and citizens to work together and to contribute directly to the goals of the strategy. For example in one project, supported by Big Lottery funding, 6 communities will develop their own climate action plans to determine what they want to do to tackle climate change. In other areas of the programme we propose community grants, which would be managed in line with council practices and targeted on those communities which need council assistance most greatly. These projects will be developed in

consultation with the council's community development team to ensure that they follow good practice.

- **Communications.** Some of programme will develop communications materials, such as a websites, and will run communications campaigns. These will be developed through the council's communications teams to ensure that they follow good practice in equalities matters.
- **Project Management and technical advice.** The programme will lead to the recruitment of several council officers to work on the projects. The recruitment will be carried out in line with the council's policies and will provide opportunities for the council to recruit from diverse communities.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

Directly the programme could affect people in the following ways:

- Generating plans which will change how the council operates and the services it provides. This could be a very wide range of people but we would need to examine the scope of each plan as it develops to be clearer. Each project will need to consider what data we have and what we need to effectively deliver.
- Providing funding for community and not for profit groups. We know that community groups in the environmental sector are working to improve their diversity but in some aspects they are not yet representative of the whole community – this is particularly the case for participation by people of Black, Asian and minority ethnic backgrounds. Yet people from Black, Asian and minority ethnic backgrounds are more concerned about climate change than the Bristol average.
- Communications. We know that many communications are not fully accessible to all members of the community.
- Council workforce. We know that the council workforce is not fully representative of the diversity of the city and this is particularly the case in climate and ecological sectors where Black, Asian and minority ethnic representation is recognised as being low.

Data from the quality of life survey provides a good picture of the concerns of residents about climate change and their participation in action to respond to it. This and other research has been used in the formulation of the programme.

| Indicator | % concerned about climate change |
|--------------------------------|----------------------------------|
| Characteristic | Percentage |
| 16 to 24 years | 87.2% |
| 50 years and older | 84.3% |
| 65 years and older | 85.9% |
| Female | 92.3% |
| Male | 83.4% |
| BAME | 89.2% |
| WME [White Minority Ethnicity] | 88.1% |
| Disabled | 84.0% |
| Carer | 86.4% |
| Single Parent | 90.8% |
| Religion or faith | 85.5% |
| No religion or faith | 91.2% |
| Lesbian, Gay or Bisexual | 93.2% |
| Bristol Average | 87.9% |

source: Quality of Life in Bristol survey 2019

2.2 Who is missing? Are there any gaps in the data?

We do not yet have comprehensive data on participation and attitudes for all communities. As part of the programme we will gather this data to better inform subsequent phases; for example, by understanding who is using our website and who is not, and why.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

The programme is very broad and so as individual projects are designed and initiated they will be developed with communities or groups that could be affected; for example, we will draw upon best practice and community knowledge to develop our community grants scheme to be as accessible and inclusive as possible. We are already in discussion with a new network of people who identify as Black environmentalists and would look to expand upon this. Our Cabinet Lead is also exploring making links to communities which he represents as councillor.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

| |
|---|
| <p>3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?</p> |
| <p>Appendix 1 provides a project by project assessment of the equalities risks.</p> <p>Two have been identified as having potentially negative impacts – from changes in procurement and from the implementation of projects to reduce the carbon emissions from heating buildings.</p> <p>Several projects have been assessed as Neutral, but this assessment will be reviewed as the projects develop and appropriate mitigation put in place.</p> |
| <p>3.2 Can these impacts be mitigated or justified? If so, how?</p> |
| <p>As these projects get underway they will address these risks and seek to avoid and mitigate them. It is too soon to be able to identify the risks and mitigation in any more detail.</p> |
| <p>3.3 Does the proposal create any benefits for people with protected characteristics?</p> |
| <p>Yes, half of the project have identified positive benefits or benefit potential. In addition, the recruitment of additional personnel to assist with the programme creates opportunities to diversify the workforce in this field, in particular with regard to race and disability which are protected characteristics which are under-represented in the workgroups. A Positive Recruitment approach will be adopted in consultation with HR advice.</p> |
| <p>3.4 Can they be maximised? If so, how?</p> |
| <p>In some cases they are already targeted as specific groups of people with protected characteristics. In others they have not yet been designed but there is potential to increase the benefits/more fully realise the potential and this can be built into project design.</p> |

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

| | |
|--|--|
| 4.1 How has the equality impact assessment informed or changed the proposal? | |
| The equalities assessment has identified those projects which pose risks of harm, ensured we consider the seemingly neutral projects more critically and have identified the areas of positive potential to be maximised. | |
| 4.2 What actions have been identified going forward? | |
| <ul style="list-style-type: none"> • All project managers and staff directly working on the programme will receive appropriate equalities training. • At Outline Business Case stage, inclusion was a principle on which the programme was based. In the Full Business Case this has been made more explicit in the Objective of the Programme. • Projects within the scope of the Climate Change and Ecological Emergency Programme will be subject to individual equalities relevance check or equality impact assessments as appropriate | |
| 4.3 How will the impact of your proposal and actions be measured moving forward? | |
| By making Inclusion an Objective the Monthly Programme Highlight report will report on performance. This is likely to need to be narrative, about the actions taken, rather than quantitative as some areas of the programme will be impossible to secure suitable data for. | |
| Service Director Sign-Off: <i>Zoe Willcox, Director, Development of Place</i> | Equalities Officer Sign Off: <i>Reviewed by Equality and Inclusion Team</i> |
| Date:12/10/20 | Date: 5/10/2020 |

Appendix: Project by Project equalities assessment

| City Council Action | Equalities commentary | Evaluation |
|--|--|--|
| <p>Zero Carbon and Sustainable Council Operations</p> <p>P1: Sustainable BCC Estates Project: Produce a strategy and delivery plan that will enable the Council to meet the carbon neutrality targets for both its operational and investment estates</p> <p>P2: Sustainable Procurement Project: Create a sustainable procurement policy and strategy and integrate into procurement team and practices and initial promotion to key suppliers</p> <p>P3: Sustainable Capital Programme: Undertake a detailed analysis of the carbon footprint, climate resilience and ecological impacts of a sample of existing typical projects, develop recommendations and provide training and support for Capital Programme staff.</p> | <p>The development of the plan is not expected to have an adverse impact. The implementation may change building heating systems, install renewable energy or insulate buildings. It is unlikely that these would have adverse impacts on groups but this will be assessed at implementation stages of projects when details are known.</p> <p>The delivery of the project is not expected to have an adverse impact. The procurement policy or processes adopted could make it more difficult for small businesses to sell to the council and this may have an disproportionate adverse impact on communities or groups. This will need to be addressed in the design and adoption of the policy and processes.</p> <p>The delivery of the project is not expected to have a direct adverse impact. It is impossible to say whether the anticipated changes in scheme design would have adverse impacts but projects undergo equalities impact assessment themselves.</p> | <p>Neutral</p> <p>Negative risk</p> <p>Unknown</p> |

Council Action in the City

P4: Climate Change Training Project:

Enhance BCC officers, managers and politicians awareness, understanding and capability to enable them to effectively address climate change through their work.

In developing the training we are consulting with the Equalities and Diversity team in order to ensure that the training is inclusive of colleagues who may have difficulty accessing it for reasons of role, ability, or any protected characteristic. We are ensuring that online training is accessible to those with visual or hearing impairment by providing captioning and transcription available to screen readers. We are also conscious of the disproportionate impact of the effects of climate change on those already disadvantaged and vulnerable, and relatedly the need for solutions to be conscious of equality and diversity issues. We have incorporated explicit acknowledgement of this within the training, linking with the fairness and inclusion aspirations of the One City Plan, and the values of Bristol City Council.

Neutral

P5: OCCS Heat Decarbonisation Delivery Plan:

Develop a OCCS Heat Decarbonisation Delivery Plan to create a clear, agreed set of priorities and projects for investment by City Leap Partnership, utilities and others

The development of this technical engineering and financial plan is not expected to have an adverse impact. The implementation may change building heating systems, install renewable energy or insulate buildings. It is unlikely that these would have adverse impacts on groups but this will be assessed at implementation stages of projects when details are known.

Negative risk

P6: OCCS Summer Over- Heating Resilience Plan:

Develop a plan to understand and address the risks to human health and city infrastructure and services from overheating to enable more effective targeting.

The delivery of the project is not expected to have a direct adverse impact. People with disabilities, BAME and older people are more likely to suffer from overheating, and so we would anticipate a net positive impact from the resultant action plan on these groups.

Neutral

P7: OCCS Delivery Plan - Sustainable Food and Bite Back Better: A project to develop the success of Going for Gold into a strategic approach to reduce the carbon and ecological footprint of the city's food system.

The development of the plan will be undertaken in an inclusive manner, to ensure that relevant communities and groups can participate. The steering group for this project will be developed, with the Chair, Councillor Asher Craig, to ensure diverse communities are represented.

Positive potential

P8: One City Ecological Emergency Strategy & BCC Action Plan:

Develop the BCC Action Plan to implement this strategy, implement initial actions and develop business cases and external funding bids for investment. Implement initial actions in the Action plan and develop business cases and external funding bids for investment.

The development of the plan will be undertaken in an inclusive manner, to ensure that relevant communities and groups can participate. The steering group for this project will be developed, with the likely Chair, Councillor Afzal Shah, to ensure diverse communities are represented.

Positive potential

P9: 100 House Retrofit Project: Pilot project testing whole-house retrofit on 100 homes for those in Fuel Poverty and linking with government energy grants

The project will have a positive impact on those in fuel poverty who use the scheme. People with disabilities, BAME and older people are more likely to be in fuel poverty. The project will be delivered in line with council processes to ensure that promotion and delivery is inclusive.

Positive

Enabling Action by Partners

City Coordination and City Networks

P10: Co-ordination of partner action on the strategies: Multi-stakeholder engagement, management and visualisation, One City Environment Board, Bristol Advisory Committee on Climate Change

This is in effect programme management of the initiative at a city scale. This has not yet been designed but the programme manager is trained in equalities and diversity.

Neutral

P11: Maintaining capacity of key non-for-profit networks: Contribute to thriving networks of organisations committed goals of the strategies

Grants will be made to key organisations working in the sector and grant agreements will incorporate how the groups are operating in an inclusive way and seeking to widen their diversity.

Positive

Specific Collaboration Initiatives

P12: Bristol Climate Leaders Project:
Contribute to a network of organisations providing peer to peer support to enable organisations to become Carbon Neutral and climate resilient.

This project for organisation in the city is being run by the Bristol Green Capital Partnership. Our grant agreement will incorporate how the project is operating in an inclusive way and seeking to widen the diversity of the business it is working with.

Neutral

P13: Climate Risks and Extreme Weather Management Project: To assess future risks to key infrastructure, assets and services and develop business case for investments. Install new monitoring network.

The development of this technical engineering and financial plan will not have adverse impact.

Positive

Enabling Action by Citizens

Inclusion and Equalities

P14: Inclusion and equalities projects to engage with key communities, including but not restricted to Black and Green (B&G) Ambassadors Project. A package of projects to engage with a range of communities including, but not restricted to, the Black and Green Ambassadors Project. Led by BGCP and Ujima Radio this project will recruit, mentor and support 9 emerging leaders with environmental and social justice ambitions

The design of this work package has not yet been completed but will be developed with relevant council colleagues and partners as described.

The B&G project is specifically targeted to increase participation and influence of BAME communities – and fairness in terms of recognising their contribution to climate change mitigation and other environmental contributions. In recruiting for participants the project leaders have sought to ensure that other protected characteristics are addressed.

Positive

Communication With Citizens

P15: Integrated Council Communications: Integrate and align existing BCC communications and behaviour change activities with the Climate Strategy – for example, to encourage more sustainable travel

This project is seeking to align the activities of these campaigns and activities run by colleagues with the goals of the strategies where possible. At this point we assume that those project/ activities are subject to their own equalities impact assessment and management and that our joining up won't generate adverse impacts.

Neutral

**Supporting
Community Action**

P16: Bristol Climate Action Hub and Sustainable Food Websites: Develop and promote an effective climate change website, for general citizen engagement and update sustainable food website.

This website has been developed by the Council's communications and web team and has addressed the relevant equalities issues. However we recognise that websites per se are not equally accessible to all communities/groups and so in our other communications activities we will be seeking to address this risk.

Neutral

P17: Communications and Engagement activities including deliberative democracy related to climate change. Aiming to increase citizen and partner action and targeted initiatives to reach the whole community, understand community priorities and understand and address barriers for specific communities.

The DD project will specifically seek to be create an inclusive and representative process. These will be developed and likely delivered through the council's Communications teams and therefore effectively manage equalities and diversity matters. However the key opportunity/ risk will be the selection of these topics for campaigns. This will be done on the basis of research and evidence and actively considering equalities and inclusion.

Positive

P18: The One City Climate Communications and Engagement Toolkit: Create the tools and resources that will enable an impactful, coherent, inclusive and effective programme of C&E by partners across the city.

This tool kit will help ensure city partner's communications are complimentary. A core principle and aim of the toolkit is to actively include equalities and diversity from the formative stage of each project and so this will encourage and enable partners to follow best practice.

Positive

P19: Community-Led Action: Support community led action on climate change project in which 6 communities will develop their own local climate action plans.

This project is already started and we will provide a small amount of officer support. The project consortium was developed through an open process, with support from Voscur, and the group of communities represented is diverse. The process of developing their climate action plans will be led by the community groups and will be supported with advice on equalities and inclusion as appropriate.

Positive

P20: BCC Community Action Grants – A small grants scheme to help communities in the city with climate action – both planning and delivery. The focus is on empowering communities and enabling them to secure funding/ investment from elsewhere.

This grant scheme has not yet been designed. It is included in the programme to specifically make the programme more inclusive by supporting lower income communities to take be part of the climate and ecological solutions through small grants. It will follow BCC good practice on grant making.

Positive

Eco Impact Checklist

| Title of report: The Climate and Ecological Emergency Programme | | | | |
|---|--------|--------------|--|--|
| Report author: Alex Minshull | | | | |
| Anticipated date of key decision: 3/11/20 | | | | |
| Summary of proposals: | | | | |
| This Programme of work is comprised of projects and on-going work to make a rapid, impactful and affordable response to the Climate and Ecological Emergencies over the next 3 years. Specifically: | | | | |
| A) Continued delivery of the Mayor's existing commitments in his Climate Emergency Action Plan | | | | |
| B) Enabling delivery the Mayor's and council's commitments under the: | | | | |
| <ul style="list-style-type: none"> o One City Climate Strategy; and o One City Ecological Emergency Strategy | | | | |
| Will the proposal impact on... | Yes/No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | Y | + | Reduction in emissions from BCC operations (all scopes) and from the wider city activities of businesses and citizens. | We will seek to quantify and maximise the reductions for these indirect impacts in key projects. |
| Bristol's resilience to the effects of climate change? | Y | + | Increased understanding of vulnerability and active work to increase resilience | None |
| Consumption of non-renewable resources? | Y | +/- | Whilst the implementation of measures such as infrastructure or insulation will consume resources these will be much less than the consumption of energy and emissions of GHG from current activities/systems. | We will seek to quantify and minimise these indirect impacts in key projects. |
| Production, recycling or disposal of waste | Y | + | Whilst the implementation of measures such as infrastructure or insulation will generate waste these will be much less than the consumption of energy and emissions of GHG from current activities/systems. | We will seek to quantify and minimise these indirect impacts in key projects. |
| The appearance of the city? | Y | +/- | Measures eventually implemented to achieve the strategies will change the | Ensure that wider impacts are considered in |

| | | | | |
|-----------------------------------|---|-----|--|--|
| | | | appearance of the city – more natural areas, more solar panels, more EV charge points. These could be either beneficial or harmful to aspects such as heritage value. | the development of projects to implement and liaison with appropriate experts and stakeholders. |
| Pollution to land, water, or air? | Y | + | Whilst the implementation of measures such as infrastructure or insulation will potentially cause risk of pollution these will be much less than the consumption of energy and emissions of GHG from current activities/systems. | |
| Wildlife and habitats? | Y | +/- | The aim of the strategies is to improve habitats. Some infrastructure projects may have adverse wildlife impacts, while others may be beneficial. | Any implementation projects arising will be subject to planning and other approvals to address wildlife risks. |

Consulted with: Giles Liddell

Summary of impacts and Mitigation - to go into the main Cabinet/ Council Report

The significant impacts of this proposal are the substantial reduction on in greenhouse gas emissions, increases in climate resilience and improvements in wildlife. However, the scale of the changes which the strategies seek to achieve, and the Programme aims to accelerate, are very substantial and therefore will use materials, generate waste and change the appearance of the city.

The proposals will mitigate the impacts by ensuring that impacts are considered in the development of projects in the programme and that council colleagues are trained in the relevant issues to be able to minimise adverse impacts.

The net effects of the proposals are positive.

Checklist completed by:

| | |
|---|-------------------------------------|
| Name: | Alex Minshull |
| Dept.: | Sustainable City and Climate Change |
| Extension: | |
| Date: | 30/09/20 |
| Verified by Environmental Performance Team | Giles Liddell |

Climate and Ecological Emergency Programme

Appendix G: Additional Finance Comments

The report together with the FBC seeks approval to progress the Climate & Ecological emergency programme via 3 distinct work streams as outlined in the FBC. The council only has direct influence over the first work stream as it relates to actions it has direct or indirect control over.

Table 1 below provides a breakdown of the costs of each work stream as well as the associated programme strands.

Table 1.

| | Revenue | Reserve | Total | 2020/21 | 21/22 | 22/23 | 23/24 |
|------------------------------------|--------------|--------------|--------------|------------|--------------|------------|------------|
| BCC Leading by example | 771 | 1,305 | 2,076 | 393 | 538 | 284 | 90 |
| Enabling Action by Partners | 279 | 628 | 907 | 123 | 266 | 181 | 58 |
| Enabling citizen action | - | 1,067 | 1,067 | 385 | 231 | 231 | 219 |
| Total | 1,050 | 3,000 | 4,050 | 902 | 1,035 | 697 | 366 |

The first work stream is estimated to cost £2.1m over a 4 year period. This and other work streams will deliver clear action plans in year 1 that outline targeted annual emission reductions and should form the basis of evaluating success as well as monitoring progress. For work stream one, the target date for carbon neutrality is 2025. The Action plan should identify the current levels of carbon emission and specify annual reductions expected up to 2025. The FBC sets an annual review date of November each year, which should not only serve as a take stock date, but also as an opportunity to release further funding if everything is on track or pause/change tack. So it is recommended that funding is released in batches, to ensure proper accountability and monitoring.

The first year plans are also expected to identify the funding required to deliver carbon neutrality for council operations, and for the city as a whole (although the full cost implications for the city might take a bit longer to ascertain). It will also identify sources of funding available, and will provide the necessary bid data required to submit successful grant funding bids.

The second work stream focuses on enabling partners to achieve carbon neutrality by 2030. This work is considered vital as the Councils own emissions only account for 1% of the city's total.

The estimated cost of this work stream is put at £0.91m. To ensure the councils investment yields tangible benefits the one city board, our one city approach, including the environmental sustainability board will need to play an active monitoring role.

The third work stream targets work with citizens of Bristol as they are responsible for majority of emissions both directly and indirectly. This is likely to be the most involved/challenging work stream

to influence in achieving the carbon neutrality target, and will therefore, require citizens and buy in engagement from the start. The estimated cost of this work stream is put at £1.07m. It should be noted that partners have already secured £375k of additional from the National lottery fund to help towards delivering this work stream, and it is expected that further funding is likely to be secured. Officers should explore options that are available within the grant conditions of all such funds to use them to fund this work stream instead of draw down from reserve where possible.

Officers have estimated the external funding that is likely to be attracted from these various work streams at a total of £13.67m, £12.5m of which is expected to support the Councils effort to lead by example.

Evaluation & Monitoring: Annual monitoring updates will be provided to Cabinet, and these updates are expected to track delivery against targets (as outlined in the Key milestones schedule in the FBC). The aim is to learn quickly from what works as well as good practice and research results both within our city and elsewhere and ultimately deliver the carbon reduction target by 2025 and 2030 depending on the work stream.



Decision Pathway Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|---|--|--|--|
| TITLE | Managing the development of houses in multiple occupation - Supplementary Planning Document | | |
| Ward(s) | All | | |
| Author: Simon Fletcher | Job title: Principal Planning Policy Officer | | |
| Cabinet lead: Cllr. Nicola Beech | Executive Director lead: Stephen Peacock | | |
| Proposal origin: BCC Staff | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: Cabinet | | | |
| Purpose of Report: | | | |
| To request that Cabinet adopt the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) following statutory consultation in Summer 2020. The SPD will be a material planning consideration which will support existing Local Plan policy used to decide planning applications for HMO development. | | | |
| Evidence Base: | | | |
| Significant growth in HMO numbers in recent years has raised concerns in many communities over existing and potential harmful impacts. Concentrations within neighbourhoods can lead to imbalanced and unsustainable communities and can damage the residential amenity and character of areas. Specific harmful impacts can include reduced social cohesion and housing choice and reduced levels of amenity as a result of increased noise and disturbance and poor waste management. Such issues have driven co-ordinated action across the Council to more effectively manage the development and operation of HMOs. | | | |
| To support this process additional guidance on Local Plan policy implementation relating to the development of HMOs has been prepared. The guidance, in the form of a supplementary Planning Document (SPD), specifically relates to the implementation of policy DM2: Residential Sub-divisions, Shared and Specialist Housing , set out in the Site Allocations and Development Management Policies Local Plan, which seeks to prevent harmful concentrations of HMOs. The SPD provides a more explicit definition of harmful concentration, further detail on the application assessment methodology and guidance for achieving a good standard of accommodation where HMOs are permitted. | | | |
| The SPD will enhance the overall effectiveness and deliverability of the policy by ensuring residential communities are protected from potential or worsening harmful impacts as a result of HMO concentrations. This will help support the Council's commitment to delivering mixed, balanced and resilient communities. | | | |
| Cabinet Member / Officer Recommendations: | | | |
| That Cabinet | | | |
| <ol style="list-style-type: none"> 1. Approve the adoption of the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD). 2. Authorise the Executive Director Growth and Regeneration to take all steps required to adopt the SPD including all procedures required under Part 5 of the Town and Country Planning (Local Planning)(England) Regulations 2012. | | | |
| Corporate Strategy alignment: | | | |
| Supporting Local Plan policy control over HMOs will further help to protect communities from harmful impacts arising from concentrations of this form of development. This will support Corporate Strategy theme 2: Fair and Inclusive -objective 4 which seeks the development of balanced communities. | | | |

City Benefits:

Supporting Local Plan policy control over HMOs will further help to protect communities from harmful impacts arising from concentrations of this form of development. Preventing such impacts will help to maintain or create more inclusive, balanced and sustainable communities.

Consultation Details:

Preparation of the SPD involved public participation between 3 February and 20 March 2020 with formal representations invited between 3 August and 11 September 2020. Following any decision to adopt the SPD an adoption statement will be published with individuals and organisations notified where requested.

Background Documents:

The following background documents are available on the Council's web site:

- [Evidence Paper \(August 2020\)](#)
- [Consultation Statement \(August 2020\)](#)

| | | | |
|--|--|---|--|
| Revenue Cost | £ Ongoing cost related to preparation of Local Plan and related Supplementary Planning documents | Source of Revenue Funding | 10227 |
| 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:

1. Finance Advice: The report seeks approval of the adoption of the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD).
The ongoing cost related to preparation of Local Plan and related Supplementary Planning documents will be funded from existing budgets. As a result there are no new financial implications resulting from this report.

Finance Business Partner: Kayode Olagundoye, Interim Finance Business Partner, Growth and Regeneration, (20th October 2020)

2. Legal Advice: The SPD has been prepared in accordance with Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012. If Cabinet adopt the SPD, then after the post adoption requirements set out in the 2012 Regulations have been complied with, the Council will be able to take the SPD into account as a material planning consideration in relation to any planning applications relating to HMO's.

Legal Team Leader: Joanne Mansfield (5th October 2020)

3. Implications on IT: No anticipated impact on IT services.

IT Team Leader: Simon Oliver - Director - Digital Transformation (1st October 2020)

4. HR Advice: There are no HR implications evident.

HR Partner: Celia Williams - HR Consultancy Manager (2nd October 2020)

| | |
|---|------------|
| Appendix A – Further essential background / detail on the proposal A1: Managing the development of houses in multiple occupation - Daft Supplementary Planning Document A2: Evidence Paper (August 2020) | YES |
| Appendix B – Details of consultation carried out - internal and external B1: Consultation Statement (August 2020) B2: Summary of Reg. 13 Representations (October 2020) | 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 |

Managing the development of houses in multiple occupation

Supplementary Planning Document

Proposed adoption date



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1. Introduction

1.1 Purpose and Scope

Managing the development of houses in multiple occupation (HMO) Supplementary Planning Document (SPD) provides further guidance on the implementation of policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) in relation to HMOs set out in the *Site Allocations and Development Management Policies Local Plan*. The policy aims to encourage balanced communities in Bristol by preventing harmful concentrations of HMOs. It also aims to achieve good standards of accommodation where new HMOs are permitted.

The guidance identifies situations where harmful HMO concentrations are likely to arise. These include the sandwiching of residential properties by HMOs and areas where more than 10% of dwellings are occupied as HMOs.

The guidance also sets out space standards for HMOs where they are permitted.

1.2 Status of the Document

Managing the development of houses in multiple occupation Supplementary Planning Document (SPD) has been prepared in accordance with part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The document should be used alongside relevant Local Plan policies to determine all applications for new HMOs and for additional bed spaces within existing HMOs and constitutes an important material consideration in the decision-making process.

1.3 Houses in Multiple Occupation in Bristol

Bristol's stock of HMOs forms a significant part of the city's private rented provision, providing homes and contributing to people's housing choice. This form of accommodation is generally more affordable and flexible and therefore suitable for younger people and other households that are not living as families. As well as reducing housing costs for individuals, sharing homes can also have positive social benefits for occupiers, helping individuals, especially young people, form new networks and relationships.

Higher numbers of HMOs in recent years reflect changes in the Bristol Housing market. Increasing numbers of individuals are unable to buy a home or rent a flat in the city. For these individuals access to HMOs is important. For some people living in such accommodation is their only practical choice.

Whilst the city's stock of HMOs is contributing to meeting housing needs, increased numbers of multiple occupancy properties can have the potential to create harmful impacts. Concentrations within neighbourhoods can lead to imbalanced and unsustainable communities and can damage the residential amenity and character of surrounding areas. Harmful impacts associated with high numbers of HMOs can affect a community's health and wellbeing. Harmful impacts can include:

- **Reduced social cohesion** resulting from demographic imbalance.
- **Reduced housing choice** resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);

- **Reduced community engagement from residents** resulting from an increase in the transient population of an area;
- **Noise and disturbance** resulting from intensification of the residential use and/or the lifestyle of occupants;
- **Overlooking and loss of privacy** resulting from poorly considered internal layouts and intensification of use;
- **Detriment to visual amenity** resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- **Reduced community services** resulting from a shift in the retail/business offer towards a narrower demographic;
- **Highway safety concerns** resulting from congested on-street parking and poor waste management.

A number of areas across the city have high proportions of HMOs housing a range of different groups.

Non-student HMOs are generally clustered in districts in east Bristol including Eastville, Easton and parts of St. George and Hillfields; districts in south Bristol including Southville, Windmill Hill and Bedminster and in north Bristol in particular Avonmouth. Some communities in these areas have expressed concern over increasing numbers of HMOs and the potential for damaging impacts should numbers increase.

The level of student population in the city is also a factor affecting the amount and distribution of HMOs. A number of residential areas have high student populations living in this form of accommodation. These areas directly surround or are accessible to the city's two universities. They include central districts such as Clifton and Cotham and outer districts such as Fishponds and those along or adjacent to the Gloucester Road corridor. The issues identified above have become intensified in these locations due to high HMO numbers. Significant concentrations in particular streets and neighbourhoods have had damaging impacts on local communities.

2. Background

2.1 What is a House in Multiple Occupation?

A property is broadly defined as an HMO if it is occupied by 3 or more persons from 2 or more households and there are shared facilities such as a toilet, bathroom or kitchen. A household can be a separate individual, a couple or a family. A family includes parents, grandparents, children (including foster children, step children and children being cared for), grandchildren, brothers, sisters, uncles, aunts, nephews, nieces or cousins.

The full legal definition of an HMO is given under the Housing Act 2004. Types of living accommodation defined include:

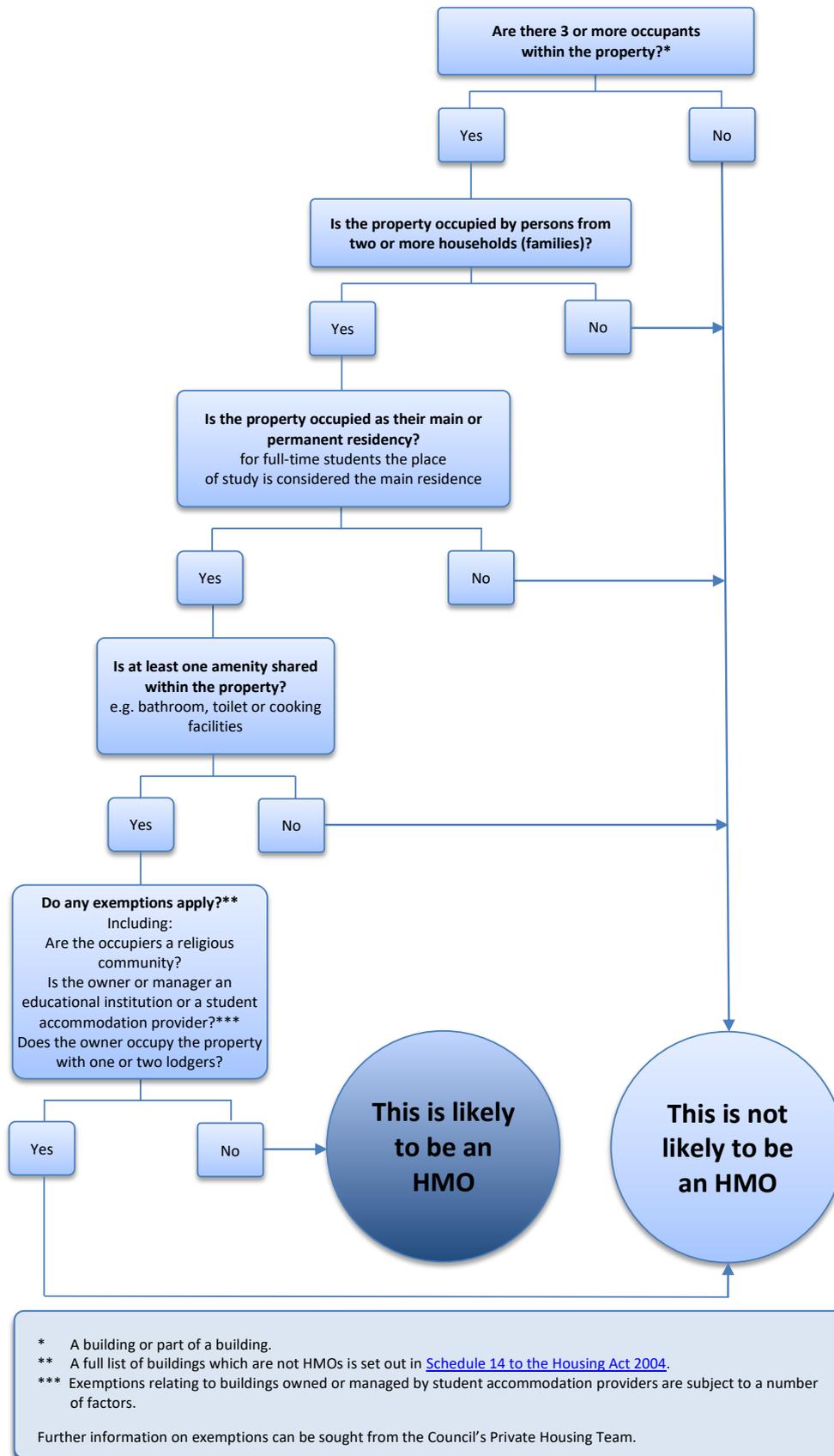
- One or more units of living accommodation within a building or part of a building not consisting of self-contained flats occupied by more than one household as their only or main residence with at least one person paying rent and two or more of the households sharing one or more basic amenities (or the building lacks an amenity) such as a bathroom, toilet or cooking facilities.
- A self-contained flat within a building occupied by more than one household as their only or main residence with at least one person paying rent and two or more of the households sharing one or more basic amenities (or the building lacks an amenity) such as a bathroom, toilet or cooking facilities.
- A converted building where new living accommodation has been created since its construction that is not a self-contained flat or flats and occupied by more than one household as their only or main residence with at least one person paying rent.
- A building or part of a building which has been converted into self-contained flats where the conversion works did not comply with 1991 Building Regulations and more than one third of the flats are not owner-occupied. These buildings/parts of buildings are currently excluded from mandatory licensing requirements and are not included in licensing schemes in Bristol.

The Act also defines types of living accommodation that are not HMOs. These include properties occupied by the owner and up to two lodgers, higher education halls of residence or other types of student accommodation and properties occupied by religious communities.

In 2010 a new planning Use Class - C4 - was created for dwellings occupied as HMOs by up to six residents. The planning meaning of the new Use Class was aligned with the definition of an HMO in the Housing Act 2004. HMOs with over 6 occupants do not fall within any specific Use Class. These are known as Sui Generis uses.

Fig. 1 provides a quick check to establish whether a property is likely to be occupied as an HMO. Further information is available on the [Council](#) and [Government](#) web sites. Advice can also be sought from the Council's Private Housing team.

Fig. 1: When is a Property an HMO?



2.2 Policy Context

National

To achieve sustainable development the National Planning Policy Framework (NPPF) expects the planning system to support strong, vibrant and healthy communities as a key social objective. This includes provision of a sufficient range of homes and a built environment that supports a community's social wellbeing. In particular, policies within the NPPF expect Local Plans to reflect the range of housing types and tenures needed by different groups in the community and help achieve the creation of inclusive and safe places that promote social interaction and address identified wellbeing needs. National Planning Policy Guidance also identifies the delivery of more dedicated student accommodation as a way of relieving pressure from the private rented sector and increasing the overall housing stock.

Local

The Council's policies relating to HMO's, housing type and community health and well-being are set out in the Bristol Local Plan and are consistent with National Planning Policy.

Development of HMOs is covered by policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) set out in the *Site Allocations and Development Management Policies Local Plan (SADMP)*. The policy provides an approach to addressing the impacts and issues that may result from this form of development and aims to ensure that the residential amenity and character of an area is preserved and that harmful concentrations do not arise. The relevant extracts from the full policy and supporting text relating to HMOs are set out at Appendix A.

Also of relevance is *Core Strategy Local Plan* policy [BCS18: Housing Type](#) and *SADMP Local Plan* policy [DM14: The Health Impacts of Development](#). Policy **BCS18** ensures that all residential development contributes to the mix of housing in an area to support mixed, balanced and inclusive communities. This includes a need to redress any housing imbalance that exists. Policy **DM14** ensures that all new development contributes to and does not result in unacceptable impacts on health and wellbeing. Development resulting in harmful concentrations of HMOs will be contrary to these policies.

Other Local Plan policies relevant to the development of HMOs are set out in relevant sections of this document.

2.3 When is Planning Permission Required?

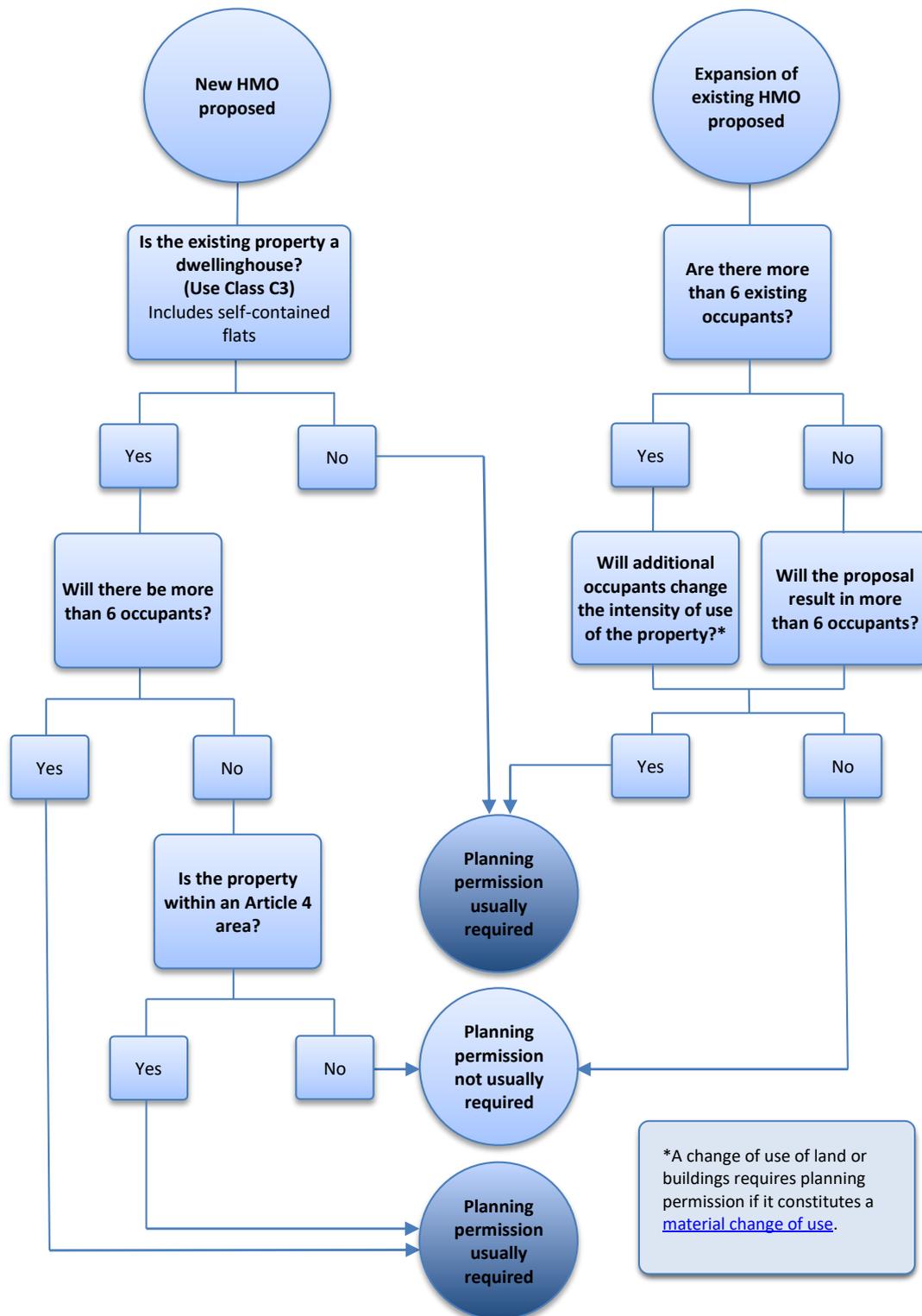
A planning application is not always required for the development of an HMO. Fig. 2 provides a quick check to establish when planning permission should be sought. If a planning application is required a fee will payable in all circumstances. Further information on [making a planning application](#), [fees](#), [publicity required](#) and [how to comment](#) can be found on the Council's website.

Article 4 Directions

The Council has widened planning control over HMOs by making Article 4 Directions in a number of areas across the city. The Directions remove permitted development rights that allow a dwellinghouse (Use Class C3) to change to a small HMO (Use Class C4) without the need for planning permission. Since the date of introduction of each Article 4 Direction such a change of use has

required and will continue to require a planning application. The location of all Article 4 Directions can be viewed using the Council’s web mapping tool [Pinpoint](#) available on the Council’s website (see section 4.5).

Fig. 2: HMO Development - Requirement for Planning Permission



3. Additional Guidance

3.1 What is a Harmful Concentration?

Local Plan Policy [DM2: Residential Sub-divisions, Shared and Specialist Housing - General Criteria](#) section (ii) does not permit new HMOs or the intensification of existing HMOs where development would create or contribute to a harmful concentration within a locality. The policy identifies a harmful concentration as a worsening of existing harmful conditions or a change to the housing mix that reduces housing choice.

The supporting text to the policy provides further detail on when harmful concentrations are likely to arise. This is where issues associated with HMOs (see section 1.3) cumulatively result in detrimental effects on the qualities and characteristics of a residential area; These are defined as generally quieter surroundings; a reasonable level of safe, accessible and convenient car parking; a well-maintained or visually attractive environment and the preservation of buildings and structures that contribute to the character of a locality. It is also where the choice of housing available no longer provides for the needs of different groups within the community. The supporting text also states that assessments should consider impacts at street, neighbourhood and ward levels.

To further support assessments of HMO development against policy **DM2** and to support the objectives of policies **BCS18** and **DM14** additional guidance on what constitutes harmful concentrations at a street and neighbourhood level is provided as follows:

Sandwiching Assessment (Street level)

A harmful concentration can arise at a localised level when an existing dwelling is sandwiched between two HMOs. This can intensify impacts on individual households even if few HMOs exist locally and can create an imbalance between HMOs and other housing at a street level.

Harmful concentration - HMO Sandwich

Proposals for the development or intensification of houses in multiple occupation are unlikely to be consistent with Local Plan policy where the development would create a harmful concentration of such uses as a result of any residential property or properties being located between two houses in multiple occupation as described in section 4.1.

HMO Threshold Assessment (Neighbourhood level)

A harmful concentration can arise when HMOs exceed a certain proportion of the dwelling stock in any given neighbourhood. Evidence of harmful impacts on residential amenity and character arising from HMO concentrations is well documented in numbers of communities across Bristol. Analysis of housing in these areas identifies HMO levels at 10% or more of the dwelling stock. Areas at or above this level also differ significantly from citywide norms on housing mix and population profile. A threshold proportion of **10% HMOs** in any neighbourhood is therefore considered a likely tipping point, beyond which negative impacts to residential amenity and character are likely to be experienced and housing choice and community cohesion start to weaken. The neighbourhood area is defined in section 4.2.

Harmful concentration - 10% HMO threshold

Within a neighbourhood area as defined in section 4.2 proposals for the development of houses in multiple occupation are unlikely to be consistent with Local Plan policy where the development would result in more than 10% of the total dwelling stock of the neighbourhood area being occupied as houses in multiple occupation.

Within a neighbourhood area as defined in section 4.2 proposals for the intensification of existing houses in multiple occupation are unlikely to be consistent with Local Plan policy where 10% or more of the total dwelling stock of the neighbourhood area is already occupied as houses in multiple occupation.

3.2 What is a Good Standard of Accommodation?

Local Plan Policy [DM2: Residential Sub-divisions, Shared and Specialist Housing - General Criteria](#) expects HMO development to provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

The supporting text to the policy explains that consideration should be given to layout, internal living space, external amenity space, outlook, privacy, adaptability, security, cycle and car parking and refuse and recycling storage. The text also refers to specific policies where requirements and standards are set out but does not provide a definitive list.

To further support assessments of HMO development against policy **DM2** additional guidance on other Local Plan policy requirements and standards is provided as follows.

Internal Living Space

Core Strategy Local Plan policy [BCS18: Housing Type](#) expects all residential developments to provide sufficient space for everyday activities and enable flexibility and adaptability by meeting appropriate space standards. To meet the policy expectation for HMOs development should have regard to the current minimum room size standards applied by the Council to licensable HMO properties. The standards in use at the time of this SPD's adoption are set out at Appendix B. The current [standards for HMO properties](#) are published on the Council's web site.

Cycle and Car Parking

SADMP Local Plan policy [DM23: Transport Development Management](#) expects all development to provide an appropriate level of safe, secure, accessible and usable parking provision having regard to the [parking standards](#) where applicable (set out at Appendix 2 of the *SADMP Local Plan*), the parking management regime and the level of accessibility by walking, cycling and public transport. Guidance on cycle parking is set out in the Council's guidance note [A guide to cycle parking provision](#).

Core Strategy Local Plan policy [BCS21: Quality Urban Design](#) and *SADMP* policy [DM26: Local Character and Distinctiveness](#) expect new development to contribute positively to an area's character and identity, creating or reinforcing local distinctiveness. *Core Strategy Local Plan* policy [BCS22: Conservation and the Historic Environment](#) and *SADMP* policy [DM31: Heritage Assets](#) seek to ensure that all new development safeguards or enhances the historic environment. These policies

are relevant to proposals that involve the creation of off-street car parking. Detailed guidance is provided in the Council's Policy Advice Note [Off-street Residential Parking in Conservation Areas](#).

Where HMOs are granted planning permission future residents may not be eligible for parking permits where these are required. Further information on [restrictions on parking permits](#) can be found on the Council's website.

Refuse and Recycling Storage

SADMP Local Plan policy [DM32: Recycling and Refuse Provision in New Development](#) sets general requirements for the provision of recycling and refuse facilities in all development. Detailed guidance is provided in the Council's guidance note [Waste and Recycling: Collection and Storage Facilities - Guidance for developers, owners and occupiers](#) including any subsequent additional or replacement guidance.

Container types and capacities for recycling and refuse will depend on numbers of HMO occupants proposed. For further information on recycling and refuse arrangements contact the Bristol Waste Company.

Outlook and Privacy

Core Strategy Local Plan policy [BCS21: Quality Urban Design](#) expects development to safeguard the amenity of existing development and create a high quality environment for future occupiers. SADMP Local Plan policy [DM29: Design of New Buildings](#) expects new buildings to achieve and existing development to maintain appropriate levels of privacy, outlook and daylight. SADMP Local Plan policy [DM30: Alterations to Existing Buildings](#) expects extensions and alterations to existing buildings to safeguard the amenity of the host premises and neighbouring occupiers.

Good standard of accommodation

Proposals for the development or intensification of houses in multiple occupation should provide a good standard of accommodation. Development should be consistent with relevant Local Plan policies and guidance and have regard to the standards set out at Appendix B or as current.

4. Assessment of Planning Applications

4.1 Sandwiching Assessment (Street level)

Proposals for the introduction of new HMOs resulting in an existing residential property or properties (Use Class C3) being sandwiched by HMOs on both sides are unlikely to be consistent with Local Plan policy. In addition, proposals for additional bed spaces within existing HMOs sandwiching residential property are unlikely to be consistent with Local Plan policy. Potential sandwiching situations include:

1. Up to three single residential properties in a street located between two single HMO properties;
2. Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;
3. A residential flat within a sub-divided building where the majority of flats are HMOs.
4. A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;
5. A residential flat within a sub-divided building located between two HMO flats above and below;
6. A residential flat within a sub-divided building located between two HMO flats on both sides;

Variations of these sandwiching situations may also occur. Sandwiching situations apply irrespective of limited breaks in building line, such as a vehicular or pedestrian access apart from a separating road.

Fig. 3 shows worked examples of the sandwiching assessment.

The datasets used to identify HMOs are set out in section 4.5. The location of identified HMO properties can be viewed using the Council's web mapping tool [Pinpoint](#) available on the Council's website. Further details on the use of *Pinpoint* are also provided in section 4.5.

4.2 HMO Threshold Assessment (Neighbourhood level)

Proposals for the introduction of new HMOs which would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the application property or site are unlikely to be consistent with Local Plan policy. In addition proposals for additional bed spaces within an existing HMO where 10% or more of the total dwelling stock is occupied as HMOs within a 100 metre radius of the application property or site are unlikely to be consistent with Local Plan policy.

The 100 metre radius is given to represent the immediate neighbourhood and is measured from a point within the application property or site as defined by the Local Land and Property Gazetteer (LLPG). Dwellings on the edge of the 100 metre radius will only be included if the property point, as defined by LLPG, falls within the radius.

When considering applications the Council's Development Management service will use Bristol City Council software to calculate the proportion of dwellings that are occupied as HMOs within any given 100 metre radius of the application property or site.

Fig. 4 shows a worked example of the HMO threshold assessment which includes an explanation of the calculation.

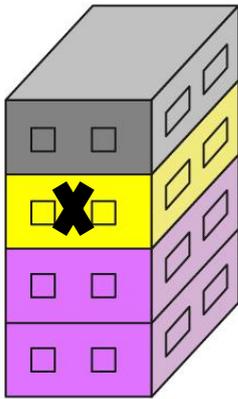
Application of the HMO threshold at the neighbourhood level should not preclude any assessment of the impact of the proportion of dwellings occupied as HMOs at street level.

The datasets used to identify HMOs are set out in section 4.5. The location of identified HMO properties can be viewed using the Council's web mapping tool [Pinpoint](#) available on the Council's website. Further details on the use of *Pinpoint* are also provided in section 4.5.

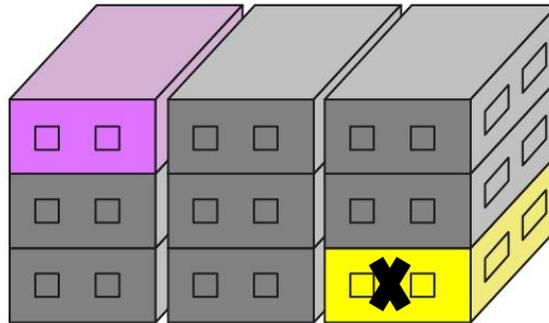
Fig. 3: Sandwich Assessment - Worked Examples



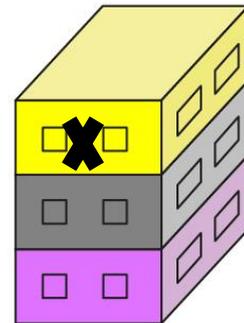




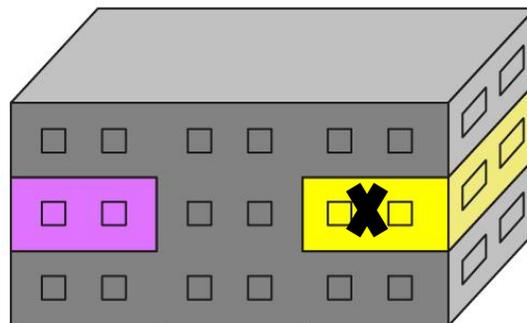
Situation 3:
Dwelling is within a sub-divided building where the majority of units will be HMOs



Situation 4:
Dwellings are sandwiched between HMOs in sub-divided buildings either side

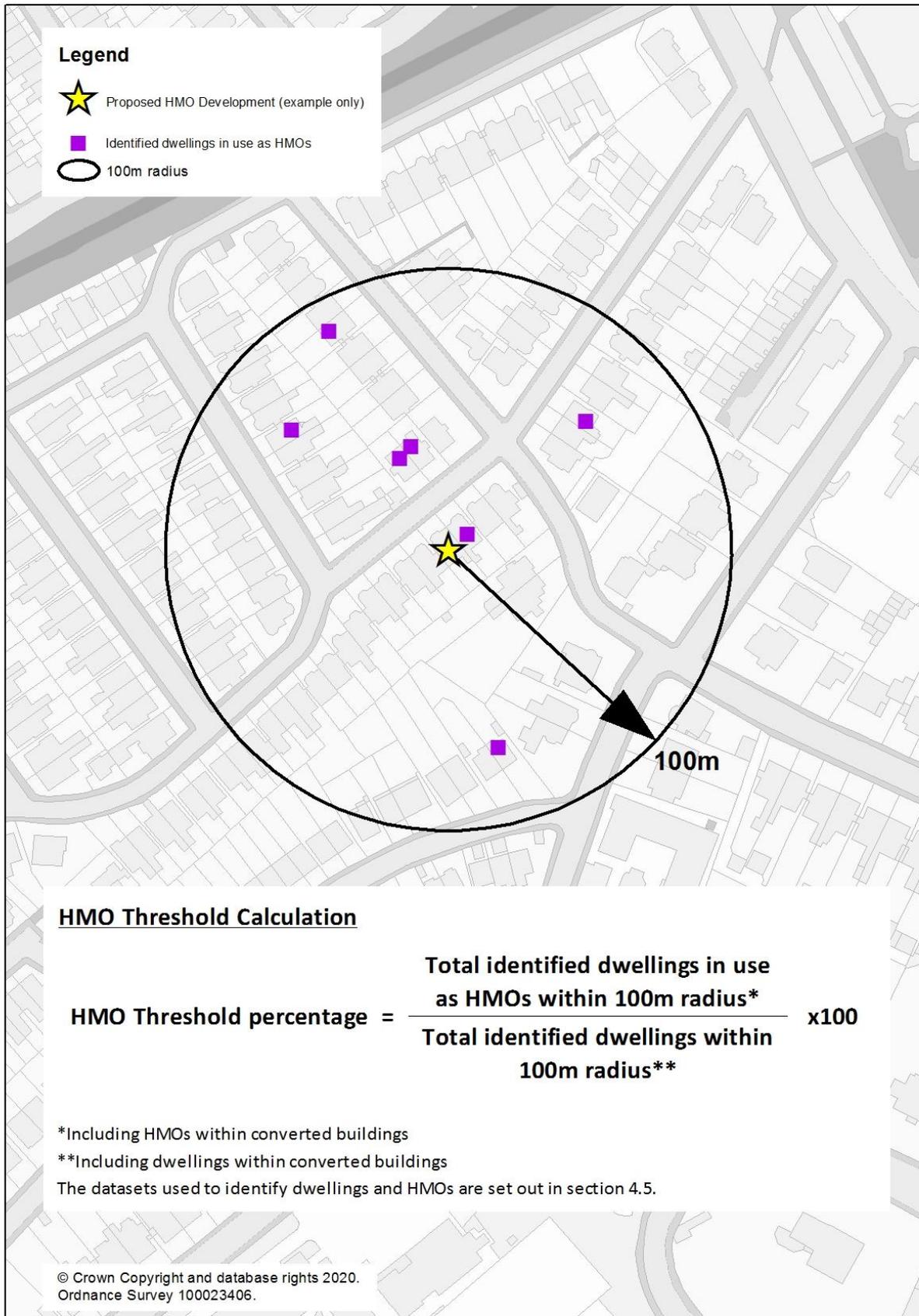


Situation 5:
Dwelling is sandwiched between HMOs above and below in the same building



Situation 6:
Dwelling is sandwiched between HMOs either side in the same building

Fig. 4: HMO Threshold Assessment - Worked Example



4.3 Achieving a Good Standard of Accommodation

To achieve a good standard of accommodation proposals for the development or intensification of HMOs should be consistent with relevant Local Plan policies and guidance, as identified in section 3.2, and have regard to the standards set out at Appendix B or as current.

4.4 HMOs and Purpose-built Student Accommodation

Other forms of shared housing, i specifically purpose-built student accommodation, can result in negative impacts when concentrated within areas. These can include noise and disturbance caused by increased levels of activity surrounding such developments, the creation of imbalances in the type and tenure of housing supply within an area and a reduction in the mix of uses across an area affecting its character. Harmful conditions could arise in a locality when any of these impacts resulting from existing purpose-built student accommodation are significant in their own right, or, are combined with impacts from existing and/or proposed HMO development.

When determining applications for HMO development within neighbourhood areas containing purpose-built student accommodation the following matters should be considered:

- The extent of concentration of purpose-built student accommodation bed spaces in the neighbourhood area compared to the citywide average;
- The proportion of HMOs calculated under the HMO Threshold Assessment as set out in section 4.2;
- The type of any purpose-built student accommodation and its location in relation to the proposed HMO;
- Whether the combined impact of the above considerations would result in the proposed HMO development creating or contributing to a harmful concentration of HMOs in combination with the impacts of any purpose-built student accommodation.

The dataset used to identify student bed spaces is set out in section 4.5. The location of known purpose-built student accommodation can be viewed using the Council's web mapping tool [Pinpoint](#) available on the Council's website. Further details on the use of *Pinpoint* are also provided in section 4.5.

4.5 Information on Datasets

HMOs

The datasets used to calculate the proportion of dwellings that are occupied as HMOs in any given area include total identified dwellings (the denominator) and total identified dwellings in use as HMOs (the numerator).

Total identified dwellings are based on residential records held within the Bristol Local Land and Property Gazetteer (LLPG) and include all approved residential classifications but exclude garages, residential car parks and provisional records.

Total identified dwellings in use as HMOs include:

- All licensed HMOs including properties with a mandatory licence or an additional licence (in areas of the city where additional licensing schemes have been declared);

- All planning permissions and other authorisations for HMOs that are not licensed.

HMO datasets are updated on a quarterly basis to ensure current HMO numbers are available to help determine planning applications. Not all HMOs can be identified as licences and/or planning permission/authorisation is not required for all properties. Improvements to HMO recording will be sought over time. This may involve the use of additional and/or alternative datasets.

Student Bed Spaces

The dataset on purpose-built student accommodation bed spaces is drawn from annually updated records of all completed schemes and schemes with planning permission. The update is carried out as part of the Council's annual [Residential Development Survey](#).

Pinpoint

The location of HMO licensed properties, HMOs with planning permission, purpose-built student accommodation and Article 4 Direction areas can be viewed using the Council's web mapping tool [Pinpoint](#) available on the Council's website.

To view the location of HMO licensed properties in *Pinpoint* open the 'Housing and property' section under 'Local information' and check the 'map' boxes relating to 'Property Licence - Additional HMO' and 'Property Licence - Mandatory HMO'.

To view the location of HMOs with planning permission, purpose-built student accommodation and Article 4 Direction areas open the 'Environment and planning' section under 'Local information' and check the map boxes relating to 'HMO planning permissions', 'Student accommodation' and 'Article 4 Directions'.

The location of all properties and all Article 4 Direction areas (including Directions not relating to HMOs) will be visible on the map. A zoom function allows the map to be viewed at different scales. Click on the 'Legend' tab of the 'Map options' box on the right hand side of the screen to view further information.

5. Submission Requirements for Applicants

To determine planning applications for new HMOs or additional bed spaces within existing HMOs the following information should be submitted:

- Completed application form;
- Block plan of the site (at a scale of 1:100 or 1:200) showing site boundaries and any on-site car parking;
- Maximum number of occupants;
- Existing and proposed floor plans showing all room sizes (square metres), room uses and number of persons occupying each bedroom/bedsit;
- Cycle parking facilities;
- Details of the location, layout, design, volume, management and collection arrangements for all recyclable and waste materials;
- Details of any associated building works.

In some cases additional information may be required to help determine the planning application. Further information on submitting a planning application is available on the Council's website.

6. Other Matters

6.1 HMO Licences

The Council operates a mandatory licensing scheme for larger HMOs in Bristol. An HMO must have a licence if it is occupied by 5 or more people.

Additional licensing schemes for HMOs are also operated in the Eastville and St. George areas of Bristol and across the central Bristol wards of Ashley, Bishopston and Ashley Down, Central, Clifton, Clifton Down, Cotham, Easton, Hotwells and Harbourside, Lawrence Hill, Redland, Southville and Windmill Hill.

All HMO property licence holders must comply with their [licence conditions](#). The planning status of an HMO cannot be considered when making a decision on whether to grant or refuse a property licence.

Further information on [HMO licensing schemes](#) is available on the Council's website.

6.2 Property Management

All HMO property licence holders must comply with the [West of England - Code of Good Management Practice](#).

The [West of England Rental Standard Rent with Confidence](#) is a voluntary set of realistic standards and requirements that sets out clearly what landlords and agents need to do when letting or managing a property.

6.3 Sound Reduction Measures

Proposals for the development or intensification of HMOs may be subject to building regulations requirements relating to sound reduction. The requirements are set out in [Approved Document E: Resistance to the passage of sound](#). Where sound reduction measures are required existing and new party walls/floors will be tested to demonstrate compliance with relevant performance standards set out in the approved document. Further advice on requirements should be sought from the Council's Building Control team.

In some circumstances a condition seeking sound reduction may be attached to a planning permission for new HMO development exclusive of any building regulations requirement.

In all circumstances applicants should consider on a voluntary basis the provision of a range of easy to install sound reduction measures where appropriate.

6.4 Reporting a Breach of Planning or Licensing Rules

The Council can investigate complaints related to the status and operation of HMOs. Further information on [reporting a breach of planning rules](#) or [reporting a rogue landlord](#) can be found on the Council's web site. To report a breach of licensing conditions contact private.housing@bristol.gov.uk.

Appendix A: Local Plan Policy for HMOs

'Policy DM2: Residential Sub-divisions, Shared and Specialist Housing

The Core Strategy sets out the overall approach to developing new homes in the city. It proposes an overall number of homes, seeks affordable housing and aims for a broad housing mix. This Development Management policy offers an approach to addressing the impacts and issues of certain forms of housing; in particular..... shared housing.....

The supply of shared housing provide an important contribution to people's housing choice. The policy aims to ensure that such development also preserves the residential amenity and character of an area and that harmful concentrations do not arise. The policy also aims for a good standard of accommodation.....

Residential Sub-divisions, Shared and Specialist Housing – General Criteria

Proposals for:

-
- **the conversion of existing dwellings or construction of new buildings to be used as houses in multiple occupation;**
- **the intensification of existing houses in multiple occupation;**
-
- **other forms of shared housing**

will not be permitted where:

- i. **The development would harm the residential amenity or character of the locality as a result of any of the following:**
 - **Levels of activity that cause excessive noise and disturbance to residents; or**
 - **Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or**
 - **Cumulative detrimental impact of physical alterations to buildings and structures; or**
 - **Inadequate storage for recycling/refuse and cycles.**
- ii. **The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:**
 - **Exacerbating existing harmful conditions including those listed at (i) above; or**
 - **Reducing the choice of homes in the area by changing the housing mix.**

Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

.....

For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people and specialist student accommodation. The council has established an Article 4 Direction to control small HMOs within the wards of Ashley, Cabot, Clifton, Clifton East, Cotham, Lawrence Hill and Redland. Small HMOs are defined as small shared houses or

flats occupied by between three and six unrelated individuals who share basic amenities. This means that a planning application is required for this type of development.

General Criteria

Whilst making a valuable contribution to the city's housing requirements shared housing can have an impact on residential amenity and the character and housing mix of an area. Specific issues common to both forms of housing can include:

- Noise and disturbance associated with intensification of the residential use and/or the lifestyles of occupants;
- Pressure for on-street parking;
- A shift from permanent family housing to more transient accommodation;
- Impacts on social cohesion;
- A shift in the character of shops and businesses supporting the community;
- Impact of external alterations;
- Poor waste management.

When making assessments on new development, consideration is to be given to the particular qualities and characteristics of a residential area or residential uses that might contribute to it being an enjoyable or otherwise satisfactory place to live. These usually include generally quieter surroundings; a reasonable level of safe, accessible and convenient car parking; a well-maintained or visually attractive environment and the preservation of buildings and structures that contribute to the character of a locality. Harmful concentrations are likely to arise when issues commonly associated with these uses, listed in para. 2.2.5 above, cumulatively result in detrimental effects on these residential qualities and characteristics. Harmful concentrations will also result where the choice of housing is reduced and no longer provides for the needs of different groups within the community.

Assessments should consider the relative impacts at street, neighbourhood and ward levels.

The policy also seeks the provision of a good standard of accommodation for future occupiers. Consideration should be given to layout, internal living space, external amenity space, outlook, privacy, adaptability, security, cycle and car parking and refuse and recycling storage. Relevant requirements and standards are set out in the policies listed in the Policy Links section.

.....

Application Information

For major developments analysis should be undertaken of the type of housing in the area, including where relevant the number of..... HMOs or specialist student housing accommodation, at street, neighbourhood and ward levels. Data is available from the Census that corresponds to these geographies.'

(Local Plan - Site Allocations and Development Management Policies - Adopted July 2014)

Appendix B: Guideline Minimum Room Size Standards for HMO Development

The standards used at the time of this SPD's adoption are set out below. The current [standards for licensable HMO properties](#) are published on the Council's web site.

Room sizes where the room is for the sole use of the occupier(s)

| Room space | Number of Persons | | |
|---|------------------------------|---------------------|----------------------|
| | 1 person under the age of 10 | 1 | 2 |
| Kitchen | N/A | 4 m ² | 5 m ² |
| Combined kitchen & living room | N/A | 11 m ² | 15 m ² |
| Bedroom | 4.64 m ² | 6.51 m ² | 10.22 m ² |
| Combined bed and living room | N/A | 9 m ² | 14 m ² |
| Combined bedroom, living room & kitchen | N/A | 13 m ² | 19 m ² |

Room sizes where the room is shared by occupiers

| Room space | Number of Persons | | | | | | | |
|-----------------------------|--------------------|------------------|------------------|------------------|------------------|------------------|------------------|--------------------|
| | 1-3 | 4 | 5 | 6 | 7 | 8 | 9 | 10* |
| Kitchen | 5m ² | 6m ² | 7m ² | 9m ² | 10m ² | 10m ² | 11m ² | 11m ² |
| Total communal living space | 13.5m ² | 17m ² | 18m ² | 20m ² | 22m ² | 24m ² | 26m ² | 27.5m ² |

*For more than 10 persons, please contact the Private Housing Team to discuss proposed room sizes



Managing the development of houses in multiple occupation
Supplementary Planning Document
Reg. 13 Version (August 2020)
Evidence Paper

Published August 2020

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1. Introduction

The draft Supplementary Planning Document (SPD) 'Managing the development of houses in multiple occupation' is being prepared to provide further guidance on the implementation of policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) set out in the *Site Allocations and Development Management Policies Local Plan*. A relevant extract of the policy text is set out at Appendix A. The draft SPD only provides guidance on parts of the policy and explanatory text that relate to harmful concentrations of houses in multiple occupation (HMO's) and to the standard of accommodation proposed. In particular, the draft SPD identifies situations where harmful HMO concentrations are likely to arise. These include a residential property being located between two HMOs, referred to as the 'Sandwiching assessment', and areas where more than 10% of dwellings are occupied as HMOs, referred to as the 'HMO threshold assessment'.

A consultation on the draft SPD took place between 3 February 2020 and 20 March 2020 seeking open comments on the document's content. A number of representations were received requesting further explanation of the 'HMO threshold Assessment' method. These included requests to justify the selection of 10% as the threshold level and the selection of a 100 metre radius to define the threshold assessment area.

In response this paper provides useful background to policy **DM2**, explains the need for further guidance to support the policy and provides a justification for the threshold approach and the parameters applied.

2. Background to policy DM2 and evidence of harm

Housing tenure and affordability have significantly changed in Bristol over the last 20 years¹. A key element of this change has been the growth in number and distribution of HMOs across the city. Probable drivers of demand for and supply of HMOs include:

- **Housing affordability:** HMOs are generally more affordable, especially for younger people and key workers. Increasing numbers of individuals unable to buy a home or rent a flat in the city due to increases in property prices and private rents have likely increased demand for HMOs.
- **Welfare reform:** Welfare reform changes have lowered the level of housing benefit that can be claimed by a single person under 35 to the Local Housing Allowance (LHA) rate for shared accommodation (the rate for a room in a shared house). This may have increased demand for HMOs as the cost of individually rented accommodation is no longer covered in full by housing benefit.
- **University expansion:** The number of students at both the city's universities has increased by 18% in the last 5 years with current student numbers totalling some 56,000². Whilst the supply of purpose-built student accommodation has increased in recent years some 45% of Bristol students continue to live in HMOs³. A growing student population will have increased demand for HMOs.
- **Economic factors:** Previous high levels of in-migration of younger people into Bristol⁴ including those seeking work may have increased demand for HMOs as younger people are more likely to seek shared housing.
- **Relaxation of planning controls:** The relaxation of planning controls from 2010 allowing dwellings to change to small HMOs without the need for planning permission has enabled unrestricted supply of HMOs in many areas of the city.

Whilst the city's stock of HMOs has contributed to meeting housing needs, increased numbers have resulted in harmful impacts in specific areas. Concentrations of HMOs in those areas have damaged residential amenity and local character and reduced housing choice resulting in imbalanced and unsustainable communities.

In response to these issues and to prevent further or new harmful impacts occurring policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) was developed and brought forward as part of the *Site Allocations and Development Management Policies Local Plan*. The plan was Adopted in July 2014. The policy offers an approach to addressing the impacts arising from HMOs and other forms of housing with similar issues. Its key aims are to ensure that such development preserves the residential amenity and character of an area and that harmful concentrations do not arise.

Analysis of issues relating to HMOs has taken place over time and is on-going. The work has been used to support Local Plan policy development and the introduction of Article 4 Directions⁵. Key work undertaken to understand the nature and distribution of harmful effects has included:

¹ Source: State of Bristol Key Facts 2020 - June 2020 Update - Bristol City Council

² Source: The Population of Bristol - April 2020 - Bristol City Council

³ Source: University of Bristol

⁴ Source: Mid-Year Estimates of Population - Office for National Statistics

⁵ Used to remove Permitted Development Rights (PDR). In the case of HMOs the PDR that allows a dwellinghouse (Use Class C3) to change to a small HMO (Use Class C4) without the need for planning permission has been removed in specific locations across the city.

- Estimation of HMO numbers using Council and other data sources;
- Mapping of HMO locations and density;
- Calculation and mapping of HMOs as a proportion of dwelling stock;
- Analysis and mapping of housing form and tenure and household composition to identify housing type/tenure imbalances;
- Review of qualitative evidence provided by communities on the impact of HMOs including correspondence received from ward councillors, amenities and residents' groups and individual residents.

Key conclusions drawn from this work include:

- **Increase in HMO numbers over the last 10 years:** The current number of verifiable⁶ HMOs in the city is 6,320 (as of April 2019). This figure represents a lower level estimate. Opinion Research Services (ORS) estimates in 2011 identify some 7,100 HMOs in the city. Building Research Establishment (BRE) estimates⁷ in 2017 identify some 12,600 and in 2020 some 14,000 HMOs in the city. These figures represent higher level estimates.
- **Widening distribution of HMOs:** Mapping of HMO locations indicate HMO growth outside of traditional HMO areas serving the city's universities. Districts such as Eastville, Easton, parts of St. George and Hillfields, Southville, Windmill Hill and Bedminster and parts of Avonmouth have seen significant HMO growth.
- **Potential housing imbalance in certain areas:** Housing type imbalances, when compared with the citywide profile, found in numbers of areas across the city. These include areas directly surrounding/accessible to the city's universities including the central districts of Clifton, Cotham, Kingsdown and Redland; the outer district of Fishponds and districts along or adjacent to the Gloucester Road corridor including Montpelier, Ashley Down, Bishopston and Horfield. Other non-student areas include the east Bristol districts of Eastville, Easton and parts of St. George and Hillfields; the south Bristol districts of Bedminster, Southville and Windmill Hill and the north west Bristol district of Avonmouth.
- **Community impacts associated with concentrations of HMOs:** Harmful effects consistently and regularly identified by numbers of communities over many years. Impacts identified include noise and disturbance, poor waste management, congested on-street parking, detriment to visual amenity, erosion of community facilities, loss of social cohesion, erosion of social capital, creation of mono-tenure neighbourhoods and loss of family housing.

Much of this analysis is set out in reports and supporting documents associated with Council decision-making on Article 4 Directions. Additional qualitative evidence from communities on the impact of HMOs has been provided through Council consultations and on-going representations on planning applications. A list of relevant Council decision-making meetings where analysis/evidence has been presented/submitted is set out at Appendix B.

⁶ Bristol City council estimates based on all licenced HMOs including properties with a mandatory licence or an additional licence (in areas of the city where additional licensing schemes have been declared), all licence applications received and all planning permissions and other authorisations for HMOs that are not licenced.

⁷ Building Research Establishment (BRE) estimates derived from BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bristol City Council.

3. The need for further guidance

A number of factors have influenced the need for further guidance to help support the implementation of policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#). These are set out as follows:

[Increasing numbers of HMOs and Council response](#)

Over the last 10 years analysis indicates that the number and distribution of HMOs has grown significantly across the city. Impacts from HMOs have become increasingly widespread with communities reporting problems with HMO concentrations outside of traditional student areas. Drivers of HMO growth remain strong with further increase in numbers expected where no controls are exercised.

The Council has responded by introducing Article 4 Directions which remove permitted development rights for small HMOs and strengthening Local Plan policy. The first Article 4 Directions were introduced in December 2011 within the wards of Clifton East, Cotham, Cabot, Ashley and Lawrence Hill (based on ward boundaries pre-May 2016). Further Article 4 Directions were introduced in October 2012 within the wards of Clifton and Redland (based on ward boundaries pre-May 2016). Existing Local Plan policy controls relating to HMOs were strengthened in 2014 with the introduction of policy **DM2**. The continuing increase in the numbers of HMOs citywide since 2014 has led to a recent review of Article 4 Direction coverage. This has resulted in the introduction of further Article 4 Directions in parts of North, South and East Bristol⁸ in July 2020.

In parallel extensions to HMO licensing control have been introduced by the Government and the Council. These include a widening of Mandatory licensing control over larger HMOs introduced in October 2018 and local Additional licensing schemes introduced by the Council to cover smaller HMOs. The Additional licensing schemes were introduced in East Bristol (Eastville and St. George West) in July 2016 and in Central Bristol (Ashley, Bishopston and Ashley Down, Central, Clifton, Clifton Down, Cotham, Easton, Hotwells and Harbourside, Lawrence Hill, Redland, Southville and Windmill Hill) in July 2019.

[Implementation of policy DM2](#)

The supporting text to policy **DM2** provides a broad definition of harmful concentration (para. 2.2.6) and some explanation of how existing and likely future conditions should be analysed (para. 2.2.7 and 'Application Information'). Implicit within this guidance is the need to assess the quantity and type of existing housing in an area to determine whether a harmful concentration of a particular type of housing has arisen or is likely to arise. There is also an implicit understanding that the greater the quantity of such housing the greater the cumulative impact it has on the residential qualities and characteristics of an area and the more limited the housing choice will be. The policy and explanatory text does not quantify a harmful concentration or explain in detail the method for assessing one.

[Full Council motion](#)

In July 2017 a Full Council resolution was passed on the motion: *Mitigation of university expansion*⁹. The Motion identified groups disproportionately affected by increases in the city's student

⁸ Partly covering wards in the following areas: Avonmouth Area (Avonmouth & Lawrence Weston), North Area (Horfield, Lockleaze, Redland, Bishopston and Ashley Down), East Area (Frome Vale, Hillfields, Eastville, Easton, Lawrence Hill, St. George West, St. George Central, St. George Troopers Hill), South Area (Southville, Bedminster, Filwood, Windmill Hill, Knowle, Brislington West).

⁹ <https://democracy.bristol.gov.uk/mgAi.aspx?ID=8184> (Motion 2)

population including residents living in communities affected by high concentrations of students. The Motion called for the development of an SPD that could support improvements to the residential amenity of areas affected by existing and future concentrations of students.

Conclusion

Significant growth of HMOs in recent years has driven co-ordinated action across the Council to more effectively manage their development and operation. To support this process additional guidance on Local Plan policy implementation relating to the development of HMOs is needed. In particular, a more explicit definition of harmful concentration and further guidance on the assessment methodology would benefit the overall effectiveness and deliverability of the policy. This will support the protection of residential communities from harmful concentrations of HMOs sought by the Full Council Motion in July 2017.

4. The threshold assessment and selection of 10%

A key purpose of policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) is to prevent harmful concentrations of certain forms of accommodation, in particular HMOs, from arising. This ensures that the residential amenity and local character of an area are protected and also supports a separate policy aim to create mixed, balanced and inclusive communities. This policy aim is set out in Core Strategy Local Plan policy [BCS18: Housing Type](#), which expects all new residential development to maintain, provide or contribute to a mix of housing tenures, types and sizes.

To determine whether harmful concentrations of HMOs are likely to arise the proposed SPD applies an HMO threshold assessment to HMO development proposals. This sets an indicative limit to the percentage of homes within any given area that are occupied as HMOs. The proposed SPD states that proposals resulting in a percentage above this limit are unlikely to be consistent with Local Plan policy. To determine such a limit the Council have considered work undertaken by the National HMO Lobby and relevant policies developed at other local authorities.

4.1 Background

[National HMO Lobby](#)

The issue of how to define a threshold level has been considered by a number of local authorities but most of them draw on work undertaken by the National HMO Lobby. This is an association of some fifty community groups in thirty towns across the UK, including Bristol, who are concerned to ameliorate the impact of concentrations of HMOs on their communities.

The National HMO Lobby published a paper in 2008¹⁰ which seeks to address the impacts of concentrations of HMOs on communities across the country. The paper sets out a broad description of a balanced community, a workable idea of how to define one and a programme of action to restore and/or maintain the balance.

As a starting point balanced and sustainable communities are described as those with an appropriate balance between settled residents and a transient population. The key problem identified is demographic imbalance within a neighbourhood resulting in social polarisation and community instability. Such imbalance arises from concentrations of HMOs whose demographic can be characterised by a generally younger more transient population group in higher density accommodation.

The workable idea of a balanced community is expressed as a community which approximates national demographic norms in terms of household types. Imbalance will occur when the household composition of an area deviates significantly from this norm. Allowing for a deviation from the norm the criteria for a balanced community is given as: not less than 60% families, not more than 33% one person households and not more than 10% HMOs, based on the Survey of English Housing current at the time of the paper's publication. The tipping point between a balanced and imbalanced community is stated to occur when HMOs exceed 10% of the properties within an area. This represents a 50% deviation from the national percentage of households that were HMOs at the time of the paper's publication. The Lobby determined that this was the maximum acceptable level of deviation.

¹⁰ National HMO Lobby - Balanced Communities & Studentification Problems and Solutions - 2008

Action to restore and protect balanced communities is set out as a 10 point plan. The plan includes the application of a threshold policy by local authorities that restricts further development of HMOs when the tipping point is reached or exceeded.

Other local authorities

Research into other local authority policy approaches to HMOs has shown increasing widespread use of the threshold approach. Some 27 English and Welsh authorities are known to have existing or emerging Local Plan policies or Supplementary Planning Documents that set out this approach. The majority identify 10% of properties in use as HMOs in a given area as the upper limit, above which a community may become imbalanced. Many authorities have also identified a 100 metre radius around the application property or site as the defined area for the threshold assessment. Appendix C sets out which local authorities are known to be using this approach.

4.2 Application of a threshold assessment in Bristol

The principle underlying the threshold approach has been applied to Bristol to determine whether 10% is locally appropriate. Based on the total number of residential properties¹¹, verifiable HMOs (lower level estimate)¹² and BRE estimated HMOs (higher level estimate)¹³ within the city the average percentage of properties occupied as HMOs is within a range of 3% (lower level average) to 6.6% (higher level average). Under the threshold principle this would indicate the normal or desired community balance between HMOs and other residential properties based on the city's demographics.

To understand an area's level of divergence from the lower and higher level average citywide percentage, standard deviation can be used. Standard deviation highlights those areas which are higher, much higher, or very much higher than the citywide average. Based on the verifiable HMO data, whilst some areas of the city have no HMOs at all, in other areas up to 22.6% of all properties are HMOs. A 10% threshold is around three times more than the lower level citywide average of 3% derived from this data. Based on the BRE HMO estimate, whilst some areas of the city have no HMOs at all, in other areas it is estimated that up to 38.6% of all properties are HMOs. A 10% threshold is around 50% more than the higher level citywide average of 6.6% derived from this estimate.

On this basis areas with at least 10% HMOs would be defined as higher to much higher than the desired community balance.

Standard deviation levels and HMO percentages have been mapped for each Lower Level Super Output Area (LSOA)¹⁴ across the city. The maps are shown at Appendix D. Map 1 shows the results for the lower level HMO estimate and map 2 the results for the higher level HMO estimate. The darker blues on the maps represent the greatest level of divergence or imbalance when compared to the citywide percentage of HMOs. Areas with 10% and above correspond to communities experiencing negative impacts from HMO concentrations in the city. These include communities in Clifton, Cotham, around the Gloucester Road corridor, Easton, Fishponds, Southville, Bedminster and Windmill Hill.

¹¹ Total identified dwellings are based on residential records held within the Bristol Local Land and Property Gazetteer (LLPG) and include all approved residential classifications but exclude garages, residential car parks and provisional records.

¹² Bristol City Council estimates based on all licenced HMOs including properties with a mandatory licence or an additional licence (in areas of the city where additional licensing schemes have been declared), all licence applications received and all planning permissions and other authorisations for HMOs that are not licenced. Data current as of April 2019.

¹³ Building Research Establishment (BRE) estimates derived from BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bristol City Council. Estimate provided as of February 2020.

¹⁴ An established statistical Geography used for the reporting of small area statistics.

4.3 Assessment and conclusion

There is considerable merit in the use of the threshold approach as an appropriate indicator of community imbalance and therefore harmful concentration. The principle of deviation from a wider statistical profile to understand imbalance at a smaller area level has also previously been used by the Council to inform Local Plan policy approaches and Article 4 Direction boundaries.

It is clear that numbers of local authorities across the country are now using the 10% threshold approach, either as a policy tool or as additional policy guidance, to support the assessment of new HMO development. This would indicate that such policies are considered sound by the Planning Inspectorate and are supported by local communities. The proposed use of a threshold approach in Bristol has gained widespread support from communities responding to the initial consultation on the draft SPD.

Using the citywide proportion of 3% to 6.6% HMOs as an indicator of a balanced community a 10% level represents a considerable deviation from this position and corresponds to those communities experiencing the greatest level of impacts from HMO concentrations.

For the reasons given the use of a 10% threshold to support the determination of proposals for new HMO development is considered appropriate for Bristol.

5. Defining the area of the threshold assessment

The threshold assessment area also needs to be considered and defined. The supporting text to policy [DM2: Residential Sub-divisions, Shared and Specialist Housing](#) expects assessments of new development to consider the relative impacts at street, neighbourhood and ward levels (para. 2.2.7). The proposed SPD provides for the use of the threshold assessment at the immediate neighbourhood level only.

The Council have again considered work undertaken by the National HMO Lobby (see section 4.1) and policies developed at other local authorities to inform an appropriate approach for Bristol.

5.1 Background

[National HMO Lobby](#)

The National HMO Lobby's 2008 publication considers the size of the area across which any threshold approach should be applied. Three potential geographies are identified and defined by reference to active local authority policy approaches at that time. These include:

- Street or Block: *Reference to Glasgow's policy on HMOs;*
- Neighbourhood: *Comprising several streets. Reference to Loughborough's (Charnwood Borough Council) threshold approach to student housing using Census Output Areas including the home Output area and adjoining Output Areas;*
- Community: *Comprising several neighbourhoods. Reference to Leeds City Council Community Areas, as defined by local residents, and used for community funding purposes.*

[Other local authorities](#)

Research of other local authority policies and guidance that apply a threshold approach to HMOs has shown that most use a 100 metre radius around the application property or site to define the area of assessment. Appendix C sets out which local authorities are known to be using this approach.

5.2 Assessment and conclusion

The use of a radius rather than a Census geography to define the threshold assessment area is the preferred approach. This provides a more accurate picture of surrounding HMO distribution as the application property or site is at the centre of the threshold assessment area. Where a Census geography is used the boundary of the threshold assessment area will not be evenly distanced from the application property or site. This may result in an uneven counting of surrounding HMOs. Such a situation might not be corrected by extending the threshold assessment to adjoining Census geographies.

The proposed threshold assessment for Bristol will be undertaken at the immediate neighbourhood level. Using the radius approach a distance of 100m in all directions around the application property or site will reasonably define the immediate neighbourhood. This distance is a 1 to 2 minute walk representing the home ground of any property within which potential impacts from neighbours will be most acute. The use of 100 metres is consistent with other local authorities who apply a threshold approach.

For the reasons given the use of a 100 metre radius to define the threshold assessment area is considered appropriate for Bristol.

Policy DM2: Residential Sub-divisions, Shared and Specialist Housing

The Core Strategy sets out the overall approach to developing new homes in the city. It proposes an overall number of homes, seeks affordable housing and aims for a broad housing mix. This Development Management policy offers an approach to addressing the impacts and issues of certain forms of housing; in particular, sub-divisions, shared housing, specialist student accommodation and housing for older people.

The sub-division of existing accommodation and the supply of shared housing provide an important contribution to people's housing choice. The policy aims to ensure that such development also preserves the residential amenity and character of an area and that harmful concentrations do not arise. The policy also aims for a good standard of accommodation.

Student numbers in the city have risen substantially since 2001 creating demand for a range of private rented accommodation. The population of older people will also increase in the coming years creating specific housing requirements. The policy aims to ensure that future specialist housing for students and older people meets appropriate standards and is sensibly located.

Residential Sub-divisions, Shared and Specialist Housing – General Criteria

Proposals for:

- **the sub-division of existing dwellings to flats;**
- **the conversion of existing dwellings or construction of new buildings to be used as houses in multiple occupation;**
- **the intensification of existing houses in multiple occupation;**
- **specialist student housing; and**
- **other forms of shared housing**

will not be permitted where:

- i. **The development would harm the residential amenity or character of the locality as a result of any of the following:**
 - **Levels of activity that cause excessive noise and disturbance to residents; or**
 - **Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or**
 - **Cumulative detrimental impact of physical alterations to buildings and structures; or**
 - **Inadequate storage for recycling/refuse and cycles.**
- ii. **The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:**
 - **Exacerbating existing harmful conditions including those listed at (i) above; or**
 - **Reducing the choice of homes in the area by changing the housing mix.**

Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.

For the purposes of this policy shared housing includes houses in multiple occupation (HMOs), bed-sits, hostels, housing for older people and specialist student accommodation. The council has established an Article 4 Direction to control small HMOs within the wards of Ashley, Cabot, Clifton, Clifton East, Cotham, Lawrence Hill and Redland. Small HMOs are defined as small shared houses or flats occupied by between three and six unrelated individuals who share basic amenities. This means that a planning application is required for this type of development.

General Criteria

Whilst making a valuable contribution to the city's housing requirements both subdivisions of existing accommodation and shared housing can have an impact on residential amenity and the character and housing mix of an area. Specific issues common to both forms of housing can include:

- Noise and disturbance associated with intensification of the residential use and/or the lifestyles of occupants;
- Pressure for on-street parking;
- A shift from permanent family housing to more transient accommodation;
- Impacts on social cohesion;
- A shift in the character of shops and businesses supporting the community;
- Impact of external alterations;
- Poor waste management.

When making assessments on new development, consideration is to be given to the particular qualities and characteristics of a residential area or residential uses that might contribute to it being an enjoyable or otherwise satisfactory place to live. These usually include generally quieter surroundings; a reasonable level of safe, accessible and convenient car parking; a well-maintained or visually attractive environment and the preservation of buildings and structures that contribute to the character of a locality. Harmful concentrations are likely to arise when issues commonly associated with these uses, listed in para. 2.2.5 above, cumulatively result in detrimental effects on these residential qualities and characteristics. Harmful concentrations will also result where the choice of housing is reduced and no longer provides for the needs of different groups within the community.

Assessments should consider the relative impacts at street, neighbourhood and ward levels.

The policy also seeks the provision of a good standard of accommodation for future occupiers. Consideration should be given to layout, internal living space, external amenity space, outlook, privacy, adaptability, security, cycle and car parking and refuse and recycling storage. Relevant requirements and standards are set out in the policies listed in the Policy Links section.

Application Information

For major developments analysis should be undertaken of the type of housing in the area, including where relevant the number of sub-divisions, HMOs or specialist student housing accommodation, at street, neighbourhood and ward levels. Data is available from the Census that corresponds to these geographies.'

(Local Plan - Site Allocations and Development Management Policies - Adopted July 2014)

Appendix B: Harmful impact of HMOs

Council decision-making meetings where evidence of harmful impact of HMOs has been presented include:

- Bristol City Council Development Control (Central) Committee - 27 October 2010
Future Control of Houses in Multiple Occupation - Consideration of Potential Article 4 Direction
- Bristol City Council Officer Delegated Report and Decision - 7 December 2010
Future control of Houses in Multiple Occupation (HMO's) Article 4 direction for Ashley, Cabot, Clifton East, Cotham and Lawrence Hill Wards
- Bristol City Council Development Control (Central) Committee - 21 September 2011
Confirmation of Article 4 direction for Ashley, Cabot, Clifton East, Cotham and Lawrence Hill Wards; Consideration of potential Article 4 direction for Clifton and Redland Wards.
- Bristol City Council Development Control (Central) Committee - 26 September 2012
Control of Houses in Multiple Occupation (HMO's). Confirmation of Article 4 direction for Clifton and Redland Wards
- Bristol City Council Cabinet - 2 April 2019
Houses in Multiple Occupation - New Article 4 Directions

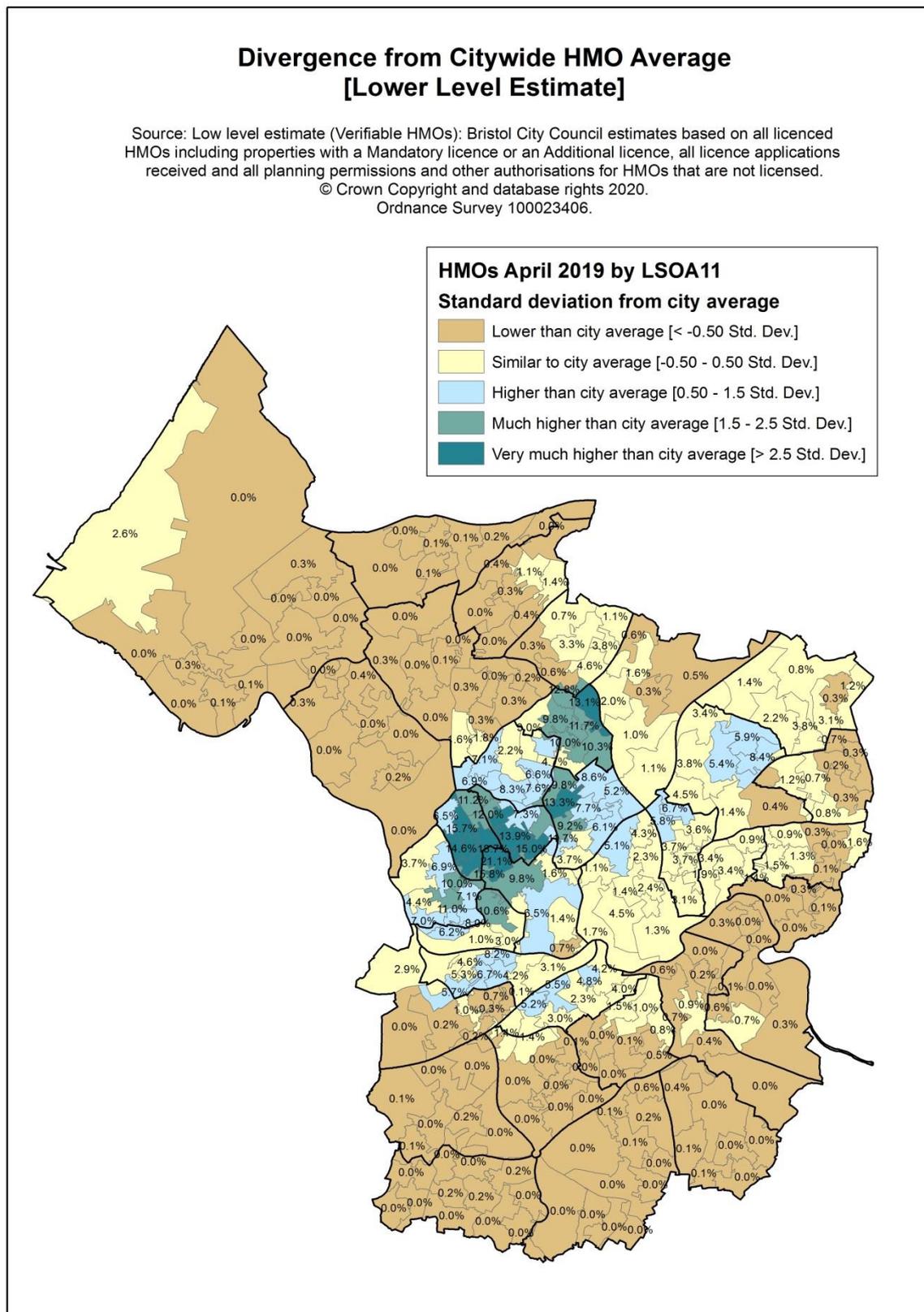
Appendix C: Other local authorities using the threshold approach

| Local Authority | Policy/SPD | Status | Threshold Percentage | Area Definition |
|--|---|--|----------------------|------------------|
| English Authorities | | | | |
| London Borough of Barking and Dagenham | <i>Planning for the future of Barking and Dagenham - Borough wide Development Policies Development Plan Document.</i> Policy BC4: Residential Conversions and Houses in Multiple Occupation | Adopted Plan (March 2011) | 10% | Street |
| Bath & North East Somerset Council | Houses in Multiple Occupation in Bath Supplementary Planning Document | Adopted SPD (November 2017) | 10% | 100 metre radius |
| Birmingham City Council | <i>Birmingham Plan 2031 - Development Management in Birmingham - Publication version (Regulation 19)</i> Policy DM11: Houses in multiple occupation (HMO) and other non-family housing | Consultation undertaken on Publication version (October 2019 to February 2020). To be submitted for Examination. | 10% | 100 metre radius |
| Brighton-Hove City Council | <i>Brighton & Hove City Plan Part One</i> Policy CP21: Student Accommodation and Houses in Multiple Occupation Part ii | Adopted Plan (March 2016) | 10% | 50 metre radius |
| Canterbury City Council | <i>Canterbury District Local Plan</i> Policy HD6: Housing in Multiple Occupation (HMO) | Adopted Plan (July 2017) | 10% | 100 metre radius |
| Charnwood Borough Council | <i>Housing Supplementary Planning Document</i> HSPD 11: Concentrations of Houses in Multiple Occupation | Adopted SPD (May 2017 – Updated December 2017) | 20% | 100 metre radius |
| Durham County Council | <i>County Durham Plan</i> Policy 16: Durham University Development, Purpose Built Student Accommodation and Houses in Multiple Occupation | Consultation on main modifications following completion of examination hearings. (May to July 2020) | 10% | 100 metre radius |
| Harlow Council | <i>Harlow Local Development Plan Pre-Submission Publication</i> Policy H3: Houses in Multiple Occupation | Consultation on main modifications following completion of examination hearings (March to May 2020). Awaiting Inspectors final report. | 20% | Row of 5 units |

| | | | | |
|-----------------------------|---|---|-----|--|
| Liverpool City Council | <i>Liverpool Local Plan 2013 -2033 Pre-submission draft 2018</i> Policy H11: Houses-in-Multiple Occupation (HMO): Neighbourhood Approach | Consultation undertaken on Pre-Submission Draft of the Liverpool Local Plan (January to February 2018). | 10% | In designated neighbourhoods |
| Manchester City Council | <i>Manchester's Local Development Framework Core Strategy Development Plan Document</i> Policy H11: Houses in Multiple Occupation | Adopted Plan (July 2012) Development Plan Document to include thresholds which define high concentration and short distance to further support application of the policy to be prepared. | 10% | 100 metres of the application site |
| Milton Keynes Council | Houses in Multiple Occupation Supplementary Planning Document | Adopted SPD (April 2012) | 35% | 50 metre radius |
| Northampton Borough Council | <i>Houses in Multiple Occupation Supplementary Planning Document (SPD)</i> | Adopted SPD (November 2019) | 10% | 50 metre radius |
| | <i>Northampton Local Plan Part 2 2011 - 2029 Proposed Submission - Round 2</i> Policy 15: Delivering Houses in Multiple Occupation | Round 2 consultation under way on proposed Submission draft (July to August 2020). | 10% | 50 metre radius |
| Nottingham City Council | <i>Nottingham City land and planning policies Development Plan Document Local Plan Part 2</i> Policy HO6: Houses in Multiple Occupation (HMOs) and Purpose Built Student Accommodation | Adopted Plan (January 2020) | 10% | Census Output Areas (Output area where proposal is located and all adjoining Output Areas) |
| Oxford City Council | <i>Oxford Local Plan 2036</i> Policy H6: Houses in Multiple Occupation (HMO) | Adopted Plan (June 2020) | 20% | 100 metres of street length |
| Portsmouth City Council | Houses in multiple occupation (HMOs) - Ensuring mixed and balanced communities Supplementary Planning Document (SPD) | Adopted SPD (October 2019) | 10% | 50 metre radius |
| Reading Borough Council | <i>Reading Borough Local Plan</i> H8: Residential Conversions | Adopted Plan (November 2019) | 25% | 50 metre radius |
| Scarborough Borough Council | <i>Houses in Multiple Occupation SPD</i> | Adopted SPD (November 2015) | 10% | 100 metre radius |

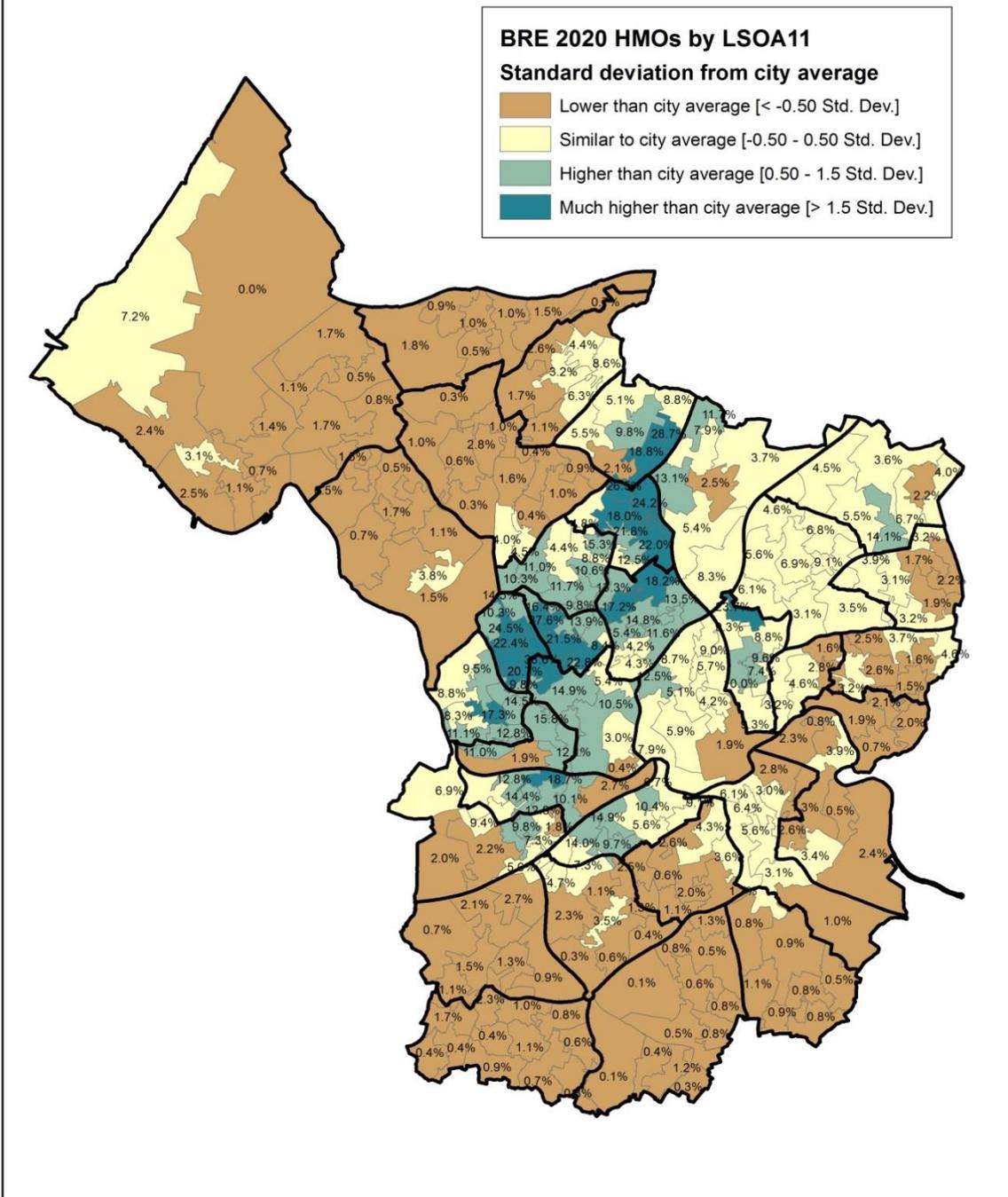
| | | | | |
|--|---|--|--------------------------------------|-----------------------------|
| Southampton | Houses in Multiple Occupation Supplementary Planning Document | Adopted SPD (May 2016) | 10% | 40 metre radius |
| Trafford Council | <i>Houses in Multiple Occupation -Supplementary Planning Document SPD6</i> | Adopted SPD (March 2018) | 10% | 40 metre radius |
| Warwick District Council | <i>Warwick District Local Plan 2011-2029</i> H6: Houses in Multiple Occupation and Student Accommodation | Adopted Plan (September 2017) | 10% | 100 metre radius |
| Welwyn Hatfield Borough Council | <i>Houses in Multiple Occupation Supplementary Planning Document</i> | Adopted SPD (February 2012) | 20% | 50 metre radius |
| Worcester City Council | <i>Houses in Multiple Occupation Supplementary Planning Document (SPD)</i> | Adopted SPD (October 2014) | 10% | 100 metre radius |
| City of York Council | <i>Draft Controlling the Concentration of Houses in Multiple Occupation Supplementary Planning Document</i> | Adopted SPD (April 2012 amended July 2014) | 20% | In a neighbourhood area |
| | | | 10% | 100 metres of street length |
| | <i>City of York Local Plan - Publication Draft</i> Policy H8 : Houses in Multiple Occupation | Plan submitted for Examination May 2018. Examination on-going | 20% | In a neighbourhood area |
| | | | 10% | 100 metres of street length |
| Welsh Authorities | | | | |
| Cardiff Council | <i>Houses in Multiple Occupation (HMOs) SPG</i> | Adopted SPG (October 2016) | 20% in selected wards | 50 metre radius |
| | | | 10% in all other wards | 50 metre radius |
| Newport Council | <i>Houses in Multiple Occupation (HMOs) SPG</i> | Adopted SPG (January 2017) | 15% in defined areas | 50 metre radius |
| | | | 10% in all other areas | 50 metre radius |
| Rhonda Cynon Taff County Borough Council | <i>Houses in Multiple Occupation (HMOs) SPG</i> | <i>Adopted SPG (May 2015)</i> | 20% in a selected ward | 50 metre radius |
| | | | 10% in all other areas | 50 metre radius |
| Swansea Council | <i>Swansea Local Development Plan 2010 - 2025</i> Policy H 9: Houses in Multiple Occupation | Adopted Plan (February 2019) | 25% within the HMO Management Area | 50 metre radius |
| | | | 10% outside the HMO Management. Area | 50 metre radius |

Map 1



Divergence from Citywide HMO Average [Higher Level Estimate]

Source: Building Research Establishment (BRE) estimates derived from BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bristol City Council.
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Ordnance Survey 100023406.





Managing the development of houses in multiple occupation
Draft Supplementary Planning Document
Reg. 13 Version (August 2020)
Consultation Statement

Published August 2020

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1. Introduction

This Consultation Statement explains how Bristol City Council has sought public participation in the preparation of *Managing the development of houses in multiple occupation Supplementary Planning Document*. The approach set out in this document demonstrates compliance with the council's [Statement of Community Involvement \(November 2015\)](#) and is in accordance with the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

2. Who was consulted?

The following consultee groups were directly consulted:

- Bristol Local Plan Stakeholder Contact List - 913 organisations and 1035 members of the public consulted;
- The West of England Landlord & Agent Panel - 4 local landlord associations consulted;
- Bristol City Councillors - 70 Councillors consulted.

The full list of organisations and Councillors is set out at Appendix A.

3. Consultation methods used

Consultation document

In February 2020 the Council published the consultation document: *Managing the development of houses in multiple occupation: Draft Supplementary Planning Document (SPD)*. The document was published as a full draft version of the proposed SPD.

Public Consultation on the draft SPD took place between 3 February 2020 and 20 March 2020 and sought open comments on its overall content. The draft SPD was made available for inspection at City Hall and placed on the Council's web site.

Web site and other promotion

The draft SPD was promoted on the Council's 'Planning policy and guidance' and 'Consultation and Engagement Hub' web pages during the consultation period. A press release was also published on the Council's 'Newsroom' web page on 3 February 2020.

The draft SPD was also promoted through the Council's 'Ask Bristol' email newsletter and the Spring publication of 'Landlord News'.

Presentation

A presentation was given to the Neighbourhood Planning Network on 14 January 2020 to explain the content of the draft SPD.

4. Summary of main issues raised and how they have been addressed

A total of 78 responses were received on the content of the draft SPD.

The table below summarises the main issues raised by respondents relating to each section of the draft SPD and how the issues have been addressed in the current consultation version (Regulation 13 Consultation). Individual issues may have been raised by more than one respondent and individual respondents may have raised multiple issues.

Of the responses received 52 (67%) supported the draft SPD; 5 (6%) objected to the draft SPD; 19 (24%) neither supported nor objected to the draft SPD and 2 (3%) made no comment. The majority of respondents acknowledged the harmful impacts caused by concentrations of HMOs and/or identified harmful impacts in named residential areas.

| Main issues raised | How issues have been addressed | |
|---|--|---|
| | Response | Changes to document |
| 1. Introduction | | |
| 1.1 Purpose and scope | | |
| Draft SPD should also address proposals for purpose-built student accommodation. | The draft SPD only provides guidance on Local Plan policies relevant to managing the development of HMOs. This does not include policy <i>BCAP4: Specialist student housing in Bristol City Centre</i> . Guidance on other forms of housing is not proposed at the current time. Clarification has been provided. | Amendments made to section 1.1 <i>Purpose and Scope</i> to clarify scope of document. |
| Draft SPD should provide similar guidance on the sub-division of existing dwellings to flats. | | |
| Clarify whether SPD will also provide guidance on policy <i>BCAP4: Specialist student housing in Bristol City Centre</i> . | | |
| SPD general approach is inflexible and will prevent/restrict the delivery of HMOs. Suggested consequences include: Increase in housing needs, reduced housing diversity, reduced supply of low-cost and convenient accommodation, increased overcrowding in existing accommodation, increased homelessness, reduced ability for companies to attract skilled young professionals to the city, young professionals having to locate further out of the city. | The draft SPD provides further guidance on existing Local Plan policies relating to HMOs. Policy restrictions only apply where harmful conditions /concentrations arise. Local Plan policies including the draft SPD will only apply to proposals requiring planning permission. Small HMOs can be developed under permitted development rights across large areas of the city. | No amendment made. |
| Restricting HMOs will have a greater impact on young people who are more dependent upon this form of accommodation. Considered unfair and discriminatory. | Any potential impacts on Protected Characteristics, including young people, will be considered under the Equalities Impact Assessment screening process. | |
| SPD general approach should provide greater emphasis on raising quality standards. A more permissive approach subject to standards/requirements being met should be considered. | Local Plan policies relating to HMOs seek to ensure a good standard of accommodation. The draft SPD provides detailed additional guidance on how | No amendment made. |

| Main issues raised | How issues have been addressed | |
|--|---|--|
| | Response | Changes to document |
| | quality standards can be achieved. | |
| Draft SPD should be applied to retrospective applications. | All retrospective applications for HMOs must be determined in accordance with relevant Local Plan policies supported by guidance in the draft SPD. | No amendment made. |
| 1.2 Status of the document | | |
| The guidance provided in the SPD should form part of the development plan. | The general approach and method for assessing proposals for new and intensified HMOs is set out in policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> and associated text. The proposed SPD is considered an appropriate mechanism to provide further guidance on the policy approach and method. Clarification has been provided. | Amendments made to section <i>1.2 Status of the Document</i> to clarify status of document. |
| 1.3 Houses in Multiple Occupation in Bristol | | |
| Include student population figure. | Not relevant to the draft SPD. | No amendment made. |
| Harmful impacts identified should also include: <ul style="list-style-type: none"> Overlooking and loss of privacy (through the use of upper floors as communal living areas); Loss of visual amenity (through the use of front gardens as parking, poor waste management, poor property maintenance); Highway safety (through poor waste management); Erosion of local character and amenities (through anti-social behaviour and irresponsible landlords). | Harmful impacts identified have been broadened to better reflect concerns. | Amendments made to section <i>1.3 Houses in Multiple Occupation in Bristol</i> to better reflect range of harmful impacts. |
| Harmful impacts identified are largely associated with student HMOs and are not representative of the wider HMO market which has shifted from students to professionals. | The harmful impacts of HMO concentrations regardless of occupier group are well established and are identified in Local Plan policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> . | No amendment made. |
| Assumption of harm and general approach taken is prejudicial towards HMOs and students. Harmful impacts relate to individuals and should not be associated with a particular form of accommodation. | | |
| Confirm if the purpose of the SPD is to restrict the supply of HMOs and if so explain the consequences of applying the guidance. | The purpose of the proposed SPD is clearly stated in section <i>1.1 Purpose and Scope</i> | No amendment made. |
| Clarify whether the guidance will be applied in | The proposed SPD provides | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| the City Centre and to student HMOs in particular. | guidance to policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> which applies across the city. | |
| Problems with non-student HMOs extend across Avonmouth. | Description of HMO locations has been changed. | Amendments made to section 1.3 <i>Houses in Multiple Occupation in Bristol</i> to more accurately reflect location of HMOs. |
| HMOs form an important part of Bristol's growing economy and housing supply. HMOs house young people otherwise unable to buy or rent on their own or to live and work in the city and support the economy. The need for HMOs and the range of needs they provide for should be acknowledged. | The importance of HMOs is acknowledged in section 1.3 <i>Houses in Multiple Occupation in Bristol</i> . | No amendment made. |
| Include reference to the needs and demands of other groups such as older people. | Not considered relevant. | No amendment made. |
| HMOs are a crucial component of the housing market for young people. | Acknowledged in section 1.3 <i>Houses in Multiple Occupation in Bristol</i> . | No amendment made. |
| Harmful impacts also arise from purpose-built student housing. | The potential harmful impacts of concentrations of purpose-built student accommodation are acknowledged. Further appropriate guidance has been provided in a new section. | New section 4.4 <i>HMOs and Purpose-built Student Accommodation</i> inserted to cover consideration of the impacts of concentrations of purpose-built student accommodation. |
| Problems associated with HMOs have been created by university expansion. No coordinated plan for where additional students will live or transport solutions to facilitate a greater dispersal. Problems could be reduced if expansion was stopped. | The draft SPD only provides guidance on Local Plan policies relevant to managing the development of HMOs. Other Local Plan policies are relevant to students and purpose-built student accommodation. | No amendment made. |
| 2. Background | | |
| 2.1 What is a House in Multiple Occupation? | | |
| Include a relevant contact. | Links to further information and a relevant contact has been provided. | Amendment made to section 2.1 <i>What is a House in Multiple Occupation?</i> providing links to further information and a relevant contact. |
| Amend <i>Fig. 1: When is a Property an HMO?</i> - Question 'Do any exemptions apply?' to include buildings managed/controlled by non-educational establishments. | Licence exemptions will apply to non-educational providers of student accommodation under specific circumstances. Text has been amended. | Amendments made to <i>Fig. 1: When is a Property an HMO?</i> providing further explanation. |
| Amend <i>Fig. 1: When is a Property an HMO?</i> - | Further explanation has been | |

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| Question 'Is at least one amenity shared?' to provide further explanation. | provided. | |
| Amend <i>Fig. 1: When is a Property an HMO?</i> - Question 'Do any exemptions apply?' to provide further explanation. | Further explanation has been provided. | |
| The section could be simplified to improve understanding of the document. | A clear definition of an HMO is provided in section 2.1 <i>What is a House in Multiple Occupation</i> . | No amendment made. |
| Provision should be made for more than 2 lodgers living with a homeowner without the property changing use to an HMO. This would address under-occupation of homes, especially by older people, and housing need. | The legal definition of an HMO is set out in the Housing Act 2004 and associated regulations. | No amendment made. |
| 2.2 Policy Context | | |
| National | | |
| No comments made | | |
| Local | | |
| Include reference to policy <i>DM30: Alterations to Existing Buildings</i> to ensure overlooking and privacy issues are considered. Policy could be set out in Appendix A. | The use of additional relevant policies has been referenced. | Amendment made to section 2.2 <i>Policy Context</i> under sub-section <i>Local</i> to indicate the use of additional policies set out in relevant sections. New sub-section <i>Outlook and Privacy</i> inserted under section 3.2 <i>What is a Good Standard of Accommodation</i> to cover Local Plan policies relating to outlook and privacy. |
| 2.3 When is Planning Permission Required? | | |
| Amend <i>Fig. 2: HMO Development - Requirement for Planning Permission</i> - Question 'Will additional occupants significantly change the intensity of the use of the property?' to provide further explanation. A metric would be useful. | Text to question has been altered and further explanation provided. | Amendments made to <i>Fig. 2: HMO Development - Requirement for Planning Permission</i> - Question 'Will additional occupants significantly change the intensity of the use of the property?' altering text to question and providing further explanation. |
| <i>Fig. 2: HMO Development - Requirement for Planning Permission</i> - Question 'Will additional occupants significantly change the intensity of the use of the property?' may undermine the policy aim to prevent harmful impacts. These can occur through small incremental increases to bed space numbers within existing HMOs across an area. The question as worded may allow such increases without the need for planning permission. | | |
| Vitality important that HMOs are subject to planning permission to protect residential areas in the city. | The requirement for planning permission is set out in section 2.3 <i>When is Planning Permission</i> | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | <i>Required?</i> | |
| Detail needed on how residents will be consulted on HMO proposals. | Links to further detail have been provided. | Amendments made to section 2.3 <i>When is Planning Permission Required?</i> to provide links to further detail. |
| Include a relevant contact. | Links to further detail have been provided. | Amendment made to section 2.2 <i>When is Planning Permission Required?</i> to provide links to further detail. |
| Include a presumption against converting listed buildings into HMOs. | All proposals for new HMOs must be determined in accordance with relevant Local Plan policies and national legislation. | No amendment made. |
| 3. Additional Guidance | | |
| 3.1 What is a Harmful Concentration | | |
| The additional guidance sections in the boxes should confirm if one or more of the definitions of harmful concentration need to apply to result in a refusal of planning permission. | The assessments set out in the 'Additional guidance' boxes are independent of each other. This is clearly indicated. | No amendment made. |
| The requirement under policy DM2 criteria (ii) to consider harmful concentration cannot be applied to proposals for the intensification of existing HMOs as this form of development would not increase the number of HMOs. | The <i>General Criteria</i> section of policy DM2: <i>Residential Sub-divisions, Shared and Specialist Housing</i> applies criteria (i) and (ii) to all types of proposal listed in the policy. This includes the intensification of existing houses in multiple occupation. The sandwiching and HMO threshold approaches set out in the draft SPD will therefore apply to this form of development. | No amendment made. |
| Additional bed spaces within HMOs may not constitute a material change of use requiring a planning application. | Further explanation has been provided. | Amendments made to <i>Fig. 2: HMO Development - Requirement for Planning Permission - Question 'Will additional occupants significantly change the intensity of the use of the property?'</i> providing further explanation. |
| Additional bed spaces within HMOs consistent with national policy on higher densities. | The national policy context is set out in section 2.2. <i>Policy Context</i> | No amendment made. |
| Two tests of harmful concentration insufficient | The street level assessment (sandwiching between HMOs) and neighbourhood level assessment (percentage of HMOs within 100 metres) are considered appropriate and sufficient to determine the | No amendment made. |
| A third geographical area above street and neighbourhood level should also form part of the threshold assessment. If any one test fails then permission should not be granted. | | |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| Ward level assessments of harmful concentration do not represent natural communities. | likelihood of a harmful concentration. Concentrations of HMOs beyond the street/neighbourhood level are less likely to have any measurable impacts. | |
| Approach set out in draft SPD diverges significantly from current approach to implementing policy DM2 and should be taken forward through the Local Plan Review process to allow for public examination and proper assessment of issues. | The general approach and method for assessing proposals for new and intensified HMOs is set out in policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> and associated text. The proposed SPD is considered an appropriate mechanism to provide further guidance on the policy approach and method. | No amendment made. |
| Should relax application of additional guidance for HMO proposals for vacant floors above shops. | Other material considerations may be weighed against policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> and guidance within the proposed SPD when determining proposals for HMO development. | No amendment made. |
| Student numbers should not increase in central areas. | The draft SPD only provides guidance on Local Plan policies relevant to managing the development of HMOs. Guidance on other forms of housing is not proposed at the current time. | No amendment made. |
| Proportions of the dwelling stock that are occupied as HMOs could be given for Article 4 Direction areas. | The locations of licensed HMOs are available to view on Bristol City Council's web application Pinpoint . | No amendment made. |
| Sandwiching (Street level) | | |
| Does not support sandwich assessment. Issue is a 'made-up' problem or over-simplification of the problem. | The sandwich assessment is considered a sound and proper indicator of a potential harmful concentration of HMOs at a localised level. | No amendment made. |
| Supports sandwich assessment but could increase the number of properties within the sandwich. | Clarification has been provided on the sandwich assessment. | Amendment made to section 3.1 <i>What is a Harmful Concentration</i> under <i>Sandwiching (Street level)</i> linking guidance set out in the 'additional guidance' box to detail provided at section 4.1 <i>Sandwiching (Street level)</i> . Amendments made to Section 4.1 <i>Sandwiching (Street level)</i> to provide further clarification of sandwiching assessment. |

| Main issues raised | How issues have been addressed | |
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| | | <i>Fig. 3: Sandwich Assessment - Worked Examples</i> expanded to show further sandwiching situations. |
| The 'Additional guidance' on sandwiching set out in the blue box should reflect the wording at 4.1 which explains that sandwiching can also occur when a proposed HMO is up to two properties removed. | Clarification has been provided on the sandwich assessment. | Amendment made to section 3.1 <i>What is a Harmful Concentration</i> under <i>Sandwiching (Street level)</i> linking guidance set out in 'Additional guidance' box to detail provided at section 4.1 <i>Sandwiching (Street level)</i> . |
| Harmful concentrations at street level should also include rows of more than 2 adjacent HMOs and individual buildings where more than 20/25% of the units are occupied as HMOs. | <p>The explanatory text to policy <i>DM2: Residential Sub-division, Shared and Specialist Housing</i> also expects analysis to be undertaken at street level. This is explained under section 4.2 <i>HMO Threshold (Neighbourhood level)</i>.</p> <p>Clarification has been provided on the sandwich assessment, including situations relating to sub-divided buildings.</p> | <p>Amendment made to section 3.1 <i>What is a Harmful Concentration</i> under <i>Sandwiching (Street level)</i> linking guidance set out in 'Additional guidance' box to detail provided at section 4.1 <i>Sandwiching (Street level)</i>.</p> <p>Amendments made to Section 4.1 <i>Sandwiching (Street level)</i> to provide further clarification of sandwiching assessment.</p> <p><i>Fig. 3: Sandwich Assessment - Worked Examples</i> expanded to show further sandwiching situations.</p> |
| HMO Threshold (Neighbourhood level) | | |
| The threshold assessment will not apply to other forms of housing set out in policy DM2 e.g. sub-divisions/student accommodation. This is considered inequitable and may encourage the development of student flats in place of HMOs which is not consistent with policy DM2. | The draft SPD only provides guidance on the managing the development of HMOs. Guidance on other forms of housing is not proposed at the current time. Proposals for purpose-built student accommodation and other student flats are subject to other policy controls. | No amendment made. |
| A threshold assessment relating to the development of purpose-built student accommodation should be considered. | | |
| The use of a fixed percentage to define a harmful concentration is overly prescriptive and does not take account of local circumstances. Development in locations that may be more suitable for HMOs rather than family housing should be supported. Suggestions include: city centre, shopping centres, along arterial routes, above commercial premises, busy junctions and transport corridors/termini. A more flexible/permissive approach is required. | The use of a threshold approach to determine the likelihood of a harmful concentration is considered appropriate. Other material considerations may be weighed against policy <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> and guidance within the proposed SPD when determining proposals for HMO development. | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| A flexible/discretionary approach is needed to ensure that mixed use areas with a lower number of residential properties do not create artificial threshold calculations that prevent the development of HMOs. The Threshold assessment should not be the sole basis for decision-making. | An evidence paper explaining the use of the threshold approach and the selection of 10% as the threshold level has been published alongside the proposed SPD. | |
| Published evidence/justification for the citywide 10% threshold percentage is required. Set at this low level the Threshold would restrict development of HMOs across a significant proportion of the city. | Small HMOs can be developed under permitted development rights across large areas of the city. The proposed SPD will only be used where planning applications for new HMOs are required. | No amendment made. |
| The threshold approach is disproportionate to the level of harm caused. | | |
| Consideration should be given to other threshold proportions - 15%, 20%, 25% - based on the characteristics of the locality e.g. access to sustainable transport, locations less suitable for family housing. | | |
| HMO threshold assessment is too high - should be set at 5%. | | |
| Purpose-built student accommodation should not be included in the threshold assessment. Managed purpose-built student accommodation is significantly less likely to give rise to adverse impacts on residential amenity or harm to housing mix. | Purpose-built student accommodation has been removed from the HMO threshold calculation. Amended guidance has been provided on how potential harmful impacts arising from this form of housing should be considered when assessing proposals for HMO development. | Amendments made to sections <i>1.1 Purpose and Scope</i> , <i>3.1 What is a Harmful Concentration</i> under <i>HMO Threshold Assessment (Neighbourhood level)</i> , <i>4.2 HMO Threshold Assessment (Neighbourhood level)</i> and <i>4.5 Information on Datasets</i> under <i>Student Bed Spaces</i> to reflect removal of purpose built student accommodation from the HMO threshold calculation. |
| Inclusion of purpose-built student accommodation within the threshold assessment could prevent new purpose built student accommodation from being developed in appropriate locations or existing purpose-built student accommodation being extended. | The proposed SPD does not provide guidance on existing or emerging policies covering the development of purpose-built student accommodation. | New section <i>4.4 HMOs and Purpose-built Student Accommodation</i> inserted to cover consideration of the impacts of concentrations of purpose-built student accommodation. |
| Inclusion of purpose-built student accommodation within the threshold assessment wrongly assumes students are harmful. Should not equate purpose-built student accommodation to HMOs. | | |
| The 10% threshold assessment must include student accommodation. | | |
| Should also note the impact of student halls of residence. | | |
| Inclusion of purpose-built student accommodation within the threshold assessment would be inconsistent with other emerging policies in the Local Plan Review which support student accommodation in defined locations up to a bed space Cap. This Cap may exceed the 10% threshold. | | |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| HMOs and purpose-built student accommodation have been combined as one. This contradicts schedule 14, para. 4 of the Housing Act 2004 which defines buildings that are not HMOs as including purpose-built student accommodation not provided by educational establishments. On this basis purpose-built student accommodation should not be counted as equivalent HMOs. | When assessing proposals for HMO development the need to consider existing purpose-built student accommodation is based on potentially harmful impacts arising from this form of housing. The legal definition of what constitutes an HMO is not relevant to this consideration. | No amendment made. |
| Should be a blanket ban on HMO proposals in areas where 10% exceeded. | The application of the 10% HMO threshold as set out in the 'Additional guidance' box provides an appropriate level of flexibility. | No amendment made. |
| Should also apply the 10% threshold assessment at street level. | The explanatory text to policy <i>DM2: Residential Sub-division, Shared and Specialist Housing</i> also expects analysis to be undertaken at street level. This is explained under section 4.2 <i>HMO Threshold (Neighbourhood level)</i> . | No amendment made. |
| 3.2 What is a Good Standard of Accommodation | | |
| Proposals for new HMOs and student developments should be required to have a proper window rather than just a skylight in each bedroom. | The use of additional relevant policies that consider outlook and daylight have been referenced. | Amendment made to section 2.2 <i>Policy Context</i> under sub-section <i>Local</i> to indicate the use of additional policies set out in relevant sections. New sub-section <i>Outlook and Privacy</i> inserted under section 3.2 <i>What is a Good Standard of Accommodation</i> to cover Local Plan policies relating to outlook and privacy. |
| All HMOs should be provided with communal space. | Requirements for communal space (where provided) are set out at <i>Appendix B: Guideline Minimum Room Size Standards for HMO Development</i> . | No amendment made. |
| Further quality standards should be included. | Additional guidance has been included. | New sub-section <i>Outlook and Privacy</i> inserted under section 3.2 <i>What is a Good Standard of Accommodation</i> to cover Local Plan policies relating to outlook and privacy. |
| The draft SPD should also provide guidance on adaptable layouts to allow for future conversion to a standard dwellinghouse layout. | Consideration of adaptability and flexibility of layouts is clearly referenced in section 3.2. <i>What is a Good Standard of Accommodation</i> and sub-section <i>Internal Living Space</i> . | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| Further requirements could include security standards and standards relating to provision and quality of shared facilities. | Consideration of security and other matters are clearly referenced in section 3.2. <i>What is a Good Standard of Accommodation</i> . | No amendment made. |
| Internal Living Space | | |
| Clarification needed on whether Internal Living Space standards also apply to purpose-built student accommodation. | The draft SPD only provides guidance on Local Plan policies relevant to managing the development of HMOs. | No amendment made. |
| One person/multi-person bedroom sizes small but acceptable provided the general condition/facilities are good and appropriate space provided elsewhere. | The proposed minimum room size standards are consistent with those applied by Bristol City Council to licensable HMO properties and are therefore considered appropriate to meet the requirement of policy <i>BCS18: Housing Type</i> . The bedroom size standards for licensable HMO properties are specified in relevant legislation. | No amendment made. |
| The proposed standards for internal living space are below the nationally described space standard and should not be applied to permanent accommodation. The standard should be significantly raised. | | |
| Welcomes additional guidance on internal living space but standards set out in Appendix B should be requirements. | | |
| The room size standards for internal living space are too small. | | |
| The room size standards should take account of furniture provision. | | |
| Text relating to <i>Internal Living Space</i> and Appendix B should be amended to reflect potential future changes to the standards. | Clarification has been provided. | Amendments made to section 3.2 <i>What is a Good Standard of Accommodation under Internal Living Space</i> and to 'Additional guidance' box, section 4.3 <i>Achieving a Good Standard of Accommodation</i> and to Appendix B to allow for future changes to the standard. |
| Cycle and Car Parking | | |
| Section on cycle and car parking should also provide guidance to prevent the use of front gardens as parking to the detriment of the street scene. | Additional appropriate guidance has been provided relating to the use of front gardens for parking. | Additional text to section 3.2 <i>What is a Good Standard of Accommodation under Cycle and Car Parking</i> to cover creation of off-street parking spaces. |
| The parking standards referred to do not provide criteria for HMOs above 6 people. | Clarification has been provided. The general principles of policy <i>DM23: Transport Development Management</i> in relation to <i>Parking and Servicing</i> will apply | Additional text to section 3.2 <i>What is a Good Standard of Accommodation under Cycle and Car Parking</i> to clarify use of parking standards. |

| Main issues raised | How issues have been addressed | |
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| | to all HMOs. | |
| Existing/new HMO occupiers should not be eligible for a parking permit within a residents' parking scheme area. | A link to further information has been provided. | Amendment made to section 3.2 <i>What is a Good Standard of Accommodation under Cycle and Car Parking</i> to provide link to further information on parking permit restrictions. |
| New HMOs should be limited to two parking permits within a residents' parking scheme area. | | |
| Student HMO occupiers who do not pay Council Tax should not be eligible for a parking permit within a residents' parking scheme area. | | |
| HMO proposals should only be approved where there is a residents parking zone. | | |
| Permits for new HMOs should be limited to ease parking congestion. | | |
| Covered and secure bicycle stores should be installed by the Council in areas with high concentrations of shared houses, bedsits and student accommodation. | Policy requirements relating to cycle parking are set out in section 3.2 <i>What is a Good Standard of Accommodation under Cycle and Car Parking</i> . | No amendment made. |
| Refuse and Recycling Storage | | |
| Document needs greater focus on waste and recycling management issues. | The draft SPD refers to current policy requirements relating to refuse and recycling storage and associated guidance <i>Waste and Recycling: Collection and Storage Facilities - Guidance for developers, owners and occupiers</i> which sets out in greater detail the provisions for residential development which includes HMOs. General waste capacities set out in the policy and guidance may be increased subject to occupant numbers. | No amendment made. |
| Draft SPD should require development to provide sufficient space for the storage of refuse and recycling containers off the pavement/road. | | |
| The waste and recycling guidance note referred to does not provide specific guidance on HMOs. | | |
| Stricter requirements needed for refuse and recycling such as waste management contracts. | | |
| HMOs are currently provided with the same refuse/recycling storage capacity as C3 dwellings. This should be increased. | | |
| Waste management problems are due to limited refuse capacity/collection. | | |
| 4. Assessment of Planning Applications | | |
| Further clarification required on how the sandwich and threshold assessments can be applied to proposals for the intensification of existing HMOs. | Clarification has been provided on the sandwich assessment. The application of the threshold assessment to proposals for the intensification of existing HMOs | Amendment made to section 4.1 <i>Sandwiching (Street level)</i> to clarify application of sandwich assessment to proposals for the intensification of existing houses in multiple occupation. |

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| | is clearly stated in sections 3.1 <i>What is a Harmful Concentration</i> and 4.2 <i>HMO Threshold (Neighbourhood level)</i> . | |
| The HMO sandwich and threshold assessment do not address the wider socio-economic impacts of HMOs e.g. detriment to community services/facilities such as shops, entertainment and transport. A third indicator of socio-economic harm is required. | The draft SPD can only provide guidance on Local Plan policies relevant to managing the development of HMOs. The principal policy used to assess proposals <i>DM2: Residential Sub-divisions, Shared and Specialist Housing</i> does not require consideration of socio-economic factors. | No amendment made. |
| 4.1 Sandwiching (Street level) | | |
| Further clarification required on how the HMO sandwich assessment is applied to development within existing single buildings that have been sub-divided into separate residential units. All scenarios described should be shown under Fig. 3. | Clarification has been provided on the sandwich assessment. | Amendment made to section 3.1 <i>What is a Harmful Concentration</i> under <i>Sandwiching (Street level)</i> linking guidance set out in 'Additional guidance' box to detail provided at section 4.1 <i>Sandwiching (Street level)</i> . Amendments made to Section 4.1 <i>Sandwiching (Street level)</i> to provide further clarification of sandwiching assessment. <i>Fig. 3: Sandwich Assessment - Worked Examples</i> expanded to show further sandwiching situations. |
| Sandwich assessment needs to be applied vertically within individual buildings to avoid locating HMOs above and below dwellings. | | |
| HMO sandwich assessment could include 2 adjacent properties sandwiched between 2 HMOs. | | |
| An HMO threshold level of 10% to 20% should be set within subdivided buildings. | | |
| The text should provide detail on the lower illustration in Fig.3 which shows that a lane would be disregarded in the application of the sandwich assessment. All breaks in building line will need to be defined in the text. | | |
| The proximity of purpose-built student accommodation should be taken into account. | Amended guidance has been provided on how potential harmful impacts arising from this form of housing should be considered when assessing proposals for HMO development. The proposed SPD does not provide guidance on existing or emerging policies covering the development of purpose built student accommodation. | New section 4.4 <i>HMOs and Purpose-built Student Accommodation</i> inserted to cover consideration of the impacts of concentrations of purpose-built student accommodation. |
| 4.2 HMO Threshold (Neighbourhood level) | | |
| Published evidence/justification for the 100 metre radius is required. | An evidence paper explaining the selection of 100 metres as the radius distance used in the HMO | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | threshold assessment has been published alongside the proposed SPD. | |
| Need to be more precise on the types of development that will be counted as equivalent HMOs rather than stating 'student bed spaces'. | <p>For clarity/transparency the HMO threshold calculation must be based on likely operational HMOs only and verified by relevant, reliable and up-to-date data sources. For these reasons the HMO datasets only include licensed HMOs and planning permissions for HMOs that are not licensed. The data sources are clearly set out in section 4.5 <i>Information on Datasets</i>. The extent of verifiable data on HMOs is expected to increase over time.</p> <p>Amended guidance has been provided on how potential harmful impacts arising from purpose-built student accommodation should be considered when assessing proposals for HMO development.</p> | <p>New section 4.4 <i>Additional Considerations</i> inserted to cover consideration of the impacts of concentrations of purpose built student accommodation.</p> |
| Should state that hostels and larger HMOs with a Sui Generis planning use class will be counted as part of the threshold assessment approach. | | |
| Clarification is needed on whether all types of accommodation defined as HMOs in section 2.1 are counted in the threshold assessment. This will include some buildings converted into self-contained flats that are legally defined as HMOs. Where these units are counted a higher threshold could be used. | | |
| The threshold assessment should also include properties that are short-term let. | | |
| The threshold assessment should also include non-HMO properties that are let to less than 3 students. | | |
| Clarification required on how student bed spaces are counted as equivalent HMOs as part of the threshold approach. | <p>Purpose-built student accommodation has been removed from the HMO threshold calculation. Amended guidance has been provided on how potential harmful impacts arising from this form of housing should be considered when assessing proposals for HMO development.</p> | <p>Amendments made to sections 1.1 <i>Purpose and Scope</i>, 3.1 <i>What is a Harmful Concentration</i> under <i>HMO Threshold Assessment (Neighbourhood level)</i>, 4.2 <i>HMO Threshold Assessment (Neighbourhood level)</i> and 4.5 <i>Information on Datasets</i> under <i>Student Bed Spaces</i> to reflect removal of purpose built student accommodation from the HMO threshold calculation.</p> <p>New section 4.4 <i>HMOs and Purpose-built Student Accommodation</i> inserted to cover consideration of the impacts of concentrations of purpose-built student accommodation.</p> |
| Purpose-built student accommodation should be counted as more than one equivalent HMO. Suggestions of one HMO for every 4 or 5 bed spaces. | | |
| Larger HMO and student accommodation should still be counted as part of the HMO threshold assessment where the property boundary is within 100m radius but the property point falls outside. | The HMO threshold calculation can only count HMO property points. Whilst purpose-built student accommodation has been removed from the HMO threshold calculation it is separately counted to inform the assessment of proposals for HMO development. This count is based on any part of the boundary of a | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | purpose-built student accommodation development falling within the 100 metre radius. | |
| A further threshold assessment across a wider geographical area or at ward level as identified in policy DM2 should be considered. Reasons given include: A more effective approach; Will take account of the wider cumulative impact of HMOs; Will help to redress imbalances of HMOs. Suggestions that this should be set between 200m to 500m. | The street level assessment (sandwiching between HMOs) and neighbourhood level assessment (percentage of HMOs within 100 metres) are considered appropriate and sufficient to determine the likelihood of a harmful concentration. Concentrations of HMOs beyond the street/neighbourhood level are less likely to have any measurable impacts. | No amendment made. |
| The existing HMO threshold radius should be extended. Reasons given include: Will take account of impacts of HMOs beyond the 100m radius; Will more effectively prevent additional HMOs being developed in small areas of low concentration that lie between areas of high concentration. Suggestions that this should be set between 150m and 500m. | | |
| Consideration should be given to different radius distances based on the characteristics of the locality. | | |
| A smaller radius distance of 50m could allow for higher concentrations of HMO development in areas less suitable for family housing. | | |
| Further detail needed to explain the HMO threshold Test. Clarification required on: Whether all HMOs are counted within the 100m radius; How HMOs are counted, including different sized HMOs; How the threshold assessment takes account of buildings converted into multiple HMOs. | The HMO threshold calculation counts all individual HMOs that are licenced or are un-licenced but with planning permission. This includes all HMOs within converted buildings where data is available. This is clearly explained in <i>section 4.5 Information on Datasets</i> . | Amendments made to section 4.2 <i>HMO Threshold Assessment (Neighbourhood level)</i> and <i>Fig.4: HMO Threshold Assessment - Worked Example</i> to further clarify the HMO threshold assessment and the calculation underlying it. |
| Fig.4 shows the general concept of the threshold assessment but does not accurately explain the calculation underlying it which could be misleading. A note is required for clarification. | Further clarification has been provided on the HMO threshold assessment and the calculation underlying it. | |
| Further detail needed to explain the outcome of applications where the 10% threshold is exceeded. | This is clearly set out in sections 3.1 <i>What is a Harmful Concentration</i> and 4.2 <i>HMO Threshold (Neighbourhood Level)</i> which explain that proposals for HMO Development where the 10% threshold is reached or exceeded are, where relevant, unlikely to be consistent with Local Plan policies. | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| Guidance relating to the intensification of existing HMOs should be provided. | The application of the threshold assessment to proposals for the intensification of existing HMOs is clearly explained in sections 3.1 <i>What is a Harmful Concentration</i> and 4.2 <i>HMO Threshold (Neighbourhood level)</i> . | No amendment made. |
| If the Local Land and Property Gazetteer is publicly available this should be referenced in the text. | The Local Land and Property Gazetteer (LLPG) is not publicly available. | No amendment made. |
| Consideration is needed on whether applications in an area where the 10% threshold has not been reached will be determined in order of receipt to ensure fairness. A delay to an application may result in refusal where the threshold is reached prior to its determination as a result of planning permissions given to subsequent applications. | Unlikely that two or more applications would be submitted in short succession and within overlapping radii. Where this does occur the harmful impact of exceeding the 10% threshold by a small margin would need to be considered. | No amendment made. |
| 4.3 Achieving a Good Standard of Accommodation | | |
| No comments made | | |
| 4.4 Information on Datasets | | |
| Data sources need to be updated regularly/updated more frequently. | The time intervals for updates to the HMO and student bed spaces datasets set out in section 4.5 <i>Information on Datasets</i> are considered appropriate. | No amendment made. |
| HMOs | | |
| The accuracy of the HMO dataset can be increased by including further data. Suggestions include: pending HMO licence/planning applications, Council Tax Class N exemptions, Census data, Electoral Roll data and properties subject to planning and/or licensing enforcement investigations/actions. The current datasets identified in the SPD or shown on Pinpoint underestimate the number of HMOs. | For clarity/transparency the HMO threshold calculation must be based on likely operational HMOs only and verified by relevant, reliable and up-to-date data sources. For these reasons the HMO datasets only include licensed HMOs and planning permissions for HMOs that are not licensed. The data sources are clearly set out in section 4.4 <i>Information on Datasets</i> . | No amendment made. |
| Concerns that HMO dataset accuracy will decline when Bristol City Council additional licensing scheme ceases in mid 2024. Suggestions that consideration is given to other data sources to maintain long-term accuracy including Council Tax Class N exemptions and 2021 Census data, or, that all planning permissions are included in datasets for unlicensed properties. | The Council's licensing and planning teams work together to ensure all relevant HMO properties are licensed and have planning permission or are otherwise authorised under planning. This ensures that HMO properties continue to be counted when licences expire. | |
| A requirement to submit a Certificate of Lawful Use application (or other appropriate application) could be imposed where an HMO licence is granted within an Article 4 Area to improve HMO dataset accuracy/ensure | The extent of verifiable data on HMOs is expected to increase over time. | |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| <p>permanent recording of HMOs when licenses expire.</p> <p>Data held by licensing and planning authorities should be the same.</p> <p>Should also include datasets on other shared housing, as set out in policy DM2, such as buildings owned by public sector bodies including bail hostels which may be exempt from licensing or other forms of accommodation including short-term lets.</p> | | |
| <p>Information should be provided on how residents/communities can input into HMO data sources.</p> | <p>Residents/communities can provide information on alleged unauthorised/unlicensed HMOs through the Council's enforcement processes. Details of how to contact the Council's enforcement teams have been provided.</p> | <p>New sub-section <i>6.4 Reporting a Breach of Planning or Licensing Rules</i> inserted to cover enforcement issues.</p> |
| <p>A subdivided building where one residential unit is occupied as an HMO should be counted as a single HMO use for the entire building. This will prevent new HMOs within subdivided buildings and strengthen the HMO sandwich approach.</p> | <p>The method of calculating the proportion of dwellings that are occupied as HMOs set out in section <i>4.5 Information on Datasets</i> is considered accurate and appropriate.</p> <p>Clarification has been provided on the sandwich assessment.</p> | <p>Amendment made to section <i>3.1 What is a Harmful Concentration under Sandwiching (Street level)</i> linking guidance set out in 'Additional guidance' box to detail provided at section <i>4.1 Sandwiching (Street level)</i>.</p> <p>Amendments made to Section <i>4.1 Sandwiching (Street level)</i> to provide further clarification of Sandwiching assessment.</p> <p><i>Fig. 3: Sandwich Assessment - Worked Examples</i> expanded to show further sandwiching situations.</p> |
| <p>Clarification required on whether HMO threshold assessment relies on Pinpoint datasets or data from other sources.</p> | <p>The datasets used in the threshold assessment set out in section <i>4.5 Information on Datasets</i> will all be available to view on Pinpoint. This has been clarified.</p> | <p>Amendments made to section <i>4.5 Information on Datasets</i> under <i>Pinpoint</i> to clarify publicly available datasets.</p> |
| <p>Retrospective applications for HMOs should not be permitted if the 10% threshold has been reached.</p> | <p>All retrospective applications for HMOs must be determined in accordance with relevant Local Plan policies supported by guidance in the draft SPD.</p> | <p>No amendment made.</p> |
| <p>Datasets should not be in the public realm to protect targeting of individual properties for burglary.</p> | <p>The Council is legally required to make available information on planning permissions and HMO licensed properties.</p> | <p>No amendment made.</p> |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| Student Bed Spaces | | |
| Smaller student accommodation of less than 3 bed spaces that are not defined as HMOs should be included within the dataset. | Smaller student accommodation where known is included within the student bed space dataset as explained in section 4.5 <i>Information on Datasets</i> . | No amendment made. |
| The annual Residential Development Survey needs to be published. | The residential Development Survey is published annually. A link to the document has been provided. | Amendment made to section 4.5 <i>Information on Datasets</i> under <i>Student Bed Spaces</i> providing link to current Residential Development Survey. |
| Suggestions for the method of counting student bed spaces as equivalent HMOs include: Cluster flats within purpose-built student accommodation counted as individual HMOs; 4/5 bed spaces within purpose-built student accommodation counted as a single HMO. | Purpose-built student accommodation has been removed from the HMO threshold calculation. Amended guidance has been provided on how potential harmful impacts arising from this form of housing should be considered when assessing proposals for HMO development. | Amendments made to sections 1.1 <i>Purpose and Scope</i> , 3.1 <i>What is a Harmful Concentration</i> under <i>HMO Threshold Assessment (Neighbourhood level)</i> , 4.2 <i>HMO Threshold Assessment (Neighbourhood level)</i> and 4.5 <i>Information on Datasets</i> under <i>Student Bed Spaces</i> to reflect removal of purpose built student accommodation from the HMO threshold calculation. New section 4.4 <i>HMOs and Purpose-built Student Accommodation</i> inserted to cover consideration of the impacts of concentrations of purpose-built student accommodation. |
| Pinpoint | | |
| Data on Pinpoint must be kept up-to-date. | The time intervals for updates to the HMO and student bed spaces datasets set out in section 4.5 <i>Information on Datasets</i> are considered appropriate | No amendment made. |
| 5. Submission requirements for applicants | | |
| Submission requirements will not apply to prior approval applications. | Prior Approval applications are not required for any HMO development. | No amendment made. |
| 6. Other considerations | | |
| Should be links to the University of Bristol. | Not relevant to the draft SPD. | No amendment made. |
| HMO Licences | | |
| Proposals for new HMOs must gain planning permission and comply with conditions before any licence is issued. | The planning status of an HMO cannot be considered when making a decision on whether to grant or refuse a property licence. However, planning is referred to in the formal licence letter. | Amendments made to section 6 <i>Other Matters</i> under <i>HMO Licences</i> providing clarification and link to further information. |
| Should explain how HMO licensing relates to planning requirements. | | |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| | Clarification and links to further information have been provided. | |
| Mandatory licensing should be extended to all HMOs. | The criteria for mandatory licensing are set at the national level. Bristol City Council has introduced additional licensing schemes for HMOs and selective licensing schemes for non-HMOs in certain areas of the city. Links to further information have been provided. | Amendments made to section 6 <i>Other Matters</i> under <i>HMO Licences</i> providing link to further information. |
| All rental properties and landlords should be licensed, not just HMOs. | | |
| Holding an HMO licence should be conditional on provision and satisfactory management of adequate recycling facilities. | HMO licence holders must provide suitable facilities for the storage and disposal of refuse and recycling in accordance with the Council's waste and recycling collection requirements as a condition of their licence. | No amendment made. |
| HMO licenses should only be issued where a waste management strategy is in place. | | |
| Property licence fees expensive in Bristol compared to other local authorities. Should be standardised across all local authorities in England. | Local authorities have discretion to set their own licence fees. | No amendment made. |
| Property Management | | |
| Landlords/Agents should be required to demonstrate effective ways to manage their properties. Matters suggested include: Transparency of ownership to enable residents to make complaints; Controlling noise and disturbance by tenants; Ensuring appropriate waste management; Providing a named person responsible for problems; Providing a code of conduct for tenants covering noise, waste and community integration; Regular visits to the property to check compliance. Suggestions that this should be secured through the planning or licensing process. | For licensable HMO properties landlords and agents are subject to licence conditions and West of England Code of Good Management Practice requirements relating to the safety, operation and management of their properties. A condition of the licence includes completion of the West of England Landlord Development Programme or other equivalent training. The Council has recently extended the licensing requirement across larger areas of the city. Other relevant HMO licence holder conditions and/or West of England Code of Good Management Practice requirements include provisions relating to: complaints procedures, dealing with any anti-social behaviour, refuse and recycling facilities, terms of occupation for residents and regular property inspections. | No amendment made. |
| Owners of HMOs should be registered. | | |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| <p>The West of England Code of Good Management Practice could be strengthened by:</p> <ul style="list-style-type: none"> • Including a requirement for planning permission and compliance with attached conditions. • Requiring landlords to respond to problems within an appropriate time frame and allowing the response to be assessed by the complainant. This can be used to assess licence renewal applications. • Requiring dedicated spaces for refuse and recycling and instructions on use for tenants. • Requiring noise attenuation requirements for HMO development including: Soundproofing to party walls, fitting of soft closers on doors, laying carpets, better fitting entrance doors, door bells instead of door knockers, sanitary ware located to avoid noise transmission. | <p>Changes to the West of England Code of Good Management Practice would require agreement between all West of England Authorities. The content of the code is considered when legislative changes occur and when new discretionary licensing schemes are being considered.</p> <p>The planning status of an HMO cannot be considered when making a decision on whether to grant or refuse a property licence. Conditions relating to planning cannot therefore be included within the West of England Code of Good Management Practice. Planning matters are referred to in the formal licence letter.</p> <p>Relevant HMO licence holder conditions and/or West of England Code of Good Management Practice requirements include provisions relating to refuse and recycling facilities and complaints procedures.</p> <p>Sound reduction requirements are set out in Building Regulations Approved Document E - Resistance to the Passage of Sound and are applied where required.</p> | <p>No amendment made.</p> |
| <p>Detail needed on how landlords and HMOs are monitored and how non-compliance with regulations and codes of practice relating to property management are addressed through enforcement processes.</p> | <p>Residents/communities can provide information on alleged unlicensed HMOs or breaches of licensing conditions through the Council's enforcement process. Details of how to contact the Council's relevant enforcement teams have been provided.</p> <p>The Council has undertaken significant work to map HMOs across the city to better understand concentration issues. The Council has and continues to seek to improve co-ordination between teams including Licensing, Development Management, Neighbourhood Enforcement and Waste Management to mitigate potential harmful impacts caused</p> | <p>New sub-section <i>Reporting a Breach of Planning or Licensing Rules</i> inserted under section 6. <i>Other Matters</i> to cover enforcement issues.</p> |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| | by existing HMOs. | |
| Appendix A: Local Plan Policy for HMOs | | |
| Is the policy text incomplete? | The text of the policy has been abridged for relevance. | No amendment made. |
| Appendix B: Guideline Minimum Room Size Standards for HMO Development | | |
| No comments made | | |

| Other Issues Raised | | |
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| Enforcement | | |
| Improvements required to planning enforcement against unauthorised HMOs or breach of planning conditions. Sanctions need to be imposed for non-compliance. Suggestions include revocation of planning permission and financial penalties/compensation for negative impacts. | Residents/communities can provide information on alleged unauthorised/unlicensed HMOs or other breaches of planning/legislative control through the Council's enforcement processes. Details of how to contact the Council's enforcement teams have been provided. The Council has undertaken significant work to map HMOs across the city to better understand concentration issues. The Council has and continues to seek to improve co-ordination between teams including Licensing, Development Management, Neighbourhood Enforcement and Waste Management to mitigate potential harmful impacts caused by existing HMOs. | New sub-section <i>Reporting a Breach of Planning or Licensing Rules</i> inserted under section 6. <i>Other Matters</i> to cover enforcement issues. |
| Concerns that some HMO properties may be immune from enforcement action. Residents should have a say. The draft SPD should cover this issue. | | |
| Improvements required to licensing enforcement against noise and disturbance, poor waste management, poor management and general control over tenants and non-compliance with the Code of Good Management Practice. Sanctions need to be imposed for non-compliance. Suggestions include revocation of licences. | | |
| Bristol City Council enforcement of noise legislation needs to be strengthened. The Neighbourhood Enforcement Team (NET) should be better resourced and processes for reporting and enforcing against noise issue should be reviewed/improved. The current approach results in significant under-reporting of noise nuisance which cannot be relied upon when determining proposals for new HMOs. | | |
| Better collaboration is needed between Council teams dealing with HMOs including Planning, HMO licensing, waste management and noise nuisance teams. Linkages between teams and remits/powers should be clearly communicated. | | |
| Retrospective Applications | | |
| Retrospective planning applications for HMOs should not be allowed. | Retrospective planning applications for HMOs will be accepted where required or | No amendment made. |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| Existing HMOs should not need to apply for retrospective planning permission in areas where the 10% threshold is exceeded. | sought where a breach of planning control requires remedy. | |
| Retrospective planning applications should not be approved unless property has been an HMO for at least 5 years. | All retrospective applications must be determined in accordance with relevant Local Plan policies supported by guidance in the draft SPD. | |
| SPD should be applied to retrospective applications for HMOs. | | |
| SPD will not stop retrospective planning consents being given. | | |
| Addressing existing harmful concentrations | | |
| <p>Draft SPD does not address problems with existing properties sandwiched by HMOs.</p> <p>SPD should identify actions needed to help communities already affected by harmful concentrations of HMOs. Suggestions for actions include mapping harmful concentrations and reviewing measures to reduce concentrations/mitigate harms.</p> <p>Draft SPD too late to address existing HMO concentrations.</p> | <p>The draft SPD is only relevant to HMO development proposals.</p> <p>The Council has undertaken significant work to map HMOs across the city to better understand concentration issues. The Council has and continues to seek to improve co-ordination between teams including Licensing, Development Management, Neighbourhood Enforcement and Waste Management to mitigate potential harmful impacts caused by existing HMOs.</p> | |
| Noise reduction | | |
| <p>HMO development proposals should include noise attenuation measures to reduce noise impact. This should be secured or referenced through the draft SPD. Measures suggested include: Sound proofing measures to party walls and floors; Use of soft-closers on internal doors and external doors; Replacement of door knockers with doorbell/keyless systems; Sound-deadening material on stair treads; Location/design of bathroom sanitary ware to avoid noise transmission through party walls; Plan layouts that avoid positioning of communal rooms opposite bedrooms in adjoining properties and restriction of access to elevated external areas (i.e. balconies, roofs).</p> <p>SPD could require attachment of a noise insulation condition to any planning permission given. Such conditions have already been used and require a scheme of noise insulation measures to be submitted and approved.</p> | Further appropriate guidance on sound reduction measures has been provided. | New sub-section <i>Sound Reduction Measures</i> inserted under section 6. <i>Other Matters</i> to cover sound reduction measures. |

| Main issues raised | How issues have been addressed | |
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| | Response | Changes to document |
| New HMOs should comply with Building Regulations Approved Document E - Resistance to the Passage of Sound. | | |
| Other considerations | | |
| Proposals for HMOs should retain/protect front gardens. Reasons provided include preservation of wildlife corridors. | Additional appropriate guidance has been provided relating to the use of front gardens for parking. | Additional text to section 3.2 <i>What is a Good Standard of Accommodation under Cycle and Car Parking</i> to cover creation of off-street parking spaces. |
| Properties should revert to C3 use when sold or not in use. | Not possible under current Planning Law. | No amendment made. |
| Rents in areas should be capped to disincentivise conversion of properties to HMOs. | Not relevant to the draft SPD. | No amendment made. |
| The draft SPD should take account of areas that may be more vulnerable to the impact of HMOs. | The guidance provided in the draft SPD is appropriate across the city. | No amendment made. |
| Financial inducements should be offered to return HMOs to family homes. | Formal processes are used by the Council to control/manage HMOs in the city. | No amendment made. |
| Lobbying needed for legislative changes to achieve greater control over existing and proposed HMOs. | Legislative changes that improve the Council's ability to manage HMOs are supported. The Council has and continues to engage with relevant Government departments on HMO matters. | No amendment made. |

Appendix A: List of organisations consulted

Bristol Local Plan Stakeholder Contact List

| | | |
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| 20th Century Society, The | Avon Area Ramblers | BDP |
| A2Dominion | Avon Badger Group | Bedminster Down and Uplands Society |
| Abbots Leigh Parish Council | Avon Bat Group | Bedminster Energy Group |
| Acorn | Avon Capital Estates 1 LLP | Bedminster Green Campaign |
| ACTA Community Theatre | Avon Fire and Rescue | Bell Cornwell LLP |
| Action for Balanced Communities | Avon Fire Authority, Fire Brigade Headquarters | Bellway Homes Ltd |
| Adblock Bristol | Avon Gorge and Downs Wildlife Project | Bishopston Society |
| AEK-BOCO Football Club | Avon Local Councils Association | BL Flooring Supplies Ltd |
| Alastair Sawday Publishing | Avon RIGS Group | Black Box Planning Ltd |
| Alder King | Avon Wildlife Trust | Black South West Network |
| Allied Welsh Ltd | Avonmouth Planning and Liaison Group | Bloor Homes |
| Almondsbury Parish Council | Avonmouth Planning Group | BME Voice |
| Ambition Lawrence Weston Neighbourhood Planning Forum | Awaz Utoah Raise your voice | BNP Paribas Real Estate UK |
| Ancient Monuments Society | BAE Systems | Bobbetts Mackan Solicitors |
| AP Redfearn Consultancy Ltd | Barcan+Kirby | BOC |
| Apsley House Capital | Barefoot Power UK | Bond Dickinson |
| Architecture Centre, The | Barnardos, New Fulford Family Centre | Bovis Homes |
| Arnos Vale Residents Association | Barratt Homes | Bower Ashton Residents Association |
| Ashley Vale Action Group (AVAG) | Barton Willmore Partnership | Braboco Limited |
| Ashton Gate Ltd | Bath and North East Somerset Council | Branchwalkers Tree Services |
| Aspect360 Ltd | Battrick Clark Solicitors Ltd | BREEAM Communities |
| Avon and Somerset Constabulary | BBA Architects and Planners | Bridgend County Borough Council |
| Avon and Somerset Police Commissioner | BCC | Bright Design Workshop |
| | | Bright Green Futures |

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| Brislington Conservation and History Society | Bristol Malayalee Cricket Club | Canal and River Trust |
| Brislington Cricket Club | Bristol Muslim Cultural Society | Cardiff Council |
| Bristol Airport | Bristol Neighbourhood Planning Network | Carter Jonas LLP |
| Bristol Alliance | Bristol Ornithological Club (BOC) | Castle Park Users' Group |
| Bristol and Glos Archaeological Society | Bristol Parks Forum | Cater Business Park |
| Bristol Association of Restaurants, Bars and Independent Establishments | Bristol Port Company, The | Cavanna Partnership |
| Bristol Avon Catchment Partnership | Bristol Pound CIC | CBRE |
| Bristol Campaign Against High Rises, The | Bristol Property Agents Association | CBRE CB Richard Ellis Ltd |
| Bristol Carpet Manufacturing Co Ltd | Bristol Regional Environmental Records Centre | CBRE Investors |
| Bristol Civic Society | Bristol Tree Forum | CCH planning group |
| Bristol Community Accountancy Project | Bristol Urban Design Forum | Census Investments |
| Bristol Energy Network | Bristol Walking Alliance | Centre for Sustainable Energy |
| Bristol Environment Trust | Bristol Water plc | CEREP Redcliffe Sarl |
| Bristol Environmental Technologies and Services | Bristol Women's Voice | Chandos Neighbourhood Association |
| Bristol Film Office | Bristol Wood Recycling Project | Chest Properties Ltd. |
| Bristol Food Policy Council | Bristol Zoo Gardens | Chew Valley Lake Art Studio |
| Bristol Friends of the Earth | Bristol@Night subgroup | Chilworth Properties Ltd |
| Bristol Green Capital Momentum Group | Brooks Planning Group | Chipping Sodbury Cricket Club |
| Bristol Green Capital Partnership | Brymain Investments Ltd | Christmas Steps and St Michaels Association |
| Bristol Green Party Climate Emergency Policy and Action Group | BS10 Parks and Planning group | Christmas Steps Arts Quarter |
| Bristol Housing Festival, The | BS3 planning group | Church Road Action Group (CRAG) |
| Bristol Industrial Archaeological Society (BIAS) | BuroHappold Engineering | Circomedia |
| | Bush Consultancy, The | City Academy |
| | Business West | City Farms and Community Gardens |
| | Byron Place Residents Association | City of Bristol College |
| | c/o Plan EL | City Office, The |
| | | Cityscape |

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| Civic Planning and Design Group | Community Led Housing West | David Ames Associates |
| Civil Aviation Authority | Connolly & Callaghan Group | David Cahill Design Consultant |
| Civil Service Pensioners Alliance | Conservation Advisory Panel | David James and Partners |
| CJH Land | Cooke Painter Ltd Solicitors | David Lock Associates Ltd |
| Clarke Willmott | Co-op, The | David Wilson Homes |
| Clifton & Hotwells Improvements Society CHIS | Co-operative Food Property, The | Day Group Limited |
| Clifton College | Cote Charity | DC Planning Ltd |
| Clifton Design and Draw | Cotham School | Deeley Freed Estates Ltd |
| Clifton Down Community Association | Council for British Archaeology | Deeley Freed Group |
| Clifton Down Residents Association | Counterslip Baptist Church | Defence Infrastructure Organisation |
| Clifton Down Shopping Centre | CPG South East Limited | DEFRA |
| Clifton Maybank Developments | CPRE Avonside | Department for Culture, Media and Sport |
| Coal Authority | Cranbrook Road Allotments | Department for Work and Pensions |
| Collier Planning | Creative Youth Network | Design Council, The |
| Colliers International | Crest Nicholson (South West Ltd) | Destination Bristol |
| Collins and Coward Ltd | Crest Nicholson Regeneration | DGLG |
| Colston Estate Community Association | Crest Strategic Projects | Dings Community Association |
| Combe Dingle Conservation Group | Cribbs Mall Nominee (1) & Cribbs Mall Nominee (2) Ltd, John Baylis Limited & Baylis Estates Ltd | Diocesan Board of Finance |
| Commercial Land | Crown Estate Office | Disability Equality Forum |
| Commission for Race Equality (CORE) | CSJ Planning Consultants Ltd | Disability Forum - Bristol Physical Access Chain |
| Community at Heart Neighbourhood Planning Group | Cubex Land Limited | Disabled Travel Service |
| Community Energy Working Group | Curo Group | Dittrich Hudson Architects |
| Community in Partnership | Cushman and Wakefield | DLP Consultants |
| | D2 Planning Limited | DMS Consulting |
| | Dalton Warner Davis | Downend and Bromley Heath Parish Council |
| | Dandara Limited | DPP planning |

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| Dreamabstract | European Movement - Bristol Branch | Friends of Crow Lane Open Spaces (FOCOS) |
| DSG Building Services | | |
| Dundry and Hartcliffe Wildlife Conservation group | Extinction Rebellion | Friends Of Dundry Park Chairman |
| Dundry Parish Council | FA Bartlett Tree Expert Co Ltd, The | Friends of Hebron Burialground |
| Dundry View Neighbourhood Partnership Pride of Place Environmental Sub-group | Federation of City Farms and Community Gardens | Friends of Lamplighter's Marsh |
| | Federation of Small Businesses | Friends of Okebourne |
| Dusk Til Dawn | Feilden Clegg Bradley Studios | Friends of St Andrews Park |
| E & S Bristol | Fifth Capital London Ltd | Friends of St George Park |
| Eagle Land Limited | Filton Town Council | Friends of Stockwood Open Spaces |
| East Bristol Advice Centre | Finzels Reach LLP | Friends of Stoke Lodge |
| Easton and Lawrence Hill Neighbourhood Management | Firmstone Consortia One Ltd | Friends of Suburban Bristol Railways |
| Easton and Lawrence Hill Planning Group | First Fox Architecture | Friends of the Avon New Cut |
| Easton Community Centre | First Group | |
| Easton Cowboys Cricket Club | FirstPlan Ltd | Friends of the Downs and Avon Gorge |
| Easton Planning Group | Fishponds Co-Build | Friends of the Earth |
| Eco Futures | Fishponds Planning | Friends of Troopers Hill |
| Ecomotive Housing | Folland Ltd | Friends, Families and Travellers |
| EconetiQ | Forestry Commission England | |
| Edward Ware Homes | Frenchay Cricket Club | Further and Higher Education |
| EE | Frenchay Village Museum | Fusion Online Limited |
| Electrical Consulting Ltd | FREP (Knowle) Ltd | Fusion Planning Consultants |
| Ellis and Co Chartered Building Surveyors | Friends of Avon New Cut (FrANC) | Galleries, The |
| Elmgrove Centre, The | Friends of Badock's Wood | Galliford Try Partnerships |
| Enfusion | Friends of Bellevue & Albion Road Park | Gardens Trust, The |
| Enterprise Allotments | Friends of Blaise | Gareth Jones Traditional Fitted Furniture |
| Environment Agency | Friends of Brandon Hill | GCP Chartered Architects |
| Environment Agency (SEA/SA) | Friends of Callington Road Nature Reserve | Georgian Group, The |
| | | Ginkgo Projects Ltd |

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| GL Hearn Limited | Hannick Homes & Developments Ltd | Hoddell Associates |
| Gladman | | Holy Nativity |
| Gladman developments | Hartcliffe & Withywood Community Partnership | Home Builders Federation |
| Glassboat | Hartcliffe & Withywood Pride of Place Group | Homes and Communities Agency |
| Gleeds (Bristol) | | |
| Globe House Limited | Hartcliffe and Withywood Ventures | Hoos Construction Ltd |
| | | Hopwood and Swallow |
| Gloucestershire County Council | Hartcliffe Community Campus | Horfield |
| | Hartnell Taylor Cook LLP | |
| Goadsby and Harding Commercial | Hartwell Plc, CgMs Consulting | Horfield A Allotments |
| | | Horfield and District Allotments Association |
| Golden Hill | HAVEN (Health for Asylum Seekers) | |
| Graham Moir Associates | Health & Safety Executive | Horfield Community Association |
| Greater Fishponds Area Partnership Planning Sub Group | Healthwatch Bristol | Horfield Residents against Stadium Expansion (ROSE) |
| | Heaton Planning Ltd | |
| Greater Fishponds Area Residents Planning Group | Henbury and Brentry Community Council | Horfield Rose |
| Greater Fishponds Area Residents Planning Group | Henbury Conservation Society | Hotwells and Cliftonwood Community Association |
| Green Future Associates | Hengrove & Whichurch Park Neighbourhood Planning Forum | Hotwells and District Allotments Association |
| Green Party - Bristol | | Housing Strategy Group |
| Green Party - Bristol West | Hengrove and Whitchurch Park NDF | Hughes Enterprise Law Practice |
| Green Path Investments Ltd | | |
| Gregg Latchams Solicitors | Henleaze Society | Hughes Property |
| GVA | High Kingsdown | Humdard |
| GVA Grimley | Highbury Residents Association | Humphreys and Co. |
| Habinteg Housing Association | Highridge Forum Community Association | Hutchinson Legal & Associates Limited |
| Hallam Land Management Ltd | | I.R.I.S |
| Hampton Park and Cotham Hill Community Group | Highways England | Idapt Design Services |
| | Hindu Temple, The - Bristol | |
| Hanham Abbots Parish Council | Historic England | Industrial Agents Society |
| Hanham Parish Council | Hoare Lea | Industrial Properties (Barton Hill) Ltd |

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| Initiative Homes Ltd | Kingswood Community Association | Lawrence Weston Neighbourhood Planning Forum |
| Inscape Architects | | |
| Institute of Directors | Kirkwells - Town Planning and Sustainable Development Consultants | Lawrence Weston Neighbourhood Planning Group |
| Ironmould Tynning | | |
| Jehu Group | Knight Frank Investment Management | LB Planning |
| JFL Planning Consultants | Knightstone (Arcadia) Housing Association | Legal and General Property Ltd |
| JMS Property Management & Building Consultancy | Knowle Cricket Club | Leith Planning |
| John Alison Land and Research Ltd | Knowle Planning Group | Leung & Co. Solicitors |
| John Hodge Solicitors Bristol | Knowle West Area Neighbourhood Planning Forum | LexisNexis |
| John Iles Associates | | LGBT Bristol |
| John Lysaght Properties Ltd | Knowle West Area Neighbourhood Planning Forum | Lichfields |
| John Page Architects | | Light Rail Transit Association |
| Johnstone Land | Knowle West Future | LiveWest |
| Joint Local Access Forum for BANES, Bristol City and South Glos. JLAF | Knowle West Health Association | Living Easton |
| Jones Day Solicitors | Knowle West Media Centre | Living Heart for Bristol |
| Jones Day Solicitors | Knowle West Residents Planning Group | Local Dialogue |
| Junction Nominee 1 Ltd & Junction Nominee 2 Ltd | Knowle West Area | Locality |
| Key Living Group | KWRPG | Lockleaze Neighbourhood Planning Forum |
| Key Properties Limited | LA 21 Land Use Group | Lockleaze Neighbourhood Trust |
| Key Transport Consultants Ltd | Lambert Smith Hampton | Lockleaze Planning Group |
| Key Transport Consultants Ltd | Land & Buildings Ltd | Lockleaze Resident Planning Group |
| Keynsham Town Council | Landmark Practice, The | Lockleaze Voice |
| Kier Regional Building | Landscape institute South West | London Planning Practice Ltd, The |
| Kingsdown Conservation Group | LaSalle Investment Management | Long Ashton Parish Council |
| Kingsland House Property Management Ltd | Lawrence Hill URC and Methodist Church | Love Food Festival |
| | | Lovell Partnerships Limited |
| | | LPC (Trull) Ltd |

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| Lucy White Planning Limited | Ministry of Defence - Defence Estates Durrington, Planning Policy | National Playing Fields Association |
| Lyons Davidson | | National Trust, The |
| Malago Greenway Team | Ministry of Defence - Defence Estates Ops | Natural England |
| Malago Valley Conservation Group | Ministry of Defence - Defence Procurement Agency | NCP |
| Mall Cribbs Causeway, The | Mobile Operators Association | Neighbourhood Partnership: Ashley/Easton/Lawrence Hill |
| Manor Community | Molesworth Drive Allotments | Neighbourhood Partnership: Brislington/Hengrove/Stockwood |
| Manor Woods Valley Group | Monmouthshire County Council | Neighbourhood Partnership: Cabot/Clifton/Clifton East: Greater Bedminster |
| Marcus Leigh | Montagu Evans LLP | Neighbourhood Partnership: Henbury/Southmead/Fishponds |
| Marine Management Organisation | Montpelier Conservation Group | Neighbourhood Partnership: Henbury/Southmead/Fishponds |
| Marksbury Area Community Association (MACA) | Moon Design and Build | Neighbourhood Partnership: Horfield/Lockleaze/Bishopston/Cotham/Redland |
| Max Fordham LLP | Motorcorner Ltd | Neighbourhood Partnership: Filwood/Knowle/Windmill Hill |
| McCreadies | Multi Faith Forum | Neighbourhood Partnership: Hengrove |
| McDonald's Restaurants Ltd | MWA, 12 The Glenmore Centre | Neighbourhood Partnership: Hengrove |
| Meade King Solicitors | Myrtle Hall C Allotments | Neighbourhood Partnership: Hengrove |
| Meadows Vale Community Centre | Narrowways Trust | Neighbourhood Partnership: Hengrove |
| Meanwhile Creative | Nash Partnership | Neighbourhood Partnership: Hengrove |
| MediaWise Trust, The | Nathaniel Lichfield and Partners | Neighbourhood Partnership: Hengrove |
| Merchants Landing Residents Association | Nathaniel Lichfield and Partners | Neighbourhood Partnership: Hengrove |
| Merlin Housing Society | National Air Traffic Services | Neighbourhood Partnership: Hengrove |
| Metford Road Allotments | National Amusements | Neighbourhood Partnership: Hengrove |
| Michael & Carolyn Baker | National Custom and Self-Build Association | Neighbourhood Partnership: Hengrove |
| Midshires Estates Ltd | National Grid | Neighbourhood Partnership: Hengrove |
| Mike Botta | National Grid Electricity Construction | Neighbourhood Partnership: Hengrove |
| Mike Whitfield Construction Ltd. | National Housing Federation | Neighbourhood Partnership: Hengrove |
| Mina Road Park Group | | Neighbourhood Partnership: Hengrove |
| Ministry of Defence | | Neighbourhood Partnership: Hengrove |

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| Nick Davies Associates | Overseas Chinese Association | Pilning and Severn Beach Parish Council |
| Night Watch | Oxford Architects | Plainview Planning Ltd |
| Nike Group of Companies | P.J Orchard Architects | Plan-EL |
| NJL Consulting | Park and Ride - The Bush Consultancy | Planinfo |
| Noma Architects Ltd | Parliment | Planning Perspectives LLP |
| Norman Associates | Passivhaus Trust | Planning Potential |
| North Bristol Advice Centre | Patchway Cricket Club | Planning Solutions |
| North Bristol NHS Trust | Patchway Town Council | Planning Solutions / Church Road Action Group |
| North Somerset Council | Pattinson Brewer Solicitors | Planning Ventures |
| North Street Traders Association | Paul Kentish and Co | Planware Ltd |
| Northern Slopes Initiative | Peel Holdings | Plummers Hill Allotments |
| Northover Developments Ltd | Peel Investments (UK) Ltd | PMG Services |
| O and H Properties Ltd | Pegasus Group | Polysigns Exhibition and Display |
| O2 - Telefónica UK Ltd | Pegasus Planning Group | Portland and Brunswick Square |
| Oakfield Residents Association | Penrilla Consultants | Portland and Brunswick Square Association |
| Odournet UK | Peoples Republic of Stokes Croft | Positive Impact Community Housing |
| Off Centre Gallery - Check | Perretts Park Allotments | Positive Impact through Community Housing |
| Office of Rail Regulation | Persimmon Homes Ltd | Powell Dobson Urbanists |
| Old Market Community Association | Persimmon Homes Severn Valley | Public Health Bristol |
| Old Market Neighbourhood Planning Forum | Persimmon Homes Wessex | Public Health England South West (North) Health Protection Team |
| Older People's Forum | Peter Evans Partnership | R and J Consultants |
| O'Leary Goss Architects Ltd | PFA Consulting | Rackham Planning |
| One in Eight | PG Group, The | Railfuture |
| Open Spaces Society, The | Philip Clifford Design | Re:Work Ltd |
| Origin 3 Urban Design Group | Phillips Planning and Development Consultants | |
| Origin3 | Pill and Easton-in-Gordano Parish Council | |
| Osborne Clarke | | |

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| Redcatch E Allotments | RSPB | Society for the Protection of Ancient Buildings |
| Redcliff Quarter MCC LLP | RTPI South West | Sofa Project, The |
| Redcliffe Community Forum | Sainsburys Supermarkets Ltd | Somer Housing Group |
| Redcliffe Futures Group | Salecreate Ltd | Somerset County Council |
| Redcliffe Neighbourhood Planning Forum/RRAG | Save Sea Mills Garden Suburb | Soroptimist International of Bristol |
| Redcliffe Parade Environmental Association | Savills | SOS Group (Supporters of Southmead) |
| Redcliffe Way Neighbourhood Planning Forum | Sea Mills and Coombe Dingle Community Action Forum | South Bristol Advice Centre |
| Redland and Cotham Amenities Society | Sea Mills Community Association | South Bristol Business |
| Redland Green Allotments | Sea Mills Signal Station Allotments | South Bristol Stakeholders |
| Redrow Homes | Self Help Community Housing Association Ltd | South Gloucestershire Council |
| Redrow Homes (South West) Ltd | Shakti Imani Inclusion Project | South West Transport Network |
| Regen SW | Shared Care Network | South Western Ambulance Service NHS Trust |
| RIBA SW | Shirehampton Community Action Forum (SCAF) | Southmead Community Association |
| Richard Jones | Shirehampton Greens | Southmead Development Trust |
| Richard Pedlar Architects | Shirehampton Planning Group | Southville Community Development Association Ltd |
| Richmond Area Residents' Association | Shirehampton Public Hall Management Committee | Southville LETS |
| Richmond Terrace Residents Association | Show of Strength Theatre Company | Sovereign Housing Association |
| RNIB South West | Simpson Millar LLP incorporating Foster & Partners | Speedwell Allotments |
| Robert Hitchins Limited | SJ Honeyfield Properties Ltd | Spike Island |
| Rock Community Centre Ltd | SMLP Bristol Partnership | Spitfire Properties LLP |
| Roger Tym and Partners | Sneyd Park Residents Association | Sport England |
| Royal Mail Group Ltd | Snuff Mills Action Group | SPRA and NP |
| Royal West of England Academy (RWA) | Social Economy | Square Bay (Developments) Ltd |
| RPS Group Plc | | SS Great Britain Trust |
| RPS Planning & Development | | SSA Planning Limited |

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| SSA Planning | Stoke Bishop Community Association | Taylor Wimpey UK Limited |
| SSE | Stoke Bishop Planning Panel | TCN |
| St George Community Association | Stoke Bishop Residents Planning Group | TDH Estates |
| St George Community Network planning group | Stoke Gifford Parish Council | Telereal Trillium |
| St George NP Planning Sub Group | Stokes Morgan Planning Ltd | Temple Bright LLP |
| St Joseph Homes Limited | Stonewall | Templegate Training |
| St Joseph's Pre-school | Strategic Land Partnership | Terence O'Rourke Ltd |
| St Mary Redcliffe Church | Stratland LLP | Terramond Ltd |
| St Mary Redcliffe Church | Stratus Environmental Limited | Tetlow King Planning |
| St Mungo's | Stride Brothers Limited | The Westbury on Trym Society |
| St Paul's planning group | Stride Treglown Limited | Theatres Trust, The |
| St Paul's Neighbourhood Management | Summix FRB Developments Ltd | Thingwall Park Allotments |
| St Peters Rise Allotments | Sustainable Bishopston | Thriving South Bristol |
| St Werburgh's Neighbourhood Association | Sustainable Britain Ltd | Thursby Associates |
| St Werburghs City Farm | Sustainable Construction Services | Timsbury Cricket Club |
| St Werburghs Neighbourhood Association | Sustainable Henleaze | Tiny House Community |
| St. Barnabas Church | Sustainable Knowle | Totterdown Childrens Community Workshop |
| St. George's Bristol | Sustainable Redland | Totterdown Residents Environmental and Social Association |
| St. James's Street Property Management | Sustainable Westbury-on-Trym | Touchwood Enterprises Ltd |
| St. Modwen Developments Limited | Sustrans | Transition Bristol |
| Stapleton Allotments Association | Sustrans (South East & South West) | Transport for Greater Bristol |
| Stapleton and Frome Vale Conservation Society | Sutherland Property & Legal Services Ltd | Transport for Greater Bristol Alliance |
| Stapleton Cricket Club | Swanmoor Crescent Allotments | Travel Foundation, The |
| Stewart Ross Associates | T and C Design Services | Tree Aid |
| | Taupo Group Ltd | TRESA Totterdown Residents Environmental and Social Action |
| | Taverners Cricket Club | Trinity Community Arts |

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| Trinity New Town Limited | Voice & Influence Forum (Bristol Disability Equality) | Westbury-on-Trym Society |
| Trustees Lockleaze Sports Ground | Voice & Influence Forum (Bristol Older People) | Western Power Distribution |
| Tuffin Ferraby and Taylor | Voice & Influence Forum (Lesbian, Gay and Bisexual) | WHaM Windmill Hill and Malago community planning group |
| Turley Associates | Voice & Influence Forum (Lesbian, Gay and Bisexual) | White Young Green Planning |
| Tynings Field Allotments | Voice & Influence Forum (Lesbian, Gay and Bisexual) | Willmore Iles Architects |
| UK Green Building Council | Volunteer Tavern | Wilmott Parks Group |
| Unions Out West, South West TUC | Waitrose Limited | Wind Prospect Developments Ltd |
| Unite Students | Wales & West Utilities | Windmill Hill and Malago Community Planning Group (WHaM) |
| United Communities | Walsingham Planning | Windmill Hill and Victoria Park Planning Group |
| University Hospitals Bristol NHS Trust | Wards Solicitors | Windmill Hill Community Association |
| University of Bristol | Watershed Media Centre | Winsor and Leaman Architects |
| University of Bristol Sustainability team | Watkin Jones Group | Winterbourne Cricket Club |
| Urban Tranquillity Development Limited | We Love Stoke Lodge | Winterbourne Parish Council |
| UWE | Welding Industries Ltd | Woodland Trust |
| Vassall Centre Trust | Welsh Government | WOW (Way out West) West St/ South St Park |
| Vattenfall Heat | Wesley Action Group (WAG) | WPB Planning |
| Veale Wasbrough Vizards | Wesley Action Group (WAG) | Wyevale Garden Centres |
| Vence LLP | Wesley SOS | Yarlington Homes |
| Vertigo SDC Limited | Wessex Water | Yew Tree Farm |
| Victoria Hall Management Limited | West of England Centre for Inclusive Living (WECIL), The | YTL Developments (UK) Ltd |
| Victoria Rooms, Department of Music - Bristol University, The | West of England Combined Authority | Savills |
| Victorian Society | West of England Community Homes | ROK Planning |
| Visual Arts South West | West of England Nature Partnership | CPRE Avonside |
| Vivid Regeneration | Westbury Lane United Neighbours | Cater Business Park Business Improvement District |
| Vodafone Ltd | Westbury Park Community Association | |

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| Ian Townsend Consulting | Clifton and Hotwells Improvement Society | Indian Women's Association - SW England |
| Origin3 | | |
| Waddeton Park Limited | College Road Allotments | Irwin Mitchell Solicitors |
| Edison Ford | Dominic Taylor Architecture & Design | Islamic Information Centre Bristol |
| Bellway Homes Limited | Dorset Chamber of Commerce | Kebele |
| Cratus Communications Ltd | Dubbers Lane Allotments | Kersteman Road Allotments |
| Habinteg | Duckmoor Road Residents Association | Kingsweston Preservation Society |
| Felsham Planning and Development | Easton Community Partnership | Lawn Tennis Association |
| Cratus Communications Ltd | Ecovillage Network UK | Layfield Allotments |
| CBRE | Filwood Community Centre | Living Easton |
| Western Power Distribution | First Group | Lockleaze Voice |
| Edgeplan ABC Tree Services | Fortfield Road Allotments | Malcolm X Centre |
| Avon and Somerset Constabulary | Goffenton Drive Allotments | Metford Road Allotments |
| Avonmouth Community Council | Goulston Road Allotments | National Federation of Market Traders |
| Bedminster Down and Uplands Society | Grittleton Road Allotments | National Market Traders Federation - Saint Nicholas Market |
| Bevan Brittan LLP | Gypsy and Traveller Representative | |
| Bristol Mauritian Association | Halcrow Group Limited | National Power plc |
| Bristol Racial Equality Council | Half Acre Lane Allotments | National Romani Rights Association |
| BT Group Plc | Hartcliffe Community Association | New Brooklea Allotments |
| Burges Salmon | Headley Park Community Association | Oatlands Avenue Allotments |
| Canford E Allotments | Hengrove and District Community Association | Office of Rail Regulation |
| Centro Per La Comunita Italiana | Hoddell Associates | Packers Allotments |
| Chalet Gardens Allotments | Horfield Community Association | Pendock Road Allotments |
| Charlton Road Allotments | | Portishead Chamber of Trade |
| Chris Thomas Ltd | Hungerford Road Community and Social Association | QEH Theatre |
| Civil Aviation Authority | Hutchison 3G UK Limited | Redland Green Action Group |
| | | Rock Allotments |

Royal London Asset
Management

Royate Hill Allotments

Sainsburys Supermarkets Ltd

Sea Mills Forum

Shirehampton Area Housing
Committee

Snowdon Road Allotments

South West Law

South Western Ambulance
Service NHS Foundation Trust

Southmead and Henbury Area
Housing Committee

Southmead Community
Association

St Giles Allotments

St Jude's Tenants Association

St. Bedes Catholic College

St. Pauls Youth Promotion Ltd

Stapleton and Begbrook
Community Association

Sturminster & Stockwood
Community Association

Supporters of Southmead

Sustainable Redland

The Gypsy Council/The Romani

T-Mobile (UK) Ltd

Treework Services Ltd

UWE Faculty of Applied
Sciences

W M Morrison Supermarkets
Plc

Wedmore Vale Allotments

Whitchurch Folk House
Association

Whitchurch Village Parish
Council

Whitefield Road Allotments

Whittock Road Allotments

Womens Forum

The West of England Landlord & Agent Panel - Local landlord associations

South West Landlords Association:

Westcountry Landlords Association:

Association of Local Landlords:

National Residential Landlords Association - Local Representative:

Bristol City Council Councillors

All BCC Ward Councillors



Managing the development of houses in multiple occupation
Draft Supplementary Planning Document
Reg. 13 Version (August 2020)

Summary of Reg. 13 Representations

October 2020

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1. Summary of individual representations

| Rep. no. | Summary of comments by document section and other issues |
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| 01 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Highly supportive of the draft SPD. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> Welcomes the additions made to the list of harmful impacts. Could also include impacts on physical and mental wellbeing (as a result of noise and sleep deprivation - with a link to policy DM14) and retail impact. <p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> Useful to provide detail on Schedule 14 of the Housing Act 2004. Should provide detail on which student accommodation providers would own/manage buildings that are not classified as HMOs under Schedule 14 of the Housing Act 2004. <p><u>Section 2.2: Policy Context - Local</u></p> <ul style="list-style-type: none"> To ensure the additional guidance provided on harmful concentrations is in line with policy DM2 the following wording should be added to this section - 'In accordance with DM2, proposals for HMOs <i>will not</i> be permitted where the development would create or contribute to a harmful concentration of such uses within a locality.' <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> Section 2.3 seems to suggest that only new HMOs will require planning permission within Article 4 areas and will therefore be subject to the guidance set out in the draft SPD. This is incorrect as it does not cover any retrospective planning requirement for conversion of dwellings to HMOs following the introduction of Article 4s where no planning permission has yet been sought. Such applications will also be subject to the SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby and referred to in the Council's evidence paper. This would provide a highly beneficial additional definition of a harmful concentration. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the improved guidance on sandwiching but should be extended to include HMO development opposite residential properties. To cover sandwiching scenarios within unconventional street layouts or at street corners a street-level threshold assessment set at 20% within a 50 metre radius should be applied. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Should include a ward level threshold test set at 10%. Concerns that further HMO development in areas of wards with a lower concentration of HMOs will increase overall ward concentration which may already be high. The threshold calculation should accurately count all properties (dwellings and those classed as HMOs) including all residential sub-divisions. Need to ensure that multiple HMO licensed properties within buildings are all counted within the threshold calculation. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> A quantitative method of measuring a harmful concentration of purpose-built student accommodation would be appropriate and useful. As worded the impact of such development (e.g. transitory occupation, mass movements along key routes to/from bars/clubs resulting in noise and disturbance, impact on retail) may not be taken into account in planning decisions. The quantitative method is explained as follows: Where the threshold calculation indicates more than 7% HMOs within an area any purpose-built student accommodation within that area should also be taken into |

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| | <p>account. This is done by converting the number of beds within such accommodation to a number of equivalent HMOs using an appropriate ratio that reflects the level of harm (considered to be less than HMOs). The ratio suggested is 12 bed spaces to 1 HMO. This calculation is added to the HMO threshold calculation to provide the overall HMO percentage.</p> <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Further data should be used including pending licence applications and enforcement investigations as backlogs of such cases are high and data updates infrequent. • Concerns about underestimating the number of HMOs due to licensing/planning enforcement backlogs. |
| 02 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in parts of Clifton. • HMO concentrations too high in parts of Clifton. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Should be extended to include HMO development opposite residential properties. |
| 03 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports the draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation should be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Approach should be extended to include HMO development opposite and to the rear of residential properties. • Applications for HMO development should not succeed if sandwiching situations arise. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • HMO licenses should not be granted unless planning permission has been obtained. <p><u>Section 4. Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> • Planning permission should not be given to retrospective applications for HMO development. Landlords of such properties are unlikely to meet the 'fit and proper' test. • Larger licensed HMOs that have not sought planning permission should have occupancy numbers restricted to 6 persons. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of planning/licensing breaches required. |
| 04 | <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • The 100m radius is too wide and does not address localised concentrations. This may result in further HMOs being permitted. The radius should be 20m or defined at a smaller level by postcode. • Proposals for new HMO development that exceed the 10% threshold should be automatically refused. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD does not address existing HMO concentrations. Action is needed to redress imbalanced communities. Re-applications for HMOs should be considered against the draft SPD. |
| 05 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Appreciate that previous comments have been taken into account. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> • The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Notes that purpose-built student accommodation isn't included in the HMO threshold assessment. The impact of these developments must be considered. |

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| | <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • A further assessment above neighbourhood level (ward/LSOA) would be welcomed. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Dataset could be improved by requiring all HMOs within article 4 areas to apply for a certificate of lawful use to ensure the HMO is permanently recorded. |
| 06 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Approach to sandwiching should be extended to include HMO development opposite residential properties. • Applications for HMO development should not succeed if sandwiching situations arise. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • The SPD should also apply to the development of purpose-built student accommodation. |
| 07 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes principle of draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in areas surrounding the University of Bristol. • HMO concentrations too high in areas surrounding the University of Bristol. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Concerns about underestimating the number of HMOs due to licensing/planning update backlogs. • Further data should be used including pending licence applications and enforcement investigations as backlogs of such cases are high and data updates infrequent. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Granting of HMO licenses should be subject to gaining planning permission. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD does not address existing harmful HMO concentrations. Guidance is needed on how situations should be managed and controlled. • The SPD should include guidance on acceptable locations for new purpose-built student accommodation. |
| 08 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Hopes that over time HMO concentration in the Clifton Down Community Association Area might be reduced. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton Down area. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Endorses submission from the Clifton Down Community Association. |
| 09 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in Kingsdown. |
| 10 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes purpose, scope and guidance within draft SPD. Appreciate that previous comments have been |

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| | <p>taken into account.</p> <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton Down area. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Unclear whether the cumulative presence of both purpose-built student accommodation and HMOs will be considered when making planning decisions. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • Would like assurance that decisions will be taken based on current actual numbers of HMO licences including retrospective licence applications. |
| 11 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Fully support aims of draft SPD which is long overdue. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Redland area. • HMO concentrations too high in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development to the rear of residential properties. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • A condition seeking sound reduction measures should be attached to all planning permissions for HMO development. This is not addressed in the SPD. Sound reduction measures should include electric doorbells (to replace door knockers) and soft-close door closers on internal doors. These measures could be added to the West of England - Code of Good Management Practice and compliance with this code conditioned. |
| 12 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Clifton area. <p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> • Tenants to be better managed by letting agents. Guidelines to be provided on community values and waste management. |
| 13 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Redland area. • HMO concentrations too high in parts of Redland. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Supports the 10% threshold within a 100metre radius. • A wider assessment area should be applied to protect residential properties further afield that may be experiencing harmful impacts through existing local HMO concentrations. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of licensing breaches required. |
| 14 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. • The draft SPD should apply to all applications relating to HMOs. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the guidance on sandwiching but should be extended to include HMO development opposite residential properties. |
| 15 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD - great addition to support the Local Plan. |

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| | <p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> Fig.1 identifies buildings owned or managed by student accommodation providers as not being HMOs. Further legislative references that clarify these exemptions could be provided to avoid misunderstanding. <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> Section 2.3 seems to suggest that only new HMOs require planning permission within Article 4 areas. This does not cover all situations where permission/authorisation is required such as retrospective planning applications and certificates of lawful use. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby. This would provide a helpful additional definition of a harmful concentration. The SPD should include a ward level threshold assessment. Without this a ward level proportion could exceed 10%. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. This could be achieved by a street-level threshold assessment set at 20% within a 50 metre radius. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> A quantitative method of measuring a harmful concentration of purpose-built student accommodation is needed. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The SPD should also consider the impacts of short-term lets. |
| 16 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcome draft SPD which provides valuable guidance. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. The impact of these developments must not be missed. <p><u>Section 3.2: What is a Good Standard of Accommodation – Outlook and Privacy</u></p> <ul style="list-style-type: none"> No reference made to HMO bedrooms needing proper windows rather than just daylight. Requirement should be set out in Appendix B. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the improved guidance on sandwiching but should be extended to include HMO development opposite residential properties. |
| 17 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. HMO concentrations too high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Purpose-built student accommodation must be included in the HMO threshold assessment. Applications for HMO development should not succeed if the proportion of HMOs exceeds 10%. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the guidance on sandwiching but should be extended to include HMO development opposite residential properties. Applications for HMO development should not succeed if sandwiching situations arise. |

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| 18 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. • HMO concentrations creating tensions in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties. |
| 19 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Supports the submission from Chandos Road Residents Association. |
| 20 | <ul style="list-style-type: none"> • Comments not relevant to draft SPD. |
| 21 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports approach - needs speedy implementation. • HMO concentrations too high in parts of Cotham. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in Cotham area. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. Impacts are the same as other sandwiching situations. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Enforcement against non-compliance of licence conditions should be undertaken. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Problems cannot be fully resolved if existing HMO concentrations are not addressed? |
| 22 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • HMO concentrations high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. Illogical to exclude due to impacts on amenity. Decision needs to be reconsidered. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Supports the 10% threshold. |
| 23 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Hoped that the SPD will start to control the amount of homes being converted to temporary accommodation which is happening across large swathes of Bristol and should help to drive up standards. • Useful changes plus extra detail have been added since the initial consultation. • Overall the SPD will deliver a tremendous improvement to the current situation. |

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| | <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> • Welcomes the additions made to the list of harmful impacts. Could also include impacts on mental wellbeing (as a result of noise and sleep deprivation) and distorting the local retail mix (where local shops and services change to predominantly cater for a transient population). <p><u>Section 3.2: What is a Good Standard of Accommodation?</u></p> <ul style="list-style-type: none"> • All content in this section welcomed. <p><u>Section 3.2: What is a Good Standard of Accommodation? - Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • Further explanation required on how discretion on the issue of resident parking scheme permits is to be applied to permitted HMO development. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the improved guidance. • Approach should be extended to include HMO development opposite residential properties. • To cover sandwiching scenarios within unconventional street layouts a street-level threshold assessment set at 20% within a 50 metre radius should be applied. <p><u>Section 4.1: Sandwiching Assessment (Street level) - Fig. 3</u></p> <ul style="list-style-type: none"> • The diagrams relating to situation 1, 3 and 5 are confusing and need clarification. <p><u>Section 4.2: HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Welcomes the 10% approach at 100m – this is validated by evidence collected from other cities set out in the evidence paper. • Should include a ward level threshold test set at 10%. Concerns that further HMO development in neighbourhoods with a lower concentration will be allowed alongside neighbourhoods with a higher concentration resulting in increased wider concentrations and cumulative harm over time. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4</u></p> <ul style="list-style-type: none"> • The star (proposed HMO development) and square (existing HMOs) symbols should be colour coded to match the legend in Fig. 3. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • The approach needs to be clearer. • Purpose-built student accommodation can cause different levels of harm depending on whether the building is managed or un-managed. On this basis the assessment of harmful effects as part of the decision-making process for proposed HMOs should be as follows: Any existing purpose-built student accommodation within 200m should be considered but each one assessed specifically against the types of harm detailed in section 1.3 of the draft SPD. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Welcome improvements sought to data over time. • Concerns over loss of data when HMO licences expire and limited planning data relating to HMOs. Data quality will degrade over time. <p><u>Section 5: Submission Requirements for Applicants</u></p> <ul style="list-style-type: none"> • Plans relating to external facilities such as a rear garden should also be submitted. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Welcome inclusion of this section. • Any sound reduction measures should also apply to conversions. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Context to SPD provided in introductory text to the representation. |
| 24 | <p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> • Greater responsibility needed from landlords and universities to ensure tenants understand and comply with waste management requirements. Landlords should be liable for additional costs incurred. • Landlords should be responsible for the maintenance of garden areas. |
| 25 | <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. Their impact is |

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| | <p>very similar to that of HMOs. The exclusion of this form of accommodation represents a step backwards.</p> <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. Suggesting flexibility in this matter removes the SPDs teeth and is contrary to its purpose of clarifying what a harmful concentration is. Will lead to inconsistent decision-making or the guidance being ignored. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> The impact of purpose-built student accommodation ‘must be considered’, not ‘should’ as their impact is very similar to HMOs. The wording within this section is too permissive and may result in purpose-built student accommodation not being accounted for in planning decisions. The impact of purpose-built student accommodation should be taken into account by converting the number of beds in such buildings to a number of equivalent HMOs, e.g. 5 beds = 1 HMO. This should be stated within the SPD. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> New section welcomed. However first sentence should read ‘Proposals for the development or intensification of HMOs are subject to building regulations requirements relating to sound reduction’ instead of ‘...may be subject...’ <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The Evidence Paper identifies the National HMO Lobby’s view that ‘the criteria for a balanced community is given as: not less than 60% families, not more than 33% one person households and not more than 10% HMOs’ Whilst purpose-built student accommodation is not included the obvious match for this form of accommodation is HMOs. If the HMO Lobby’s 10% figure is used then it should include purpose-built student accommodation. |
| 26 | <ul style="list-style-type: none"> Requires further information on the progress and development of the West of England Combined Authority’s Spatial Development Strategy and the Bristol Local Plan Review in order to make a representation on the draft SPD. |
| 27 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Broadly welcomes and supports draft SPD. Appreciate that previous comments have been taken into account. <p><u>Section 2.1: What is a House in Multiple Occupation</u></p> <ul style="list-style-type: none"> Welcomes the clear definition of what constitutes an HMO. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes the detailed guidance on sandwiching but should be extended to include HMO development opposite residential properties. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> Robust guidelines required on where purpose-built student accommodation can and cannot be sited. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> The separation of planning and licensing is acknowledged however, the Council should seek a retrospective planning application for a property that has obtained an HMO licence but has not sought planning permission. |
| 28 | <ul style="list-style-type: none"> No comments. |
| 29 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. Draft SPD should also relate to purpose-built student accommodation. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Clifton Down area. Particular concerns relating to: <ul style="list-style-type: none"> Unsuitability of old terraced houses for conversion resulting in poor plan layouts - HMO living areas |

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| | <p>adjacent to bedrooms in neighbouring property.</p> <ul style="list-style-type: none"> - More frequent movements to and from properties day and night relating to student HMOs. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Unwilling enforcement against non-compliance of licence conditions. <p><u>Section 6.2: Property Management</u></p> <ul style="list-style-type: none"> • Tenants poorly managed by landlords/letting agents. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Draft SPD should also relate to purpose-built student accommodation. • Unwilling intervention by universities to address problems with student HMOs. |
| 30 | <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • The targeting of smaller HMOs particularly in the Clifton/Cotham/Redland area is not supported. These are largely operated by reputable landlords and often let to professionals. Additional costs, as a result of licensing requirement, have to be passed on to tenants. Resources should be focused on non-compliant landlords in other areas of the city. • Concerns that community panic over HMO creation is unjustified. Negative perceptions of HMOs could unnecessarily de-value an area. |
| 31 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. • HMO concentrations high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4. Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> • Planning permission should not be given to retrospective applications for HMO development. Landlords of such properties are unlikely to meet the 'fit and proper' test. |
| 32 | <ul style="list-style-type: none"> • Comments not relevant to draft SPD. |
| 33 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Ashley Down Road area. |
| 34 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Will avoid further detriment to the environment and amenities of local communities. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Cotham area. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Welcomes 10% HMO threshold level. • Exclusion of purpose-built student accommodation from the HMO threshold assessment not supported. Impacts of such accommodation include noise, poor waste management and parking problems - excluding it will result in significant detrimental effect on local communities. <p><u>Section 3.2: What is a Good Standard of Accommodation – Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • Parking permits should be limited for HMOs. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite and behind residential properties. |

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| | <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • All HMOs must be licensed. • HMO licenses should be subject to gaining planning permission. • All HMOs must be inspected to ensure compliance with minimum maintenance and safety standards. • Landlords should be required to annually update their contact details with neighbouring properties. • Landlords must demonstrate they have informed tenants of their responsibilities. • Licences should not be automatically renewed if evidence of persistent problems (from tenants or maintenance of the property). <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> • Improvements to Council enforcement of planning/licensing breaches required. |
| 35 | <ul style="list-style-type: none"> • Comments not relevant to draft SPD. |
| 36 | <ul style="list-style-type: none"> • Fully supports response from Action for Balanced Communities. |
| 37 | <ul style="list-style-type: none"> • Do not wish to comment. |
| 38 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Draft SPD very much welcomed. Commend the creation and work conducted on this important guidance. <p><u>Section 2.1: What is a House in Multiple Occupation?</u></p> <ul style="list-style-type: none"> • The definition of a student accommodation provider needs to be included as this is referred to in Fig. 1. <p><u>Section 2.1: What is a House in Multiple Occupation? - Fig. 1</u></p> <ul style="list-style-type: none"> • Unclear why purpose-built student accommodation provided by a student accommodation provider is not considered an HMO. The impact of such properties on communities is significant so should be treated as an HMO or subject to the same restrictions. <p><u>Section 2.3: Policy Context</u></p> <ul style="list-style-type: none"> • Section 2.3 seems to suggest that only new HMOs will require planning permission within Article 4 areas and will therefore be subject to the guidance set out in the draft SPD. This is misleading as it does not cover any retrospective planning requirement for conversion of dwellings to HMOs following the introduction of Article 4s where no planning permission has yet been sought. Such applications will also be subject to the SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> • The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • The SPD should also set a threshold for HMO occupants at 20% of the population as identified by the HMO Lobby. This would provide a further definition of a harmful concentration. <p><u>Section 3.2: What is a Good Standard of Accommodation - Cycle and Car Parking</u></p> <ul style="list-style-type: none"> • The Council website link to restrictions on parking permits is not an effective means to control HMO related parking. <p><u>Section 3.2: What is a Good Standard of Accommodation - Refuse and Recycling Storage</u></p> <ul style="list-style-type: none"> • Draft SPD guidance relating to refuse and recycling is insufficient as the existing guidance note referred to does not make specific reference to HMOs. Draft SPD should include a requirement for a waste management plan and compliance with that plan. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the additional guidance on sandwiching but should be extended to include: <ul style="list-style-type: none"> - HMO development opposite and to the rear of residential properties. - A street-level threshold assessment within a 50 metre radius. <p><u>Section 4.2: HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • A ward level assessment should also be included to ensure harmful concentrations do not arise across the wider community. |

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| | <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Use of a metric to support decision-making is encouraged. • Introduction of student bed spaces within an area above 10% HMOs will lead to a harmful concentration of students. This issue requires special consideration within the SPD. • Draft wording far too open and permissive to provide clear direction giving rise to concern that purpose-built student accommodation could avoid requirements of the SPD. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> • The threshold assessment should also include data on short-term lets. |
| 39 | <p><u>Section 2.3: When is Planning Permission Required? - Article 4 Directions</u></p> <ul style="list-style-type: none"> • Following concerns raised relating to Article 4 Directions: <ul style="list-style-type: none"> - May restrict delivery of HMOs reducing housing supply; - HMOs provide valuable affordable accommodation for younger people (not just students) who would otherwise be unable to purchase or afford market rents; - Discriminatory to penalise young professionals, graduates and migrant workers by restricting supply of HMOs; - Problem HMOs could be better addressed by more effective policing of licensed properties - this should be the priority; - Responsible landlords more affected by Article 4s than those already breaching regulations. <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Draft SPD applauded. A more effective means to address problems associated with HMOs than Article 4 Directions or extended licensing. • Separating HMOs from residential property perpetuates idea that HMOs are disruptive and of poor quality. Guidance infers that HMOs are likely to generate more noise than a regular family dwelling. High-quality HMOs should be recognised and well-integrated into localities as a valuable contribution to the housing offer that contributes to a sustainable balanced community. <p><u>Section 3.1: What is a Harmful Concentration</u></p> <ul style="list-style-type: none"> • Unclear why additional bed spaces within HMOs are subject to the sandwich and threshold assessments as any impacts on the amenity and character of the area would not be material, in particular increased waste production, and the number of HMOs would not increase. Approach would withhold much needed accommodation provision. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Assessments of HMO proposals should be flexible and case specific taking account of the following scenarios: <ul style="list-style-type: none"> - Where HMO concentrations have become an established part of an areas character (over the 10% threshold); - Where HMOs already sandwich residential property; - The introduction of high quality HMO accommodation within an area - this should be prioritised. <p><u>Section 3.2: What is a Good Standard of Accommodation – Internal Living Space</u></p> <ul style="list-style-type: none"> • Issues relating to layout, design and minimum amenity space should be dealt with under licensing. <p><u>Section 3.2: What is a Good Standard of Accommodation - Refuse and Recycling Storage</u></p> <ul style="list-style-type: none"> • Supports approach to refuse and recycling storage. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Not clear as to why up to three adjacent dwellings between two HMOs is considered sandwiching rather than just one. Evidence needed for this. |
| 40 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Welcomes draft SPD. Will enable better control and consideration of HMOs. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in the Cotham area. • HMO concentrations too high in parts of Cotham. <p><u>Section 3: Additional Guidance</u></p> |

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| | <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Welcomes inclusion of vertical sandwiching assessment. Sandwiching approach should be extended to include HMO development opposite and behind residential properties. <p><u>Section 4.5: Information on Datasets</u></p> <ul style="list-style-type: none"> Concerns about underestimating the number of HMOs due to licensing/planning update backlogs. Further data should be used including: enforcement investigations, pending licence applications, unimplemented HMO planning permissions and purpose-built student accommodation. <p><u>Appendix B: Guideline Minimum Room Size Standards for HMO Development</u></p> <ul style="list-style-type: none"> Minimum room size standards are below the nationally described space standard. |
| 41 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Cotham area. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. No justification for this change - should be included. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite residential properties. |
| 42 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcomes draft SPD. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Purpose-built student accommodation should be included in the HMO threshold assessment. Impacts of such accommodation, including noise (movements of student along key routes, especially at night) and changes in the character of local services (shops and cafes), should be taken into account. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to cover both sides of the road. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> A ward level assessment should also be included. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> HMO properties under planning enforcement investigation should be included in the sandwiching assessment. Data updates should be more regular. |
| 43 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Agree with Council's approach. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Cotham. <p><u>Section 6.1: HMO Licenses</u></p> |

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| | <ul style="list-style-type: none"> • Will HMO licenses be renewed on properties in areas of high HMO concentration given impacts felt? This should not be allowed. • Enforcement against non-compliance of licence conditions, in particular revocation of licences, should be undertaken. No evidence of this happening which undermines entire process. |
| 44 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • An excellent document. Logical approach clearly and effectively articulated. <p><u>Section 4.1: Sandwiching Assessment (Street level) - Fig. 3</u></p> <ul style="list-style-type: none"> • Clarification required for situation 3 - Are the adjoining HMOs shown in situations 2 and 4? <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Is the Local Land and Property Gazetteer (LLPG) publicly accessible? |
| 45 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Very welcome - valuable guidance and excellent work. <p><u>Section 3.2: What is a Good Standard of Accommodation - Outlook and Privacy</u></p> <ul style="list-style-type: none"> • No reference made to HMO bedrooms needing proper windows rather than just daylight. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. |
| 46 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment especially in areas where significant numbers of students exist. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Sandwiching approach should be extended to include HMO development opposite residential properties. |
| 47 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Pleased by the draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Harmful impacts of HMOs acknowledged in High Kingsdown including noise and disturbance, poor waste management and reduced shopping and public transport provision. Combinations of these factors can affect the health and well-being of permanent residents. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> <ul style="list-style-type: none"> • Impacts on emotional well-being and mental health should be added to the list of harmful effects associated with high numbers of HMOs. <p><u>Section 2.3: When is Planning Permission Required - Article 4 Directions</u></p> <ul style="list-style-type: none"> • Understands that the requirement to submit a planning application within an article 4 area can be avoided. The SPD should help to close any loopholes. <p><u>Section 3. Additional Guidance</u></p> <ul style="list-style-type: none"> • Additional guidance relating to harmful concentration should take account of street width. Impacts on residential properties from HMOs on the opposite side of the street may be lesser or greater depending on the width of the street. <p><u>Section 6.1: HMO Licences</u></p> <ul style="list-style-type: none"> • Questions relating to the use and occupation of a property should form part of the licensing assessment. |
| 48 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. An improvement on the previous version but further improvement needed. Overall the draft SPD will deliver a tremendous improvement to the current situation. <p><u>Section 1.3: Houses in Multiple Occupation in Bristol</u></p> |

- Welcomes the additions made to the list of harmful impacts. Could also include impacts on mental wellbeing (as a result of noise and sleep deprivation) and distorting the local retail mix (where local shops and services change to predominantly cater for a transient population).

Section 2.2: Policy Context - Local

- To ensure the additional guidance provided on harmful concentrations is in line with policy DM2 wording should be added to this section which states that harmful concentrations as described in section 3.1 will not be consistent with Local Plan policy.

Section 3: Additional Guidance

- The wording of the additional guidance should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.

Section 3.2: What is a Good Standard of Accommodation?

- All content in this section welcomed.

Section 3.2: What is a Good Standard of Accommodation? - Cycle and Car Parking

- Further explanation required on how discretion on the issue of resident parking scheme permits is to be applied to permitted HMO development.

Section 4.1: Sandwiching Assessment (Street level)

- Welcomes the improved guidance on sandwiching but wording in first para. should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.
- Approach should be extended to include HMO development opposite residential properties.
- To cover sandwiching scenarios within unconventional street layouts a street-level threshold assessment set at 20% within a 50 metre radius should be applied.

Section 4.1: Sandwiching Assessment (Street level) - Fig. 3

- The diagrams relating to situations 1, 3 and 5 are confusing and need clarification.

Section 4.2: HMO Threshold Assessment (Neighbourhood level)

- Welcomes the 10% approach at 100m. This is validated by evidence collected from other cities set out in the evidence paper.
- Wording in first para. should be amended from ‘...unlikely to be consistent with Local Plan policy...’ to ‘...not consistent...’ to ensure alignment with policy DM2.
- Need to ensure that multiple HMO licensed properties within buildings are all counted within the threshold calculation.
- Should include a ward level threshold test set at 10%. Concerns that further HMO development in neighbourhoods with a lower concentration will be allowed alongside neighbourhoods with a higher concentration resulting in increased wider concentrations and cumulative harm over time.

Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4

- The star (proposed HMO development) and square (existing HMOs) symbols should be colour coded to match the legend in Fig. 3.
- Further clarification required to HMO Threshold Calculation.

Section 4.4: HMOs and Purpose-built Student Accommodation

- The approach needs to be clearer.
- Purpose-built student accommodation can cause different levels of harm depending on whether the building is managed or un-managed. On this basis 2 options are proposed for the assessment of harmful effects as part of the decision-making process for proposed HMOs.
 - Any existing Purpose-built student accommodation within 200m should be considered but each one assessed specifically against the types of harm detailed in section 1.3 of the draft SPD;
 - Convert the number of beds within the accommodation to a number of equivalent HMOs using an appropriate ratio suggested as 12 bed spaces to 1 HMO. This calculation can be used as extra information to inform the decision. The assessment could be undertaken at the 100m level and at ward level.

Section 4.5: Information on Datasets - HMOs

- Welcome improvements sought to data over time.
- Concerns over loss of data when HMO licences expire and limited planning data relating to HMOs. Data quality will degrade over time.

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| | <p><u>Section 5: Submission Requirements for Applicants</u></p> <ul style="list-style-type: none"> Plans relating to external facilities such as a rear garden should also be submitted. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> Welcome inclusion of this section. Any sound reduction measures should also apply to conversions. |
| 49 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Supports 10% threshold level. Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. This form of accommodation has similar impact to HMOs and excluding it from the count will harm residential neighbourhoods. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite residential properties. |
| 50 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. Logic for exclusion unclear. Presents landlords with a loophole. |
| 51 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> The spread of HMOs and purpose-built student accommodation should be limited in Redland and surrounding areas. <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Significant harmful impacts of HMOs acknowledged in Redland. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. This will undermine attempts to limit the spread of HMOs. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> Local landlords have not provided their contact details to residents or taken responsibility for tenant's behaviour in breach of licensing conditions. Un-licensed HMOs should be closed. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Neighbourhood Enforcement Team unresponsive to noise complaints. Improvements required to licensing enforcement. |
| 52 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Most of the comments concerning the previous consultation have been adequately addressed. <p><u>Section 3.2: What is a Good Standard of Accommodation</u></p> <ul style="list-style-type: none"> Parking, waste management and privacy issues should be adequately addressed with processes set out. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Needs to be an easy way to raise concerns about the management of HMOs. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The shift from family accommodation to short-term occupancy should be considered. |

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| 53 | <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The 10% threshold level should be consistently applied. This was not applied in a recent application. |
| 54 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> HMO concentrations too high in parts of Cotham. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> The 10% threshold level is supported and should be strictly and consistently applied. This approach was applied in a recent application. |
| 55 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Welcomes the draft SPD. Will benefit communities likely to be subject to HMO growth. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. Proposals resulting in sandwiching or exceeding the HMO threshold should not be permitted. <p><u>Section 4: Assessment of Planning Applications</u></p> <ul style="list-style-type: none"> Large-scale purpose-built student accommodation has an impact on the balance of communities e.g. noise, retail offer. The proportion of students in an area needs to be considered when assessing applications for new HMO development. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> Sandwiching approach should be extended to include HMO development opposite and to the rear of residential properties. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> The process of counting HMOs is not accurate and needs to be better understood by organisations and individuals. <p><u>Section 6.4: Reporting a Breach of Planning or Licensing Rules</u></p> <ul style="list-style-type: none"> Opportunities to report unauthorised HMOs should be provided through public engagement. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> The impact of AirBnB whole properties should also be considered. |
| 56 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in Redland, Cotham and Clifton areas. HMO concentrations too high in parts of Redland, Cotham and Clifton. <p><u>Section 6.2: Property Management</u></p> <ul style="list-style-type: none"> Local example provided of poorly managed HMO property. |
| 57 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> Harmful impacts of HMOs acknowledged in the Redland area. Further HMOs in Redland area opposed. <p><u>6.2 Property Management</u></p> <ul style="list-style-type: none"> Poor landlord management of local HMO properties - complaints ignored, contact details not provided. |
| 58 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> Strongly supports draft SPD. Changes made following the first round of consultation mostly positive but areas that could be improved. <p><u>Section 3: Additional Guidance</u></p> <ul style="list-style-type: none"> The wording of the additional guidance should not provide any flexibility in the determination of planning applications for new HMO development. Should proposals result in harmful concentrations as described |

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| | <p>within the sections <i>Sandwiching Assessment (Street level)</i> and <i>HMO Threshold Assessment (Neighbourhood level)</i> then development should not be permitted in line with policy DM2. If the draft SPD seeks to provide flexibility then the scope and purpose of such discretion needs to be explained. Policy DM2 does not appear to refer to any such flexibility.</p> <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. This will damage the aim of the SPD which is to restrict the growth of shared housing due to acknowledged harmful impacts. This includes purpose-built student accommodation which has similar effects, in particular noise and disturbance created by busy movement corridors between bars/nightclubs and residential areas. • Should not be assumed that the development of purpose-built student accommodation will be confined to the city centre. Future student growth will create pressure for such accommodation in or near residential areas. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • Welcomes the additional guidance on sandwiching but clarification required on the following issues: <ul style="list-style-type: none"> - That situation 1 set out in Fig. 3 could equally apply to detached or semi-detached properties. - How the assessment applies where two lines of properties meet at a street intersection. <p><u>Section 4.2 HMO Threshold Assessment (Neighbourhood level) - Fig. 4</u></p> <ul style="list-style-type: none"> • The legend should distinguish between dwellings selected within the radius and dwellings outside the radius. • Needs to make clear that buildings can have multiple licences all of which are counted to ensure consistency with the counting of all dwellings. • Not making available the Council's calculation software to the public raises issues of transparency and makes officer decisions based on this calculation difficult to challenge or verify. <p><u>Section 4.4: HMOs and Purpose-built Student Accommodation</u></p> <ul style="list-style-type: none"> • Need for greater detail in this section to address the following issues: <ul style="list-style-type: none"> - If purpose-built student accommodation cannot be counted as equivalent HMOs some alternative method to evaluate objectively the combined effects of the two forms of accommodation must be found. - The section should acknowledge that an application might fail under the alternative method even if the proposed Neighbourhood assessment shows HMOs to be under the 10% threshold. - The phrase 'appropriate area level' needs to be better defined. - A separate SPD is needed to deal with proposals for purpose-built student accommodation. - Clarification required on what type of purpose-built student accommodation needs to be licensed. Such licensed accommodation must be included within the HMO threshold assessment and stated in the draft SPD. <p><u>Section 4.5: Information on Datasets - HMOs</u></p> <ul style="list-style-type: none"> • Concerned that not all HMOs are counted within the threshold calculation. In particular HMOs awaiting a licence renewal will not be identified. If the Council allows such HMOs to continue operation without a licence then they must be counted. • Properties operating as HMOs that are subject to licensing and/or planning enforcement investigations should also be counted within the threshold calculation. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Welcomes inclusion of this new section. However, specific noise mitigation measures beyond those mandated by regulations could be identified through best practice guidance and adopted by developers on a voluntary basis. Measures could include: <ul style="list-style-type: none"> - Use of soft-closers on internal doors and external doors; - Replacement of door knockers with doorbell/keyless systems; - Sound-deadening material on stair treads; - Location/design of bathroom sanitary ware to avoid noise transmission through party walls; - Plan layouts that avoid positioning of communal rooms opposite bedrooms in adjoining properties and restriction of access to elevated external areas (i.e. balconies, roofs). - Noise mitigation measures where access to properties is from the rear via external steps and walkways (i.e. HMOs above commercial premises). These can include enclosed lobbies and walkways or creation of an entrance on the main street. |
| 59 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> |

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| | <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties. |
| 60 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD - will help to develop strong and sustainable communities. Council to be congratulated. <p><u>Section 3.1: What is a Harmful Concentration?</u></p> <ul style="list-style-type: none"> • Supports sandwiching and HMO threshold approaches. |
| 61 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Council's work on improving the regulation and development of HMOs a positive step. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. • A flexible approach to the development of HMOs should not be taken where the 10% threshold has been reached. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Stronger enforcement of licensing conditions required relating to anti-social behaviour. |
| 62 | <p><u>Whole document</u></p> <ul style="list-style-type: none"> • Strongly supports draft SPD. <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Concerned that purpose-built student accommodation isn't included in the HMO threshold assessment. No explanation for this change - should be included. <p><u>Section 4.1: Sandwiching Assessment (Street level)</u></p> <ul style="list-style-type: none"> • No planning application should succeed if sandwiching occurs. • Sandwiching approach should be extended to include HMO development opposite residential properties. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • Compliance with license conditions should be checked. • Reviews of licenses should be undertaken where instances of non-compliance. • Consultation should be undertaken as part of the license renewal process. |
| 63 | <p><u>General concerns relating to HMOs</u></p> <ul style="list-style-type: none"> • Significant harmful impacts of HMOs acknowledged in Cotham. <p><u>Section 6.1: HMO Licenses</u></p> <ul style="list-style-type: none"> • No action to revoke licences taken where breaches occur. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Important that SPD is adopted. |
| 64 | <ul style="list-style-type: none"> • Has asked to be notified of the adoption of the draft SPD. |
| 65 | <p><u>Section 3.1: What is a Harmful Concentration - HMO Threshold Assessment (Neighbourhood level)</u></p> <ul style="list-style-type: none"> • Purpose-built student accommodation must be included in the HMO threshold assessment. • Proposals for new HMO development that exceed the 10% threshold should be refused. <p><u>Section 6.3: Sound Reduction Measures</u></p> <ul style="list-style-type: none"> • Much stronger requirements for noise attenuation needed. <p><u>Other Issues</u></p> <ul style="list-style-type: none"> • Concerns that the introduction of new permitted development rights allowing additional storeys to dwellinghouses will allow for the intensification of HMOs. The potential for future implementation of this permitted development right should be considered when determining applications for new HMO |

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| | development. |
| 66 | <ul style="list-style-type: none"> Demand for HMOs has been driven by student growth which has supported the viability of universities. Consideration should therefore be given to the economic impacts of restricting HMOs. |

2. Changes made to document

| Section | Key changes made |
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| 1.3 Houses in Multiple Occupation in Bristol | Further detail and clarification provided relating to harmful impacts of HMO concentrations on communities. |
| 2.1 What is a House in Multiple Occupation Fig 1: When is a Property an HMO? | Further detail and clarification provided relating to buildings that are not defined as HMOs. |
| 2.3 When is Planning Permission Required Article 4 Directions | Clarification provided on the need for a planning application for a change of use from a dwellinghouse to a small HMO within an Article 4 area. |
| 3. Additional Guidance | Deletion of 'Additional guidance' from title of each shaded box. |
| 3.2 What is a Good Standard of Accommodation Refuse and Recycling Storage | Further detail provided relating to guidance supporting Local Plan policy DM32. |
| 4.1 Sandwiching Assessment (Street level) | Example of further sandwiching situation provided. |
| 4.1 Sandwiching Assessment (Street level) Fig. 3 Sandwich Assessment - Worked Examples | Diagram legend relating to situation 1 expanded for clarification. Diagram of further sandwiching situation provided. Diagrams relating to situations 4 and 6 amended for clarification. |
| 4.2 HMO Threshold Assessment (Neighbourhood level) | Clarification provided on use of Bristol City Council software for HMO threshold assessment. |
| 4.2 HMO Threshold Assessment (Neighbourhood level) Fig. 4 HMO threshold Assessment - Worked Example | Diagram symbols and legend amended for clarification. Further detail provided relating to HMO threshold calculation for clarification. |
| 4.4 HMOs and Purpose-built Student Accommodation | Further detail and clarification provided relating to the determination of applications for HMO development within local areas containing purpose-built student accommodation. |
| 4.5 Information on Datasets - HMOs | Clarification provided on numerator description. Clarification provided relating to identification of HMOs. Further detail provided relating to future recording of HMOs. |
| 6.3 Sound Reduction Measures | Further detail provided relating to voluntary installation of sound reduction measures. |
| 6.4 Reporting a Breach of Planning or Licensing Rules | Further detail provided on reporting a breach of licensing rules. |

Appendix D: Risk Asssment

| Managing the development of houses in multiple occupation SPD - Risk Register | | | | | | | | | | | | | | | | | |
|---|---|---|---|----------------------------|--------------------|------------------------------|----------------------|---|------------------------|--------------------|--------|----------------|-------------------------------------|----------------|--------|----------------|------|
| Negative Risks that offer a threat to the introduction of the SPD 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 | Judicial Review of decision to adopt SPD. | HMO landlords/agents/others challenge introduction of SPD on grounds of illegality, procedural unfairness or irrationality. | If SPD not delivered (as a result of decision being overturned) may limit effectiveness of Local Plan policy relating to control of HMOs. | Open | Fair and Inclusive | Reputation Communities Legal | Development of Place | Legal requirements relating to the content and process of producing SPDs have been complied with. | Stable | 1 | 1 | 1 | | | | 0 | |
| 2 | SPD not adopted. | Cabinet decide not to adopt the SPD. | If SPD not adopted may limit effectiveness of Local Plan policy relating to control of HMOs. | Open | Fair and Inclusive | Communities | Development of Place | Legal requirements relating to the content and process of producing SPDs have been complied with. Production of SPD in line with Corporate objectives (Them 2, Obj. 4). Production of SPD has significant support from the community. | Stable | 1 | 1 | 1 | | | | 0 | |
| | | | | | | | | | | | | 0 | | | | 0 | |
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Bristol City Council Equality Impact Relevance Check

This tool will identify the equalities relevance of a proposal, and establish whether a full Equality Impact Assessment will be required. Please read the guidance prior to completing this relevance check.

| What is the proposal? | |
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| Name of proposal | Managing the development of houses in multiple occupation - Supplementary Planning Document |
| Please outline the proposal. | Adopt the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) following statutory consultation in Summer 2020. The SPD will be a material planning consideration which will support existing Local Plan policy used to decide planning applications for HMO development. |
| What savings will this proposal achieve? | None |
| Name of Lead Officer | Simon Fletcher |
| Could your proposal impact citizens with protected characteristics? (This includes service users and the wider community) | |
| Please outline where there may be significant opportunities or positive impacts, and for whom. | More effective planning controls delivered by the implementation of the SPD will help to prevent harmful impacts arising from HMO concentrations and help to support the creation of balanced communities which will have a positive impact on all members of those communities affected. |
| Please outline where there may be significant negative impacts, and for whom. | No significant negative impacts for people with protected characteristics are identified from this proposal. The SPD will only be used where planning permission for an HMO is required and as such will mostly affect areas where article 4 directions (removing permitted development rights that allow a change of use of a dwellinghouse - Use Class C3 - to a small HMO - Use Class C4) are in place. These areas can be viewed on Pinpoint and cover 25 wards (some wards only in part). Individual data profiles for the wards are available at https://www.bristol.gov.uk/statisticscensus-information/new-wards-data-profiles |
| Whilst accurate diversity data about private tenants (or landlords) is not available it is possible that a reduction in the supply of HMOs at a local level may have a disproportionate impact on the groups who typically occupy this type accommodation - i.e. younger people (e.g. students), migrants and those on lower incomes. Impacts may include possible increases in rent and/or increases in commuting distances for work or studying. | |

However any potential negative impacts are mitigated because:

- The areas mostly affected by the SPD are those with already existing or potentially high concentrations of HMOs so unlikely to be a shortfall of available shared accommodation.
- More effective planning controls will help to protect communities from harmful impacts of HMO concentrations.
- The SPD will support decision makers to promote the creation of balanced communities and allows for any implications for protected characteristics groups to be taken into account.

Could your proposal impact staff with protected characteristics?

(i.e. reduction in posts, changes to working hours or locations, changes in pay)

Please outline where there may be significant opportunities or positive impacts, and for whom.

None identified.

Please outline where there may be negative impacts, and for whom.

None identified.

Is a full Equality Impact Assessment required?

Does the proposal have the potential to impact on people with protected characteristics in the following ways:

- access to or participation in a service,
- levels of representation in our workforce, or
- reducing quality of life (i.e. health, education, standard of living) ?

Please indicate yes or no. If the answer is yes then a full impact assessment must be carried out. If the answer is no, please provide a justification.

No, for the following reasons:

- More effective planning controls to prevent harmful impacts of HMO concentrations and to support the creation of balanced communities will benefit all within such communities.
- The existing citywide supply of HMOs which may serve the housing needs of certain protected characteristics groups will be unaffected by the implementation of the SPD.
- Future supply of HMOs in large areas of the city (where permitted development rights for smaller HMOs apply) will be unaffected by the implementation of the SPD.

Service Director sign-off and date:

Zoe Willcox

09/09/2020

Equalities Officer sign-off and date:

Reviewed by Equality and Inclusion Team

1/10/2020

Eco Impact Checklist

| Title of report: Managing the development of houses in multiple occupation - Supplementary Planning Document | | | | |
|---|--------------------------------|--------------|-------------------------|--------------------------------------|
| Report author: Simon Fletcher | | | | |
| Anticipated date of key decision: 3 rd November 2020 | | | | |
| Summary of proposals: Adopt the 'Managing the development of houses in multiple occupation' Supplementary Planning Document (SPD) following statutory consultation in Summer 2020. The SPD will be a material planning consideration which will support existing Local Plan policy used to decide planning applications for HMO development. | | | | |
| Will the proposal impact on... | Yes/No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | No | | | |
| Bristol's resilience to the effects of climate change? | No | | | |
| Consumption of non-renewable resources? | No | | | |
| Production, recycling or disposal of waste | No | | | |
| The appearance of the city? | No | | | |
| Pollution to land, water, or air? | No | | | |
| Wildlife and habitats? | No | | | |
| Consulted with: | | | | |
| Summary of impacts and Mitigation - <u>to go into the main Cabinet/ Council Report</u> | | | | |
| The purpose of the SPD is to provide guidance on existing Local Plan policies relating to the management of HMOs. This includes guidance on preventing harmful concentrations of HMOs and preventing harmful impacts on residential amenity where HMOs are permitted. This will help to deliver environmental benefits by avoiding detrimental impacts such as poor waste and recycling management, noise and disturbance, parking pressures and harm to an area's character/heritage. Where HMOs require planning permission, a sustainability and energy statement will be required in many cases to show how it complies with adopted planning policies BCS13-BCS16. | | | | |
| Checklist completed by: | | | | |
| Name: | Simon Fletcher | | | |
| Dept.: | Strategic City Planning | | | |
| Extension: | | | | |
| Date: | 7 th September 2020 | | | |
| Verified by Environmental Performance Team | Amy Harvey | | | |

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|---|--|---------------------------------|--------------------------------|
| TITLE | Next Steps accommodation funding to tackle rough sleeping | | |
| Ward(s) | <i>City wide</i> | | |
| Author: | Paul Sylvester | Job title: | Head of Housing Options |
| Cabinet lead: | Helen Godwin | Executive Director lead: | Stephen Peacock |
| Proposal origin: <i>BCC Staff</i> | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: <i>Cabinet</i> | | | |
| Timescales: Cabinet 3rd November 2020 | | | |
| Purpose of Report: | | | |
| <ol style="list-style-type: none"> 1. To seek Cabinet approval to authorise the Executive Director of Growth and Regeneration to approve the grant award and spend from Ministry of Housing, Communities and Local Government (MHCLG) Next Steps fund. | | | |
| Evidence Base: | | | |
| <p>Bristol City Council and its partners are working together with the aim that nobody need sleep rough in Bristol. This work is being co-ordinated through two City wide initiatives with a focus on innovation and system change. Our One City Move On project aims to significantly increase the number of affordable rented properties that are available to people who are homeless or threatened with homelessness. A range of options are being progressed including new modular development, private sector leasing and increasing supported move on accommodation. Our Change for Good Initiative is a collaboration between Bristol City Council, Clinical Commissioning Group (CCG) and Golden Key. This was launched last month by the Mayor and commits to positively change how agencies in the city work together to support people with complex needs, starting with people who are homeless and in the homeless pathway.</p> <p>The Next Steps Accommodation Programme (NSAP) will deliver much needed accommodation and support as part of these initiatives.</p> | | | |
| MHCLG Next Steps Accommodation Programme | | | |
| <p>This programme makes available financial resources to support local authorities and their partners to prevent people currently accommodated in emergency accommodation, as a result of the Covid “Everybody In” response, from returning to the streets.</p> <p>The Programme comprises two funds: interim; and long-term.</p> <p>The interim fund makes available £105m of funding to deliver interim accommodation / options for rough sleepers, supporting people into tenancies of their own (e.g. rental deposits), as well as securing alternative rooms already available and ready for use (e.g. hotels and student accommodation).</p> <p>The long-term fund makes available £161m of funding for long-term, move-on accommodation – £130m capital funding and £31m revenue funding for support services.</p> <p>The focus of the fund is on delivering supported move-on accommodation, through the flexible use of local authority</p> | | | |

stock, Registered Provider stock, housing in the private rented sector and new build supply.

New accommodation, whether supported by capital or revenue, needs to be delivered by 31st March 2021. Bids for revenue funding can cover a 4-year period (inclusive of 2020/21) where it is for support relating to the creation of additional move-on units.

Bristol bid

This report relates only to the first phase of the Next Steps Accommodation Programme. We will engage with Homes England and MHCLG continuous market engagement (CME) in the near future to consider further capital development proposals for future rounds. Some capital proposals submitted to us this time are not deliverable by March 2021, but can still be considered within the CME process going forward.

A bid totalling £9.320m was submitted on 20th August to the MHCLG next steps fund. The table below shows a breakdown of the elements of the bid and the confirmed award across the financial years.

| | Bid £m | Awarded £m | 2020/21 £m | 2021/22 to 2023/24 £m |
|---------------------------|--------------|---------------|---------------|--------------------------------|
| 2020/21 Revenue funding | 2.174 | 1.936 | 1.936 | - |
| Capital expenditure | 4.694 | tbc | 4.694 | - |
| Revenue linked to capital | 1.688 | tbc | - | 1.688 |
| Long term revenue | 0.764 | tbc | - | 0.764 |
| Total | 9.320 | 1.936 | 6.630 | 2.452 |

Summary of proposals

1. Interim costs (20/21) £1.936m

- 1) To cover the costs of the hotel and youth hostel provision –for the majority of hotel provision this is for use up to the end of September.
- 2) One hotel will continue until March next year (at reduced capacity, 32 rooms)
- 3) YHA and YMCA continue into 2021
- 4) Use of a block contract for shared housing to create a cluster of houses where residents can be supported by a remodelled Rough sleeper initiative (RSI) funded support team and additional dispersed accommodation that enabled clients to move on out of the hotels for a short period until longer term solutions are secured
- 5) Provision for those with no recourse to public funds (NRPF) – through Temporary Accommodation and accessing 2 units within our partners non-commissioned youth provision
- 6) Taken on an ambitious private sector scheme in September – providing 120 studio and one-bed flats at Imperial Apartments on assured shorthold tenancies (AST) at affordable rent level (ASTs)

The cost of support services for individuals in the hotels (and then on into Imperial Apartments and block contract for shared housing) is covered by remodelled RSI funding and other resources from existing providers

2. Long-term fund (2021-22 to 2023/24)

Supported move on options for rough sleepers, supporting people into self-contained accommodation.

Revenue request: £1.688m and capital grant funding(from 2020/21)of £4.694m will deliver 85 homes for long term Supported Move On to properties identified by BCC and local partners, and a further 128 flats that will be available for at least the next three years.

Support for the clients moving on to new accommodation will include:

- 1) A Housing First style programme (for 14 of the 28 complex, long term rough sleepers/returners where a settled accommodation offer alongside access to an intensive support service is more appropriate and cost-effective).
- 2) A new Supported Move-On Team to support all the clients moving into the Supported Move on properties.

3. Revenue only requests within main NSAP bid: Total request: £764,190

- 1) Housing First style programme (for the other 14 of the 28 complex, long term rough sleepers/returners identified for this project).
- 2) Financial Incentives to support 50 people to transition from the street into longer term supported accommodation.
- 3) A dedicated social worker carrying out Care Assessments to help access a care package and alternative more appropriate housing options.
- 4) Revenue Support for the remaining 6 months costs of the HMO block contract delivering 120 interim accommodation units within the interim bid.

Funding Awarded

On 17th September it was announced that Bristol will receive £1.936m against the £2.174m interim funds bid. The shortfall in funding is being discussed with MHCLG and there is potential for further funding to be awarded through a contingency fund. It is anticipated that the remainder of the costs that were not successful in the bid will either not happen or be offset by savings elsewhere in the service.

The outcome of the capital and longer term revenue funding will not be known until the end of October 2020. Informal communications indicate that the capital grant award will be around £2.9m (for 51 units).

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Approve, subject to successful grant award, the acceptance of the grant award from MHCLG Next Steps fund of up to £9.32m
2. Authorise the Executive Director of Growth and Regeneration in consultation with the Cabinet Member for Women, Families and Homes to take all steps required to allocate the funding including the procurement of all contracts (goods, services or works) in accordance with the proposals contained in the report.

Corporate Strategy alignment:

1. Key commitment to reduce the overall level of homelessness and rough sleeping, with no-one needing to spend a 'second night out'.

City Benefits: In brief the proposal will assist many rough sleepers to access accommodation and support improving their health and reducing the physical and mental health impact of living on the streets.

Consultation Details:

1. The proposals included in the bid were developed with the input from the Homelessness sector, Registered Providers and key stakeholders.

Background Documents:

<https://www.gov.uk/government/publications/next-steps-accommodation-programme-guidance-and-proposal-templates>

| | | | |
|---|---|---|--|
| Revenue Cost | £1.936m awaiting MHCLG figures for the longer term revenue figures | Source of Revenue Funding | MHCLG ring fenced grant |
| Capital Cost | £ TBC | Source of Capital Funding | MHCLG via Homes England |
| 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: |
| <p>1. Finance Advice Bristol City Council has successfully bid for funds from the MHCLG Next Steps Accommodation Programme. £1.936m revenue funding has been awarded and this is ring fenced to the Homelessness and Rough Sleeping services as detailed in the body of this report, to provide move-on accommodation and support for the cohort of individuals who were accommodated as part of the “Everybody In” response to Covid. The grant is for the period from August 2020 to 31st March 2021 and will be paid in instalments. The £1.936m forecast cost of move on, is currently included in the current Homelessness and Rough sleeping budget forecast hence this funding will offset these costs.</p> <p>The outcome of the bid for capital is still to be announced, though any successful schemes will need to be delivered by 31st March 2021, either by BCC or its partners as per the bid. Any capital funding or longer term revenue funding awarded will enable increased supply of move on accommodation with ongoing support for this cohort of people. If the bids are unsuccessful then the proposed activities will either not happen or have to be reprioritised within partners’ existing budgets. Hence there will be no new cost implications for BCC regardless of the outcome of the bid. However, the risk of a second wave of Covid leading to a further lockdown remains which would lead BCC to incur further as yet unplanned and unfunded expenditure in order to protect rough sleepers.</p> |
| Finance Business Partner: Wendy Welsh, Finance Manager, 20 th October 2020 |
| <p>2. Legal Advice: The proposals may involve the allocation of a mixture of contracts and grants. Any contracts must be awarded in accordance with the Public Contracts Regulations 2015 and the Council’s internal procurement rules. Potential state aid implications will also need to be considered in relation to any grants.</p> <p>The funding should be allocated in accordance with the grant conditions both in terms of the purposes and the method(s) of allocation.</p> |
| Legal Team Leader: Husinara Jones, Solicitor/Team Leader, 20 th October 2020 |
| 3. Implications on IT: No anticipated impact to IT Services |
| IT Team Leader: Simon Oliver, 02/10/20 |
| <p>4. HR Advice: There are no identifiable HR implications in the report. There may be a need to recruit additional resource at a later stage to provide support for the in-house supported Move On Accommodation process.</p> |
| HR Partner: Celia Williams 5/10/20 |

| | |
|---|------------|
| Appendix A – Further essential background / detail on the proposal Next steps bid summary | YES |
| Appendix B – Details of consultation carried out - internal and external to follow | NO |
| Appendix C – Summary of any engagement with scrutiny | NO |
| Appendix D – Risk assessment | YES |
| Appendix E – Equalities impact assessment of proposal | YES |
| Appendix F – Eco-impact screening/ impact assessment of proposal signed version to follow | 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 |

Next Steps Accommodation Programme (NSAP): Submitted 20th August 2020

1. Challenges in finding supported move-on accommodation for those in C-19 emergency provision, or on the street.

Challenges for placing all 2,218 clients anticipated to need emergency accommodation in Bristol in 2020-21 (387 currently in emergency provision and 37 sleeping rough) include:

1. **Higher levels of homelessness than other areas outside London** – Bristol's high levels of street homelessness have seen 840 people accommodated under the Everyone In scheme since March 2020.
2. **High and rising local rent levels** – Even with LHA increases, the highest rising rents outside of London are a significant barrier to moving on, particularly since the market opened back up following lockdown.
3. **Lack of self-contained properties** – a lack of supply of both private and social/affordable one-bed accommodation in the city means intense competition for what is available.
4. **Blockages in supported housing** – Around 800 single homeless people are in supported housing at any one time and 50-60 who become 'stuck' beyond the two years due to factors on this list, and to lack of specific accommodation for people with enduring needs. This prevents new rough sleepers accessing that accommodation.
5. **COVID market conditions** – Uncertainty in the market; increased rental market activity due to unemployment and relationship breakdown; and high numbers of recent move on placements are using up supply of suitable properties.
6. **Challenges in the private sector** – Landlords can be selective and usually want evidence that a prospective tenant can sustain a tenancy or be reassured that ongoing support will be provided to support a tenant with any ongoing support needs.

Additional challenges for at least 70 people who clearly have 'High/complex/multiple needs' include:

7. **History of placement breakdown** – A significant proportion of the 70 High/complex/multiple needs in emergency accommodation have exhausted all other supported housing options due to their multiple and complex needs.
8. **Need for ongoing support** – Around 50 people ongoing mental health needs, substance misuse issues or physical health require ongoing floating support provision.
9. **Challenges in shared settings** – there are people within this cohort who find it difficult to live with others and will not move into supported housing environments where others have support needs, leading to greater exposure to noise, presence of drugs and alcohol related behaviours.

2. How the plans will achieve shared objectives of protecting those currently in Covid-19 emergency accommodation from future homelessness, and achieving a sustained reduction in rough sleeping overall.

Since adopting the 'Everyone in' approach in line with MHCLG guidance we have accommodated 840 people, with nearly 300 people moving on in that time period. Based on the continuing crisis we are working to an estimate of 2,218 clients in total experiencing homeless and at risk of homelessness who need of accommodation by the end of March 2021. We have assimilated the additional Covid 19 accommodation into our overall system, reflecting the large flow of people onto and off the streets in Bristol. In this way we are not only seeking to move people on directly from Covid 19 accommodation onto next steps e.g. PSL scheme (low support) and core and cluster HMOs (medium/high support), but also ensuring we create capacity in the overall system so that people move into the accommodation best suited to their needs.

As part of this whole system approach we are also seeking to move as many people as we can from our existing supporting housing pathway accommodation into social housing and the private rental sector (some into the PSL scheme). This is then freeing up vacancies for people who are accommodated in Covid 19 accommodation with higher support needs to move into our supported housing pathways or looking to target those people who are on the streets who have abandoned or been evicted from Covid 19 accommodation as it did not provide the tailored support they needed to sustain this accommodation.

Similarly, accommodation bought online with new capital for move on will be integrated into this system. This will allow us to move people on from Covid 19 accommodation or from elsewhere in the system – to create space and vacancies in accommodation suited to the needs of the individual – such as creating vacancies in supported housing pathways or more bespoke interventions such as a Housing First approach where accommodation comes first and services and support are wrapped around them. The 'best fit' for an individual is considered through the Covid 19 accommodation Operational Management Groups (OMGs) and where a bespoke solutions are needed, cases are referred to the multi-agency Case Review Group or the Creative Solutions Board (hosted by Golden Key).

RSI funds have been reallocated – with each service area making varying adjustments to ensure the service is operating effectively. However for some proposed work areas the impact has been much greater. SStS funding is going into running the YMCA as a hostel for those newest to the streets (accommodation has been secured until end of March next year). St Mungo's are also setting up of a preventions service operating from New Street as the separation of accommodation and new assessments is important in enabling safer Covid secure environments. St Anne's shelter funding is being used to support clients at the YHA (which has been secured until February next year). The RSI funding for a Second Shelter – and some likely underspend – has been allocated to two separate floating support services to link directly with our proposed INTERIM accommodation proposals for 120+ clients with lower support needs.

The approach is to move from:

Q1 End March – end June 2020

Phase 1 – Already achieved over 200 successful move on and the through put during Q1 was over 800 people.

- Clients are placed in emergency hotel accommodation and SPOT purchased TA
- Shelters relocated into more structured YHA & YMCA accommodation.

Q2 July – end September 2020:

Phase two – planned reduction in emergency hotel use. Already started with reduction at end of July, and again at end of August. This aligns with:

- More moves into the Pathways.
- Increase in PRS tenancies offered to those leaving hotels
- Work with refugee sector – to utilise university help/ Hospitality hosts and voluntary sector
- PSL scheme with 120 units of self-contained accommodation on ASTs for this client group within a wider development (Next Steps bid but delivered from September 2020 – so also included with Interim)
- 9 units for young people in new modular development (Z Pods) delivered end of October/early November

Q3 October– December 2020

Phase 3 – Reduction in emergency hotels. End emergency hotel use at end of October (with contingency to continue 32 spaces through to March 2021 to absorb increased demand for accommodation).

- Continue to fill Imperial Apartments PSL scheme with full 120 units planned by end of October 2020
- PSL scheme (Hawthorn Croft) leased by St Mungos, on a five year lease, to provide 8 units of Supported Move-on accommodation for women that will also be closely aligned to the women only supported housing Pathway service.
- Block purchase of HMOs to provide a core and cluster model – staggered introduction expected by October 2020. This will provide a cluster of shared housing with intensive support for complex needs (support service already in place from the RSI repurposed funding, currently operating from Arnos Manor). And additional units supported from Supported Lettings & other existing floating support teams to minimise the use, and higher cost, of unsupported TA. (INTERIM bid element). High support needs, different / smaller environment,
- Looking at options within Pathways Accommodation and with our lead providers to see if there are any other ways to increase INTERIM options and maximise moves directly into pathways
- Contingency use of increased block contract Temporary Accommodation and SPOT Temporary Accommodation, particularly to meet the needs of people with NRPF who are actively engaging in a move on solution

Q4 Jan- March 2021: (Next Steps Programme delivered)

We have a substantial and well recognised Supported Housing Pathway accommodation – the issue in Bristol is that people get stuck in this Pathway

because of the lack of longer-term move on options that are affordable. Therefore, our Next Steps bid is for a mixture of **Supported Move on** with non-secure tenancy (as form of TA) or ASTs, providing a useful stepping stone for some clients who still require a more supported structure. We recognise the importance in requesting and being allowed to re-provision units within the wider stock in the future to enable someone to remain there where that is in the person's best interests and an alternative RS unit offered to replace it. This approach will give that individual the opportunity to make this their longer-term home – and the RP or LA landlord commits to providing an alternative unit if the placement is successful.

- During this period the dedicated support teams (Salvation Army, Golden Key, SStS, Support Lettings, Navigators, SIB) will be assessing the longer-term move on needs and options.
- Preparing clients in INTERIM core & cluster for moves on into Pathways high support accommodation, Housing First type option, High Tolerance Housing or Supported Living
- Set up **permanent TA** within the local authority stock to deal with those new to the street but complex needs - with potential to request (from Homes England) re-provision as secure accommodation and commitment to re provide alternative unit where success of placement relies on a secure and settled tenancy for that individual.
- Set up range of Supported Move on provided through RPs with dedicated support team (may be commissioned across the provision – or directly attached to scheme – still tbc) – with potential to request (from Homes England) re-provision as secure accommodation and commitment to re provide alternative unit where success of placement relies on more settled status.
- Assess the level of need for additional move on accommodation likely to be required due to the flow onto the streets (and the impact of evictions and increase in job losses) and continue to work up proposals. Greater focus on modular development (not feasible within the current Next Steps timelines). Based on figures since March with a 20% uplift from October to March), we anticipate having to accommodate 2,218 clients in 2020-21 if all still need to be accommodated
- Housing First type revenue programme, 28 units, with 14 coming through additional supported move on being identified within this bid and the remaining 14 coming from BCC and a range of other registered providers committed to this programme.
- We have also changed our SWEP provision for this winter using hotel rooms, Spot purchased TA and repurposing rooms in supported housing as single bedrooms which we hope will be a better environment to engage with people than a large shelter.
- Re-establishing effective mechanisms to prevent people coming onto the streets

The recommissioning of our Rough Sleeper service has been delayed but a clear strand of the proposed change in approach focussed on the ability to more effectively work with longer term rough sleepers and returners. The proposal is to recognise these as a distinct cohort and create a separate contract – focussing on more personalised move on planning - and judged by longer term successful

outcomes for individuals (rather than block KPIs). A critical element of our approach going forward to deliver a sustained reduction in rough sleeping overall.

For move on purposes we have categorised clients in accommodation according to the Cohorts set out in the guidance. Of the 387 currently accommodated and the 37 people who are currently rough sleeping:

- **High/complex/multiple needs:** *54 clients in this cohort (and an additional 16 people who rough sleeping)*
- **Medium/high needs:** people who have a significant or repeat history of rough sleeping: *149 clients in this cohort (and an additional 18 people who are rough sleeping)*
- **Low/no support needs:** *145 clients in this cohort (and an additional 3 people who are rough sleeping)*
- **People with NRPF:** *39 people in this cohort (and an additional 1 person who is rough sleeping)*

2.1 Support services working across properties provided through NSAP funds

1. Supported Move on Team:- to provide support: for those in new Supported Move on properties (79 properties in capital section) and for those moving into the 8 leased units from St Mungo's at Hawthorne Croft (in revenue only section)
2. Settled Move on Team – 'Housing First' approach: with a multi-disciplinary team including clinical health workers, specialist benefit advice, employment advice and housing advice attached to support 28 rough sleepers with the most complex needs (split between revenue and capital sections).
3. A dedicated registered practitioner (Social Worker or Occupational Therapist) carrying out Care Assessments (initially working alongside the RSI Flexible High Support Service). These clients fall into three groups:
 - a) Ineligible for social care but need some support and sign-posting
 - b) Some eligibility for floating support e.g. via Support to Access the Community (home visits) or Direct Payments (personal budget to pay for support and or accommodation) but still following a homelessness pathway for accommodation
 - c) Eligibility for social care and suitability for a placement of accommodation with support e.g. Supported Living (especially mental health placements), Extra Care Housing (currently estimated at 5-10 people in hotels in this category)
4. Financial Incentives to support 50 people to transition from the street into longer term supported move-on accommodation. Support for securing and sustaining private sector tenancies will include access to the Credit Union supported deposit bond scheme, gifted one month rent in advance, 1 year gas electric, water and Wi-Fi and £100 towards start-up household items. A third of clients will also receive 1 year's bus pass where placed at a distance from city centre / work.

5. A bid to assist people into employment (for 2020/21). We have internally funded employment support for those with NRPF but are seeking to extend this for clients (30k for ESOL and specific employment support) with low support needs who are much closer to gaining employment and for whom this should then increase their likelihood of sustaining their accommodation. We are aiming to target employment support and employability courses for 60 people at a cost of £55,000
6. Move In – a proposal for those who are likely to get stuck in supported housing (40 people) for longer than the expected 2 years as they have long term ongoing needs such as mental health, substance misuse, physical health needs. This service is about a housing led approach that provides both resettlement and ongoing low/medium support for as long as required to enable tenancy sustainment (to be included in a future bid).
7. Peer-led support enabled through VCS partners (to be included in a future bid as VCS capacity currently providing food to clients in Covid 19 accommodation).

Interim Fund

Under the interim fund this client group will access the Core and Cluster HMOs alongside flexible floating support for 60 clients delivered by Golden Key. There will be access to High Tolerance Housing for those that get stuck in our supported Housing Pathways who have longer-term care and support needs. For those housed in 32 hotel beds throughout the winter they will receive food and comfort packages from VCS food providers. There will also be support to access employment for those people in this cohort that are advanced enough in their recovery to consider employment.

2.2 Summary of project strands

2.21 Interim costs (20/21) £2,174,274

- To cover the costs of the hotel and youth hostel provision – with the majority of hotel provision already reduced and ending in September.
- One hotel with continue until march next year (at reduced capacity, 32 rooms)
- YHA and YMCA continue into 2021
- *Move into PRS and our Supported Pathways (no cost request from this fund but critical to our overall approach)*
- Use of a block contract for shared housing to create a cluster of houses where residents can be *supported by a remodelled RSI funded support team*. And additional dispersed accommodation that enables clients to move on out of the hotels for a short period until longer term solutions are secured
- Provision for those with NRPF – through TA and accessing 2 units within our partners non-commissioned youth provision
- Taken on an ambitious PSL scheme in September – providing 120 studio and one-bed flats on assured shorthold tenancies (AST) at affordable rent level

(ASTs)

- Employment support & employability courses for 60 clients
- The cost of support services for individuals in the hotels (and then on into Imperial Apartments and block contract for shared housing) is covered by remodelled RSI funding and other resources from existing providers

2.22 Long-term fund (21/24)

Supported move on options for rough sleepers, supporting people into self-contained accommodation.

Capital & revenue requests:

Revenue request: £1,688,447 and Capital Grant funding of £4,693,866 will deliver 85 homes for Supported Move On to properties identified by BCC and local partners:

- Street Acquisition scheme and Whitehall Road, provided by St Mungo's (44 homes/bed spaces)
- BCC Supported Move On Properties (13 homes/bed spaces)
- Four schemes provided by United Communities/Solon (6 homes/bed space)
- A proposed shared accommodation property, provided by Elim (5 homes/bed spaces)
- New flats in Ashton Rise, a new build development provided by BCC (8 homes /bed spaces)
- Chalk Road Zed Pods, provided by BCC (9 homes /bed spaces)

These are supplemented by 128 further longer term units:

- BCC, Imperial Apartments (120 homes /bed spaces) five year lease
- St Mungo's, Hawthorn Croft (8 homes /bed spaces)

Support for the clients moving on to new accommodation will include:

- A Housing First style programme (for 14 of the 28 complex, long term rough sleepers/returners where a settled accommodation offer alongside access to an intensive support service is more appropriate and cost-effective). This will be linked to 14 of the units identified in this bid. A simplified procurement process will be set up in the next few weeks in anticipation of the need to have this team in place by January 2021.
- A new Supported Move-On Team to support clients to move into the additional 71¹ Supported Move on units delivered through the longer term capital programme, and to 50 of the flats within the Imperial Apartment tenancies. This service will deliver support to build clients' resilience and capability to move on successfully into more secure tenancies. Discussions will take place in the next few weeks with the RPs who have submitted proposals for providing Supported

¹ (i.e. 85 – 14 used for Housing First style programme)

Move on units to determine the most effective, and sustainable, way to procure & deliver this support service to the timescales required.

2.23 Revenue only requests within main NSAP bid:

Total request:£764,190

- a) Housing First style programme (for the other 14 of the 28 complex, long term rough sleepers/returners identified for this project). This will be linked to 14 existing RP or BCC units. (No capital element required).
- b) Financial Incentives to support 50 people to transition from the street into longer term supported accommodation.
- c) A dedicated social worker carrying out Care Assessments (initially working alongside the RSI Flexible High Support Service) to help access a care package and alternative more appropriate housing options.
- d) Revenue Support for the remaining 6 months costs of the HMO block contract delivering 120 interim accommodation units within the interim bid.

RSI Risk Register

Negative Risks that offer a threat to NSAP interventions and outcomes (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 | Delay in spending the funding for the Interim fund | Delays in securing agreement on Imperial Apartments and Block purchased accommodation (all other spend has been or is in the process of being spent on agreed projects) | Additional expense in accommodating people in hotels or spot purchase.. | Open | Empowering & Caring | Financial | Paul Sylvester | Work has been done intensively to gain agreement on the contract with Caridon and any issues have now been ironed out. Expect to sign by 19-10-20; Slight delay to block purchased accommodation but now units are coming online and nominated to (08-10-20). | | 2 | 4 | 8 | Unknown | 1 | 4 | 4 | Oct-20 |
| 2 | Long term fund and revenue attached below bid level, reducing move on accommodation options | Not all properties submitted fit the award criteria, providing less units than requested. | reduced capacity for move-on | Open | Empowering & Caring | Increase in rough sleeping | Paul Sylvester | We have strong indications that the majority of the units are being progressed to award. The fund will open up again soon and we will have more time to ensure that the properties fit the criteria. Also further move-on accommodation will come online from a wider BCC move-on project. | ↓ | 2 | 4 | 8 | Unknown | 1 | 4 | 4 | Oct-20 |
| 3 | Rise in rough sleeping | Due to Covid related economic impact, there is not enough accommodation available to meet needs of all the people coming onto the streets or not enough suitable accommodation to offer people according to their support needs. | Increase of people coming remaining on to the streets longer. | Open | Empowering & Caring | Increase in rough sleeping | Paul Sylvester | Accommodation now coming online catering for clients with different support needs, additionally, move-on from Pathways and new units will facilitate move-on for client with specific needs e.g. Housing First. Rough Sleeping Prevention service re-established from 1st October will have an increased impact on prevention for people new to the streets and reconnection. Also further move-on accommodation will come online from move-on project. | ↔ | 3 | 4 | 12 | Unknown | 2 | 4 | 8 | Oct-20 |

| | | | | | | | | | | | | | | | | | |
|---|---|--|--|------|---------------------|--|----------------|---|---|---|---|----|---------|---|---|---|--------|
| 4 | Increase in households in spot purchased accommodation | Increase in homelessness and lack of alternative accommodation to house people in. | Lack of move-on accommodation available | Open | Empowering & Caring | Finance | Paul Sylvester | Interim award received allowing move on which will reduce level of people in TA into PRT and funded block booked accommodation. Initial feedback that a significant proportion of longer term move on will also be funded with support and that further applications to fund can be submitted soon. Also further move-on accommodation will come online from move-on project. | ↓ | ↑ | 4 | 4 | | 0 | 4 | 0 | Oct-20 |
| 5 | Not enough time to ensure suitable procurement processes so that services are in place on time. | Lack of Capacity within contracts & Commissioning Team | Projects not online on time (increasing rough sleeping), | Open | Empowering & Caring | Increase in rough sleeping/reputational with MHCLG | Carmel Brogan | Utilise all staff resources in team to prioritise commissioning projects linked to MHCLG funding (new team member on temporary contract recently appointed to help cover this) | ↓ | ↻ | 4 | 12 | Unknown | ↑ | 4 | 4 | Oct-20 |

Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



| | |
|------------------------------|---|
| Name of proposal | Next Steps Accommodation Programme (NSAP) |
| Directorate and Service Area | Growth and Regeneration |
| Name of Lead Officer | Carmel Brogan |

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

The proposal is for a use government funding to help reduce the number of people needing to sleep on the street. The immediate/interim programme is cover the cost of the emergency use of hotels and then moving people into a range of interim accommodation, including shared housing and self-contained temporary accommodation as well as longer-term tenancies (mainly at Imperial Apartments – a separate EQIA has been prepared for this development). The main programme will fund long-term move on accommodation with revenue support for at least first three years. The focus of the fund is on delivering supported move in accommodation, through the flexible sue of Local Authority stock, register provider stock, housing I the private sector or new build supply.

Step 2: What information do we have?

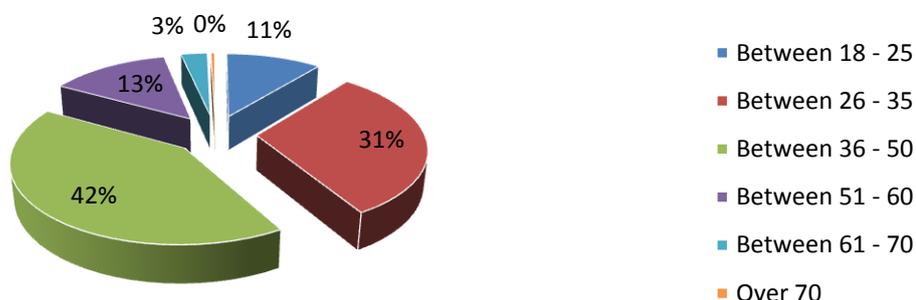
Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

The data below gives an outline of those recognised as rough sleeping or at risk of homelessness – this is the group that the NSAP is directly targeted for:

Age profile

Age Profile 2016-19: 1,975 individuals



The majority of people (over 70%) who have accessed the current Rough Sleeper Service between 2016-19 are aged between 26 and 50 years old. The number of **young people (18 to 25)** is 11% of the client group. Young people (up to the age of 25) are offered accommodation in the young people's pathway as this is often more appropriate for their needs and prevents them being exposed to older people with more complex needs who may take advantage of their vulnerability. There are rarely any people who are under 18 who access the service as they are immediately referred into social services and accommodated immediately through the Emergency Duty Team.

Only 3% of clients who have contact with the service are **61 years or older**. This partly reflects the vulnerability of people who end up sleeping on the streets and the complexity of their issues. The mean age at death was 45 years for men and 43 for women, far lower than for the general population, which is 76 years and 81 years for men and women respectively. This often reflects the impact of living on the streets and the trauma that many people experience in early life.

Gender

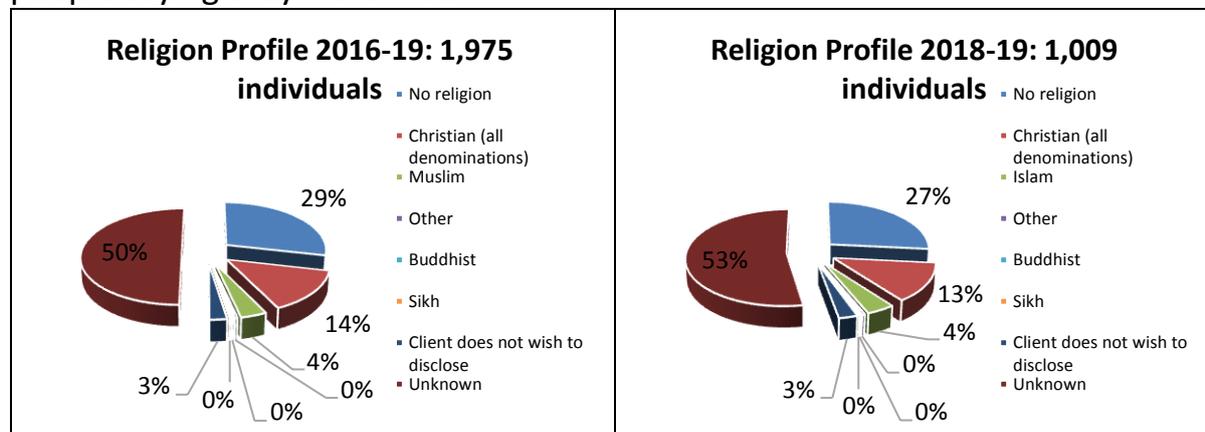
In the last year – compared to the average for the last three years - there has been a slight shift in the gender of people accessing the service with the number of female clients increasing to 18% of the total client group.

Ethnicity

Information from the Needs Analysis tells us that there are higher levels of Black/African/Caribbean/Black British people (11%), white other (13%) and lower levels of Asian/Asian British people engaging with the service compared to the Bristol population.

Religion

A significant number of people stated they had no religion, other or did not wish to disclose. In 2018-19 13% of people said they were Christian with 4% of people saying they were Muslim.



Disability

The majority of people on entry to the service responded to say that they were not disabled; indeed only 9% clearly stated that they were disabled. This maybe partially explained by stigma in acknowledging disability but could also be related to people not recognising mental health problems and learning difficulties as potential disabilities.

However, as noted above, this contrasts with a 2010 Health Needs Audit of 152 people in homelessness services or supported housing, whereby 59% said they experienced a long term physical health need or problem. We also know that in the adult supported accommodation pathways in 2018-19, 73% of people have mental health needs and 43% of people have physical health needs.

Sexual orientation

Information on sexual orientation does not reflect the level of 4% of LGBT* people in Bristol Quality of life Survey 2016¹. This reflects a need to assimilate in recommendations from the Stonewall 'Finding Safe Spaces' so that people feel safer in services in the city to feel confident to be open about their sexuality.

2.2 Who is missing? Are there any gaps in the data?

¹ Sexual Orientation and gender - 2015/16 Bristol Quality of Life Survey adult population

There is no data on marriage and civil partnership.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

Due to the very short timescale provided for submitted the NSAP bid, the main consultation has been with stakeholders directly involved in the homelessness sector fora. This has included IF group members (representatives of those with lived experience).

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

The location of the shared housing (HMO) options (which may have to be predominately in the outer fringes of Bristol) & Imperial Apartments (in South Bristol) may reduce the access to support networks for some Black, Asian and minority ethnicity clients².

There is nothing else in the proposals that has been identified at this stage as having an adverse impact on people because of their protected characteristics, although this will be further explored as the referral criteria and routes for accessing the supported move on accommodation are determined.

3.2 Can these impacts be mitigated or justified? If so, how?

Those placed in shared housing or at Imperial Apartments will have access to dedicated support services in the first few months to help ensure that local support networks, or other ways to gain appropriate support in the longer term to sustain tenancies, can be identified. We will also continue to look to increase the number of HMOs in neighbourhood with easier access to BAME support networks.

3.3 Does the proposal create any benefits for people with protected characteristics?

The dedicated support services will have an increased awareness of particular potential issues for some people with protected characteristic and for experienced support workers to help address/mitigate these.

² We have carried out a separate Equality Impact Assessment for Imperial Apartments (Parkview) <https://democracy.bristol.gov.uk/documents/s51656/Appendix%20E%20-%20EqIA%20Imperial%20Appartments%20Parkview%20development%20Final.pdf>

Additionally the following are being explored in the allocation criteria for supported move on:

1. Dedicated shared housing, and supported move on accommodation for women
2. Looking to achieve high quality standards in the new build and conversion and maximise the number of units that are accessible - which will be particularly beneficial to people who have a disability or access needs.
3. Providing two units for young people with No Recourse to Public Funds within dedicated young people's provision

3.4 Can they be maximised? If so, how?

The issue of maximising the number of accessible units can be highlighted with all the accommodation providers at this stage to ensure that this is not overlooked.

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?

The short timescales provided for this particular bid have severely limited our ability to directly engage with service users and equality groups to inform the bid itself. However, previous EQIAs on the recommissioning of services have strongly influenced our approach to this particular programme such as awareness of the issues around provision for women, young people, and for those with disabilities has influenced the shape of the programme. We have also consulted service users through the IF group on the proposals.

4.2 What actions have been identified going forward?

The issue of maximising the number of accessible units will be highlighted with all the accommodation providers at this stage. We will also monitor the referral and allocation process into the supported move on accommodation and request that the accommodation/support providers produce an EQIA with

and action plan each year to improve access to services for all protected characteristic groups.

4.3 How will the impact of your proposal and actions be measured moving forward?

The EQIAs and action plans will be an integral part of the annual reviews of services.

Service Director Sign-Off:



Date: 09/10/2020

Equalities Officer Sign Off:

Reviewed by Equality and Inclusion Team

Date: 8/10/2020

Eco Impact Checklist

| Title of report: MHCLG next steps funding to tackle rough sleeping | | | | |
|---|---------|--------------|--|--------------------------------------|
| Report author: Paul Sylvester | | | | |
| Anticipated date of key decision 3 November 2020 | | | | |
| Summary of proposals: | | | | |
| To accept the grant award from MHCLG Next Steps funds to prevent people currently accommodated in emergency accommodation from returning to the streets. The short term funds will help support the continued use of emergency accommodation over the next few months (up to April 2021). The main programme of funding will provide capital grant funding for move on accommodation. 85 longer term properties have been identified by BCC and local partners; the award will also provide revenue funding for linked support services. | | | | |
| Will the proposal impact on... | Yes/ No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | No | -ve | There will be some emissions from the residential use of properties, but most would have been used residentially in any case. | |
| Bristol's resilience to the effects of climate change? | No | | | |
| Consumption of non-renewable resources? | No | | | |
| Production, recycling or disposal of waste | No | | | |
| The appearance of the city? | Yes | +ve | Some of the supported move on accommodation enabled through this programme brings empty properties back into use which might otherwise have remained derelict. | |
| Pollution to land, water, or air? | No | | | |
| Wildlife and habitats? | No | | | |
| Consulted with: | | | | |
| Summary of impacts and Mitigation - <u>to go into the main Cabinet/ Council Report</u> | | | | |
| The programme should improve the appearance of the city but not have any other significant direct environmental impacts. Most properties are not derelict and are already | | | | |

used, or can be brought into use for this purpose without significant refurbishment. The redevelopment of the Parkview Office Campus into Imperial Apartments is a private sector scheme that would have taken place whether this programme was in place or not. It has also be considered under a previous cabinet report.

Any impacts from minor works required to bring properties into use for this purpose are likely to have extremely minor direct negative or significant impacts from this proposal, and no mitigation measures are therefore required. The net environmental effects of the proposals are likely to be neutral.

Checklist completed by:

| | |
|---|-----------------|
| Name: | Paul Sylvester |
| Dept.: | Housing Options |
| Extension: | |
| Date: | 08/10/2020 |
| Verified by Environmental Performance Team | Giles Liddell |

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|--|---|--|--|
| TITLE | Emergency Active Travel Fund - Bristol Streetspace | | |
| Ward(s) | Citywide | | |
| Author: Pete Woodhouse | Job title: Group Manager | | |
| Cabinet lead: Cllr Dudd | Executive Director lead: Stephen Peacock | | |
| Proposal origin: <i>Other</i> | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: <i>Cabinet</i> | | | |
| Purpose of Report: | | | |
| <ol style="list-style-type: none"> 1. To approve the receipt of funding from WECA of up to £3.74m for the purpose of delivering schemes to promote Active Travel and facilitate social distancing, in line with the Government’s Emergency Active Travel Fund 2. To delegate the implementation of schemes for streetspace reallocation under the Emergency Active Travel Fund to the Executive Director of Growth & Regeneration in consultation with the Cabinet Member for Transport and Energy, the Green New Deal, Clean Air Zone planning. | | | |
| Evidence Base: | | | |
| <ol style="list-style-type: none"> 1. The Covid 19 pandemic will continue to affect the way people travel into and around the city. Social distancing requirements on buses and trains has reduced their carrying capacity, and with this public transport capacity reduced, the city’s roads will struggle to cope unless significant numbers of people choose to walk or cycle instead. 2. The Government gave clear direction to local authorities, as follows: ‘Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart’ 3. The Government has released statutory guidance requiring Councils to bring forward schemes that will deliver additional numbers of people walking and cycling and established the Emergency Active Travel Fund (EATF) to support the delivery of schemes. Funding for these schemes is to be provided to the West of England Combined Authority (WECA) for allocation to constituent Councils to progress relevant schemes. This funding was made available in two Tranches. In recognition of the emergency nature, the Government expectation for Tranche 1 schemes was that they would be temporary in nature. Tranche 1 schemes were submitted to WECA on 4th June, and a list of schemes is at Appendix A1. 4. As shops and businesses reopened there was a need to provide additional space to allow for socially distanced queuing. This will affect a number of different district centres around the city, particularly where footway space is limited. In addition, there is a strong desire to capture and maintain the improvements to air quality that we saw through lockdown. 5. Strategic City Transport were directed by the Mayor’s Office to identify measures that would help protect public transport services, ensure that residents could practice social distancing safely, and provide improved facilities for active travel. 6. Public transport will continue to be the only option of travel for many residents including numerous key workers. It will also be extremely important that public transport networks are functioning as efficiently as possible as workplaces, universities and schools reopen. To enable this, all active travel schemes will seek to maintain or improve existing bus priority measures. | | | |

7. On the basis of the above aspirations, information from the recently adopted Local Cycling and Walking Infrastructure Plan (LCWIP), was used to shape the Tranche 1 proposals.
8. The conditions of the first tranche required spending within 8 weeks of receipt of funding. Given this urgency, at their meeting of 22nd May WECA CEO's collectively agreed that the authorities should proceed with the design and implementation of Tranche 1 schemes as soon as possible, in consultation with respective Cabinet Member and local ward members. On the expectation of EATF from Government, WECA allocated a pot of £3m to allow the authorities to proceed ahead of receipt of the funding from Government.
9. All Tranche 1 schemes in Bristol were implemented using temporary barriers that could be moved to accommodate local needs. Schemes have been amended in accordance with Government advice and Covid safe practices being introduced in shops. This report seeks retrospective approval for the expenditure and implementation of Tranche 1 schemes.
10. The Government direction for Tranche 2 funding was that it should be aimed at more permanent active travel solutions. Tranche 2 proposals were submitted to the Government through WECA on 7th August, and we are awaiting confirmation of award. The schemes under Tranche 2 were informed by Tranche 1 implementation, public feedback from the Interactive Map, historical local aspirations and were agreed with the Mayor's Office before submission. Tranche 2 funding needs to be committed by the end of March 2021, and we therefore have the opportunity to better engage with local communities so that the views of local people will help shape the design. Tranche 2 schemes are listed at Appendix A2.
11. The EATF schemes are temporary in nature but may become permanent. All schemes have varying impacts on the highway and these will need to be clarified as part of a more detailed cabinet report when funding levels are confirmed and final schemes are known. Issues such as reductions in parking income from lost spaces, bus route alterations and potential additional works will be covered in the next cabinet report.

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Notes the decision made in May 2020 to accept and spend up to £1m of funding from the West of England Combined Authority for the design and implementation of Emergency Active Travel Fund – Bristol Streetspace Tranche 1 schemes
2. Approves the receipt of further funding of up to £2.74m, from the West of England Combined Authority for the delivery of Tranche 2 Emergency Active Travel Fund – Bristol Streetspace schemes, as per the submission to the Department of Transport.
3. Authorises the Executive Director for Growth and Regeneration in consultation with the Cabinet Member for Transport and Energy, the Green New Deal, Clean Air Zone planning to take all steps required to spend the funding and agree and implement Tranche 2 Emergency Active Travel Fund - Bristol Streetspace Schemes.

Corporate Strategy alignment:

1. Improve physical and geographical connectivity; tackling congestion and progressing towards a mass transit system. We want to reduce the impacts of transport on the environment, tackle congestion and encourage healthy lifestyles through widening travel choices, significant public transport schemes, and provision of safe and attractive cycling and walking routes.

City Benefits:

1. The proposal will encourage active modes that will improve health of citizens both directly and by reducing the amount of car borne traffic, congestion and air pollution
2. The proposal directly sought to promote a safe reopening of local high streets through the provision of increased footway space for pedestrians and those queuing outside shops

Consultation Details:

Tranche 1

1. **Growth and Regeneration Scrutiny meetings** – 13th and 20th August
2. **Cabinet Member briefing** – weekly meetings with Cabinet Member for Transport
3. **Local ward Councillors** – ward members were advised of the proposed members in advance of their

implementation, on the basis that the schemes could be reviewed at short notice if local feedback necessitated it.

4. **Local traders** – due to the urgency of implementing these measures there was insufficient time to engage businesses and residents in advance of installation of barriers. However, all affected businesses were sent a letter regarding the proposals with details of how to feedback if any problems arose. In many cases schemes were amended at traders' request to accommodate particular delivery or customer needs.
5. **Equalities Group** – a fortnightly meeting was established with representatives from Equalities Groups
6. **Establishment of Interactive Map** - website for public feedback and suggestions for future interventions

Tranche 2

7. **Engagement** – As the spending requirements for Tranche 2 allow more time for implementation, engagement plans will be in place for Tranche 2 schemes which will include local community and ward member engagement.

Background Documents:

Government guidance: 'Traffic Management Act 2004: network management in response to COVID-19'

<https://www.gov.uk/government/publications/reallocating-road-space-in-response-to-covid-19-statutory-guidance-for-local-authorities/traffic-management-act-2004-network-management-in-response-to-covid-19#network-management-duty-guidance>

| | | | |
|---|--|---|--|
| Revenue Cost | £ | Source of Revenue Funding | |
| Capital Cost | £up to 3.74m | Source of Capital Funding | Government Grant |
| 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:

1. The report asks Cabinet to note that Central government funding had been granted for 'Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart'. This was underwritten by WECA, pending the receipt of a government grant of £1m as the schemes were to be delivered with 8 weeks from the date of the government directive.

2. The report seeks approval to accept and spend (retrospectively), the £1m grant for the Tranche 1, and approval to receive and spend (subject to a success grant award), funding of up to £2.74m for work required for schemes under Tranche 2, which are based on more permanent active travel solutions. If successful, these measures will have to be put in place by March 2021.

3. It is anticipated that some of these measures may have a financial impact on parking income (although the temporary measures have not so far) as well as other services like buses, however, if successful, officers intend to bring back a paper to Cabinet with proposals that will not only highlight any concerns, but options to mitigate such impacts, as the results of the temporary measures are fully analysed.

4. The approval of this report does not constitute a new funding pressure for the Council.

Finance Business Partner: Kayode Olagundoye, Interim Finance Business Partner, Growth and Regeneration, 21/10/2020

2. Legal Advice: Provided the agreement is a grant agreement and not a contract for services, it will not need to be procured in compliance with the Public Contracts Regulations 2015. Client officers will need to seek legal assistance to ensure the agreement is a grant agreement.

The grant funding must be allocated in accordance with the grant conditions. When spending the grant, 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 advice should in relation to any state aid implications.

Legal Team Leader: Husinara Jones, Team Leader/Solicitor, 6 October 2020

| | | |
|--|----------------|-----------------|
| 3. Implications on IT: No anticipated impact to IT Services | | |
| IT Team Leader: Simon Oliver 6 October 2020 | | |
| 4. HR Advice: There are no HR implications evident as the project will be managed using existing resource within G&R (Economy of Place/Management of Place) | | |
| HR Partner: Celia Williams, HR Business Partner – Growth and Regeneration, 5 October 2020 | | |
| EDM Sign-off | | |
| Cabinet Member sign-off | Cllr Kye Dudd | 12 October 2020 |
| For Key Decisions - Mayor's Office sign-off | Mayor's Office | 12 October 2020 |

| | |
|---|------------|
| Appendix A – Further essential background / detail on the proposal A1 - Tranche 1 scheme list A2 - Tranche 2 scheme list | YES |
| Appendix B – Details of consultation carried out - internal and external | NO |
| Appendix C – Summary of any engagement with scrutiny A presentation on Streetspace schemes and delivery was made at Growth and Regeneration Scrutiny Commission on the 13 th August, with a follow up meeting of the same Commission including other stakeholders on the impact of Streetspace schemes on the 20 th August. | NO |
| Appendix D – Risk assessment | NO |
| Appendix E – Equalities screening / impact assessment of proposal Equalities Impact Assessment for Tranche 1 schemes | 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 1 – schemes submitted to WECA for Tranche 1 funding:

| |
|--|
| Old City pedestrianisation |
| Bristol Bridge/Baldwin Street modal filter/bus gate |
| Victoria Street & Counterslip cycle lanes |
| Lewins Mead and Stokes Croft cycle lanes |
| Clifton Triangle pavement widening and cycle lanes |
| Marlborough Street and Park Row cycle lanes |
| Bedminster Parade pavement widening |
| Stapleton Road pavement widening |
| St Marks Road pavement widening |
| Clifton Village pavement widening |
| Henleaze pavement widening |
| Westbury on Trym pavement widening |
| Wells Road pavement widening |
| North Street pavement widening |
| Mina Road point closure |
| Cumberland Road cycle lanes |
| Merchants Rd Bridge pavement widening |
| Greville Road/Upton Road point closure |
| Langton Court Bridge point closure |
| Rosemary Lane point closure |
| Beaufort Road and Victoria Avenue point closure |
| Mina Road cycle lanes |
| Redcliffe Mead/Prewett Street point closures |
| Bus stop amendments. City Centre and corridors A38n/s, A4018, A37, A4, A420/A431, A432 |
| King Street point closure |

Appendix 2 – Tranche 2 schemes submitted to WECA

| |
|---|
| Old City Pedestrianisation |
| Lewins Mead Cycle Lane |
| Clifton Triangle pavement widening and cycle lane |
| Upper Maudlin Street, Park Row and Colston Street cycle lanes |
| Nelson Street cycle lane and pedestrian improvements |
| St Mark's Road pedestrian and cycle improvements |
| Clifton Village pedestrian and cycle improvements |
| Greville Road/Upton Road point closure |
| Langton Court Bridge point closure |
| Rosemary Lane point closure |
| Beaufort Road and Victoria Avenue point closures |
| Redcliffe Mead and Prewett Street point closure |
| Overton Road point closure |
| Woodland Road point closure |
| Picton Street point closure |
| Cotham Side point closure |
| Dean Lane point closure |
| Secure on-street cycle shelters |
| Mina Road point closure |

Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



| | |
|------------------------------|--|
| Name of proposal | Bristol Streetspace Tranche 1 Programme |
| Directorate and Service Area | Strategic City Transport, Economy Of Place |
| Name of Lead Officer | Pete Woodhouse |

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

- The Covid-19 pandemic will continue to affect the way people travel into and around the city. Social distancing requirements on buses and trains have reduced their carrying capacity, and with this public transport capacity reduced, the city's roads will struggle to cope unless significant numbers of people choose to walk or cycle instead.
- The Government gave clear direction to local authorities, as follows: 'Local authorities in areas with high levels of public transport use should take measures to reallocate road space to people walking and cycling, both to encourage active travel and to enable social distancing during restart'
- As shops and businesses reopened there was a need to provide additional space to allow for socially distanced queuing. This will affect a number of different district centres around the city, particularly where footway space is limited.
- Strategic City Transport were directed by the Mayor's Office to identify measures that would help protect public transport services, ensure that residents could practice social distancing safely, and provide improved facilities for active travel.

Following this direction, SCT has implemented multiple temporary schemes

across the city to improve social distancing on local High Streets, provide improved walking and cycling infrastructure, and reduce motor traffic in local neighbourhoods. This Equality Impact Assessment is a summary of the impact of this Bristol Streetspace Tranche 1 programme of individual schemes across the city.

Most individual schemes and phases of schemes, where appropriate, have had their own Equality Impact Assessment:

EQIA 1: Bedminster Parade, Princess Victoria Street, St Mark's Road

EQIA 2: Henleaze Road, North Street, Mina Road (First proposal), Westbury Village

EQIA 3: Lewins Mead, Park Row, The Triangle, Mina Road (second proposal)

EQIA 4: Bristol Bridge

EQIA 5: Old City and King Street

Other Schemes:

- **Stapleton Road:** was included in the Bid but was not taken forward.
- **Cumberland Road:** was included in the Bid but was not taken forward.
- **Merchants Road Bridge:** One-way system on the narrow footways on the bridges, with a new temporary pedestrian crossing on Brunel Lock Road and removal of the fence to slow cyclists by the footpath out of Rownham Mead.
- **Victoria Street & Counterslip cycle lanes:** Temporary bi-directional segregated cycle infrastructure on Victoria Street and Counterslip to link in with Bristol Bridge improvements. The measure provides a critical north-south cycle link in the central area from Temple Meads Station and the recently completed Temple Gate. Impacts to consider included the removal of some parking, pinch points at junctions along the scheme and accommodation of bus stops. The Counterslip section was easier to deliver without any impacts due to the presence of existing mandatory cycle lanes.

Some of the schemes have been amended following feedback from local stakeholders:

- **North Street:** Following communications with local stakeholders we removed a number of barriers on North Street, retaining limited sections where local businesses were in favour.

- **St Marks Road:** After ongoing consultation with local stakeholders, all the barriers on St Marks Road were removed.
- **Bedminster Parade:** After ongoing consultation with local stakeholders, all the barriers on Bedminster Parade were removed.
- **Mina Road:** Communication with local stakeholders lead to the abandonment of parking removal and footway widening scheme on Mina Road. Subsequent feedback from residents and stakeholders also led to a pause on the implementation of the proposed road closure scheme in favour of the current cycling scheme.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

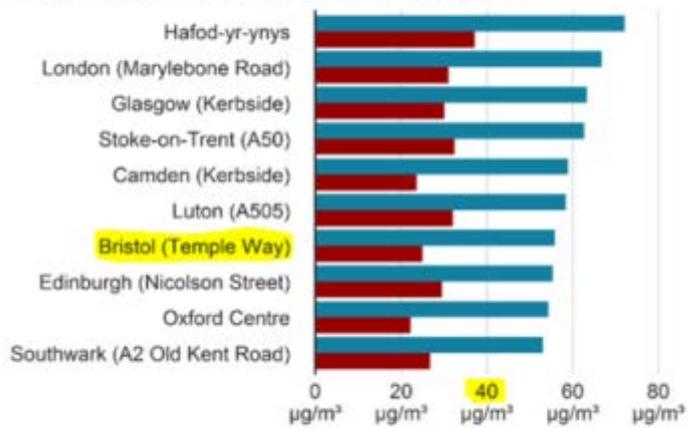
At the beginning of the pandemic, data gathered on changed travel patterns indicated that there has been a:

- Significant (>50%) reduction in travel to destinations such as workplaces, retail, leisure, transport hubs
- Significant increase in local travel (>15%) with communities and to parks and green spaces.
 - Significant increases in the number of people walking and cycling - comparator cities est. 40% and 60% respectively
 - Significant drop in bus patronage of 8-10% compared to baseline
 - General reduction in air pollution

Air pollution has fallen compared with last year

Daily average NO2 emissions

■ 25 March to 7 April 2019 ■ 23 March to 5 April 2020



µg/m³ = micrograms per cubic metre

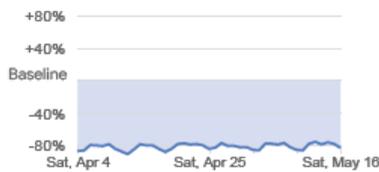
Source: Defra



Bristol City

Retail & recreation

-82% compared to baseline



Grocery & pharmacy

-31% compared to baseline



Parks

+44% compared to baseline



Transit stations

-71% compared to baseline



Workplaces

-48% compared to baseline



Residential

+17% compared to baseline



Source: Google COVID-19 Community Mobility Report May 2020

The impacts of Covid-19 and the resultant restrictions are not distributed equally across society, and there is data giving more information on the spread of these impacts that has informed the interventions made. The data below shows disproportionate health impacts on those from BAME communities, amongst older persons, and amongst those in lower income deciles.

In addition, although we lack specific impact data for Covid-19 for particular protected groups across Bristol, we can use existing Ward data and the Quality of Life Survey to identify where in Bristol interventions may have the most impact from the responses to questions on accessibility and wellbeing .

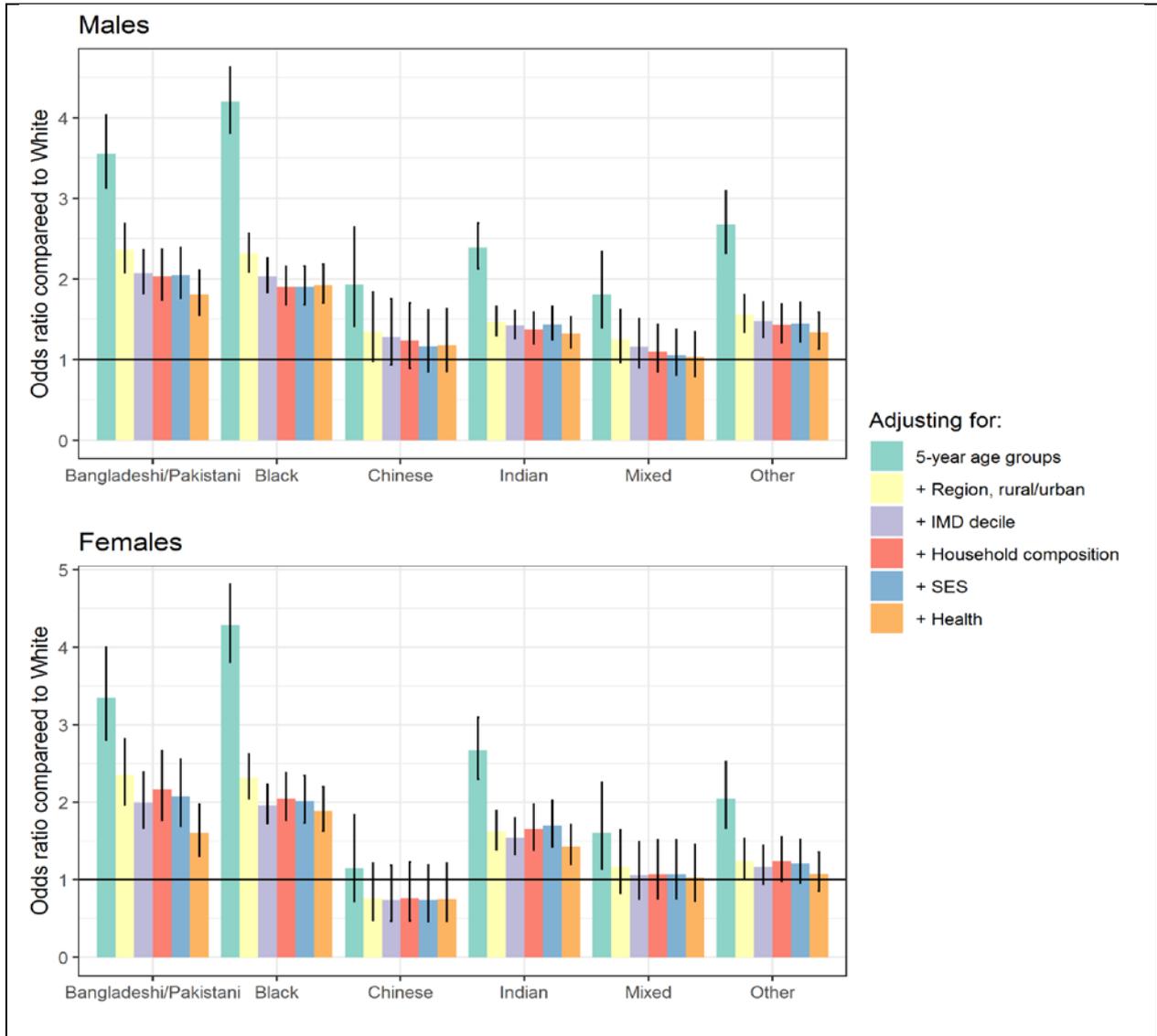
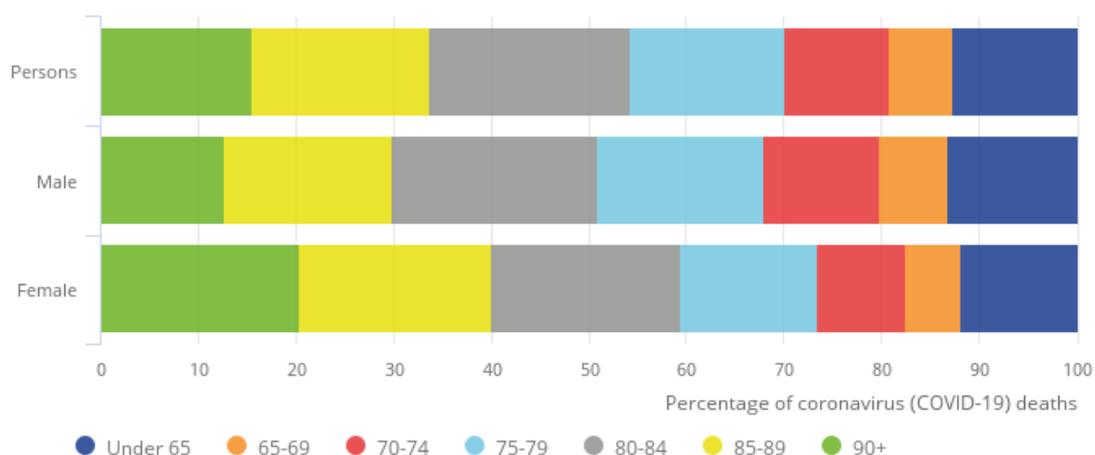


Figure 7: Those aged 85 to 89 years made up the largest proportion of COVID-19 deaths

Percentage of deaths due to COVID-19 that were in each age group, England and Wales, occurring in March 2020



Source: Office for National Statistics – Analysis of deaths involving COVID-19

% of people for whom accessibility issues stop them from getting involved in their community

| Ward | Statistic | Lower Confidence Limit | Upper Confidence Limit |
|-------------------------------|-----------|------------------------|------------------------|
| Bristol Average | 1.8 % | 1.4 % | 2.3 % |
| Ashley | 2.8 % | 0.8 % | 10.0 % |
| Central | 1.9 % | 0.7 % | 5.1 % |
| Bedminster | 0.9 % | 0.1 % | 5.5 % |
| Clifton | 0.0 % | 0.0 % | 2.1 % |
| Westbury-on-Trym and Henleaze | 1.8 % | 0.6 % | 5.5 % |
| Southville | 0.6 % | 0.1 % | 4.3 % |
| Hotwells and Harbourside | 3.0 % | 0.9 % | 9.1 % |
| Lockleaze | 4.4 % | 2.0 % | 9.7 % |
| Easton | 0.8 % | 0.1 % | 4.7 % |

| Ward Name | % with illness or health condition which limits day-to-day activities |
|-------------------------------|--|
| Bedminster | 29.1% |
| Easton | 22.9% |
| Clifton | 22.4% |
| Westbury-on-Trym and Henleaze | 19.6 % |
| Southville | 19.7 % |
| Central | 26.3% |
| Ashley | 20.8 % |
| Hotwells and Harbourside | 18.4 % |
| Lockleaze | 28.6 % |
| Bristol Average | 25.7% |

2.2 Who is missing? Are there any gaps in the data?

At this stage we have limited data on the impact of COVID-19 on equalities groups at a local level. We know that there are gaps in our diversity data for some protected characteristics citywide, especially where this has not historically been included in census and statutory reporting e.g. for sexual orientation.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

Due to the emergency timescales imposed by the pandemic, and the need to

rapidly facilitate transport with safe social-distancing, prior consultation has not been possible.

However we have sought feedback from representatives of relevant local equalities organisations, including those with an understanding of the needs of disabled and older people in Bristol through ongoing regular meetings with Bristol Physical Access Chain (BPAC), both for these sites and the programme as a whole.

All frontages to the temporary measures (residential and business premises) have received a letter from the council regarding the measures, and the transport engagement team have gathered information and feedback directly from businesses across the programme. Business premises have generally received a personal visit from the project manager to explain the measures. We responded to Local Stakeholder feedback on multiple schemes and majorly altered or withdrawn interventions based on feedback.

We have responded to stakeholder recommendations and requests in the immediate delivery of these measures wherever possible technically, and this has already taken into account local concerns for Mina Road and Westbury Village in modifying designs.

Designs and summaries have been shared by local Ward Members to reach as wide an audience as possible, and feedback from this exercise has been used to modify design for Westbury Village, and pause implementation of Mina Road measures for design review.

Letters have been circulated to sites in advance to ensure notice of timelines, and to signpost the public towards their local Ward Members for feedback.

We have gathered public feedback and continuously monitored initially implemented measures, including their impact upon specific protected groups. Feedback was then used quickly and reactively to modify measures, reduce disproportionate negative impacts, and maximise positive impacts for groups with protected characteristics.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

Each specific scheme will have its own impacts as detailed in the individual EQIA. On a programme level:

Reduction in both parking spaces outside shops in local centres could affect the access of persons with disabilities to services. It could also affect access for pregnant persons and older persons, who are more likely to rely upon a private car to access shops and services.

Reduction in carriageway allocation and road closures at could reduce access and lengthen journey times for the same groups who rely on cars. Road closures in residential areas especially will impact local access, potentially resulting in increased journey difficulty and times, especially for larger vehicles from organisations who work with disabled people. A reduction in residential on-street parking could impact upon blue badge holders in the area.

Altered street configuration could create issues for disabled people's access along footways and familiarity with surroundings. This is especially true where cyclists are directed through areas and crossing points that bring them in close contact with pedestrians as part of the Lewins Mead scheme.

Bus stops may need to be temporarily moved. Depending on the destination, this may mean people with mobility issues need to go further to the bus stop.

We are also aware of the following issues for protected characteristic groups relating to coronavirus/COVID-19 which we will seek where possible to address / mitigate through this proposal :

Only 47.8% of people in Bristol aged 65+ say they are comfortable using digital services, compared to 81.8% overall . We need to use a range of communication channels. At a local level the council is working with partner organisations to ensure key messages for older people are being delivered via telephone, radio and print/postal media.

Ensure communications are in plain English and that Easy Read versions are available (or on request if appropriate).

People with visual impairments may find it difficult to meet social distancing requirements. Many cannot judge distances, or need to physically touch objects to be aware of their presence. Guide dogs for example are not trained to keep distance from people or objects. Therefore exercise that involves walking can be stressful as they have to be very aware of people around them and sighted people do not always move out of the way. Social distancing has also led to people with visual impairments being barred and thrown out of shops for either requesting sighted guides, going in to a shop with a sighted guide, or having to touch products.

People who do not speak English as a main language will require local updates and information in plain English, and alternative languages/formats to address the risk of misinformation being spread e.g. through social media.

Black and Minority Ethnic-led small businesses may lack information about the support available to them from the government particularly taxi drivers, restaurants, cafes and hotels.

3.2 Can these impacts be mitigated or justified? If so, how?

Careful consideration has been given on a case by case basis to ensure that a sufficient level of disability and parent/ carer and child parking spaces are retained to allow these persons to access needed shops and services.

Clear and proactive signage for changing in parking access and cycle lanes to reduce conflict as much as possible has been prioritised. Designs for schemes has both proactively prioritised access for those with limited mobility and/or vision, and been modified in light of ongoing feedback from representatives, especially where conflict with pedestrians and cyclists is possible that could make navigation difficult for people with limited vision and/or mobility.

Reduced car access to local centres has also been designed on a case-by-case basis to ensure viable alternative routes and access was maintained.

These disbenefits are also mitigated by the positive health and access outcomes of providing safer, social distanced active travel routes and waiting areas for shops for these groups.

Overall, the health benefits to all residents from improved social-distancing, increased active-travel and reduced air pollution are balanced against any

remaining access concerns.

Local businesses and resident groups have been contacted as part of delivery to identify access concerns and come up with solutions, and clearly inform as to changes.

3.3 Does the proposal create any benefits for people with protected characteristics?

Improving the safety of shopping through social-distancing measures creates health benefits for those protected groups who are disproportionately impacted by COVID-19. Improving pedestrian provision across the city creates benefits and safer environments from traffic for users of wheelchairs and those with limited vision and/or mobility.

Negative health impacts from air pollution also disproportionately affect young and elderly persons, lower-income groups, Black and Minority Ethnic populations, and pregnant and nursing women. Measures to re-allocate carriageway space to active travel and away from cars will reduce air pollution and benefit these groups.

By creating better and safer active-travel alternatives to private car travel for lower-income groups and elderly persons, positive financial impacts will be realised for these groups.

The significant improvements to cycling infrastructure across all schemes will benefit disabled people using adapted cycles. The provision of protected bike lanes with physical separation from traffic will ensure that people of all ages and abilities can now use the route. Further phases of the schemes will seek to improve the existing crossing facilities at junctions. These improvements will ensure that access to destinations such as the Hospital other key destinations are upgraded to cater for people using all modes of transport rather than through traffic.

3.4 Can they be maximised? If so, how?

Tranche 1 of Bristol Streetspace has prioritised areas of the city that suffer most from the negative health impacts due to the Covid-19 crisis and air pollution. The changes have been introduced as a temporary response to the pandemic. The Council will work with local communities to make adjustments to scheme design where necessary to address specific concerns raised by the

community e.g. increased blue badge parking availability.

Moving forward, Tranche 2 of the programme will engage with the wider community and look to make a number of schemes more permanent by using higher quality materials and incorporating detailed feedback from local consultation.

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?

On a programme level EqIA has helped us to identify potential impacts in the areas of the city where we will be implementing measures, and the need for planned monitoring and subsequent adjustment of measures in line with feedback from equalities stakeholders and citizens.

Specific feedback from residents and stakeholder groups has led to the expansion of extra advisory disabled spaces in sites where parking was removed, and communication and consideration given to yellow line areas in the schemes where blue badge holders are able to park and load.

Local stakeholder concerns have led to the abandonment of parking removal, and footway widening and point closure schemes on Mina Road in favour of the current scheme. This is also the case for North Street, St Marks Road and Bedminster Parade where following Local Stakeholder concern we removed the barriers based on their feedback.

Consultation with BPAC has led to specific design impacts on advisory disabled bays, barrier configuration on approach to crossings, and temporary tactile marking usage guidelines for gaps in barriers, and how to mitigate potential pedestrian conflicts with bicycles on temporary schemes. Provision of suitable footway widths and modal filters widths to allow motorised wheelchairs full access has also impacted designs from these discussions.

4.2 What actions have been identified going forward?

Incorporation of ward equality data into site choosing for packages of measures, and consideration of their detail in light of this, such as maintaining disabled access when altering pavement configuration.

Ongoing submission to Covid-19 equalities representative group for feedback on measures. Design-specific feedback on access for persons with limited vision and/or mobility will now take place with this representative group to inform elements of implementation such as temporary tactile markings, ramps, and handrails. This feedback will be implemented where possible in new and existing sites.

Immediate group-specific monitoring of impacts from introduction of first measures to allow rapid reactive adjustment to reduce or mitigate negative impacts.

4.3 How will the impact of your proposal and actions be measured moving forward?

Through built in monitoring. A company has been procured to provide video monitoring of major schemes within the programme, such as Bristol Bridge. Data has been gathered on the physical success of social distancing, allowing the success of social distancing to be assessed in each location. The first lot of distancing surveys have been completed. A public website has been launched for the public to give feedback both on local transport issues in general and on interventions to date. Ongoing monitoring through physical access representative is taking place on an informal basis to provide feedback on schemes in place.

Air pollution impacts will be measured through existing testing infrastructure across city on a site-by-site basis.

| | |
|----------------------------|------------------------------|
| Service Director Sign-Off: | Equalities Officer Sign Off: |
| Date: | Date: |

Eco Impact Checklist

| Title of report: Emergency Active Travel Fund – Bristol Streetspace | | | | |
|---|--------|--------------|---|---|
| Report author: Pete Woodhouse | | | | |
| Anticipated date of key decision: 3 rd November | | | | |
| Summary of proposals: | | | | |
| To approve the receipt of funding from WECA of up to £3.74m for the purpose of delivering schemes to promote Active Travel and facilitate social distancing, in line with the Government's Emergency Active Travel Fund | | | | |
| Will the proposal impact on... | Yes/No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | Yes | + | Promoting alternatives to car use during the pandemic and in the longer term will help reduce greenhouse gas emissions. This is important in the context of Transport being the biggest contributor by sector to the UK's CO2 output. | |
| | | - | Installing new bus, walking and cycling lanes will require the use of equipment and machinery that emit carbon emissions | Use equipment using clean fuels (e.g. solar electronic signage and night time lighting, electric plant) where possible. |
| Bristol's resilience to the effects of climate change? | Yes | + | Implementing sustainable transport measures across the network will help build resilience by providing realistic and attractive alternatives to car use. | |
| Consumption of non-renewable resources? | Yes | + | Reducing reliance on car use and promoting alternatives will provide a net benefit for reducing the | |

| | | | | |
|--|-----|---|---|--|
| | | - | consumption of non-renewable fossil fuels Installing new bus, walking and cycling lanes will require the use of equipment, materials and machinery that either emit carbon emissions or have embedded emissions within extraction and refinement process. | Teams within EoP and MoP will work with colleagues in the Environment Team to ensure that where possible sustainable, longer lasting, and/or recyclable materials are considered over more carbon intensive equivalents. |
| Production, recycling or disposal of waste | Yes | - | Installing new bus, walking and cycling lanes will require the use of equipment and machinery that produces waste products | Minimise waste where possible and ensure that waste material segregation, storage, treatment and disposal is suitable and legal. |
| The appearance of the city? | Yes | + | While the temporary walking and cycling schemes have had an arguably negative impact on public realm the programme hopes to turn these schemes into permanent features. The delivery of more walking, cycling and bus lanes should reduce the overall quantity of motor vehicles in the central area and local neighbourhoods | |
| Pollution to land, water, or air? | Yes | + | Promoting alternatives to car use during the pandemic and in the longer term will help reduce the presence of air pollutants. This is important in the context of the city's statutory obligation to | |

| | | | | |
|------------------------|-----|---|---|--|
| | | | bring NO2 within legal limits in the shortest time possible. Planting trees as part of schemes will contribute to improved air quality. | |
| Wildlife and habitats? | Yes | + | Removing general traffic lanes and installing better pedestrians and cycling infrastructure in their place will provide opportunities for tree planting and Sustainable Urban Drainage projects | |

Consulted with:

Summary of impacts and Mitigation - to go into the main Cabinet/ Council Report

The significant impacts of delivering schemes are carbon emissions and waste produced during works (and embodied carbon from the sourcing and production of materials). These are likely to be significantly outweighed by the reduction in emissions and improvement in air quality from encouraging active travel and public transport options. The actual impact will depend on the permanence of measures and the overall impact of multiple small changes.

Measures to mitigate impacts included in these proposals include options to minimise emissions and waste, and embodied carbon through the careful choice of equipment and materials. Planting trees as part of schemes is likely to further contribute to improved air quality.

The net effects of the proposals are likely to be positive.

Checklist completed by:

| | |
|---|------------------|
| Name: | Jacob Pryor |
| Dept.: | Economy of Place |
| Extension: | |
| Date: | 05/10/2020 |
| Verified by Environmental Performance Team | Giles Liddell |

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| TITLE | Print and Mail Strategic Review | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|------|-----------------------|----------|----------------------|------|-----------------------|--------------|---|---|---|---------------|---|---|---|----------|---|---|---|----------|---|---|---|-------------------|---|---|---|------|---|---|---|
| Ward(s) | n/a – internal change | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Author: Nikki Davey | Job title: Project manager | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cabinet lead: Councillor Craig Cheney | Executive Director lead: Mike Jackson | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Proposal origin: BCC Staff | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Decision maker: Cabinet Member | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Decision forum: Cabinet | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Purpose of Report: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <ol style="list-style-type: none"> To seek approval for the outsourcing of the digital and non-digital functions of the council’s internal print and mail service through the procurement of a single supplier at a value of up to 1.2M (existing service budget) To seek approval for extending the existing contracts, compliantly in line with the council's procurement rules, from Feb21 for up to 9 months pending the procurement of a fully outsourced service due to be awarded in Mar21 and implemented by Aug21: cost = ~50K pm, total cost = up to ~450K (to be funded from the existing service budget) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Evidence Base: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>The council has a small in-house print and mail service through which inbound and outbound mail, printing, and scanning is managed. The council also has a contractor for scanning and a separate contractor for outbound mail; however, uptake of the contracted services is variable and often staff use the more expensive approach of printing and posting their own mail (using the MFDs and buying envelopes and stamps).</p> <p>NB. MFDs are the multi-functional devices, ie. printers/photocopiers/scanners.</p> <p>We are intending to modernise the print and mail service through a consistently applied corporate business process enabled by digital technology by:</p> <ol style="list-style-type: none"> Outsourcing and expanding the Print and Mail service with a compliant contract (replacing all existing contracts); the following table shows which how current activity is managed – the aim is to move all activity to an external contractor and significantly reduce the use of MFDs | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 25%;">Activity</th> <th style="width: 25%;">In-house P&M Service</th> <th style="width: 25%;">MFDs</th> <th style="width: 25%;">External contractor/s</th> </tr> </thead> <tbody> <tr> <td>Inbound mail</td> <td>Y</td> <td>N</td> <td>N</td> </tr> <tr> <td>Outbound mail</td> <td>Y</td> <td>Y</td> <td>Y</td> </tr> <tr> <td>Printing</td> <td>Y</td> <td>Y</td> <td>Y</td> </tr> <tr> <td>Scanning</td> <td>Y</td> <td>Y</td> <td>Y</td> </tr> <tr> <td>Security scanning</td> <td>N</td> <td>N</td> <td>N</td> </tr> <tr> <td>Fax*</td> <td>N</td> <td>Y</td> <td>N</td> </tr> </tbody> </table> | | | | Activity | In-house P&M Service | MFDs | External contractor/s | Inbound mail | Y | N | N | Outbound mail | Y | Y | Y | Printing | Y | Y | Y | Scanning | Y | Y | Y | Security scanning | N | N | N | Fax* | N | Y | N |
| Activity | In-house P&M Service | MFDs | External contractor/s | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Inbound mail | Y | N | N | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outbound mail | Y | Y | Y | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Printing | Y | Y | Y | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Scanning | Y | Y | Y | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Security scanning | N | N | N | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fax* | N | Y | N | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>*Fax capability also available on stand-alone fax devices and fax server</p> <ol style="list-style-type: none"> Ensuring the contract value for a fully outsourced service is within the existing annual budget of £1.2M thereby eradicating the income target shortfall (~£300K pa) and reducing the cost of the service Combining the Print and Mail contract with the MFD contract (currently held by ICT) and moving the MFD budget and responsibility into Facilities Management (cabinet approval was secured for the procurement of MFDs in Sep19) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

4. Designing, implementing and embedding a To Be model which meets the budget, enables accurate recharging and incorporates MFD contract and which is supported by robust strategy and policy
5. Extending the existing contracts from Feb21 for up to 9 months pending the procurement of a fully outsourced service due to be awarded in Mar21 and implemented by Aug21: cost = ~50K pm, total cost = up to ~450K (to be funded from the existing service budget)

It is anticipated that this approach will yield significant benefits by reducing turnaround time, costs and environmental impact while increasing security, accessibility, flexibility and productivity.

Cabinet Member / Officer Recommendations:

That cabinet:

1. Approves the procurement of a contract with a single supplier for internal print and mail services at a value of up to 1.2M.
2. Authorises the Chief Executive in consultation with the Cabinet Member Finance, Governance and Performance, management of the Housing Revenue Account budget to take all steps required to procure and award the contract(s) necessary for the implementation of an outsourced print and mail service, in-line with the procurement routes and maximum budget envelopes outlined in this report.
3. Authorises the Chief Executive in consultation with the Cabinet Member Finance, Governance and Performance, management of the Housing Revenue Account budget to take all steps required to extend the existing contract from February 2021 for up to 9 months pending the procurement of a fully outsourced service at an estimated cost of £50k per month (to be funded from the existing service budget).

Corporate Strategy alignment:

- **Well Connected – make progress towards being the UK’s best digitally connected city:** Improved internal digital print and mail processes will improve council turnaround time, productivity and security
- **Wellbeing – keep Bristol on course to be run entirely on green energy by 2050 whilst improving our environment:** CO2 reduced by project closure (30/09/21)
- **Redesign the council to work effectively as a smaller organisation:** The internal print and mail team staff will be TUPEd to the new provider
- **Equip our colleagues to be as productive and efficient as possible:** Improved internal digital print and mail processes will improve council turnaround time, productivity and security
- **Undertaking technology redesign and replacement to improve effectiveness, enhance cyber security, technology resilience and improve staff efficiencies through new software tools and hardware:** Improved internal digital print and mail processes will improve council turnaround time, productivity and security
- **Use our assets wisely, generating a social and/or financial return:** Cost of print and mail service (including opportunity costs) reduced by end of FY 21/22

City Benefits:

- **Bristol will be a carbon neutral city by 2030:** CO2 reduced by 40% by project closure (30/09/21)

Background Documents:

Print and Mail cabinet report Jul19
 Print and Mail cabinet report Oct18
 Print and Mail cabinet report Aug16
 FSA [MFDs] cabinet report Sep19

| | | | |
|---|---|---|--|
| Revenue Cost | Up to £1.2M | Source of Revenue Funding | Mail Services Print Services |
| Capital Cost | £0 | Source of Capital Funding | n/a |
| One off cost <input checked="" type="checkbox"/> | Ongoing cost <input checked="" type="checkbox"/> | Saving Proposal <input type="checkbox"/> | Income generation proposal <input type="checkbox"/> |

NB. Although this project does not have a savings target it is anticipated that it will be possible to achieve a reduction in service costs through outsourcing and any savings achieved will contribute to the Facilities Management savings target

Required information to be completed by Financial/Legal/ICT/ HR partners:

1. Finance Advice:

General commentary:

This project aims to deliver a longer term modernised solution to the provision of BCC's Print and Mail services. It has scoped and assessed a number of approaches and concludes that its preferred option is to outsource both services (digital and non-digital) and contract with a single supplier. It should be noted that the Print and Mail services' net budget position in recent years and currently presents a forecast annual pressure of c.£0.3m. The project has not at this time proposed any savings. Finance recommends that if, in the course of procurement, savings are identified that these are first used to offset the 'bau' pressure before being recorded as contributing to FM wider savings targets. The project estimates spend of £0.2m on resources for development of this project to FBC standard.

Confirmation of funding source(s):

For the contract itself –

£1.1m expenditure budget is confirmed as held within the cost centres for Print 11751 a/c code R4300 and Mail 11636 a/c code R4503.

There is up to £0.1m further expenditure budget identified as held within cost centres across the rest of BCC which it would be appropriate to centralise as part of the project's delivery process.

For resources in the implementation of this project -

The Key Line Of Business Reserve has earmarked £180k (for Outline Business Case and Full Business Case combined). The project is revisiting cost estimates in order to meet this total budget envelope.

Finance Business Partner: Jemma Prince, 22/09/20

2. Legal Advice:

Combining the service and supply requirements of various legacy contracts into a single new contract will require a clear specification of BCC's financial and service needs together with robust legal provisions to ensure BCC's objectives are achieved through the new contract, including use of KPIs, service credits, parent company guarantees, bonds and other remedies as may be considered necessary (though not all these protections may be needed).

With multiple current contracts being amalgamated into one new contract, TUPE (as has been mentioned) is likely to apply, but being a multiple transfer of employees to a single transferee, there is need to act with particular care. However, as BCC will not be employing any transferred employees, BCC has no direct legal status in the process, other than as a facilitator to support the transferor / transferee providers, except where the existing legacy contracts give BCC legal rights over the way in which the transferring employers deal with employee information. Legal services will support HR in the TUPE process as needed.

A further consideration is whether the new contract will be procured and awarded through a framework or as a one-off bespoke contract, the latter offering more scope for adaptation to BCC requirements, but more complex in terms of work required.

Care will need to be applied in considering the extension of the legacy contracts, with particular regard to the contract terms, the value of the extension the need for same provider need to carry out the services and whether there is any urgency. In the current Covid climate, there may also be consideration of what is proportionate in terms of extending contracts generally.

Legal Team Leader: Eric Andrews, Legal Services, 30 September

3. Implications on IT:

IT Services are supportive of the approach being undertaken. This will bring long-term benefits to the Council in terms of services and efficiencies.

IT Team Leader: Simon Oliver, 22/09/20

4. HR Advice:

A fully outsourced service is likely to involve (TUPE) transfer of staff currently undertaking these duties to the new provider. Consultation with those impacted will need to be undertaken as required by law.

HR Partner: James Brereton, 21/09/20

| | | |
|------------------------------------|-------------------------|----------|
| EDM Sign-off | Mike Jackson | 02/09/20 |
| Cabinet Member sign-off | Councillor Craig Cheney | 01/09/20 |
| CLB sign-off | Mike Jackson | 15/09/20 |
| For Key Decisions - Mayor's | Mayor's Office | 05/10/20 |

| | | |
|------------------------|--|--|
| Office sign-off | | |
|------------------------|--|--|

| | |
|---|------------|
| Appendix A – Risk assessment | YES |
| Appendix B – Equalities screening /impact assessment of proposal | YES |
| Appendix C – Eco-impact screening/impact assessment of proposal | YES |

Project Risk Log - high level risks

| Ref/ID (risk) | Risk Description | Key Causes | Key Consequence | Risk Owner | Key Mitigations | Equalities related risk? | Likelihood | Impact | Risk Rating | Current status |
|---------------|---|--|--|--------------|--|--------------------------|------------|--------|-------------|---|
| 1 | Scope creep - This project is vulnerable to scope creep as we undertake the discovery work, and this could increase the timeline | - Discovery process uncovers unknown issues and areas of work | - Existing P&M project timeline may be increased | David Martin | - Ongoing assessment of impact against agreed tolerances | N | 4 | 5 | 20 | - Increased scope has increased the timeline within tolerance so far |
| 2 | Bidders' submissions are too expensive The financial objective is to reduce costs If the market cannot meet the contract value then we will have to rapidly pivot our approach | - Supplier market value | - Outsourcing becomes unviable | David Martin | - Contract negotiation - Reduced volumes maintained from lockdown - Robust procurement | N | 3 | 5 | 15 | - Requirements underway and route to market being defined |
| 3 | Lack of buy-in from user departments Council staff not buying into the savings and digitisation strategy and resisting culture change | - Lack of appetite at senior level - Poorly designed and communicated objectives and benefits - Ineffective comms plan | - Lack of compliance - Failure to embed - Unable to realise full savings potential / cost reductions - Unable to fully support the digital strategy across the organisation, eg. Environmental impact | John Walsh | - Mandate from sponsor to comply - Challenge non-compliance - Print policy - Clear strategy - Escalate when necessary - Clear comms | N | 3 | 5 | 15 | - Requirements workshops complete; engagement has been positive - Policy drafted |
| 4 | Lack of control due to outsourcing - Once the contract is outsourced then we could have less control of the service | - Fully outsourced service | - Poor service quality - Increased costs | David Martin | - Robust procurement process - Maintain close contract management - Ensure the supplier has robust business continuity in place at all times | N | 3 | 5 | 15 | - Requirements under development |
| 5 | Challenges re recharges - Some other LAs have found that accurate recharging has been challenging to implement | - Volume of codes - Unlear who owns the print/mail - Complex council structures | - Innacurate financial reporting - Lack of control of costs - Solution failure | David Martin | - Engage the correct IT and finance resources - Test the process - Contract manager in place | N | 3 | 5 | 15 | - Build into implementation |



Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)

| | |
|------------------------------|----------------------------------|
| Name of proposal | Print and Mail Strategic Review |
| Directorate and Service Area | Facilities Management, Resources |
| Name of Lead Officer | David Martin |

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

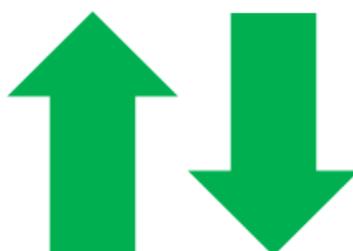
1.1 What is the proposal?

The proposal is to modernise the print and mail service through a consistent corporate business process enabled by digital technology.

The project has the following goals:

Implement and embed a digital print and mail service to:

Increase productivity
Increase security
Increase service flexibility



Reduce costs
Reduce turnaround time
Reduce environmental impact

The strategic approach is to:

- Outsource all or part of the Print and Mail service with compliant contracts (replacing all existing contracts) across the following areas:
 - Inbound mail
 - Outbound mail
 - Printing
 - Scanning
 - Security scanning (of inbound mail for potential harmful materials)
- Combine the Print and Mail contracts with the contract for MFDs (multi-functional devices, ie. printer/photocopier/scanner)

The project will be encouraging departments to digitise their hard copy comms where possible but only if citizens opt to receive digital comms; however, it is not in scope of this project to manage the digitisation of departments' hard copy comms.

Bristol Design is out of scope so this proposal will not affect marketing and comms products.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

1. **Citizens** will not be affected as this is an internal change
2. **All staff** will be affected because we are likely to be implementing a new accessible online portal. The Diversity and Inclusion Consultant who reviewed the EqIA relevance check advised that staff with sensory impairments need to be considered (as one example). 10% (580) of staff have declared that they have a disability on the *Diversity dashboard 16 July 2020 v1-0*. This data is not broken down by disability.
3. **The staff who currently manage the in-house elements of the service** will be affected as they are likely to be TUPEd to the new supplier: 4 staff, 100% male, 50% aged 50-64. These staff are likely to be doing same job; just not employed by BCC. This process will adhere to the council's Management of Change policy during which staff will be consulted. Staff members' rights under TUPE will be confirmed through the contract negotiation with the new supplier.

2.2 Who is missing? Are there any gaps in the data?

Data re staff with sensory impairments does not exist.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

We will be carrying out user testing with a range of staff during the implementation phase.

We will ensure testing includes all protected groups but in particular those who are experiencing difficulty in using the current system as well as likely to experience difficulties in using the future system.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

Protected groups that might be adversely affected:

Disability

Staff with physical disability and those with sensory impairment could be affected because we will be introducing a new online portal to manage bulk printing and inbound and outbound mail; however, we will be requesting the supplier adheres to WCAG 2.0 through the procurement process and carrying out user testing. This will mitigate the adverse effects through the provision of reasonable adjustments.

Some disabled staff may be affected by the reduction in MFDs in core buildings such as City Hall; however, reasonable adjustments can be put in place and the new service is likely to meet the needs of all staff and significantly reduce the need to use MFDs.

Accessible training on the Learning Pool and user guides will be made available to all staff.

Low Socio-Economic Status

Some staff may be on low banding post where IT equipment is not provided and/or may prefer not to use IT.

Some staff may not have basic literacy / numeracy / IT skills in which case reasonable adjustments will be provided as required (eg. support worker).

Accessible training on the Learning Pool and user guides will be made available to all staff.

Staff with other protected characteristics are unlikely to be negatively impacted. However, we will monitor usage in future to ensure that this is the case.

3.2 Can these impacts be mitigated or justified? If so, how?

- We will be asking suppliers to evidence that they can support the council's approved accessibility standard (WCAG 2.0) <https://www.w3.org/WAI/standards-guidelines/wcag/>
- A senior UX designer and web editor is allocated to the project team
- A training module will be available on the Learning Pool as well as user guides
- Reasonable adjustments can be put in place in discussion with line managers
- Procurement Team to ensure equality and inclusion good equality and inclusion practice is adhered to throughout the tender process
- Procurement Team to ensure equality and inclusion good practice is happening within the organisations that receives the contract (their workforce and service delivery)
- The aim of the project is to reduce our costs and our carbon footprint and these are justifiable drivers for change

3.3 Does the proposal create any benefits for people with protected characteristics?

All staff are likely to find it easier to access printed copies of documents. This is because printing can be ordered through the new supplier portal and posted out to the member of staff (or any specified recipient/s). This will have a positive impact on any staff who are working from home and/or do not have access to a printer.

A digital interface is likely to make it easier for staff, and in particular those with sensory impairment, who will be able to use accessibility software to use the service which they can't do at the moment.

3.4 Can they be maximised? If so, how?

Accessible training on the Learning Pool and user guides will be made available to all staff.

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

| 4.1 How has the equality impact assessment informed or changed the proposal? | | | |
|---|--|---------------------|-----------|
| We are more mindful and will be taking tangible actions regarding eliminating/reducing adverse impacts on staff who will be delivering the changed service as well as all staff within BCC who will be using the new service. | | | |
| 4.2 What actions have been identified going forward? | | | |
| Issue / improvement required | Action | Responsible officer | Timescale |
| Staff changes | Adhere to Management of Change policy, inc. staff consultation | David Martin | Aug21 |
| Staff changes | Confirm staff TUPE rights | David Martin | Aug21 |
| Data | Gather data re staff with sensory impairments | Nikki Davey | Aug21 |
| Data | Monitor impact on all protected groups | Nikki Davey | Aug21 |
| Procurement | User testing with protected groups | David Martin | Aug21 |

| | | | |
|-------------|---|--------------|-------|
| Procurement | Supplier to adhere to WCAG 2.0 | David Martin | Aug21 |
| Procurement | Ensure equality and inclusion good equality and inclusion practice is adhered to throughout the tender process | David Martin | Aug21 |
| Procurement | Ensure equality and inclusion good practice is happening within the organisations that receives the contract (their workforce and service delivery) | David Martin | Aug21 |
| Training | Module on the learning Pool and user guides | David Martin | Aug21 |

4.3 How will the impact of your proposal and actions be measured moving forward?

- Tender evaluation
- User testing
- Staff feedback
- Management of Change process

| | |
|--|--|
| Service Director Sign-Off: John Walsh | Equalities Officer Sign Off: Chaman Verma |
| Date: 28/09/20 | Date: 28/09/20 |

Eco Impact Checklist

| Title of report: Print and Mail Strategic Review | | | | |
|---|--------|--------------|--|--|
| Report author: Kieron Draper/Nikki Davey | | | | |
| Anticipated date of key decision: 15/09/20 | | | | |
| Summary of proposals: | | | | |
| Will the proposal impact on... | Yes/No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | Yes | +ive or -ive | <p>Council printing and mailroom equipment will no longer be used if the service is outsourced.</p> <p>An external company will use energy and produce printing emissions. If they are located outside Bristol, travel distances may also increase.</p> <p>Some printing will be done by a contractor instead of by the council, but encouraging the adoption of a digital-by-default approach among staff may reduce the number of pages printed. This will produce less carbon emissions and ground level ozone.</p> <p>It should be noted that the number of pages printed in council offices per day during lockdown was reduced by 67% for black and white printing and 55% for colour printing. This shows that there is</p> | <p>The number of contracts will be reduced from 8 to between 1 and 5 (one would be preferred). This will make contract management easier, and contractors will be expected to demonstrate environmental improvements in their bid.</p> |

| | | | | |
|--|-----|------|--|---|
| | | | scope to reduce printing. It may also reduce if homeworking is used more in the longer term, now that staff are used to it. | |
| Bristol's resilience to the effects of climate change? | No | | | |
| Consumption of non-renewable resources? | Yes | +ive | A reduction in printing volumes will lead to reduced consumption of paper and other consumables. | Contractors will be expected to demonstrate reduced environmental impacts in their bids such as use low levels of paper waste, recycled or FSC paper, and low impact inks, and modern efficient printers and other machinery. |
| | | +ive | Outsourcing will reduce council resources used and travel, but some of these resources will still be used by the contractor. | |
| Production, recycling or disposal of waste | Yes | +ive | Reduction in printing volumes leading to reduced consumption of paper and other consumables and thereby reduced waste | Contractors will be expected to demonstrate reduced environmental impact in their bids, such as low levels of printing waste, paper waste recycling, and using the waste hierarchy. |
| | | -ive | Any decommissioned council equipment make become waste. An outsourced supplier will scan mail to digitise it which will produce ozone. Printing usually also produces ozone. | Finding new homes for equipment that is no longer needed, but still in working order, or recycling it when necessary. Minimising printing volumes or using equipment that doesn't use devices that produce ozone. |
| The appearance of the city? | No | | | |

| | | | | |
|---|---|------|---|---|
| Pollution to land, water, or air? | Yes | +ive | Some mail exempt and still to be delivered, but most mail deliveries will be greatly reduced. | Contractors expected to demonstrate reduced environmental impact in their bids such as efficient fleet (hierarchy as follows, best to worst): <ul style="list-style-type: none"> ▪ <i>Electric Vehicles</i> ▪ <i>Plug in Petrol Hybrid</i> ▪ <i>Petrol hybrid</i> ▪ <i>Gas or petrol</i> ▪ <i>Plug in Diesel Hybrid</i> ▪ <i>Diesel Hybrid</i> ▪ <i>Diesel</i> |
| Wildlife and habitats? | No | | | |
| Consulted with: Gary Goodwin – senior user David Martin – project executive | | | | |
| Summary of impacts and Mitigation - <u>to go into the main Cabinet/ Council Report</u> | | | | |
| <p>This proposal is likely to reduce the consumption of paper and printing consumables, as well as travel for mail deliveries. This will reduce emissions and resource use. Harmful environmental impacts are not likely to exceed the existing impact of the service.</p> <p>The overall impact is likely to be environmentally beneficial, although the extent is uncertain (it depends on both the procurement process and council staff adjusting to the new digital-by-default approach.</p> | | | | |
| Checklist completed by: | | | | |
| Name: | Kieron Draper and Nikki Davey | | | |
| Dept.: | Print and Mail Services and Change Services | | | |
| Extension: | | | | |
| Date: | 18/08/2020 | | | |
| Verified by Environmental Performance Team | Giles Liddell | | | |

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|--|--|--|--|
| TITLE | Data and Insights Delivery Partner and Procurement Approach | | |
| Ward(s) | N/A | | |
| Author: Simon Oliver | Job title: Director - Digital Transformation | | |
| Cabinet lead: Councillor Cheney | Executive Director lead: Mike Jackson | | |
| Proposal origin: BCC Staff | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: Cabinet | | | |
| Purpose of Report: | | | |
| <ol style="list-style-type: none"> 1. To seek approval to place a contract with a suitable supplier to work in partnership with the council as the “Effective use of Data” delivery partner | | | |
| Evidence Base: | | | |
| <ol style="list-style-type: none"> 1. In July 2018, Cabinet approved £20.3m (£7.2m revenue, £13.1m capital) to deliver the FSA programme in a timescale of 3-5 years. FSA set out components needed to build on the current IT platforms and ICT service delivery to ensure a modern, secure, flexible and service-aligned IT service in support of the Corporate Strategy and business drivers/outcomes will be delivered. 2. This included a significant component looking at the data quality and use of the organisation including recommendations on how Bristol can become a truly data driven council across all departments. This has been successfully delivered and provided BCC a blueprint on how to truly develop data services to improve all decision making 3. The Council sourced a credible supplier of Data and Insight Consultancy for the FSA Programme, however instead of contracting directly with the Partner, they were sub-contracted through our main Microsoft contract and there is no approved procurement approach to enable further work to be contracted directly and this would lead to unnecessary layer of margin being included on the work without any additional value 4. Following successful delivery of the Data and Insights work contracted for through the FSA Programme (now ITTP) further work has been identified to embed Data and Insights developments within the Council 5. The ITTP Programme (using ITTP and non-ITTP budgets) have identified funding for the following projects and upon approval will appoint the supplier for these; <ol style="list-style-type: none"> a. ASC Accelerators b. Worker Index and HR Alignment Analytics c. Think Family DB Review d. Enterprise Data/ Analytics Functional Operating Model Ways of Working e. CIO/Director Direct Support 6. Other identified but not funded projects are set out below. It is the intention that further procurements will undertake a separate approval process but let under this overall contract; <ol style="list-style-type: none"> a. House and Landlord Accelerators b. Think Family Database replacement c. Children’s Services Accelerators 7. Deliverables identified above (#5) will be delivered via three approaches. 1) Work undertaken directly by the supplier with a handover to BCC staff upon delivery. 2) Work undertaken jointly by the supplier and the Council as part of a development/training approach. 3) Work undertaken by the Council, with the supplier | | | |

acting as a support function where necessary.

8. The work being procured will be monitored and led by a new Data and Insights Board made up of technical and business representatives from across the Council.
9. Expediency of procurement is a key factor to the intended approach as a number of Corporate priorities are underpinned by the work being proposed in #5.
10. Several procurement approaches were considered including running a competition to seek a new partner. Due to the initial work and value being delivered, and experience to date, it is considered best value of resources to further appoint the identified supplier through a compliant and legal process
11. Following market testing, and undertaking procurement advice, the award of contract via GCloud Framework following clarification of price and service offerings is preferred. This is due to a) Avoiding the costs and risks associated with a competition and b) Speeding up the delivery of the benefits by using the pre agreed framework contract c) Allowing continuity between the ending of ITTP and moving forward into business as usual
12. Preferential rates to the usual GCloud rates have been secured, which will be discounted further if the supplier is contracted for all deliverables in #5.

Cabinet Member / Officer Recommendations:

That Cabinet:

1. Approves in principle the award of a contract for an Effective Use of Delivery Partner using CCS G.Cloud Framework, (for a maximum term of 2 years and to an estimated value to not exceed £2m);
2. Authorise the Chief Executive in consultation with the Deputy Mayor (with special responsibility for Finance, Governance and Performance) to take all steps required to award the contract.

Corporate Strategy alignment:

The Corporate Strategy identifies a need to work with back office services to identify what needs to change to be a more effective and efficient council to achieve our priorities (p7). The FSA/ITTP and resulting IT Strategy is a core component of this, particularly contributing to two of the four Organisational Priorities outlined in the Corporate Strategy (p11):

1. Redesign the council to work effectively as a smaller organisation
2. Equip our colleagues to be as productive and efficient as possible
3. The data insights provided through the individual projects of work that make up this programme will assist meeting the aims above

City Benefits:

1. There are no specific or direct benefits to the city however this service improvement programme supports the whole organisation’s ability to deliver commitments in the city; there are no identified equalities impacts.

Consultation Details:

1. No consultation is considered necessary as aligned to previous cabinet decision to comment the FSA Transformation Programme.

Background Documents: ICT Future State Assessment – Cabinet meeting 18/06/18

| | | | |
|---|--|---|--|
| Revenue Cost | - | Source of Revenue Funding | - |
| Capital Cost | £2m | Source of Capital Funding | Allocated Budgets |
| 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 negotiate and award a contract via the GCloud framework to the Council’s current supplier for the ‘effective use of data delivery’ partnership. This contract is to be for a maximum term of 2 years and for a ‘not to exceed’ value of £2m Capital funding. The Capital funding itself is either already approved in the current MTFP and Budget or is to be proposed for approval in a

future year's MTFP and Budget.

The composition of up to £2m Capital funding is as detailed –

The ITTP Programme (using ITTP and non ITTP budgets) have identified funding for the following projects:

| | <u>£'000</u> | <u>Funding Source</u> |
|--|--------------|------------------------|
| a. Adult Social Care Accelerators | 400 | Key Line of Business |
| b. Worker index and HR Alignment Analytics | 145 | ITTP or Cyber Security |
| c. Think Family Database review | 18 | Digital Transformation |
| d. Enterprise Data/Analytics Functional Operating Model Ways of Working | TBC* | - |
| e. CIO/Director Direct Support | TBC* | - |
| | 563 | |

Other identified but no yet funded projects are set out below:

| | | |
|--|-------|---|
| a. House and Landlord Accelerators | 351 | - |
| b. Phase 3 – works to be concluded and confirmed | TBC* | - |
| c. Think Family Database replacement | 400 | - |
| d. Children's Services Accelerators | 343 | - |
| | 1,094 | |
| *TBC's as above | 343 | - |

| | | |
|--|-------|---|
| A further consideration for future identified work directly tied to data/analytics | 1,094 | - |
|--|-------|---|

| | | |
|-----------------------------|--------------|--|
| TOTAL CONTRACT VALUE | 2,000 | |
|-----------------------------|--------------|--|

The report goes on to request that authority to award this contract be delegated to the Chief Executive.

Finance Business Partner: Jemma Prince, 19 October 2020

2. Legal Advice: The use of the Gcloud Framework is a legally acceptable procurement route. Legal services will advise and assist officers with regard to the use of the Framework and the resulting contractual arrangements.

Legal Team Leader: Husinara Jones, Team Leader/Solicitor, 15 October 2020

3. Implications on IT: Fully supported by IT Services. This is a key strategic procurement to achieve our ambitions to be a data-led (insight-led) organisation and enable this aspect of Digital Transformation to proceed quickly and the benefits realised as soon as possible.

IT Team Leader: Simon Oliver, 22/09/2020

4. HR Advice: Work by the external supplier will complement and not replace the work currently undertaken in-house, so TUPE Regulations would not apply.

HR Partner: James Brereton (People & Culture Manager), 29th September 2020

| | | |
|--|---|------------|
| EDM Sign-off | Mike Jackson | 02/09/2020 |
| Cabinet Member sign-off | Cllr Craig Cheney (via ITTP Delivery Board) | 27/08/2020 |
| For Key Decisions - Mayor's Office sign-off | Mayor's Office | 19/10/2020 |

| | |
|---|-----------|
| 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 | 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 |

Decision Pathway – Report

PURPOSE: Key decision

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|--|---|--|--|
| TITLE | Supplier Early Payment Initiative | | |
| Ward(s) | All | | |
| Author: Kevin Smith | Job title: Revenues Operations Manager | | |
| Cabinet lead: Councillor Craig Cheney | Executive Director lead: Mike Jackson, Chief Executive | | |
| Proposal origin: Councillor | | | |
| Decision maker: Cabinet Member | | | |
| Decision forum: Cabinet | | | |
| Purpose of Report: | | | |
| <p>To seek approval for the procurement and implementation of a Supplier Early Payment Initiative ('SEPI') for payments to suppliers and to contract with Oxygen Finance Ltd ('Oxygen') as the service provider for the implementation and management of the service.</p> | | | |
| Evidence Base: | | | |
| <p>Bristol City Council (the 'Council') has set out its ambitious plan to achieve inclusive, sustainable growth and in achieving this ambition economic growth and sound financial management are integral themes. The need to create a prosperous local economy, supporting people and the local business community and creating an environment in which they can flourish, have never been greater. The Council must support local businesses and job creation through embedding social value in commissioning and procurement, including managing and monitoring delivery of social value activities, and through the prompt payment of invoices.</p> <p>The Council spends some £400 million annually on goods and services, with in excess of 10,000 suppliers. Circa 40% is expended within the local area (defined for this purpose only as BS1 – BS16 postcodes). The Public Contracts Regulations 2015 requires local authorities to ensure that every public contract which they award contains suitable provisions to require <i>“that any payment due from the contracting authority to the contractor under the contract is to be made no later than the end of a period of 30 days from the date on which the relevant invoice is regarded as valid and undisputed”</i> and report on the number of invoices paid within these terms. This is particularly important for many of the small local businesses that provide services to the Council.</p> <p>At the end of September 2020 year to date performance of the Council’s was 86.3% of invoices paid within 30 days. This is an improvement slightly from last year’s position of 81.00% and predominantly resulting from the temporary accelerated payment in initial response to the Covid-19 pandemic. The main issues preventing this targets being achieved are the volume of invoices processed, internal systems and processes and the complexities of the type of provision. Bristol is not unique in this regard, roughly half of invoices in the UK are paid within 30 days; and roughly one fifth wait longer than 60 days.</p> <p>The headline findings in relation to SMEs from the Pay.UK Late Payments research 2019 (pre-Covid-19) indicated the following:</p> <ul style="list-style-type: none"> • 78% of SMEs said they are being forced to wait a month, or longer, beyond agreed payment terms before | | | |

being paid and Some 45% of SMEs are waiting two months or more;

- of those SMEs impacted by delayed payments, 63% say it has a negative effect on their businesses;
- more than a third (35%) are forced to rely on bank overdrafts, while almost a quarter (24%) say that being paid late forces them to hold off paying their own staff or business bills;
- 24% of business owners say they take a cut in their own salaries just to keep cash inside their businesses; and
- 22% of those waiting on funds spending more than £500 a month chasing payments.

The position as outlined above is expected to have deteriorated further in the wake of the Covid-19 outbreak.

The Proposition

The Council has been working on a solution to electronically receive, match and pay supplier invoices to standard contract terms thereby improving the process and cash flow for all suppliers as well as providing the functionality for an optional three way incentive programme to deliver even earlier payments. The implementation of a Supplier Early Payment Initiative (SEPI) will assist with embedding the Council's 'no PO no pay policy', ensuring that goods and services are purchased from the right supplier at the correct price. With enhanced checks and controls in place as part of the SEPI programme, it should also reduce the risk of duplicate and fraudulent payments, which presents a heightened risk in the current economic climate.

The SEPI could enable thousands of invoices to be processed early, injecting millions of pounds of liquidity into the local economy, with the additional revenue generated from the SEPI Programme being channelled into frontline services for the benefit of local residents. The SEPI works on the following principles:

- New electronic -invoicing platform
- Supplier payment terms for new contracts are set at standard 30 days
- No supplier is compelled to sign-up to or participate in the programme

Optional three way Incentive:

- Engaged suppliers (on board) are offered an earlier settlement of their invoices, typically around 10 days ('Target Date') from the date of receipt of a valid invoice, in exchange for a discount directly related to spend categories and how quickly the payment is made; an Early Payment Rebate ('EPR')
- Existing supplier payment terms are replaced with incentivised, accelerated payment terms
- The acceleration is the difference between contracted payment term and actual number of days taken to pay
- The rebate is calculated on each individual invoice and is determined by actual early payment performance, i.e. the actual payment date compared against standard invoice terms
- The net cash flow is increased for the supplier / early payment rebate shared between the operator and the Council
- A phased approach will be adopted with on-boarding of suppliers to this new arrangement. Supplier spends that are not managed via our centralised systems and processes such as Social Care (Controcc) will be considered in a later phase of this programme.
- To support local micro businesses a 'Freepay' approach would be implemented, allowing eligible micro businesses in Bristol to receive payment of invoices earlier than under contracted terms without any early payment discount (0%) to the invoice sum.

The commercial terms of this proposition are outlined in the exempt Appendix I1.

Benefits to the Supplier / Economy

- Suppliers will gain improved liquidity and better cash flow certainty
- Local micro businesses will be able to benefit from 'Freepay' at no cost
- Deliver Social Value contributing to the development and post Covid -19 recovery of the local economy through the earlier payment of invoices

Benefits to the Council

- There are legislative drivers that may be partially addressed through a properly implemented SEPI
- The Public Contracts Regulations 2015 - liabilities paid within 30 days

- The Public Procurement (Electronic Invoices etc.) Regulations 2019 - EU Electronic Invoicing Directive contains provisions relating to the processing of electronic invoices
- The EU Late Payments Directive - automatic entitlement to interest for late payment
- Improved Council performance in terms of Accounts Payable.
- Improved strategic engagement with suppliers who choose to sign up.
- Encourages suppliers to help drive best practice (e.g. e-invoicing) and compliance (e.g. no PO/ no pay)
- Contributes toward social value goals by improving cash flow for local businesses and creating added social value in Bristol.
- Over the medium term the programme will generate a net return (after implementation costs and lost interest on balances held) that can be reinvested into the delivery of front line services.

Procurement

In taking the proposition forward the Council is seeking approval to commission Oxygen Finance via a direct call-off contract from a compliant public sector framework (NEPO 521 Early Payment Services Framework), open until March 2024 with the option of two 24 month extensions. There is no maximum value to any call-off. Oxygen is a specialist provider of payment solutions and one of the leading providers of early payment programmes working with public sector organisations to improve operational effectiveness, drive financial efficiencies and deliver directly and indirectly against the Council's social value objectives which will be embedded in the contract terms and conditions.

A contract term of 5 years is proposed which will enable the implementation costs (largely met by the contractor) to be recovered, new processes to be embedded and gradual growth of suppliers on board. This will be aligned with quarterly meetings and as a minimum annual reporting which will enable metrics that are deviating from expectation to be appropriately considered. This public sector framework provides a quick and value for money route to market and working in partnership with Oxygen Finance can implement a proven approach that can rapidly drive benefits locally.

Whilst we have modelled scenarios with a tapered approach which indicate a range of contract values for each of the 5 years, the rule of thumb is that the initiative could realise bottom line income equivalent to c.0.1% of its total procurement spend on boarded every year. To ensure sufficient headroom the contract value of £1.5m (over the 5 year period) is being proposed, noting that the actual value will be determined by the third party activity in scope, discount fee, level of on-boarding and pace of take up.

Implementation

It will be necessary for the Council to change a number of existing practices around payment processes and adopt a number of new ones, which will need to include:

- Embed the option for early payment terms into all future tenders across the agreed categories;
- To adopt a policy of no early payment, or similar, negotiations with suppliers to be undertaken outside of this SEPI Programme;
- To ensure payment terms in the finance system for existing and new contracts are a standard 30 day term in line with relevant legislation (unless for genuine reasons the contract term for specifically identified contracts have to be shorter than the standard term);
- In line with the social value commitment, revise the terms further for Micro businesses who have a primary business base within the geographical boundaries of Bristol Wards) on boarding to 'Freepay'.

The draft implementation plan is outlined in Appendix I and will require a dedicated team of process change experts from Oxygen Finance along with a small resources team from across a range of support services such as Procurement, Accounts Payable and Communications for a short period to work collaboratively to establish the necessary processes and devise a communication strategy to promote the SEPI to suppliers and ensure the Supplier engagement undertaken by our proposed provider is aligned with our ethos and values and the benefits are clearly understood.

Cabinet Member Recommendations:

That Cabinet:

1. Approve the implementation of a Supplier Early Payment Initiative.
2. Authorises the Director of Finance in consultation with the Deputy Mayor (with special responsibility for Finance, Governance and Performance) to take all steps required to award the 5 year contract through a compliant public sector framework to Oxygen Finance Ltd with an estimated contract value of £1.5m and progress implementation of the programme including revisions to the associated policies and protocols.

Corporate Strategy alignment:

This proposal set out in this report supports and aligns with the vision within the Corporate Strategy in playing a leading role in driving a city of hope and aspiration where everyone can share in its success.

In particular this initiative supports the theme “Fair and Inclusive”, improving economic and social equality and developing a diverse local economy that offers opportunity to all.

Guided by the following principles:

- Build city resilience, improving our ability to cope with environmental, economic or social ‘shocks and stresses
- Use our assets wisely, generating a social and/or financial return
- Raise money in a fair but business-like way

City Benefits:

The supplier earlier payment initiative will assist in improving the local economy through increasing the liquidity of local suppliers and contribute to the creation of a prosperous local economy, supporting the local business community and creating an environment in which they can flourish.

Consultation Details:

None Required

Background Documents:

Not applicable

| | | | |
|---|---|----------------------------------|--|
| Revenue Cost | Initial set-up costs £0.05m Ongoing costs in the range of £0.3m to £0.6m (total over 5 years) (depending on BCC / Supplier contract split) | Source of Revenue Funding | Initial set-up costs to be funded from Commercialisation Reserve Ongoing costs to be self- funding from income generation |
| Capital Cost | n/a | Source of Capital Funding | n/a |
| One off cost <input checked="" type="checkbox"/> Ongoing cost <input checked="" 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:

Finance Advice: This report seeks approval to contract with Oxygen Finance for an initial 5 year term to implement and manage an early payment initiative with suppliers to Bristol City Council. Relevant due diligence work has indicated that Oxygen are highly experienced in the delivery and provision of Early Payment Services and the service is already in use at other local authorities. It is anticipated that circa 50% of the Council’s third party activity would be ‘in scope’, with public sector bodies, schools, utility companies ‘out of scope’.

This initiative is expected to yield a number of benefits to engaged suppliers, to the Council and to the wider economy.

Suppliers considered eligible for ‘Freepay’ are those with fewer than 10 employees and a turnover of less than £632k

(micro entity). These suppliers: (1) are active on the Accounts Payable system within the last 12 months (to be reviewed on a six monthly basis); (2)) have their registered Office address within the Council boundary.

Based on the areas in scope for early adoption, and whether the savings split for BCC: Oxygen is 50:50 or 60:40 with annual flat fee, payback could be achieved in as little as 1 year and generate a small return to the Council for reinvestment in front line services of £0.3m per annum within 5 years. The scheme is expected to reach maturity in the 5th year. Financial appraisal assesses that a widened scope in later phases could potentially increase the scheme's savings generation to £0.5m per annum for reinvestment in front line services within 5 years.

In both cases, sensitivity analysis indicates that a 10% point reduction in take up per year of an initial 5 year contract will reduce net income by £0.1m and extend payback by an additional 1 year.

Further exempt commercial information is included at Appendix I1, I2 and I3.

Finance Business Partner: Jemma Prince – 22 October 2020

2. Legal Advice: It is proposed to make the direct award to Oxygen through the use of the NEPO 521 Early Payment Services Framework, established in May 2020 by South Tyneside Council on behalf of NEPO (North East Procurement Organisation). This single supplier framework is available to all Associate Members, with membership being freely available. It is understood that the both the suitability and availability of the framework has been addressed by colleagues in procurement, and accordingly its adoption should provide a compliant procurement route.

Legal Team Leader: Eric Andrews – 21 Oct 2020

3. Implications on IT: Whilst this is an established product and we do not anticipate any real concerns, IT Services will need to ensure appropriate controls are in place to manage data exchanges and identity management in conjunction with Information Assurance colleagues. This will need to be factored into the delivery approach undertaken.

IT Team Leader: Simon Oliver Director – Digital Transformation – 16 Oct 2020

4. HR Advice: This is new work, so TUPE does not apply. 1 FTE client-side resource is required, which has been budgeted for, being funded from income.

HR Partner: James Brereton (People & Culture Manager) – 19 Oct 2020

| | | |
|--|---|-------------------------------|
| EDM Sign-off | Mike Jackson | |
| Cabinet Member sign-off | Councillor Craig Cheney, Deputy Mayor, Cabinet member for Finance, Governance, Property and Culture | 26 th October 2020 |
| For Key Decisions - Mayor's Office sign-off | Mayor's office | 26 October 2020 |

| | |
|--|------------|
| 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 (<i>Financial officer must be the author of the advice</i>) | YES |
| Appendix H – Legal Advice (<i>Legal Services must be the author of the advice</i>) | YES |
| Appendix I – Exempt Information (<i>Legal Services must confirm that information is to be exempt in accordance with the constitution</i>) | YES |
| <ul style="list-style-type: none"> I1 - Oxygen Finance – Short Form Proposal including implementation plan | |

| | |
|---|------------|
| <ul style="list-style-type: none"> • <i>I2 - Exempt Finance</i> • <i>I3 – Exempt Finance – Implementation Costs</i> | |
| Appendix J – HR advice | YES |
| Appendix K – ICT <i>Include here additional information from ICT</i> | YES |
| Appendix L – Procurement | YES |

Oxygen Finance Risk Register

Negative Risks that offer a threat to Oxygen Finance and its Aims

| Ref | Risk Description | Key Causes | Key Consequence | Status Open / Closed | Strategic Theme | Risk Category | Risk Owner | Direction of travel | Current Risk Level | | | Monetary Impact of Risk £k | What we are doing? | Risk Tolerance | | | |
|-----|---|--|--|----------------------------|------------------------------------|--|--|---------------------------|--------------------|--------|----------------|-------------------------------------|---|----------------|--------|----------------|-----------|
| | | | | | | | | | Likelihood | Impact | Risk Rating | | | Likelihood | Impact | Risk Rating | Date |
| 1 | Inability to commit to working on the systems interface with our finance system | Insufficient resources | Implementation Delay / Reduced Income | Open | Our Organisation | Service provision | Finance Systems Manager | ↔ | 2 | 3 | 6 | 1,000 | Continue to engage with colleagues on timescales in order they may plan resources. | 1 | 3 | 3 | 08-Sep-20 |
| 2 | Challenging to agree a uniform approach to managing participating suppliers across the Council as supplier relationship management sits within other service areas. | Slow supplier take up | Reduced income | Open | Fair and Inclusive, Well Connected | Service provision / Financial gain/ Reputation | Head of Procurement | ↔ | 1 | 3 | 3 | 1,000 | Procurement to work with colleagues across the organisation and with the contractor to deliver a consistent approach. | 1 | 3 | 3 | 08-Sep-20 |
| 3 | Working arrangements and policies within the Council cannot be changed quickly enough to allow new ways of working to be introduced. | Inertia | Reduced income | Open | Fair and Inclusive, Well Connected | Service provision / Financial gain/ Reputation | Head of Revenues / Finance Systems Manager | ↔ | 1 | 3 | 3 | 1,000 | Engagement with colleagues to champion cause. | 1 | 3 | 3 | 08-Sep-20 |
| 4 | The estimate of current invoice processing performance may be inaccurate caused by the quality / availability of data. | Data quality | Reduced income | Open | Fair and Inclusive, Well Connected | Financial Loss / Gain | Head of Revenues / Finance Systems Manager | ↔ | 1 | 3 | 3 | 1,000 | Ensure ABW recording data and working effectively and accurately. | 1 | 3 | 3 | 08-Sep-20 |
| 5 | Insufficient appetite by the Council to include early payment in its construction contracts. | Council decision | Reduced income | Open | Fair and Inclusive, Well Connected | Service provision / Financial gain/ Reputation | Head of Procurement | ↔ | 1 | 7 | 7 | 1,000 | Engagement with colleagues to champion cause. | 1 | 3 | 3 | 08-Sep-20 |
| 6 | Resource constraints within PMO | Insufficient resources | Implementation Delay / Reduced Income | Open | Our Organisation | Programme / Project Management | Portfolio Management Office | ↔ | 2 | 3 | 6 | 1,000 | Continue to engage with colleagues on timescales in order they may plan resources. | 1 | 3 | 3 | 08-Sep-20 |
| 7 | Weak or poor internal / external communications to promote and advise on the key changes | Poor planning | Implementation Delay / Poor take up | Open | Well Connected | Service provision / Financial gain/ Reputation | Head of Revenues / Head of Procurement | ↔ | 1 | 3 | 3 | 1,000 | Communication plan to establish internal and external stakeholders / establish platforms for comms and implementation of comms. | 1 | 3 | 3 | 08-Sep-20 |
| 8 | Key performance indicators do not reflect the changed ways of working | Data quality / management information | Inaccurate performance recorded and reported | Open | Our Organisation | Reputation | Strategic Intelligence & Performance Manager, Insight Performance and Intelligence | ↔ | 1 | 1 | 1 | 1,000 | Review current performance indications and establish indicators to reflect the changes in working practice. | 1 | 1 | 1 | 08-Sep-20 |
| 9 | Implementation delayed or less effective due to ongoing COVID-19 | COVID-19 pandemic continues | Unable to implement due to change in Accounts Payable practices - ie all invoices paid as soon as possible | Open | Our Organisation | Financial Loss / Gain | Head of Procurement | ↔ | 2 | 3 | 6 | 1,000 | Do not implement changes to Accounts Payable practices and encourage sign up to the SEPI scheme. | 1 | 3 | 3 | 08-Sep-20 |
| 10 | Supply chain issues post 31 Dec 2020 due to BREXIT | Import restrictions due to trade rules or restrictions | Implementation Delay / Reduced Income | Open | Our Organisation | Financial Loss / Gain | Head of Procurement | ↔ | 2 | 3 | 6 | 1,000 | Ensure Council contracts for products and services are robust to minimise any delays or disruption in the supply chain. | 1 | 3 | 3 | 08-Sep-20 |
| 11 | Resilience / Contingency for Business Continuity | System Outage | Delayed Payments to suppliers | Open | Our Organisation | Financial Loss / Gain | Head of Procurement | ↔ | 1 | 3 | 3 | 1,000 | Ensure Council contracts for products and services are robust to minimise any delays or disruption in the supply chain. | 1 | 3 | 3 | 08-Sep-20 |

Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



| | |
|------------------------------|---|
| Name of proposal | Early Payment Initiative – Oxygen Finance |
| Directorate and Service Area | Finance, Revenues |
| Name of Lead Officer | Kevin Smith |

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

To implement an early payment initiative for suppliers which would deliver earlier payment (inside normal 30 day contract terms) to those suppliers who sign up for the scheme, whilst reducing expenditure, and creating an income stream, for the Council.

Micro businesses who have a primary business base within the geographical boundaries of Bristol Wards will be able to sign up for 'Freepay' thus obtaining the benefits of earlier payment terms without any reduction in invoice value.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

Procurement will hold details of suppliers who invoice the Council under contract but do not currently maintain any records of businesses that are micro businesses as defined in (1.1) above.

Local research¹ shows that Black and minority ethnic and women-led businesses contribute an estimated average of £2bn to the regional economy. 12.3% of Black, Asian and minority ethnic respondents in the Bristol Quality of Life survey 2019-20 said they were self-employed, compared to 9% Bristol average, and 4.1% said they were in paid work as a freelancer, consultant or contractor (Bristol average 4.8%).

Local research² has highlighted how long-term underinvestment and lack of equity in funding and procurement has eroded the local Voluntary and community sector – in particular for Black and minority ethnic led organisations. 30% of the organisations surveyed stated to operate on an annual budget below £5,000, and an additional 18% operated on below £25,000. 42% of the organisations sampled had no paid staff at all and fully relied on volunteers to deliver their activities and services.

2.2 Who is missing? Are there any gaps in the data?

Currently Procurement requires information on suppliers Equalities Policy as a part of the procurement process. Under the Procurement regulations this is all that is required. What is not available is data on suppliers protected characteristics so it is difficult to determine if any particular groups are more likely to be impacted by the proposal.

Those micro businesses identified from (1.1) are not immediately identifiable by Procurement and Accounts Payable data.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

Appropriate communications in Plain English with translations / accessible formats available on request will be issued by either / both the Council and / or Oxygen Finance to all currently contracted suppliers advising of the opportunity to participate in the scheme. As each new contract is agreed, suppliers will have the opportunity to on-board and sign up to the scheme.

Micro businesses will be actively targeted and signed up to the 'Freepay' initiative to decrease the time taken for invoices to be paid but also increase their cash flow.

¹ Annual Equality and Diversity Report (April 2017), West of England Local Enterprise Partnership, <http://www.westofenglandlep.co.uk/about-us/strategicplan>

² [Black South West Network: 'We want to change, and they have the power', 2018](#)

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

| |
|--|
| 3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics? |
| Some suppliers may not be able to take advantage of the scheme due to their personal circumstances. |
| 3.2 Can these impacts be mitigated or justified? If so, how? |
| We will ensure that the Oxygen Finance payment portal is accessible e.g. compatible with industry standard assistive technology such as screen readers / text to speech software. Suppliers who are not able to take advantage of the scheme will stay on 'normal' contract terms, with payment of invoices being made within 30 days rather than earlier. Micro businesses will be able to sign up for 'Freepay' which delivers the benefits of this initiative but at no detriment to the invoice value. There is some further mitigation; any supplier who does not sign up for the scheme will receive full payment of their invoice rather than the reduced sum that would be payable. |
| 3.3 Does the proposal create any benefits for people with protected characteristics? |
| Some suppliers with protected characteristics may sign up for this scheme, providing earlier payment of invoices thereby increasing cash flow. |
| 3.4 Can they be maximised? If so, how? |
| Micro businesses will be able to sign up for 'Freepay' which delivers the benefits of this initiative but at no detriment to the invoice value. |

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?

The need to capture equalities data as well as data relating to business type (e.g. micro businesses) moving forward in order that action can be taken to promote the initiative to those sectors that are underrepresented and also so that this data can be reported on a regular basis.

4.2 What actions have been identified going forward?

1. Continued, pro-active communications will be undertaken to those suppliers who have not signed up to the scheme by both colleagues in Procurement and also the contractor.
2. Procurement colleagues will explore options and procurement regulations in order to understand if they need to amend their processes to collect equalities data that includes protected characteristics, so that it can be reported on a regular basis if required.

4.3 How will the impact of your proposal and actions be measured moving forward?

1. As a part of the Contract Management piece of work associated with this contract the supplier will be required as a part of their Key Performance Indicators to provide equalities data and report on take up of the early payment initiative by suppliers on a regular basis. This will be monitored by Procurement, Supplier Relations Team and the Contract Manager as a part of their quarterly meetings.

| | |
|---|--|
| Service Director Sign-Off: Denise Murray | Equalities Officer Sign Off: <i>Reviewed by Equality and Inclusion Team</i> |
| Date: 21/10/20 | Date: 19/10/2020 |

Eco Impact Checklist

| Title of report: Early Payment Initiative | | | | |
|--|------------|--------------------|---|---|
| Report author: Kevin Smith, Revenues Operations Manager | | | | |
| Anticipated date of key decision: 03 Nov 2020 | | | | |
| Summary of proposals: Implementation of an Early Payment Initiative which would aim to make payments to suppliers in a much shorter timeframe than current invoice terms which would enable the Council to make savings of £0.4m - £0.5m per annum. | | | | |
| Will the proposal impact on... | Yes/ No | +ive or -ive | If Yes... | |
| | | | Briefly describe impact | Briefly describe Mitigation measures |
| Emission of Climate Changing Gases? | Yes | -ive | Use of software requires powering council and supplier ICT systems. Since servers and PCs would be powered anyway for other reasons, this is unlikely to change the use of ICT energy much overall. | Use of web hosted software where possible. Encourage supplier to use electricity generated renewably (where REGOs have been retired, to avoid any double counting for electricity used in the UK). REGO is the Renewable Energy Guarantee of Origin. For any additional council electricity use, the council generates about as much renewable electricity as it uses, excluding street lighting. |
| Bristol's resilience to the effects of climate change? | No | | | |
| Consumption of non-renewable resources? | No | | | |
| Production, recycling or disposal of waste | No | | | |
| The appearance of the city? | No | | | |
| Pollution to land, water, or air? | No | | | |
| Wildlife and habitats? | No | | | |
| Consulted with: | | | | |
| Summary of impacts and Mitigation - <u>to go into the main Cabinet/ Council Report</u> | | | | |

The significant impacts of this proposal are in electricity use from using ICT equipment to run the software, but it is unlikely that the overall use of ICT energy will change much.

Mitigation measures will include the potential use of web hosted software (commercial datacentres run efficiently on minimal hardware) and encouraging the supplier to use to use electricity generated renewably, with the REGOs retired.

The net environmental effect of the proposal is likely to be neutral, or .

Checklist completed by:

| | |
|---|-------------------|
| Name: | Kevin Smith |
| Dept.: | Finance, Revenues |
| Extension: | 21122 |
| Date: | 12 Aug 2020 |
| Verified by Environmental Performance Team | Giles Liddell |

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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Document is Restricted

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of the Local Government Act 1972.

Document is Restricted

Decision Pathway –Report

| | | | |
|---------------------------|---|--------------------------------|---------------------------------|
| TITLE | 2020/21 Period 6 Finance Report | | |
| Ward(s) | n/a | | |
| Author: | Tian Ze Hao | Job title: | Senior Finance Business Partner |
| Cabinet lead: | Cllr Craig Cheney | Statutory Officer lead: | Denise Murray |
| Proposal origin: | Other | | |
| Decision maker: | Cabinet Member | | |
| Decision forum: | Cabinet | | |
| Purpose of Report: | <p>The Council budget for 2020/21 was agreed by Council in February 2020 and this report provides the update on the Council’s financial performance at Period 6 (end of September) against the approved budget and forecast use of resources for the financial year 2020/21.</p> <p>The Council continues to operate Directorate cash limited budgets and Executive Directors are responsible for ensuring that appropriate action is taken to contain both revenue and capital spending within the directorate’s overall budget limit. Budget holders forecasting a risk of overspend which is not related to the pandemic and potentially recoverable, should in the first instance set out in-service options for mitigation. Where these 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 report also includes an update on the estimated financial impact of the COVID 19 pandemic on the Council’s finances.</p> | | |
| Evidence Base: | <p>The original budget set in February 2020 was balanced over 5 year medium term. For 2020/21 full Council agreed the following:</p> <ul style="list-style-type: none"> ○ The General Fund net budget of £395.7m; (forecast variation at P6 is £73.2m overspend, at P5 was £75.8m) <p>The Ring-fenced Accounts</p> <ul style="list-style-type: none"> ○ Housing Revenue Account (HRA) of £122.4m gross expenditure budget (forecast underspend of £3.5m at P6) ○ The Dedicated Schools Grant (DSG) budget, including amounts recouped by the Education and Skills Funding Agency for Academies is £374.2m (forecast £8.1m in-year deficit at P6 and a total £11m carried forward deficit) ○ The Public Health budget is £37.5m (no forecast variation at P6, with £0.5m planned drawn down from reserves to cover the leisure contract pressures). <p>Capital Programme</p> <ul style="list-style-type: none"> ○ Capital programme revised budget 2020/21 only is £218.4m for General fund and £83m for HRA. (forecast variation at P5 £92.3m underspend) <p><u>COVID-19</u></p> <p>The financial challenges as a result of the COVID 19 pandemic is currently estimated to be £67.9m (£68.7m in P5) and are attributed to additional costs incurred in responding to the pandemic and significant loss on income directly related to restricted activities and /or changing economic climate (see Appendix A for details) noting that this figure will be subject to change as the position evolves.</p> <p>Up to the end of September (P6), the Council had received three tranches of emergency funding support, additional specific grants from the Government and estimated funding in the recovery of income losses totalling £53.0m, (£53.5m excluding £0.5m utilised against COVID impact in 2019/20).</p> | | |

In October, further funding streams were announced by the government which were not incorporated in the forecast. These include the fourth tranche of un-ringfenced COVID emergency funding of £919m nationally (Bristol share £11.1m) and an extension to the Adult Social Care Infection Control Fund until March 2021, £546m nationally, £3.7m for Bristol. This report seeks approval to incorporate and utilise these funding streams in 2020/21. Please note the infection control fund, Surge enforcement fund and the supported housing bid are expected to have nil impact on the net forecast position once both funding and cost are incorporated in P7 forecast.

Taking into account the new funding announcements, the revised residual general fund COVID budget gap is expected to reduce from £14.9m (£15.7m in P5) to £3.8m which is proposed to be mitigated by approved local funds. Please note that the residual mitigations previously identified will be held in abeyance for uncertainties arising under the government's new 3-tier system and implications of local measures required in 2020/21 with any residual amount carried forward to 2021/21 offsetting future year COVID financial pressures.

The revised corporate mitigating actions for 2020/21 are as follows:

- Utilisation of the government's coronavirus Job retention scheme (£1.7m)
- Utilising £0.7m from General Reserves (above the policy compliant level of 5%)
- Utilise £1.4m from Earmarked Reserves (Public Health £0.5m & PFI £0.9m)

Please note that the government had announced £100m via DCMS to be used to introduce a new fund which will support council leisure centres most in need, however further details, legibility and conditions on the scheme are yet to be released therefore no additional grant is currently assumed in the forecast.

Also note the COVID 19 related forecast excludes income losses c£25.0million attributed to the reduction in the levels of Council Tax and business rates collected, which will have a budgetary impact in 2021/22 and beyond. Plans to address this will be outlined in the 2021/22 budget.

Non COVID 19

The non COVID 19 forecast variations for General Fund in 2020/21 equates to a net £5.3m (£7.1m in P5) overspend mainly relates to pressures in Adult Social Care (£7.1m) which including non-delivery of savings aligned to the Better lives programme. This pressure is partly offset by mitigations identified in other Directorates.

Ring Fenced budgets

Public Health reported £0.5m draw-down from Earmarked Public Health Reserves to support Leisure Services contract pressure during the pandemic. HRA reported a forecast underspend of £3.5m due to delays in recruitment and the repairs and maintenance programme. DSG reported a forecast in-year overspend of £8.1m mainly relates to increase activities in the high-need block and increasing pressures relation COVID and the reopening of the school.

Recovery plans are being developed across all directorates including a range of management actions that will enable expenditure to be held in abeyance, key service requirements to be delivered and a balance budget position achieved. This position and proposed mitigations will be reported in future monitoring reports once finalised and closely monitored thereafter.

Future Action

The Council is required to ensure that it has a balanced financial plan after taking into account deliverable cost savings and/or local income growth strategies as well as useable reserves. If during monitoring of the original budget it is considered that significant variations in either expenditure or income may result in an unbalanced budget then alternative action must be taken to bring the budget back into balance. Such action would include drawing-down further from reserves or reducing expenditure.

We recognise that the impact of the pandemic and economic recovery will go beyond a single financial year, therefore significant, sustainable long-term additional finance will be required in order to deliver services in an adverse economic cycle where demand for public services will significantly increase. Please see more details in the published MTFP.

Full detail of revenue spending and forecast is provided in Appendix A and A1 to A6
 Full details of Capital spending and forecast is provided in Appendix B and A1 to A6

Recommendations:

That Cabinet Approve:

1. The incorporation of the fourth tranche of un-ringfenced COVID emergency funding from the government to the 2020/21 budget (£11.1m), as outlined in Appendix A, Section 3.4.3.
2. The incorporation of Round 2 extension of the Adult Social Care Infection Control Fund (£3.7m) to the 2020/21 budget as outlined in Appendix A, Section 3.4.4.
3. The incorporation of the Surge enforcement fund (£0.3m) to the 2020/21 budget as outlined in Appendix A, Section 3.4.5.
4. The incorporation of the MHCLG award of £249,099 for the Supported Housing Oversight Pilot as outlined in Appendix A Section 3.4.6 and Appendix A8.
5. The re-profiling of the Capital Programme as outlined in Appendix B.

That Cabinet note:

6. Risks associated with the forecast outturn and the long-term financial impact on the Council as a result of COVID-19 pandemic
7. The £3.8m COVID 19 funding gap is indicative and that the residual mitigations previously identified will be held in abeyance for uncertainties arising under the government's new 3-tier system and implications of local measures required in 2020/21 with any residual amount carried forward to 2021/21 offsetting future year COVID financial pressures.
8. The estimated Collection fund deficit of £25.0m impacting in future years Appendix A, Section 3.5.
9. A risk of non COVID-19 related overspend on General fund services, an overall forecast overspend of £5.3m for 20/21 at Period 6, representing 1.3% of the approved budget and that it is expected that the forecast overspend will be managed through management actions / mitigations through the rest of the financial year.
10. Forecasts underspend of £3.5m with regard to the Housing Revenue Account.
11. A forecast in-year deficit of £8.1m and a total £11m carried forward deficit in the ring fenced Dedicated Schools Account (DSG).
12. In line with the scheme of delegation the emergency decision record with regards to the distribution of Round 2 (phase 1) Infection Control fund (Appendix A7)
13. A forecast £92.3m underspend against the approved Capital Programme, which requires budget re-profiling at the end of P6.

Corporate Strategy alignment: This report sets out progress against our budget, part of delivering the financial plan described in the Corporate Strategy 2018-23 (p4) and acting in line with our organisational priority to 'Be responsible financial managers' (p11).

City Benefits: Cross priority report that covers whole of Council's business.

Consultation Details: n/a

| | | | |
|--|--|---|--|
| Revenue Cost | See Above | Source of Revenue Funding | Various |
| Capital Cost | See Above | Source of Capital Funding | Various |
| 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 resource and financial implications are set out in the report.

Finance Business Partner: Michael Pilcher (Chief Accountant) 23/10/20

2. Legal Advice: The report, including the detail set out in the appendices, will assist Cabinet to monitor the budget position, the ongoing impact of COVID 19 and mitigations put in place, with a view to meeting the Council's legal obligation to deliver a balanced budget.

| | | |
|---|----------------|----------|
| Legal Team Leader: Nancy Rollason, Head of Legal Service 23/10/20 | | |
| 3. Implications on IT: There are no additional IT implications arising from production of this report. | | |
| IT Team Leader : Simon Oliver, ICT 23/10/20 | | |
| 4. HR Advice: Expenditure on staffing is monitored on a monthly basis. Managers are required to manage expenditure within the agreed staffing budget that has been set for 2020/21. As part of the work to refresh of the Medium Term Financial Plan, the workforce implications arising from estimated reductions in the Council's income will require consideration. | | |
| HR Partner: Mark Williams, Head of Human Resources 23/10/20 | | |
| EDM Sign-off | Denise Murray | 26/10/20 |
| Cabinet Member sign-off | Clr Cheney | 26/10/20 |
| For Key Decisions - Mayor's Office sign-off | Mayor's Office | 26/10/20 |

| | |
|--|------------|
| Appendix A – P02 Revenue Budget Monitoring Report | YES |
| Appendix B – P02 Capital Budget Monitoring Report | YES |

Bristol City Council September 2020 (P6) Revenue Finance Report

1 FORECAST GENERAL FUND REVENUE SUMMARY POSITION

- 1.1 At Period 6 (September), the Council is forecasting a £73.2m overspend (£75.8m in P5) against the approved General Fund budget (£395.7m), of which £67.9m overspend relates to the impact of COVID 19 pandemic (£68.7m in P5) and the remaining £5.3m attributes to non-COVID financial cost pressures (£7.1m in P5).
- 1.2 Table 1 below provides a summary of the current 2020/21 forecast General Fund position by directorate.

Table 1 General Fund P6 Directorate Level Forecast

| General Fund | 2020/21 - Full Year | | | P6 Forecast Variance | | Movement vs P5: Increase /(Decrease) | | |
|--|---------------------|------------------|---------------------------|----------------------|--------------|--------------------------------------|----------------|----------------|
| | Revised Budget | Forecast Outturn | Forecast Outturn Variance | COVID | Non-COVID | COVID | Non-COVID | Total Movement |
| | £000s | | | £000s | | £000s | | |
| People | | | | | | | | |
| Adult Social Care | 148,413 | 176,761 | 28,348 | 21,200 | 7,148 | 0 | (600) | (600) |
| Children and Families Services | 61,710 | 64,556 | 2,846 | 2,640 | 206 | 0 | 94 | 94 |
| Educational Improvement | 11,546 | 13,027 | 1,481 | 1,112 | 369 | 310 | (471) | (161) |
| Public Health - General Fund | 3,991 | 6,414 | 2,423 | 2,410 | 13 | 840 | 13 | 853 |
| Total People | 225,660 | 260,758 | 35,098 | 27,362 | 7,736 | 1,150 | (964) | 186 |
| Resources | | | | | | | | |
| Digital Transformation | 15,598 | 14,706 | (892) | 300 | (1,192) | 300 | (442) | (142) |
| Legal and Democratic Services | 8,164 | 8,869 | 705 | 972 | (267) | 2 | (142) | (140) |
| Finance | 9,044 | 13,871 | 4,827 | 5,482 | (655) | 103 | 110 | 213 |
| HR, Workplace & Organisational Design | 10,388 | 10,541 | 153 | 0 | 153 | 0 | (20) | (20) |
| Policy, Strategy & Partnerships | 3,384 | 3,393 | 9 | 60 | (51) | 0 | 2 | 2 |
| FM Services | 3,378 | 5,310 | 1,932 | 850 | 1,082 | 0 | (75) | (75) |
| Commercialisation & Citizens | 613 | 1,590 | 977 | 433 | 544 | (1,669) | 802 | (867) |
| Total Resources | 50,569 | 58,280 | 7,711 | 8,097 | (386) | (1,264) | 235 | (1,029) |
| Growth & Regeneration | | | | | | | | |
| Housing & Landlord Services | 14,896 | 19,970 | 5,074 | 4,612 | 462 | (270) | (4) | (274) |
| Development of Place | 1,431 | 2,425 | 994 | 1,501 | (507) | (82) | (32) | (113) |
| Economy of Place | 14,246 | 22,003 | 7,757 | 6,673 | 1,084 | 26 | 74 | 99 |
| Management of Place | 33,809 | 46,757 | 12,948 | 14,480 | (1,532) | 212 | 380 | 592 |
| Total Growth & Regeneration | 64,382 | 91,155 | 26,773 | 27,266 | (493) | (114) | 419 | 305 |
| SERVICE NET EXPENDITURE | 340,611 | 410,193 | 69,582 | 62,724 | 6,857 | (228) | (310) | (537) |
| Levies | 857 | 857 | 0 | 0 | 0 | 0 | 0 | 0 |
| Corporate Expenditure | 30,494 | 34,652 | 4,158 | 5,154 | (996) | (591) | (1,191) | (1,782) |
| Capital Financing | 23,745 | 23,189 | (556) | 0 | (556) | 0 | (307) | (307) |
| TOTAL REVENUE NET EXPENDITURE | 395,707 | 468,891 | 73,184 | 67,878 | 5,305 | (819) | (1,808) | (2,627) |

2 NON-COVID RELATED RISK OF OVERSPEND

- 2.1 At P6, budget managers are currently forecasting emerging risks and potential for further overspends by £5.3m (£7.1m in P5) with reasons not directly attributed to the COVID 19 pandemic.

2.2 The areas forecasting an unmitigated risk of overspend are predominantly within the People Directorate:

People Directorate

- Adult Social care forecasted a £7.1m risk to overspend (£7.7m in P5) mainly relates to market pressures resulting in the need for a continuation of service provision previously allocated on a one-off basis.
- Children social care has a £0.2m forecast risk of overspend (£0.1m in P5): related to savings at risk and on-going increases in out of area placement cost
- Home to School Transport £0.5m risk of overspend, (£0.9m in P5): We now have a better understanding of the impact of social distancing and COVID and this has led to a reduction in the forecast overspend.

Further areas of directorate pressures and savings to offset pressures are summarised below:

Resources Directorate

- Digital Transformation's favourable forecast position (£1.2m) is largely due to employee and contract underspend plus higher than budgeted income from internal traded activities
- Finance's favourable forecast (£0.7m) mainly relates to recoveries of overpayments exceeding budgeted amount and drawdown from reserves, it also noted that there had been a shift of in-year resources from business as usual activities to COVID emergency Responses.
- Facility Management' overspend of £1.1m relates to legacy savings/income targets unachieved that have been further exacerbated by the pandemic.

Corporate Expenditure

- Following the announcement of the 2.75% pay award, £3.6m of provisions previously held in abeyance had been allocated to Directorates in P6 to cover the cost uplift in the services. There had also been an in-year saving on superannuation therefore the remaining provision that is no-longer required (c£1m) which will help to mitigate the above mentioned in-year non-COVID related pressures.

Capital Financing

- The underspend of £0.6m forecast reflects the current position due to delays in the delivery of capital programme to the pandemic coupled with the reduction on borrowing rate.

- 2.3 As the year progresses, budget holders will continue to identify opportunities for recovery and delivering the needs of the service in a sustainable manner. In this regard a detailed review is underway within Adult Social Care division to consider the opportunities and service plans further and report back to Cabinet in due course with the recovery plans for consideration.

3 COVID 19 IMPACT AND GOVERNMENT FUNDING SUPPORT

3.1 SUMMARY POSITION

- 3.1.1 Based on the P6 Directorate forecast the General fund Revenue funding gap due to COVID 19 (excluding collection fund) is estimated to be £67.9m in 2020/21 (see Table 1 above and directorate appendices for details). The position shows a slight improvement comparing to P5 position (£68.7m). It is also worth noting that there had been some movements of budget responsibilities between directorates in P6, notably the reassignment of Commercialisation, Citizen and FM services from Resources to G&R and People directorates.

Table 2: Overspend Due to COVID-19

| | COVID-19 Exp | COVID-19 Inc | COVID |
|--|-----------------|-----------------|---------------|
| | £000s | | £000s |
| People | | | |
| Adult Social Care | 19,395 | 1,805 | 21,200 |
| Children and Families Services | 2,640 | 0 | 2,640 |
| Educational Improvement | 256 | 856 | 1,112 |
| Public Health - General Fund | 2,410 | 0 | 2,410 |
| Total People | 24,701 | 2,661 | 27,362 |
| Resources | | | |
| Digital Transformation | 0 | 300 | 300 |
| Legal and Democratic Services | 695 | 277 | 972 |
| Finance | 3,497 | 1,985 | 5,482 |
| HR, Workplace & Organisational Design | 0 | 0 | 0 |
| Policy, Strategy & Partnerships | 60 | 0 | 60 |
| FM Services | 600 | 250 | 850 |
| Commercialisation & Citizens | 0 | 433 | 433 |
| Total Resources | 4,852 | 3,245 | 8,097 |
| Growth & Regeneration | | | |
| Housing & Landlord Services | 4,612 | 0 | 4,612 |
| Development of Place | 264 | 1,236 | 1,501 |
| Economy of Place | 925 | 5,748 | 6,673 |
| Management of Place | 1,830 | 12,650 | 14,480 |
| Total Growth & Regeneration | 7,631 | 19,634 | 27,266 |
| SERVICE NET EXPENDITURE | 37,184 | 25,540 | 62,724 |
| Corporate Expenditure | 2,150 | 3,004 | 5,154 |
| TOTAL REVENUE NET EXPENDITURE | 39,334 | 28,544 | 67,878 |

3.2 EMERGENCY RESPONSE EXPENDITURE

3.2.1 Government funding received to date (September P6) has offset to a large extent the in-year COVID 19 related financial pressures in 2020/21, however a budgetary gap of £14.9m still remains. Note that this is before taking into account a new tranche of COVID emergency funding confirmed on 23 October 2020 (in P7) the approval to incorporate this new funding is sought under this report (see details in later section).

3.3 LOSS OF SALES, FEES AND CHARGES INCOME

3.3.1 The forecast loss of service income for the year is £28.5m which remains largely unchanged comparing to P5.

3.3.2 Please note that whilst there is some support from the central government to support local authorities in funding some of the income losses on fees and charges, it doesn't fully cover all losses. Government won't provide any funding for commercial property losses or the first 5% of sales fees and charges losses, thereafter compensating 75% of losses above this level.

3.4 GOVERNMENT COVID FUNDING, GENERAL FUND RESIDUAL GAP AND MITIGATIONS

Government Funding

3.4.1 Up to the end of September, the Council had received three tranches of emergency funding support, additional specific grants from the Government and estimated funding in the recovery of income losses totalling £53.0m, (£53.5m excluding £0.5m utilised against COVID impact in 2019/20). It was previous approved to incorporate these funding streams into the Council's 20/21 budget to support / mitigate the reported COVID 19 financial pressures.

Table 3: GF Government Emergency Funding and Residual Gap

| Government COVID Response Funding | National | Bristol Share | Cabinet Approval |
|--|----------|---------------|------------------|
| | £m | £m | |
| Emergency Funding Tranche 1 (excl. 0.5m utilised in 19/20) | 1,600 | 13.044 | Given |
| Emergency Funding Tranche 2 | 1,600 | 12.906 | Given |
| Emergency Funding Tranche 3 | 500 | 4.580 | Given |
| Infection control Round 1 | 600 | 4.025 | Given |
| Open high street Safely fund | | 0.416 | Given |
| Partial Hardship fund (matching gross forecast under | | 2.250 | Given |
| COVID 19 Fees and Charge Income Grant | n/a | 13.859 | Given |
| Next Steps Accommodation Programme | 91 | 1.900 | Given |
| Total Offset to GF Revenue Pressures | | 52.980 | |
| P6 Forecast COVID overspend | | 67.878 | |
| General Fund Residual Gap | | 14.898 | |

3.4.2 Due to the timing of P6 reporting, further new tranches of funding announcement listed in the table below were not included in the forecast. This report seeks approval to incorporate and utilised these funding streams in 2020/21. Please note the infection control fund, Surge enforcement fund and the supported housing bid are expected to have nil impact on the net forecast position once both funding and cost are incorporated In P7 forecast.

Table 4: New funding

| New funding to be incorporated | National | Bristol | Cabinet Approval |
|--|-----------------|----------------|-------------------------|
| | £m | £m | |
| Emergency Funding Tranche 4 | 919 | 11.128 | Sought under P6 |
| Infection control Round 2 (Cost not in forecast) | 546 | 3.653 | Sought under P6 |
| Surge enforcement fund | 60 | 0.283 | Sought under P6 |
| Supported Housing Oversight Pilot Bid (Cost not in forecast) | | 0.249 | Sought under P6 |

3.4.3 On 23 October the government confirmed allocations of a further £919m nationally (Bristol share £11.1m) of a further un-ringfenced funding to support local councils. This is part of a package of further support for council’s worth over £1bn, which also include £100m from DCMS to be used to introduce a new fund which will support council leisure centres most in need, however further details and conditions on the scheme are yet to be released.

3.4.4 In October the government had announced an extension to the Adult Social Care Infection Control Fund until March 2021, with an extra £546m of funding nationally (Bristol share £3.7m). This is a new grant, with revised conditions from the original Infection Control Fund with 80% funding allocated to care homes and CQC-regulated community care provider on defined basis and remaining 20% to the full range of social care providers at the Council’s discretion. In line with the scheme of delegation please note the urgent payment decision recorded to social Care settings, appended to this report.

3.4.5 On 22 September the Government announced the allocation of Surge enforcement funding to local authorities and the Police to support a range of additional compliance and enforcement activity. Of this funding the Council has been awarded £0.283m to cover a period of four months.

3.4.6 MHCLG invited Bristol to submit a bid to pilot methodologies to raise the standards of accommodation and support within the ‘non-commissioned’ sector. The Council had submitted a bit on 22nd October for funds to develop a multi-disciplinary team comprising Environmental Health, Safeguarding and Support Review Officers, to inspect Bristol’s non-commissioned supported accommodation. Please also note the

decision recorded appended to this report. This bid has been successful and approval to accept an award of £249,099 is being sought in this report.

- 3.4.7 Taking into account the new funding announcements, the revised residual general fund COVID budget gap is expected to reduce from £14.9m to £3.8m which is proposed to be mitigated by the list below. Please note that the residual mitigations previously identified will be held in abeyance for uncertainties arising under the government's new 3-teir system and implications of local measures required in 2020/21 with any residual amount carried forward to 2021/21 offsetting future year COVID financial pressures.

Table 5: COVID Mitigation Plan

| COVID Mitigation Plan | Approved Use of Mitigation | Current Trajectory |
|---|----------------------------|--------------------|
| | £m | £m |
| Estimated Furlough Income | 1.700 | 1.700 |
| Use of Earmarked Reserves (Public Health £0.5m & PFI £0.9m) | 1.417 | 1.417 |
| Use of general reserve above £20m | 3.100 | 0.653 |
| Capital Financing (various) | 5.995 | 0.000 |
| Use of resilience reserve | 1.710 | 0.000 |
| Total | 13.922 | 3.770 |

3.5 REGULATORY INCOME LOSS

- 3.5.1 The estimated total income loss on collection fund is £25.0m. Please note that the collection fund shortfalls will impact on the Council's cash position in 2020/21 however the budgetary impact will fall in the following year 2021/22. Recent Government announcement indicates they will be bringing in changes to enable Councils to spread collection fund tax deficits over 3 years rather than all being met in 2021/21. These changes however will not solve the problem but rather buying more time to introduce measures to mitigate the on-going gap.

Council Tax

- 3.5.2 Council tax (CT) including preceptor's income: Like many councils we set our Council Tax budget for 2020/21 with a 3.99% increase (1.99% for general requirements plus 2% specifically for adult social care). The Council's budgeted income from Council Tax is £226.1m and represents 57% of the net budget requirement (£395.7m).
- 3.5.3 Reductions in Council Tax income is the largest single income loss which is estimated to be £14.3m by March 2021 (same compared to P5).

- 3.5.4 It is important to note this represents latest modelling however there is significant uncertainty with regard to these estimates as the impact of end of furlough and new employment support scheme and impact on long term collection rates is unknown
- 3.5.5 The losses are mainly due to increase in Council Tax reduction scheme (CTRS) for working age adults, reduction in collection rate and delays in housing growth.

Business Rates

- 3.5.6 Business rates (BR): The Council’s BR income is £136.7m in 2020/21 represents 35% of the net budget requirement (£395.7m). Assuming all tax-breaks for businesses are funded by Central Government we estimate a reduction c8% (£10.6m consistent with previous estimate) of business rate income as a result of unavoidable business insolvencies and reduction on debt collection rate within the Bristol area.
- 3.5.7 Note that under the business rates retention scheme, the Government currently operates and levy and the safety net system where BR income is guaranteed at the safety net level for local authorities. However Bristol’s safety net entitlements is calculated to be £116.2m for 2020/21, this would meant that the safety net mechanism will not be triggered before income losses reach £20.5m.

Government Funding

3.6 SAVINGS PROGRAMME

- 3.6.1 The savings / efficiency programme agreed by Council in 2020 included savings totalling £8.7m for 2020/21. In addition, £6.6m of savings were carried forward from 2019/20 to 2020/21 which still requires recurrent delivery and mitigation in 2020/21. Therefore the total savings delivery target for 2020/21 is £15.3m.
- 3.6.2 At P6 £9.2m of £15.33m savings are reported to be at risk where further work / mitigating actions will be required in order to deliver, of which £6.3m relates to the Adult Social Care Better Lives Programme and £2.2m Children’s social care transformation with the remainder relating to Council-wide cross-cutting savings initiatives and schemes.

Table 5 Summary of Savings by Directorate

| Directorate | 2020/21 Savings £m | 2020/21 Savings reported as safe | 2020/21 Savings reported as at risk | |
|---------------------------|--------------------|----------------------------------|-------------------------------------|------------|
| | | £m | £m | % |
| People | 8.79 | 0.29 | 8.50 | 97% |
| Resources & Cross-Cutting | 3.53 | 3.53 | 0 | 0% |
| Growth and Regeneration | 3.01 | 2.34 | 0.67 | 22% |
| Total | 15.33 | 6.16 | 9.17 | 60% |

4 RING-FENCED BUDGETS

4.1 HRA

- 4.1.1 HRA is a ring-fence budget, any COVID pressures may be offset by in-year underspend on staffing due to delays in recruitment and delays in the repairs and maintenance programme due to the lockdown. HRA is currently reporting a forecast underspend of £3.5m at P6 (£1.6m underspend in P5).
- 4.1.2 The forecast COVID impact on HRA ring fenced account is £3m which consists of £2.0m on loss of income / increases in bad debt, and £1.0m increased in costs including additional staffing pressures and PPE.
- 4.1.3 For the time being no in year adjustment of spend for 2020/21 is required for HRA related budgets although this position will be monitored in the context of the issues raised above. The forecast underspend if it materialises will be transferred to the HRA reserve. Please see Appendix A4 for more detail.

4.2 DSG

- 4.2.1 DSG budgets continue to experience significant pressures and are forecasting a deficit of £8.1m, which when added to the brought forward balance, will give a total deficit to carry forward at the end of the year of £11m. The main area for concern continues to be the High Needs block which is forecasting an overspend in-year of £7.7m, a slight improvement of £0.3m since P5. Please see appendix A5 for more detail.
- 4.2.2 Following an Ofsted review last year, the Education service has invested significant resources in the EHC assessment and planning process to ensure that Pupils are assessed and receiving the relevant support in time. This has resulted in an increased number of high needs cases and had a significant impact on the DSG High Needs Block. Since the measures for improvement on the EHC process were introduced, additional Pupils have been assessed and brought into the service quicker, resulting in the increased cost forecast, there have been increases in the number of top-ups to both mainstream and special schools. In addition, the increase in demand would also have a knock on impact on higher cost placement needs (e.g. in out of area or independent non-maintained schools) where available capacity is not sufficient locally.
- 4.2.3 The Education Transformation Programme commenced this year and is primarily concerned with SEN and consequently the High Needs Block. Nationally this is an area where many authorities are experiencing difficulties and continues lobbying on government is needed for more sustainable future funding.
- 4.2.4 During the pandemic, most schools remained open to provide education to children of Key Workers and vulnerable pupils. Any additional costs incurred by schools during this time were able to be reclaimed from ESFA. The funding into the DSG was

unaffected by COVID, and also the amounts paid to schools continued at pre-COVID levels following DfE guidance.

- 4.2.5 Please note in the absence of additional government funding Bristol in late October led the way to provide continuous support feeding the Children outside term-time this is estimated to be around £0.2m for October half term break which will be reflected in P7 forecast.
- 4.2.6 Consideration should be given to the long term sustainability of the DSG taking into account changes in practices in schools during the pandemic and how these forecast pressures will materialise during and after the pandemic. Continuous government lobbying is required.

4.3 Public Health

- 4.3.1 Public Health is forecasting £2.4m overspend (a mixture of General fund and Ring-fenced account), of which £0.5m relates to the increased costs of contract variations and £0.9m for the obligations under PFI contracts to support the maintaining and reopening of leisure provision in the city during the pandemic. Furthermore, this also includes a forecast overspend of £0.840m against the Bristol Impact Fund (BIF) where there has been continued delay to budget plans to reduce spend, due to Covid-19 outbreak.
- 4.3.2 These are mitigated by drawing down from the Public Health Earmarked Reserve and the PFI Reserve. Other small variations include £0.9m for safer cities and £0.7m other public health activities.
- 4.3.3 The Council will continue to press for additional support from government in introducing measures to support local authorities' leisure services. A new funding stream (£100m) had been announced by the government in late October however funding condition and legibility are yet to be confirmed.

a: Revenue Budget Monitor

| | Revised Budget | Forecast Outturn | Outturn Variance | Of which : | |
|------------|----------------|------------------|-------------------------|---------------|--------------|
| | | | | COVID | Non COVID |
| P06 | £225.7m | £259m | £35.1m overspend | £27.4m | £7.7m |
| <i>P05</i> | <i>£222m</i> | <i>£256.9m</i> | <i>£34.9m overspend</i> | <i>£26.2m</i> | <i>£8.7m</i> |

| May | June | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
|------|------|------|------|-----|-----|-----|-----|-----|
| 32.4 | 34.5 | 34.9 | 35.1 | | | | | |
| | ▼ | ▼ | ▼ | | | | | |

Position by Division:

| General Fund | 2020/21 - Full Year | | | P6 Forecast Variance | | | | Movement vs P5: Increase /(Decrease) | | |
|--------------------------------|---------------------|------------------|---------------------------|----------------------|--------------|---------------|--------------|--------------------------------------|--------------|----------------|
| | Revised Budget | Forecast Outturn | Forecast Outturn Variance | COVID-19 Exp | COVID-19 Inc | COVID | Non-COVID | COVID | Non-COVID | Total Movement |
| | £000s | | | £000s | | £000s | | £000s | | |
| People | | | | | | | | | | |
| Adult Social Care | 148,413 | 176,761 | 28,348 | 19,395 | 1,805 | 21,200 | 7,148 | 0 | (600) | (600) |
| Children and Families Services | 61,710 | 64,556 | 2,846 | 2,640 | 0 | 2,640 | 206 | 0 | 94 | 94 |
| Educational Improvement | 11,546 | 13,027 | 1,481 | 256 | 856 | 1,112 | 369 | 310 | (471) | (161) |
| Public Health - General Fund | 3,991 | 6,414 | 2,423 | 2,410 | 0 | 2,410 | 13 | 840 | 13 | 853 |
| Total People | 225,660 | 260,758 | 35,098 | 24,701 | 2,661 | 27,362 | 7,736 | 1,150 | (964) | 186 |

Key Messages:

Adult Social Care

Adult social care is showing an overspend of £28.3m (£28.9m in P05). Adult social care non-Covid variance of £7.1m which mainly relates to undelivered savings in year and carried forward from 2019/20 plus market pressures resulting in the need for a continuation of service provision previously allocated on a one-off basis.

In regards to COVID emergency response, the Council has acted as system leads in responding to the crisis working directly alongside the NHS and providers to create capacity and deal with increased demand (c£3m) meanwhile sustaining the market (c£11.4m) to ensure the local care market has sufficient capacity and of sufficient quality to meet the needs of the population and the Council direct financial support. Additionally, £4m Infection Control Fund monies have been allocated to help the care sector bolster infection control in care settings to halt the transmission of corona virus.

The Council also increased the Council's frontline Staff Cover for short term targeted support for up to two weeks after discharge and to provide a short-term up-front response and additional capacity costs for MH services (£2.6m). The Council had spent additional £0.7m on providing PPE to staff and providing emergency supplies to service providers.

In addition the planned efficiency savings had not been able to progress as anticipated, it is estimated that the whole of the £6.3m would now not be delivered from planned efficiencies mainly due to covid-19 pandemic outbreak.

Children and Families

Children social care is showing a £2.8m overspend, the majority of which relates to placements. There has been a net increase in the forecast on placements of £143k. As noted in period 5 placements budgets remain very volatile with limited supply of both in-house and Independent placements. These increases have been offset by including mitigations to the value of £500k. There is also an emerging pressure within asylum seeking families with no recourse to public funds.

Within the Forecasted COVID emergency expenditure, £1.1m relates to increases in the anticipated number of young people coming into Residential Care and foster carers care (5%) and also an 5% increase on contract pricing due to associated costs such as infection control measures, and reduced occupancy in residential settings, and additional supports were provided Care Leavers and Children in Need (0.3m). The Council also increased short term workforce capacity (£1.13m) to support Child Protection and domestic abuse cases and recruitment/ support to in-house foster carers recruited specifically to provide additional support and respite as a result of COVID 19.

Included in the COVID overspend is the delays in Savings Delivery c.£1.0m – part of the £2m Strengthening families transformation and savings programme which includes a re provision of our in house children's homes.

Educational Improvement

The biggest pressure in this division continues to be Home to School Transport, which is forecasting overspend of £521k, the forecast has reduced by 375k between P5 and P6. This is due to a better understanding of the impact of social distancing and COVID. Contingency had been built into the forecast to deal with this previously. The Mission system is now up and running providing greater clarity over route costs, there has also been a review to bring route costs within the framework. The overspend is being driven from increased demand for the service, particularly from SEN pupils.

Education had also seen additional emergency expenditure in supporting key-workers and vulnerable children. This include costs incurred in setting up a local Free School Meal voucher scheme to bridge the gap(£0.4m) before the national scheme was in operation, but these costs are reclaimed by ESFA.

Elsewhere in the division the current forecast variances are the result of COVID and mainly relate to the loss of income both in Adult Learning and from traded activities with schools.

Public Health

In P6 a £2.4m pressure is currently being reported as a result of Covid-19 pandemic outbreak. £0.5m of the pressure relates to the increases in cost on the leisure services contract, £0.9m relates to the increase in contractual obligations under the leisure PFI contracts and variations in safer city and other public health activities. These are mitigated by drawing down from the Public Health Reserve and PFI Reserve. The council continues to lobby the central government to provide funding support to sustain leisure services during the pandemic. Furthermore, an overspend of £0.840m is also forecast against the Bristol Impact Fund (BIF) where there has been continued delay to budget plans to reduce spend, due to Covid-19 outbreaks.

Savings Delivery

| 20/21 People Directorate Savings Target (£'000s): | | | | | | | 8,785 |
|--|---------------------------------|------------------------|--------------------|---------------------------------|------------------------|--------------------|-------|
| | This month | | | Last month | | | |
| | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | |
| No - savings are at risk | 8,535 | 8,495 | 100% | 8,535 | 8,495 | 100% | |
| Yes - savings are safe | 250 | 0 | 0% | 250 | 0 | 0% | |
| SAVING CLOSED - CONFIRMED AS 'SECURED & DELIVERED' | 0 | 0 | n/a | 0 | 0 | n/a | |
| NO RAG PROVIDED | 0 | 0 | n/a | 0 | 0 | n/a | |
| Grand Total | 8,785 | 8,495 | 97% | 8,785 | 8,495 | 97% | |
| n/a - represents one off savings or mitigations in previous year | -4,385 | 0 | 0% | -4,385 | 0 | 0% | |
| Accelerated efficiencies (balancing line) | 0 | 0 | n/a | 0 | 0 | n/a | |
| WRITTEN OFF | 0 | 0 | n/a | 0 | 0 | n/a | |
| Grand Total | 4,400 | 8,495 | 193% | 4,400 | 8,495 | 193% | |

| Top 5 largest savings at risk In (ordered by size of saving at risk) | | |
|--|---|--------------------------------|
| ID | Name of Proposal | Value at Risk In 20/21 (£'000) |
| FP33 | Introduce Better Lives Programme (Improving outcomes for adults in Bristol) (incl. partial 18/19 rollover) | £ 6,300 |
| FP31 | "17/18 rollover included" Children's social care transformation | £ 2,195 |
| BE7-2 | 18/19 Rollover - Organisational redesign including the council's senior management structures (Mitigation for Education Post) | £ - |
| | | |
| | | |

| Mitigated savings from previous years' that remain 'due' for delivery this year (£m) | |
|--|--------|
| Amount due from previous year(s): | £ 4.39 |
| Amount reported at risk: | £ 4.30 |

Key Changes since last month:
There have been no changes to report In 20/21 for P6

Key messages/Comments:

1. People has a significant savings target in 20/21 of £8.8m, of which £4.4m relates to rollover from 19/20. The target is made up of five savings lines.
2. The Director of Adult Social Care has drawn up draft plans for financial savings but until these are finalised the full £6.3m target continues to be at risk (note the programme itself has now closed but savings are still due, with revised plans for adult social care transformation being developed).
3. FP31 Children's social care transformation continues to report the full £2.2m at risk this month with high level of volatility in placements and increasing pressure across the children's system as a whole.
4. Please note: BE7-2 18/19 Rollover - Organisational redesign including the council's senior management structures (Mitigation for Education Post) (£40k) reports savings at risk but without a value confirmed.

b: Risks and Opportunities

| Division | Risk or Opportunity | Description of Impact £ | Risk / Opportunity £ | Likelihood (%age) | Net /(opportunity) £ |
|-----------------------|---------------------|---|----------------------|-------------------|----------------------|
| Adult Social Care | Risk | Second wave of covid-19 infections resulting in additional care costs above initial emergency funding planning assumptions and infection control grant levels. (Risk based on third of £9m emergency spend) | 3,100,000 | 50% | 1,550,000 |
| Children and families | Risk | Mitigations have been built into the placements forecast, risk is that these are unachieved. | 500,000 | 50% | 250,000 |

c: Capital

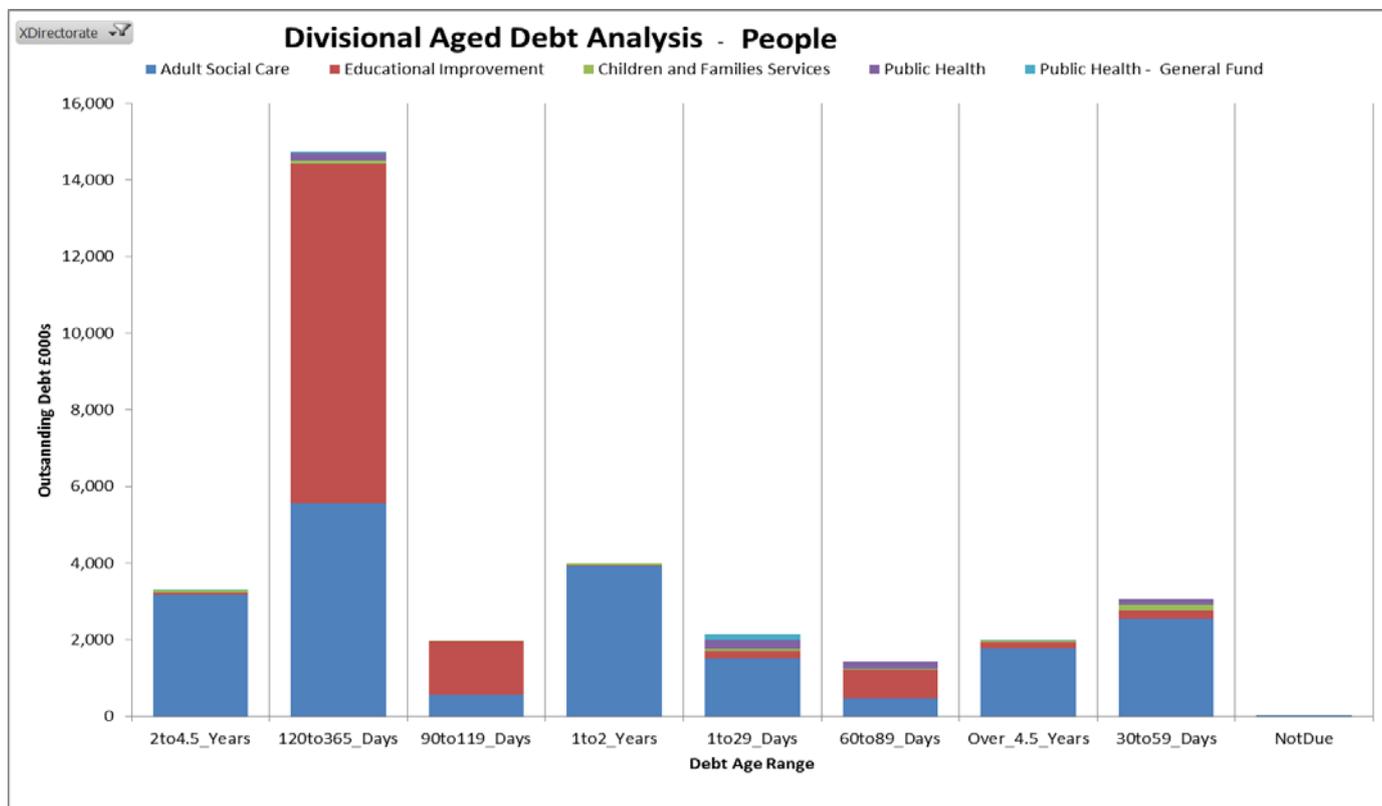
| | | | | |
|---|--|---|---|---|
| Approved Budget £32.3m | Revised Budget £40.4m | Expenditure to Date £5.6m 14% of Budget | Forecast Outturn £31.9m 79% of budget | Outturn Variance (£8.5m) |
|---|--|---|---|---|

| Ref | Scheme | Budget | Expenditure to Date | Forecast | Variance | Expenditure to date | Forecast |
|---------------------|--|---------------|---------------------|---------------|----------------|---------------------|------------|
| | | | | | | £000s | % |
| People | | | | | | | |
| PE01 | School Organisation/ Children's Services Capital Programme | 25,298 | 4,572 | 24,555 | (743) | 18% | 97% |
| PE02 | Schools Organisation/SEN Investment Programme | 3,128 | 222 | 2,764 | (364) | 7% | 88% |
| PE03 | Schools Devolved Capital Programme | 2,685 | 148 | 1,263 | (1,421) | 6% | 47% |
| PE05 | Children & Families - Aids and Adaptations | 266 | 20 | 155 | (111) | 7% | 58% |
| PE06 | Children Social Care Services | 2,455 | 468 | 1,085 | (1,370) | 19% | 44% |
| PE06B | Adult Social Care – Better Lives at Home Programme | 6,049 | 101 | 1,967 | (4,082) | 2% | 33% |
| PE08 | Care Management/Care Services | 5 | 5 | 5 | 0 | 96% | 100% |
| PE10 | Sports Capital Investment | 546 | 24 | 80 | (466) | 4% | 15% |
| Total People | | 40,431 | 5,560 | 31,874 | (8,557) | 14% | 79% |

The People Directorate capital programme is predominantly spend on schools, of the £23 million the biggest schemes relates to Cathedral Schools Trust Trinity Academy, which has been delayed due to COVID-19 however is anticipated to complete works in January 2021. The other major works relate to KnowLEDGE where design work is on-going.

Besides schools scheme in both Adults and Children social care, to investment in improved accommodation has both been delayed as a result of covid-19 with project plans being reviewed. These are investing to save proposals which will delay planned savings in both these areas which is factored into the revenue forecast.

d: Aged Debt



e: Payment Performance

| | Amount Paid (inc VAT) | Number of invoices | Average days to pay | Number of invoices paid late | % Paid Late |
|-------------------------------------|--------------------------|-----------------------|---------------------------|--|----------------|
| 1 - People | | | | | |
| 14 - Adult Social Care | 724,079 | 382 | 29 | 99  | 26% |
| 15 - Children and Families Services | 1,771,769 | 599 | 33 | 160  | 27% |
| 16 - Educational Improvement | 3,313,238 | 172 | 49 | 49  | 28% |
| 1Y - Capital - People | 1,370,480 | 10 | 43 | 1  | 10% |
| 34 - Public Health | 2,479,406 | 137 | 28 | 11  | 8% |
| 36 - Public Health - General Fund | 451,162 | 17 | 34 | 10  | 59% |
| 1 - People Total | 10,110,134 | 1,317 | 33 | 330  | 25% |

a: Revenue Budget Monitor

| | Revised Budget | Forecast Outturn | Outturn Variance | Of which : | |
|------------|----------------|------------------|------------------------|--------------|----------------|
| | | | | Covid | Non Covid |
| P06 | £50.6m | £58.1m | £7.7m overspend | £8.1m | (£0.4m) |
| P05 | £51.9m | £60.7m | £8.7m overspend | £9.3m | (£0.6m) |

| May | June | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
|-----|------|-----|------|-----|-----|-----|-----|-----|
| 7.6 | 5.4 | 8.7 | 7.7 | | | | | |
| | ▲ | ▼ | ▲ | | | | | |

Position by Division

| General Fund | 2020/21 - Full Year | | | P6 Forecast Variance | | | | Movement vs P5: Increase /(Decrease) | | |
|---------------------------------------|---------------------|------------------|---------------------------|----------------------|--------------|--------------|--------------|--------------------------------------|------------|----------------|
| | Revised Budget | Forecast Outturn | Forecast Outturn Variance | COVID-19 Exp | COVID-19 Inc | COVID | Non-COVID | COVID | Non-COVID | Total Movement |
| | £000s | | | £000s | | £000s | | £000s | | |
| Resources | | | | | | | | | | |
| Digital Transformation | 15,598 | 14,706 | (892) | 0 | 300 | 300 | (1,192) | 300 | (442) | (142) |
| Legal and Democratic Services | 8,164 | 8,869 | 705 | 695 | 277 | 972 | (267) | 2 | (142) | (140) |
| Finance | 9,044 | 13,871 | 4,827 | 3,497 | 1,985 | 5,482 | (655) | 103 | 110 | 213 |
| HR, Workplace & Organisational Design | 10,388 | 10,541 | 153 | 0 | 0 | 0 | 153 | 0 | (20) | (20) |
| Policy, Strategy & Partnerships | 3,384 | 3,393 | 9 | 60 | 0 | 60 | (51) | 0 | 2 | 2 |
| FM Services | 3,378 | 5,310 | 1,932 | 600 | 250 | 850 | 1,082 | 0 | (75) | (75) |
| Commercialisation & Citizens | 613 | 1,590 | 977 | 0 | 433 | 433 | 544 | (1,669) | 802 | (867) |
| Total Resources | 50,569 | 58,280 | 7,711 | 4,852 | 3,245 | 8,097 | (386) | (1,264) | 235 | (1,029) |

Key Messages:

There has been further budget movement in Period 6 both within the Resources Directorate and also cross-directorates. A review of the Commercialisation and Citizens Division structure has led to a consequent deconstruction and reassignment of its services so that

- Citizen Services' Corporate Complaints along with the Companies Lead service have moved to Legal and Democratic Services, whilst the remainder of Citizens Services has moved to Digital Transformation. These continue to report within Resources Directorate.
- Trading With Schools has moved to the People Directorate.
- Neighbourhoods and Communities Division and the Bristol Impact Fund have moved to People Directorate's Public Health.
- The Harbour and Markets services have moved to the Growth and Regeneration Directorate

The transfer of these services out of Resources represents a reduction to this directorate's total budget of £2.6m. Partially offsetting this budget reduction, there has been a budget increase of £1.3m due to the annual inflationary increase to salaries and wages.

This results in a net £1.3m reduction to the directorate's total full year budget. At the same time, there is a £1.2m reduction in the directorate's forecast overspend.

For most of the divisions (Digital Transformation, Legal and Democratic Services, HR, Workplace & Organisational Design, Policy, Strategy & Partnerships and Facilities Management Services) there has been no significant change in forecast position this period aside from that due to the transfer across of Commercialisation and Citizens services and the payroll increase as set out above.

Finance reports a £0.2m net movement in the month it should be noted that included here is the assumption that there will be both £0.4m of further lost Court Summons income and £0.2m additional shortfall in overpayment recovery income reflecting Covid's adverse impact to continue to the close of March 2021. This has been largely offset by £0.4m of savings forecast due to slow down in business as usual activities. In addition, Commercialisation & Citizens reports a £0.9m improvement in its forecast variance to budget down from £1.8m to £0.9m adverse. This is due to the transfer out of Trading With Schools which carried a £0.3m (Covid) challenge to income and expenditure and the Bristol Impact Fund which carried a £0.7m (Covid) challenge offset by the transfer out of the Harbour service, Neighbourhoods and Communities and Companies Lead which combined were reporting a favourable forecast at P5 of £0.1m.

Savings Delivery

| 20/21 Resources Directorate Savings Target (£'000s): | | | | | | | 3,258 | | | | | | | | | | | | | | | |
|---|--|--------------------------------|--------------------|---------------------------------|------------------------|--------------------|--|---|------------------|-----------------------------------|--------|--|-----|--|--|--|--|--|--|--|--|--|
| | This month | | | Last month | | | Top 5 largest savings at risk in 20/21 (ordered by size of saving at risk) | | | | | | | | | | | | | | | |
| | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | | | | | | | | | | | | | | | | |
| No - savings are at risk | 0 | 0 | n/a | 1,359 | 1,276 | 94% | <table border="1"> <thead> <tr> <th>ID</th> <th>Name of Proposal</th> <th>Value at Risk in 20/21 (£'000)</th> </tr> </thead> <tbody> <tr> <td></td> <td>No savings reporting as at risk in 20/21</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> | ID | Name of Proposal | Value at Risk in 20/21 (£'000) | | No savings reporting as at risk in 20/21 | | | | | | | | | | |
| ID | Name of Proposal | Value at Risk in 20/21 (£'000) | | | | | | | | | | | | | | | | | | | | |
| | No savings reporting as at risk in 20/21 | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | |
| Yes - savings are safe | 1,832 | 0 | 0% | 473 | 0 | 0% | | | | | | | | | | | | | | | | |
| SAVING CLOSED - CONFIRMED AS SECURED & DELIVERED | 1,426 | 0 | 0% | 1,426 | 0 | 0% | | | | | | | | | | | | | | | | |
| NO RAG PROVIDED | 0 | 0 | n/a | 0 | 0 | n/a | | | | | | | | | | | | | | | | |
| Grand Total | 3,258 | 0 | 0% | 3,258 | 1,276 | 39% | | | | | | | | | | | | | | | | |
| n/a - represents one off savings or mitigations in previous year | -1,340 | 0 | 0% | -1,340 | 0 | 0% | <table border="1"> <thead> <tr> <th colspan="2">Mitigated savings from previous years that remain 'due' for delivery this year (£m)</th> </tr> </thead> <tbody> <tr> <td>Amount due from previous year(s):</td> <td>£ 1.60</td> </tr> <tr> <td>Amount reported at risk:</td> <td>£ -</td> </tr> </tbody> </table> | Mitigated savings from previous years that remain 'due' for delivery this year (£m) | | Amount due from previous year(s): | £ 1.60 | Amount reported at risk: | £ - | | | | | | | | | |
| Mitigated savings from previous years that remain 'due' for delivery this year (£m) | | | | | | | | | | | | | | | | | | | | | | |
| Amount due from previous year(s): | £ 1.60 | | | | | | | | | | | | | | | | | | | | | |
| Amount reported at risk: | £ - | | | | | | | | | | | | | | | | | | | | | |
| Accelerated efficiencies (balancing line) | 268 | 0 | 0% | 268 | 0 | 0% | | | | | | | | | | | | | | | | |
| WRITTEN OFF | 0 | 0 | n/a | 0 | 0 | n/a | | | | | | | | | | | | | | | | |
| Grand Total | 2,186 | 0 | 0% | 2,186 | 1,276 | 58% | | | | | | | | | | | | | | | | |

Key Changes since last month:

1. There have been a number of significant changes for the Resources Directorate this month due to the Change Request approved at DE on the 30/09/20. A large number of the 20/21 savings in 20/21 weren't deliverable and have 'rolled over' into 21/22. This change request confirms mitigation for a large group of savings in resources via IT underspend or Covid funds. The changes relating to 20/21 are as follows:

- BE42 Reducing Fraud & Avoidance - split into BE42-a and BE42-b, with £50k relating to COVID-19 mitigation and the remaining £50k to continue as original plans. Both are marked as safe for 20/21.
- BE43 Improved Debt Management - split into BE43-a and BE43-b, with £50k relating to In year COVID-19 mitigation and the remaining £100k rolling into 21/22. Marked as safe for 20/21 and 21/22.
- BE6-7 18/19 rollover - mitigation for Workforce Policy & Review - split into BE6-7-a and BE6-7-b, with £23k relating to OTHER mitigation and £60k in line with original plans (both now marked as safe).
- IN23-2 18/19 rollover - More income from commercial opportunities - split into IN23-2-a and IN23-2-b, with £150k relating to In year COVID-19 mitigation and £310k relating to OTHER mitigation, both of which have been marked as safe for 20/21.
- NEW1-2x and NEW1-2y 17/18 rollover Facilities Management savings - split into NEW1-2x-a and NEW1-2y-a, with £446k relating to In year COVID-19 mitigation and £49k relating to OTHER mitigation, both of which have been marked as safe for 20/21.
- BE7-4 18/19 rollover - CORPORATE SAVING now reporting full £120k as safe for 20/21
- NEW3-2 17/18 rollover - generate additional income from our historical assets - now reporting full £250k as safe for 20/21

b: Risks and Opportunities

| Division | Risk or Opportunity | Description of impact | Risk/(Opportunity) £ | Likelihood (%age) | Net Risk /(Opportunity) £ |
|-----------------------|---------------------|--|----------------------|-------------------|---------------------------|
| Finance | Risk | Annual LA errors for 19/20 going above the lower or upper threshold following external audit review. Risk estimated to be between £400k to £500k. | 450,000 | 50% | 225,000 |
| Finance | Opportunity | Reduction in Subsidy income received, relating to the LA Error going above the lower or upper threshold for the previous financial year will be met from earmarked reserves. | (450,000) | 50% | (225,000) |
| Registrars | Risk | Income streams have increased as now able to offer ceremonies etc. However, the current forecast assumes that there will be NO further lockdowns | 810,000 | 10% | 81,000 |
| Land Charges | Opportunity | If number of searches conducted reach the same levels as last year | (46,628) | 50% | (23,314) |
| Legal Team | Opportunity | Forecast at P5 assumes that locums will be engaged until the end of the financial year. This is dependent on the implementation of the team re-structure | (280,000) | 25% | (70,000) |
| FMServices | Opportunity | Facilities Management | (522,000) | 50% | (261,000) |
| Digital Transformaion | Risk | Digital Transformation - Salaries | 200,000 | 100% | 200,000 |
| Digital Transformaion | Opportunity | Digital Transformation - Salaries | (200,000) | 100% | (200,000) |
| Digital Transformaion | Risk | Digital Transformation - Contracts | 500,000 | 100% | 500,000 |
| Digital Transformaion | Opportunity | Digital Transformation - Contracts | (500,000) | 50% | (250,000) |
| Digital Transformaion | Risk | Digital Transformation - Contracts | 100,000 | 100% | 100,000 |
| Digital Transformaion | Opportunity | Digital Transformation - Contracts | (100,000) | 100% | (100,000) |
| | | | | | (23,314) |

c: Capital

| Approved Budget | Revised Budget | Expenditure to Date | Forecast Outturn | Outturn Variance |
|-----------------|----------------|--------------------------------|--------------------------------|------------------|
| £17.7m | £16.6m | £13.2m 79% of Budget | £17.9m +8% of budget | +£1.3m |

Capital Budget Monitor Report for period 202006 - Summary by Programme

Gross expenditure by Programme

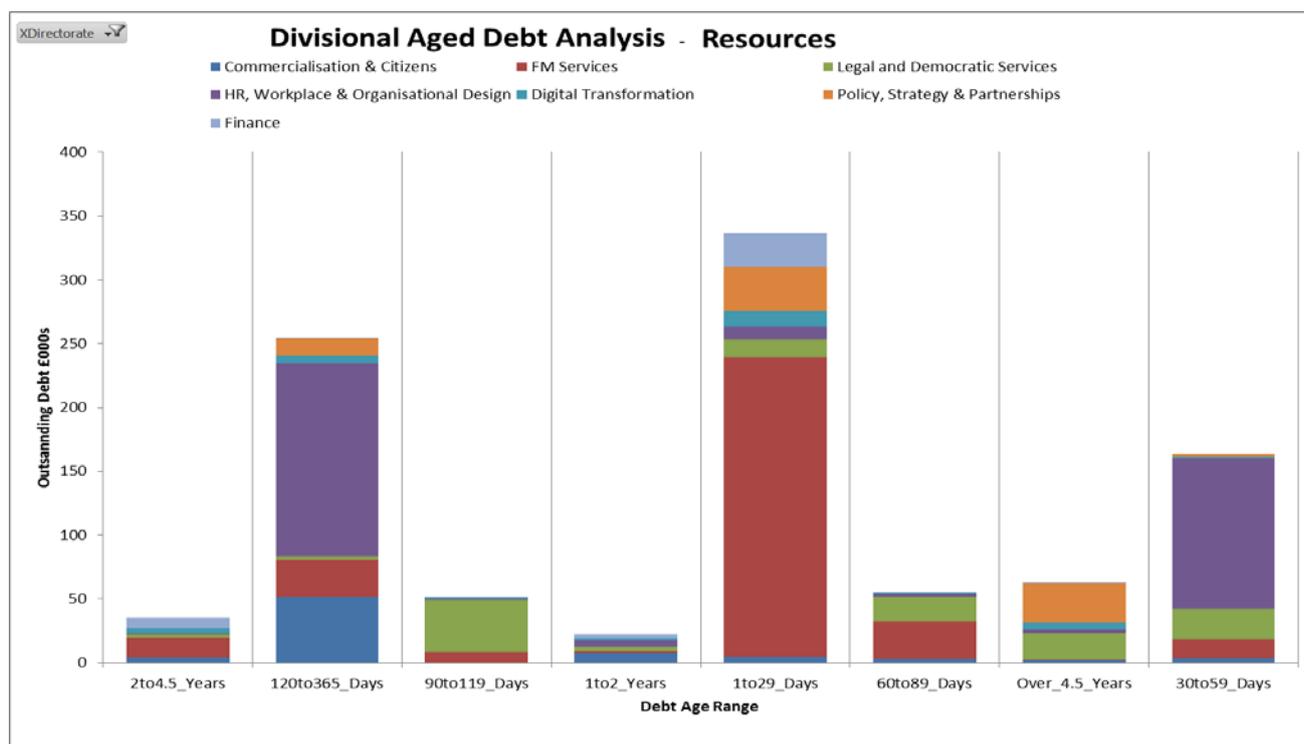
| Ref | Scheme | Description | Current Year (FY2020) | | | |
|------------------------|---|---|-----------------------|-------------------------|---|-----------|
| | | | Budget | Budget Manager Forecast | Variance based on budget manager forecast | |
| | | | £000s | £000s | £000s | % |
| PL21 | Building Practice Service - Essential H&S | Health & Safety works to maintain the structural fabric and condition of existing Council buildings to meet statutory compliance. | 3,301 | 2,200 | (1,101) | -33% |
| PL27 | Vehicle Fleet Replacement Programme | Vehicle Fleet replacement programme. | 2,344 | 1,244 | (1,100) | -47% |
| RE01 | ICT Refresh Programme | A programme of investment to replace and upgrade the Council's ICT assets. | 5,253 | 5,643 | 389 | 7% |
| RE02 | ICT Development - HR/Finance | Development of HR/Finance System. | 517 | 517 | 0 | 0% |
| RE03 | ITTP - IT Transformation Programme | Investment that will be required to support ICT infrastructure including a Cloud Hosting solution. | 5,175 | 8,317 | 3,142 | 61% |
| Total Resources | | | 16,590 | 17,921 | 1,330 | 8% |

Key Messages:

- Building Practice has revised its forecast down by a further £401k to £2.2m as Covid continues to impact the scheduling of asset assessments, the planning and delivery of works.
- ICT Refresh Programme has brought £100k spend previously planned for 21/22 forward in to the current year to reflect the purchase of an additional 800 laptops this year.
- IT Transformation Programme has increased its current year forecast by a further £194k accelerating budget previously planned for 21/22 in to 20/21. Its' total forecast programme spend remains in line

with the programme's approved budget and this increase in current year spend will be offset by forecast underspends across other Resources Directorate projects and across other BCC Directorate projects.

d: Aged Debt



Within Resources, outstanding income totals £1.3m.

£0.7m of this falls within the 1 - 119 days window and £0.4m of this relates to Facilities Management Services. At 120 days the debt is referred to the Council's Debt Recovery Team. The 120 - 4.5 years window represents £0.6m of which £0.3m relates to 3 companies and pay recovery is being progressed. A further £0.1m is in the process of being written off having previously been fully provided against.

e: Payment Performance

| | Amount Paid (inc VAT) | Number of invoices | Average days to pay | Number of invoices paid late | % Paid Late |
|--|-----------------------|--------------------|---------------------|------------------------------|-------------|
| 2 - Resources | | | | | |
| 21 - Digital Transformation | 660,645 | 156 | 17 | 15 | 10% |
| 22 - Legal and Democratic Services | 451,954 | 136 | 45 | 42 | 31% |
| 24 - Finance | 511,354 | 94 | 61 | 57 | 61% |
| 25 - HR, Workplace & Organisational Design | 102,832 | 81 | 34 | 18 | 22% |
| 28 - Policy, Strategy & Partnerships | 111,450 | 46 | 25 | 11 | 24% |
| 2B - FM Services | 788,913 | 192 | 34 | 41 | 21% |
| 2Y - Capital - Business Change | 1,533,079 | 71 | 27 | 21 | 30% |
| 38 - Commercialisation & Citizens | 163,016 | 221 | 26 | 29 | 13% |
| 2 - Resources Total | 4,323,243 | 997 | 33 | 234 | 23% |

This table shows Directorate payments during this month. This one month 'snap shot' distorts the year to date position in particular for Legal and Democratic Services which last month averaged 37 and for Finance which last month averaged 18 days.

a: Revenue Budget Monitor

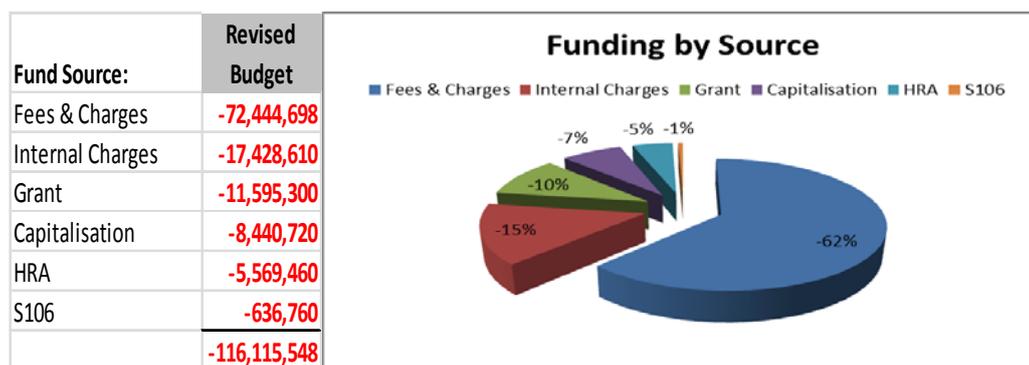
| | Revised Budget | Forecast Outturn | Outturn Variance | Of which : |
|------------|----------------|------------------|-------------------------|-----------------------|
| | | | | Covid Non Covid |
| P06 | £64.4m | £91.2m | £26.8m overspend | £27.3m (£0.5m) |
| P05 | £63.1m | £89.6m | £26.5m overspend | £27.4m (£0.9m) |

| May | June | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
|------|------|------|------|-----|-----|-----|-----|-----|
| 31.0 | 28.9 | 26.5 | 26.8 | | | | | |
| | ▲ | ▲ | ▼ | | | | | |

Position by Division

| General Fund | 2020/21 - Full Year | | | P6 Forecast Variance | | | | Movement vs P5: Increase /(Decrease) | | |
|--|---------------------|-----------------|--------------------------|----------------------|---------------|---------------|--------------|--------------------------------------|------------|----------------|
| | Revised Budget | Revised Outturn | Revised Outturn Variance | COVID-19 Exp | COVID-19 Inc | COVID | Non-COVID | COVID | Non-COVID | Total Movement |
| | £000s | | | £000s | | £000s | | £000s | | |
| Growth & Regeneration | | | | | | | | | | |
| Housing & Landlord Services | 14,896 | 19,970 | 5,074 | 4,612 | 0 | 4,612 | 462 | (270) | (4) | (274) |
| Development of Place | 1,431 | 2,425 | 994 | 264 | 1,236 | 1,501 | (507) | (82) | (32) | (113) |
| Economy of Place | 14,246 | 22,003 | 7,757 | 925 | 5,748 | 6,673 | 1,084 | 26 | 74 | 99 |
| Management of Place | 33,809 | 46,757 | 12,948 | 1,830 | 12,650 | 14,480 | (1,532) | 212 | 380 | 592 |
| Total Growth & Regeneration | 64,382 | 91,155 | 26,773 | 7,631 | 19,634 | 27,266 | (493) | (114) | 419 | 305 |

The Growth & Regeneration Directorate reported a £26.8m overspend against a net expenditure budget of £64.4m (which also reflects services transferring to G&R from Resources). The overspend is mainly due to the impacts of the pandemic which has significantly affected a number of the directorate's fee generating services. The Directorate generates over £116m in revenue to partially fund its activities. The table below shows the breakdown of the funding by type.



Key Messages:

Housing & Landlord Services – The division is forecasting a £5.1m overspend against a revised budget of £14.9m at P6. The main reasons for the expenditure pressure are:

- The £2.5m budget for subsidy loss has been transferred from Revenues and Benefits to Housing Options, with a forecast overspend of £1.1m.
- As part of the initial response to Covid-19, Bristol City Council has accommodated and supported over 350 people who were rough sleeping or in communal night shelters as part of “Everyone in”. The forecast net cost of this provision until the end of July was £2.7m, which included costs of dilapidation

and deep cleaning of hotels yet to be incurred which are anticipated to be funded from the Covid-19 grant allocation, as well as a small ring-fenced grant of £73,500 received from the MHCLG.

- The Move-on Project Board recommends the principle of continuing to accommodate and provide move on options to avoid rough sleepers returning to the streets, including people with no recourse to public funds. In order to facilitate this, a bid for £2.174m was made to the MHCLG for Next Steps Accommodation Programme funding, of which £1.936m has been awarded which will reduce the call on the Covid grant.

Development of Place – The division is forecasting a £1m overspend against a revised budget of £1.4m at P6.

The main reasons for these variances are:

- Significant reductions in income have been experienced across the planning and building regulations services during the pandemic. Some developments and work are simply put on pause and which will create a small amount of “catch-up”. However there is only a limited capacity within the market to progress developments, planning applications, searches etc. Therefore it is anticipated that there won’t be 100% “catch-up” and that this will take several months to return to regular level. The services are anticipating a reduction in its ability to support and progress on capital projects.
- Planned MTFP savings from income are now also at risk, estimated at £0.1m

Economy of Place – The division is forecasting a £7.8m overspend against a revised budget of £14.2m at P6 (as the sustainable transport budgets transfer in from MOP). The main reasons for these variances are:

- It is expected that commercial property rental income will also experience up to 25% reduction (c£3m) base on ONS statistics on national business insolvency risk and intelligence from the Council’s own property agents who estimates these losses across a national mixed commercial portfolio.
- The Council run 7 museums which are general free to visit however do generate income for the Council as they do run some fee charging exhibitions, cafes and shops. The Council also run fee paying services within our libraries. Whilst some costs may be covered by furloughing relevant staff this doesn’t cover all of the lost income. These activities may take a long time to return to pre-COVID income levels as capacity will be reduced for the foreseeable future as a result of infection control and social distancing measures.
- Planned MTFP savings from income are now also at risk, estimated at £0.3m

Management of Place – The division is forecasting a £12.9m overspend against a revised budget of £33.8m at P6 (as the sustainable transport budgets transfer out to EOP). The main reasons for these variances are:

- Significant reductions in income have been experienced across our car parks including off-Street car parks, on street parking, resident parking schemes, parking charge notices etc. Occupancy has reduced significantly during the pandemic. Estimated in-year loss is £12.6m.
- Other income reduction include advertising income from council assets e.g. bus shelters, and income generated by Council’s renewable energy assets due to unprecedented market price volatility.
- Waste management services also experienced additional cost pressures (£1.7m) due to increases in residential residual waste and recycling volumes, market price volatility for waste disposal, and additional measure introduced for social distancing.

It is important to note that whilst central government have announced support to local authorities in funding a proportion of lost fees and charges income, there are caveats on what they are prepared to fund, as a result the Directorate will still be left with a balance of Covid related overspends that will need to be funded from its earmarked reserves.

Savings Delivery

20/21 G&R Directorate Savings Target (£'000s):

3,012

| | This month | | | Last month | | | Top 5 largest savings at risk in (ordered by size of saving at risk) | | |
|--|---------------------------------|------------------------|--------------------|---------------------------------|------------------------|--------------------|--|---|--------------------------------|
| | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | Total value of savings (£'000s) | Value at risk (£'000s) | Proportion at risk | ID | Name of Proposal | Value at Risk in 20/21 (£'000) |
| No - savings are at risk | 875 | 675 | 77% | 1,225 | 1,225 | 100% | IN04-1 | Establish city centre business rate development team (including some 19/20 roll over) | £ 240 |
| Yes - savings are safe | 2,137 | 0 | 0% | 1,787 | 0 | 0% | NEW2 | *19/20 Rollover* - Review our approach to managing and optimising the value of public sector land and buildings | £ 200 |
| SAVING CLOSED - CONFIRMED AS SECURED & DELIVERED | 0 | 0 | n/a | 0 | 0 | n/a | IN05 | Increase income from museum buildings | £ 86 |
| NO RAG PROVIDED | 0 | 0 | n/a | 0 | 0 | n/a | IN29 | New ways of funding Development Management services | £ 80 |
| Grand Total | 3,012 | 675 | 22% | 3,012 | 1,225 | 41% | R502-B | SMART City initiatives | £ 50 |
| n/a - represents one off savings or mitigations in previous year | -1,326 | 0 | 0% | -1,326 | 0 | 0% | | | |
| Accelerated efficiencies (balancing line) | 0 | 0 | n/a | 0 | 0 | n/a | | | |
| WRITTEN OFF | 380 | 0 | 0% | 380 | 0 | 0% | | | |
| Grand Total | 2,066 | 675 | 33% | 2,066 | 1,225 | 59% | | | |

| Mitigated savings from previous years' that remain 'due' for delivery this year (£m) | | |
|--|---|------|
| Amount due from previous year(s): | £ | 1.07 |
| Amount reported at risk: | £ | 0.41 |

Key Changes since last month:

There are three changes to note for the G&R Directorate this month:

1. BES7 Improving the performance of the council's Commercial/Investment Property portfolio - now reporting the full £100k as safe and is in the process of completing the paperwork to make as 'secured and delivered'.
2. FP02-C General Waste Savings Target (Note name changed last month) - now reporting the full £250k as safe for 20/21.
3. R502-B SMART City initiatives - amount reporting at risk reduced from £250k to £50k. It is understood this is due to other mitigations.

b: Risks and Opportunities

| GROWTH & REGENERATION DIRECTORATE RISKS & OPPORTUNITIES | | | | | |
|---|--------------------|--|--|--|---------------------------|
| Division Name | Service Name | Description | Risk / Opportunity £'000 | Mitigations / Opportunity | Value of Mitigation £'000 |
| Management of Place | Traffic & Highways | Signals & Lighting General - overrun of section 74 work, TTR0/TTRN and Inspection charges owed by Bristol Water totals £1.448m at 07/10/20 split as: £18k under 30 days, £35k 30-59 days, £20k 60-89 days, £117k 90-119 days, £1,214k 120-365 days, £43k 1-2 years. BCC have made an offer to Bristol Water to reduce the charge. As at Oct'20 Patsy Mellor is in discussions with CEO of Bristol Water. | Over 60 days £1.394 m o/s, if 50% not paid, risk of losing £697k | Corporate Finance set up a provision for this at 31/03/20 | tbc |
| Housing and Landlord Services | Housing Options | Due to economic impact of Covid - homelessness may increase - leading to greater use of temporary accommodation | | Seek additional supported accommodation and increase acquisition of units | |
| Management of Place | Traffic & Highways | Repairs at West End may highlight additional work that needs to be done and any delays in work being completed will impact on income | ? | Delays in work being completed, may result in people moving to Trenchard to park | |
| Management of Place | Traffic & Highways | Marston's are not allowed to enforce the PCN debts. As at Oct'20 Patsy Mellor is raising this with Stephen Peacock. | 400 | | |
| Management of Place | Traffic & Highways | Bristol Bridge PCNs when we go live in November. Almost impossible to quantify, but for context, the PCNs issued in the first 5 months on Stoke Lane amounted to about £400k. | ? | | |
| Management of Place | Traffic & Highways | Potential for parking income to increase as economy picks later in the financial year after the effects of COVID on parking | 358 | | |
| Management of Place | Parks Service | Rising cases of COVID into Winter, pressure on Cems & Crems should the level of deaths start to rise as per early Summer. Also, cafes, Nursery and Kiosks income could fall. | ? | | |
| Management of Place | Energy Service | Facilities Mgt to run all BCC buildings with windows open and heating on full blast during winter to combat COVID!! Pressure on Energy Service gas expenditure | 200 | | |
| Management of Place | Energy Service | From Nov'20 the Heat Network Ltd company (SPV) will operate. This has stopped the Energy Service from recharging staff to capital projects in relation to this and also the fee income from customers will now go direct to Heat Network Ltd company. This is slightly off set from a mgt fee recharged to the Company for services they will continue to support the Company with. | 480 | | |
| Management of Place | Traffic & Highways | Rising cases of COVID into Winter, pressure on Parking income as per early Summer. | ? | | |
| Management of Place | Reg Services | COVID pressure on licensing income - undue on the numbers of pubs, clubs etc that might not renew their licenses. | ? | | |
| | | | 1,438 | | - |

There are four new quantified risks highlighted totalling £1.4m, as well as a number of unquantified risks that have been flagged by service managers. These require close monitoring as some are linked to the council's wider response to covid.

c: Capital

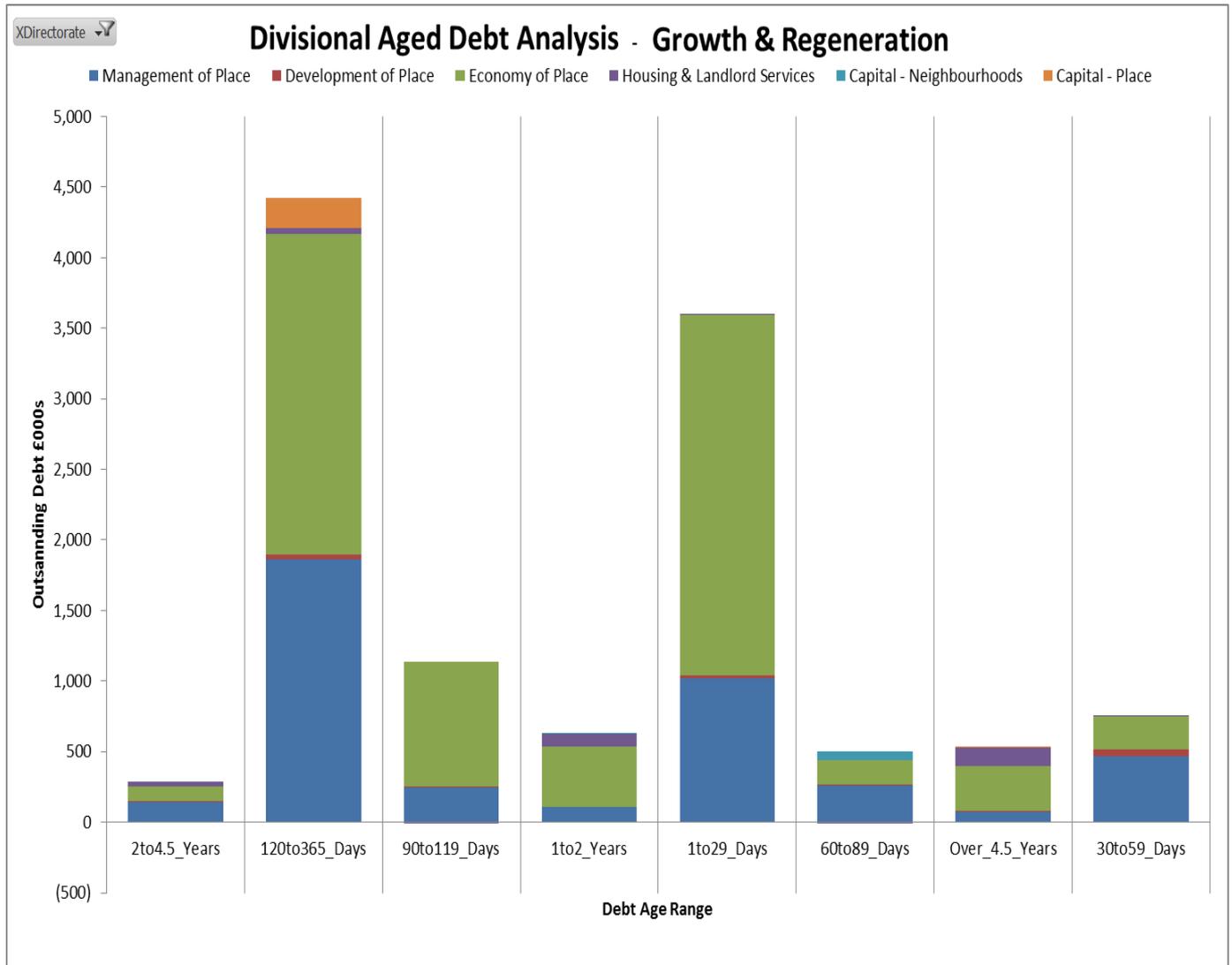
| | | | | |
|--|---|--|--|--|
| Approved Budget £163.3m | Revised Budget £160.5m | Expenditure to Date £23.3m 15% of Budget | Forecast Outturn £108.3m 67% of budget | Outturn Variance £(52.2m) |
| <i>2019/20 Comparator</i> | | | | |
| | Revised Budget £136.9m | Expenditure to Date £25.8m | Forecast Outturn £67.1m | Outturn Variance £(69.7m) |

Key Messages

The current reports shows (£23.3m) spend against budget (15% delivery) against the revised budget of £160.5m and are behind spend reported same time last year (£25.8m as at P6). To achieve the budget target for 20/21, the directorate will need to increase monthly spend to £14.2m (excluding HRA) from the average of £3.9m per month as at P6. To ensure delivery, the directorate will be submitting revised budget proposals in line with up-to-date milestones. Recent reviews will be reflected in the P6 numbers and will show a significant reprofiling of forecast spend. Below is a breakdown of all the schemes within the G&R Capital programme.

| Ref | Scheme | Budget | Expenditure to Date | Forecast | Variance | Expenditure to date | Forecast |
|--|--|----------------|---------------------|----------------|-----------------|---------------------|------------|
| | | | | | | | |
| | | | | | | £000s | % |
| Growth & Regeneration | | | | | | | |
| GR01 | Strategic Property – Temple Meads Development | 6,054 | 27 | 5,446 | (608) | 0% | 90% |
| GR03 | Economy Development - ASEA 2 Flood Defences | 8,568 | 314 | 8,032 | (536) | 4% | 94% |
| GR05 | Strategic Property - Hawkfield Site | 500 | 0 | 167 | (333) | 0% | 33% |
| GR06 | Innovation & Sustainability - OPCR 2 | 1,846 | 184 | 1,846 | 0 | 10% | 100% |
| GR08 | Delivery of Regeneration of Bedminster Green | 225 | 46 | 225 | 0 | 21% | 100% |
| HIF | HIF BID match funding | 6,000 | 0 | 0 | (6,000) | 0% | 0% |
| NH01 | Libraries for the Future | 609 | 77 | 527 | (82) | 13% | 87% |
| NH02 | Investment in parks and green spaces | 1,378 | 430 | 1,776 | 398 | 31% | 129% |
| NH03 | Cemeteries & Crematoria - Pending Business Case Development | 789 | 46 | 270 | (519) | 6% | 34% |
| NH04 | Third Household Waste Recycling and Re-use Centre | 5,624 | 344 | 1,921 | (3,703) | 6% | 34% |
| NH06 | Bristol Operations Centre - Phase 1 | 286 | 129 | 150 | (136) | 45% | 52% |
| NH06A | Bristol Operations Centre - Phase 2 | 1,876 | 156 | 529 | (1,348) | 8% | 28% |
| NH07 | Private Housing | 3,110 | 1,422 | 3,110 | 0 | 46% | 100% |
| PL01 | Metrobus | 172 | 246 | 1,923 | 1,751 | 142% | 1115% |
| PL02 | Passenger Transport | 1,487 | (93) | 955 | (532) | -6% | 64% |
| PL03 | Residents Parking Schemes | 3 | 0 | 3 | 0 | 0% | 100% |
| PL04 | Strategic Transport | 534 | 1,451 | 568 | 33 | 271% | 106% |
| PL05 | Sustainable Transport | 9,524 | 3,055 | 6,885 | (2,639) | 32% | 72% |
| PL06 | Portway Park & Ride Rail Platform | 3,038 | 274 | 1,726 | (1,312) | 9% | 57% |
| PL08 | Highways & Drainage Enhancements | 191 | (62) | 191 | 0 | -33% | 100% |
| PL09 | Highways infrastructure - bridge investment | 2,849 | 26 | 577 | (2,272) | 1% | 20% |
| PL09A | Highways infrastructure - Cumberland Road Stabilisation Scheme | 5,140 | 395 | 3,854 | (1,286) | 8% | 75% |
| PL10 | Highways & Traffic Infrastructure - General | 11,628 | 3,503 | 10,189 | (1,438) | 30% | 88% |
| PL10B | Highways & Traffic - Street Lighting | 591 | 60 | 291 | (300) | 10% | 49% |
| PL10C | Transport Parking Services | 1,881 | 179 | 1,135 | (746) | 10% | 60% |
| PL11A | Cattle Market Road site re-development | 2,858 | 378 | 1,307 | (1,551) | 13% | 46% |
| PL14 | Bristol Legible City Scheme | 315 | 75 | 130 | (185) | 24% | 41% |
| PL15 | Environmental Improvements Programme | 319 | 39 | 140 | (179) | 12% | 44% |
| PL17 | Resilience Fund (£1m of the £10m Port Sale) | 53 | 1 | 53 | 0 | 2% | 100% |
| PL18 | Energy services - Renewable energy investment scheme | 1,678 | 109 | 886 | (792) | 6% | 53% |
| PL18A | Energy Services – Bristol Heat Networks expansion | 16,480 | 2,999 | 7,867 | (8,613) | 18% | 48% |
| PL18B | Energy Services - School Efficiencies | 151 | 66 | 0 | (151) | 44% | 0% |
| PL18D | Energy Services - EU Replicate Grant | (115) | 23 | 26 | 141 | -20% | -23% |
| PL19 | Energy Services Phase 2 Investment & commercialisation opportunities | 1,200 | 0 | 180 | (1,020) | 0% | 15% |
| PL20 | Strategic Property | 332 | 0 | 86 | (246) | 0% | 26% |
| PL22 | Strategic Property - Investment in existing waste facilities | 1,057 | 0 | 521 | (536) | 0% | 49% |
| PL23 | Strategic Property - Temple St | 355 | 30 | 30 | (326) | 8% | 8% |
| PL24 | Bristol Beacon | 19,468 | 6,720 | 19,468 | 0 | 35% | 100% |
| PL25 | Strategic Property - Community Capacity Building | 998 | 0 | 0 | (998) | 0% | 0% |
| PL30 | Housing Strategy and Commissioning | 30,296 | 611 | 11,734 | (18,561) | 2% | 39% |
| PL30A | Housing Programme delivered through Housing Company | 9,500 | 0 | 13,000 | 3,500 | 0% | 137% |
| PL32 | Western Harbour Design Development | 480 | 0 | 0 | (480) | 0% | 0% |
| PL35 | Harbour Operational Infrastructure | 739 | 0 | 179 | (561) | 0% | 24% |
| PL36 | Investment in Markets infrastructure & buildings | 444 | 42 | 382 | (62) | 9% | 86% |
| Total Growth & Regeneration | | 160,510 | 23,305 | 108,283 | (52,228) | 15% | 67% |

d: Aged Debt



e: Payment Performance

| | Amount Paid (inc VAT) | Number of invoices | Average days to pay | Number of invoices paid late | % Paid Late |
|--|-----------------------|--------------------|---------------------|------------------------------|-------------|
| 4 - Growth & Regeneration | | | | | |
| 37 - Housing & Landlord Services | 1,426,169 | 761 | 20 | 33 | 4% |
| 3Y - Capital - Neighbourhoods | 1,398,912 | 38 | 55 | 17 | 45% |
| 42 - Development of Place | 185,769 | 42 | 54 | 14 | 33% |
| 46 - Economy of Place | 672,710 | 279 | 45 | 86 | 31% |
| 47 - Management of Place | 9,357,463 | 614 | 31 | 147 | 24% |
| 4Y - Capital - Place | 2,791,349 | 146 | 28 | 34 | 23% |
| 4 - Growth & Regeneration Total | 15,832,372 | 1,880 | 29 | 331 | 18% |

a: Revenue Budget Monitor

| | Revised Budget | Forecast Outturn | Outturn Variance | Of which : | |
|------------|----------------|------------------|---------------------------|--------------|----------------|
| | | | | Covid | Non Covid |
| P06 | £(0.0m) | £(3.5m) | £(3.5m) underspend | £3.0m | £(6.5m) |
| P05 | £0.0m | £(1.6m) | £(1.6m) underspend | £3.0m | £(4.6m) |

| Forecast Outturn Variance by month £m | | | | | | | | | |
|---------------------------------------|-------|-------|-------|-------|-----|-----|-----|-----|-----|
| May | June | July | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
| (0.0) | (1.0) | (0.9) | (1.6) | (3.5) | | | | | |
| | ▲ | ▼ | ▲ | ▲ | | | | | |

Revenue Position – Income and Expenditure

| HRA Income and Expenditure | 2020/21 - Full Year | | | P6 Forecast Variance | | Movement vs P5: Increase/(Decrease) | | |
|---|---------------------|-----------------------|-------------------------------|----------------------|----------------|-------------------------------------|----------------|---------------------|
| | Revised Budget £000 | Forecast Outturn £000 | Revised Outturn Variance £000 | COVID £000 | Non COVID £000 | COVID £000 | Non COVID £000 | Total Movement £000 |
| Dwelling rents | (113,276) | (115,356) | (2,080) | 0 | (2,080) | 0 | (1,632) | (1,632) |
| Voids | 1,200 | 1,524 | 324 | 0 | 324 | 0 | 2 | 2 |
| Non-dwelling rents | (950) | (963) | (14) | 0 | (14) | 0 | (130) | (130) |
| Charges for services and facilities | (8,353) | (8,628) | (274) | 0 | (274) | 0 | (42) | (42) |
| Contributions towards expenditure | (80) | (12) | 69 | 0 | 69 | 0 | 13 | 13 |
| TOTAL INCOME | (121,458) | (123,434) | (1,976) | 0 | (1,976) | 0 | (1,790) | (1,790) |
| Repairs & Maintenance | 32,513 | 29,933 | (2,580) | 0 | (2,580) | 0 | (253) | (253) |
| Supervision & Management | 31,237 | 30,332 | (905) | 960 | (1,865) | 0 | 163 | 163 |
| Special Services | 9,719 | 9,704 | (15) | 0 | (15) | 0 | 53 | 53 |
| Rents, rates, taxes and other charges | 1,189 | 1,206 | 17 | 0 | 17 | 0 | (44) | (44) |
| Depreciation & impairment of non-current assets | 28,867 | 28,867 | 0 | 0 | 0 | 0 | 0 | 0 |
| Debt management | 41 | 41 | 0 | 0 | 0 | 0 | 0 | 0 |
| Movement in the allowance for bad debts | 1,783 | 3,783 | 2,000 | 2,000 | 0 | 0 | 0 | 0 |
| TOTAL EXPENDITURE | 105,349 | 103,866 | (1,483) | 2,960 | (4,443) | 0 | (80) | (80) |
| NET COST OF HRA SERVICES | (16,110) | (19,569) | (3,459) | 2,960 | (6,419) | 0 | (1,871) | (1,871) |
| Net interest payable, pension costs and other non operational charges | 10,344 | 10,344 | 0 | 0 | 0 | 0 | 2 | 2 |
| Capital Expenditure Funded From The HRA | 5,766 | 5,766 | 0 | 0 | 0 | 0 | 0 | 0 |
| SURPLUS FOR THE YEAR ON HRA SERVICES | 0 | (3,459) | (3,459) | 2,960 | (6,419) | 0 | (1,869) | (1,869) |

Key Messages

HRA is a ring-fenced budget, therefore the £3.0m pressure forecast due to COVID is anticipated to be offset against an underspend of of £6.4m from delays in recruitment and the repair and maintenance programme due to COVID. The overall forecast for the HRA is an underspend of £3.5m which if materialises will be transferred to the HRA reserve at the year end.

The forecast underspend has increased from P5 due to additional income forecast on dwelling rents. This mainly consists of additional income relating to Temporary Accommodation, new units and relets.

b: Risks and Opportunities

| Risk | Key Causes | Key Consequence | Key Mitigations |
|---|---|---|---|
| Implementation of Universal Credit (UC) and increased number | UC continues to be a risk with increased monthly migrations | Arrears for this group increasing- increase in claimants over 9 | New UC Team Leader role Focussed day to day case work Use of Managed Payments |

| | | | |
|---|---|---|---|
| of claimants following Covid | increasing by around 200 | months from 31 March 2019 by 1400 with a £1m increase in UC arrears | All team training on UC management Closer working with DWP and issue log developed |
| Impact of Grenfell enquiry outcomes | Additional works as a result of Grenfell enquiry outcomes, or the outcomes of independent fire safety checks on clad blocks; public /political pressure to install sprinklers | This could cost up to £25m if a complete programme is required | Need to retain flexibility in capital programme to meet outcomes of Grenfell enquiry that does not result in disruption to the rest of the programme |
| Zero Carbon Target | | May be required to retro fit and ensure compliance for new builds | City Leap may enable innovative solutions. Funding is yet to be identified for this work |
| Increase in income arrears and unable to spend Right to Buy receipts within designated timeframe | Impact of Covid-19 social distancing and economic disruption | Impact on the ability to development new stock and to progress the Housing Investment Programme | Monitor impact of Covid on 2020/21 budget and 30 year business plan and develop action plan for recovery including use of Rentsense to target arrears |
| Covid Second Wave / further lockdown or access issues to properties following Covid | | Further delay to planned work programme | Continue to develop safe working practices maintaining social distancing, reprioritise work that can be done |
| Impact of Brexit | Potential disruption to supply of materials / labour | Delays to planned programme work | Reprioritise work that can be done |

c: Capital

| | | | | |
|---|--|--|---|--|
| Approved Budget £83.0m | Revised Budget £83.0m | Expenditure to Date £12.1m 15% of Budget | Forecast Outturn £50.1m 60% of budget | Outturn Variance (£32.8m) |
|---|--|--|---|--|

| Gross expenditure by Programme | | Current Year (FY2020) | | | | Change from previous forecast | Analysis v Budget | | | | | | | |
|--------------------------------------|---------------------------------------|-----------------------|-------------------------|---|-------------|-------------------------------|-------------------|--------------|--------------|---------------------------|--------------|---------------|--------------|--|
| Ref | Scheme | Budget | Budget Manager Forecast | Variance based on budget manager forecast | % | | Expenditure | Current Year | Total Scheme | Expenditure + Commitments | Total Scheme | Run Rate | Current Year | |
| | | £000s | £000s | £000s | % | £000s | % | % | £000s | % | £000s | % | | |
| Housing Revenue Account | | | | | | | | | | | | | | |
| HRA1 | Planned Programme - Major Projects | 12,587 | 7,122 | (5,465) | -43% | ↑ | 1,672 | 13% | 13% | 1,673 | 13% | 3,344 | 27% | |
| HRA2 | New Build and Land Enabling | 43,378 | 27,233 | (16,146) | -37% | ↓ | 4,936 | 11% | 11% | 5,878 | 14% | 9,872 | 23% | |
| HRA3 | Building Maintenance and Improvements | 21,026 | 15,292 | (5,733) | -27% | ↓ | 5,350 | 25% | 2% | 5,388 | 2% | 10,701 | 51% | |
| HRA4 | HRA Infrastructure | 6,000 | 524 | (5,476) | -91% | ↔ | 186 | 3% | 3% | 224 | 4% | 372 | 6% | |
| Total Housing Revenue Account | | 82,991 | 50,171 | (32,820) | -40% | | 12,144 | 15% | 3% | 13,162 | 4% | 24,289 | 29% | |

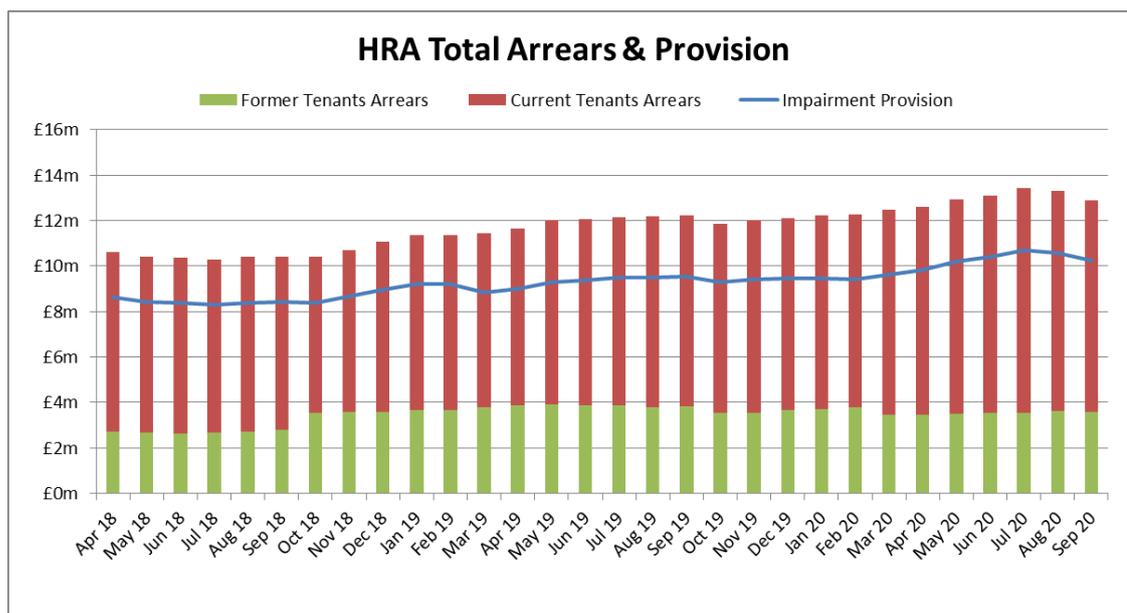
Planned Programme – Major Projects the underspend of £5.5m is due to Covid restrictions with limited access to homes for prolonged periods. The forecast is based on starting works when working arrangements can be made safe and there is now a reduction in planned activity for the year.

New Build and Land Enabling – forecast underspend (£16.1m). Despite the negative impact of Covid on the Councils ability to achieve its Housing Delivery Targets for this year, there remains a high degree of confidence that significant progress can be made. Several schemes have progressed through the planning process, to ensure that build can be commenced at the earliest available opportunity. However, as the year progresses and the status of schemes are regularly reviewed, some have been identified as at risk. As approved by Cabinet in October, some of the slippage will be used to fund additional acquisitions within the current capital programme to take advantage of opportunities that may arise.

Building Maintenance and Improvements – forecast underspend (£5.7m). The planned work has also been affected by Covid, though for relets changes in standards have also impacted on the numbers and spend on kitchens, rewires and bathrooms. (£4.8m) of the underspend has been due to delays on major refurbishment as tenders were not released due to Covid.

HRA Infrastructure – The Sandy Park project has been delayed due to Covid and will be reprofiled within the capital programme.

d: Aged Debt



Since lockdown on the 23rd of March, there has been a marked increase in the level of rent arrears, as well as an increase in the number of claimants for Universal Credit. The P6 forecast includes an increased provision for potential increased bad debt due to Covid.

a: Revenue Budget Monitor

| | Revised Budget | Forecast Outturn | Outturn Variance |
|------------|----------------|------------------------|------------------------|
| P06 | £0.0m | £8.1m | £8.1 Overspend |
| <i>P05</i> | <i>£0.0m</i> | <i>£8.3m overspend</i> | <i>£8.3m overspend</i> |

| May | June | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
|-----|------|-----|------|-----|-----|-----|-----|-----|
| 2.4 | 3.3 | 8.3 | 8.1 | | | | | |
| | ▼ | ▼ | | | | | | |

Revenue Position

Summary DSG position 2020/21 Period 6 (all figures in £000s)

| | b/f | DSG funding/ budget 2020/21 | Outturn Period 6 2020/21 | In-year variance at P6 | Cumulative c/f | In-year variance at P5 | Movement P5 to P6 |
|-----------------------|--------------|-----------------------------|--------------------------|------------------------|----------------|------------------------|-------------------|
| Schools Block | (174) | 272,492 | 272,492 | 0 | (174) | 0 | 0 |
| De-delegation | (464) | 0 | 0 | 0 | (464) | 0 | 0 |
| Schools Central Block | 0 | 2,386 | 2,385 | (0) | (0) | (0) | 0 |
| Early Years | 20 | 37,119 | 37,508 | 388 | 409 | 237 | 151 |
| High Needs Block | 3,509 | 62,511 | 70,248 | 7,737 | 11,246 | 8,070 | (333) |
| Funding | | (374,508) | (374,508) | 0 | 0 | 0 | 0 |
| Total | 2,892 | 0 | 8,125 | 8,125 | 11,017 | 8,307 | (182) |

Key Messages

The in-year forecast deficit on the DSG has reduced by £0.2m to £8.1m, which when added to the brought forward balance will give a total deficit to carry forward at the end of the year of £11.0m. The main area for concern continues to be the High Needs block which is forecasting an overspend in-year of £7.7m, a slight improvement of £0.3m since P5, reflecting a reduction in the forecast for Special Placements. The Early Years overspend is also primarily caused by High Needs expenditure in this area.

Following an Ofsted review last year, the Education service has invested significant resources in the EHC assessment and planning process to ensure that Pupils are assessed and receiving the relevant support in time. This has resulted in an increased number of high needs cases and had a significant impact on the DSG High Needs Block. Since the measures for improvement on the EHC process were introduced, additional Pupils have been assessed and brought into the service quicker, resulting in the increased cost forecast, there have been increases in the number of top-ups to both mainstream and special schools. In addition, the increase in demand would also have a knock on impact on higher cost placement needs (e.g. in out of area or independent non-maintained schools) where available capacity is not sufficient locally.

Following agreement of Schools Forum, the amount transferred from the Schools Block in 2020/21 is being used to contribute towards the Education Transformation Programme. We are currently forecasting that all this funding will be spent in 2020/21. The Education Transformation Programme commenced this year and is

primarily concerned with SEN and consequently the High Needs Block, this will need to reduce future cost pressures in the block and make it more sustainable. Nationally High Needs continues to be challenging and in Bristol this has been exacerbated by work to clear the backlog of EHCP. Further detailed activity review & analysis will need to be undertaken to ensure planning is robust and sufficient resources are available to meet needs, and we will continue to lobby government for a more sustainable funding settlement.

During the pandemic, most schools remained open to provide education to children of Key Workers and vulnerable pupils. Any additional costs incurred by schools during this time were able to be reclaimed from ESFA. The funding into the DSG was unaffected by Covid, and also the amounts paid to schools continued at pre-Covid levels following DfE guidance.

a: Revenue Budget Monitor

| | Revised Budget | Forecast Outturn | Outturn Variance |
|------------|----------------|------------------|------------------|
| P06 | £0.0m | £0.0m | £0.0m |
| <i>P05</i> | <i>£0.0m</i> | <i>£0.0m</i> | <i>£0.0m</i> |

| May | June | Aug | Sept | Oct | Nov | Dec | Jan | Feb |
|-----|------|-----|------|-----|-----|-----|-----|-----|
| 0.0 | 0.0 | 0.0 | 0.0 | | | | | |
| | | | | | | | | |

- Public Health (PH) Grant of £33.142m was awarded for 2020/21.
- The investment will focus on developing commissioning strategies and plans for the key services including Domestic Abuse, Drugs and Alcohol, Sexual Health and Child health.

The tables below provide a breakdown as follows:

- Table 1: The budget for 2020/21 and the current forecast at P6.
- Table 2: Planned externally commissioned services for 2020/21.
- Table 3: Planned internally commissioned services for 2020/21 .

Table 1: Summary of Spend

| Budget Projection | Budget 2020/21 | Current Forecast | Variance |
|---------------------------------------|----------------|------------------|----------|
| | £'000 | £'000 | £'000 |
| Salaries | 2,613 | 2,647 | 34 |
| Running Costs & Overheads | 1,271 | 800 | -471 |
| Internal Commissioned Services | 5,296 | 5,896 | 600 |
| External Commissioned Services | 28,812 | 28,607 | -205 |
| Gross Cost | 37,992 | 37,950 | -42 |
| Funding: | | | |
| Public Health Grant | -33,142 | -33,142 | 0 |
| Joint Partnership Funding | -4,850 | -4,808 | 42 |
| Use of Reserve | 0 | | 0 |
| Total Funding | -37,992 | -37,950 | 42 |
| | | | 0 |
| Net Spend | 0 | 0 | 0 |

Table 2: Public Health – External Commissioned Services: Plan 2020/21

| PHE Code | Public Health - External Commissioning Intentions | 2020/21 |
|----------|--|---------------|
| | | £'m |
| 361 | Sexual health services - STI testing and treatment (prescribed functions) | 5,171 |
| 362 | Sexual health services - Contraception (prescribed functions) | 3,387 |
| 363 | Sexual health services - Promotion, prevention and advice (non-prescribed functions) | 19 |
| 365 | NHS health check programme (prescribed functions) | 332 |
| 366 | Health protection - Local authority role in health protection (prescribed functions) | 135 |
| 368 | National child measurement programme (prescribed functions) | 467 |
| 370 | Public health advice to NHS commissioners (prescribed functions) | 4 |
| 371 | Obesity - adults | 0 |
| 372 | Obesity - children | 0 |
| 373 | Physical activity - adults | 183 |
| 374 | Physical activity - children | 163 |
| 376 | Substance misuse - Treatment for drug misuse in adults | 6,789 |
| 377 | Substance misuse - Treatment for alcohol misuse in adults | 2,352 |
| 378 | Substance misuse - Preventing and reducing harm from drug misuse in adults | 0 |
| 379 | Substance misuse - Preventing and reducing harm from alcohol misuse in adults | 39 |
| 380 | Substance misuse - Specialist drug and alcohol misuse services for children and young people | 0 |
| 381 | Smoking and tobacco - Stop smoking services and interventions | 519 |
| 382 | Smoking and tobacco - Wider tobacco control | 60 |
| 383 | Children 5–19 public health programmes | 1,618 |
| 384 | Mandated 0-5 children's services (prescribed functions) | 7,478 |
| 385 | All Other 0-5 children's services (non-prescribed functions) | 15 |
| 386 | Health at work | 0 |
| 387 | Public mental health | 10 |
| 389 | Miscellaneous public health services - other | 71 |
| | Total External Commissioning Intentions | 28,812 |

Table 3: Public Health – Internal Commissioned Services: Plan 2020/21

| Public Health - Internal Commissioning intentions | Directorate | 2020/21 £'000 |
|--|-----------------------|--------------------------|
| Gypsy and Traveller Health | Growth & Regeneration | 12 |
| Housing Officers | Growth & Regeneration | 70 |
| Prevention Homelessness - Substance Misuse Pathway | Growth & Regeneration | 750 |
| Breast Feeding Support Team | People | 83 |
| Safety Fitting Equipment | People | 20 |
| Children's Centres | People | 1,220 |
| Community Use of school sports facilities | People | 603 |
| Children and Young People Substance Misuse | People | 146 |
| Domestic Abuse | People | 875 |
| Advice Grants | Resources | 76 |
| Impact Grant | Resources | 597 |
| Community Development Team | Resources | 809 |
| JSNA Manager | Resources | 15 |
| QOL Survey - Health Questions | Resources | 10 |
| Trading Standards - illicit tobacco | Resources | 10 |
| Total - Internal Commissioned Services | | 5,296 |



**BRISTOL CITY COUNCIL
DECISION**

DECISION OF: SECTION 151 OFFICER

WITH ADVICE FROM: EXECUTIVE DIRECTOR OF PEOPLE AND DIRECTOR OF ADULT SOCIAL CARE

DIRECTORATE: PEOPLE

DECISION NO: 007
(2020/21 ASC: COVID-19 Emergency Control)

SUBJECT: COVID-19: Infection Control Fund (ICF) - Allocation to Adult Care Providers

KEY DECISION: Yes

REASON

To authorise the allocation of COVID-19 Infection Control Fund grants. The second round of the fund makes available £3 652 730 to Bristol City Council to support adult social care providers with infection control measures. The conditions for the fund require that it is allocated in two tranches on the following basis.

80% allocation to care homes and CQC registered community care providers (so mainly domiciliary care and extra care housing providers) within Bristol area (whether contracted with BCC or not).

The other 20% of the funding must be used to support care providers to take additional steps to tackle the risk of COVID-19 infections but can be allocated at the local authority's discretion. **A separate Decision Pathway document is being prepared for this allocation**

This decision relates to the use of the 80%, amounting to £2 922 184 payable in two equal tranches, first in October and second in December.

BACKGROUND

Between May and September 2020 BCC distributed £4.025m of Infection Control Fund monies to Bristol based providers. The second round of ICF was announced on 1st October 2020. The 80% is allocated as follows:

Care Homes are allocated 70% based on bed numbers taken from the NHS Capacity Tracker.

Monies for Community CQC regulated community care providers allocated 30% based on 'people using service' numbers from the CQC homecare survey which is displayed on LGA Inform database.

The Infection Prevention and Control measures are listed in full here

<https://www.gov.uk/government/publications/adult-social-care-infection-control-fund-round-2/adult-social-care-infection-control-fund-round-2-guidance>

It includes 'staff who are isolating receive their normal wage, limiting staff movement between settings (or for dom care visiting an individual), support recruitment to enable to limit movement of staff, supporting safe visiting to settings, ensuring staff attend work for purpose of testing'.

The 80% to care homes and CQC registered community providers **cannot** be used for purchasing PPE as those services have access to the PPE Pool

DECISION

This decision authorises the tranche one payment of £1,461,093 of the Infection Control Fund monies as set out below.

Table 1 - £2 922 184 to be distributed in two tranches and allocated as follows.

| | Tranche 1 (October) £ | Tranche 2 (December) £ | TOTAL |
|--------------------------|--------------------------|---------------------------|-----------|
| Care Homes | 1,028,561 | 1,028,560 | 2,057,121 |
| Community Care Providers | 432,532 | 432,531 | 865,063 |
| | 1,461,093 | 1,461,091 | 2,922,184 |

This emergency decision will be reported to Cabinet and the full amount of £2.9m will be subject to a Council decision as outlined in the Council's Scheme of Delegation.

FINANCIAL IMPLICATIONS

The second round of ICF totalling £3.6m will be received in two instalments, 50% already received on 1st October and the remaining 50% balance is scheduled for receipt in December. The DHSC expect the grant will be fully spent on infection control measures (as outlined in the grant determination letter) by 31 March 2021. DNSC are clear that 'spent' means that expenditure has been incurred on or before 31 March.

The Grant Circular includes a reporting template and the second round will require monthly returns.

LEGAL POWERS AND IMPLICATIONS

The Council has a duty to support the care market and ensure capacity and sustainability.

CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS

None.

CONSULTATION

Discussions have taken place with care providers.

RISK MANAGEMENT

Risk of claw back of the allocation has been addressed by:

- Allocating all monies.
- Agreement to be returned signed advising that in order to retain monies they must be used for infection control sent to providers.
- Providers must continue to use the NHS Capacity Tracker or CQC homecare survey at least once week and this will be monitored by ASC. Both record COVID and infection control related data.

EQUALITY IMPLICATIONS

Have you undertaken an Equality Impact Assessment? Yes / No
An Equalities Impact Assessment will be carried out.

CORPORATE IMPLICATIONS

None, other than those already highlighted

This decision is being taken under the urgency/emergency powers provided in the Council's scheme of delegation.

The Head of Paid Service and / or Section 151 Officer can take emergency action on behalf of the Council on any matter in cases of urgency or emergency, wherever possible in consultation with the Mayor or Deputy Mayor for Finance, Governance and Performance and subject to a full report as soon as possible afterwards to the relevant forum explaining the decision, the reasons for it and why the decision was treated as a matter of urgency.

SIGNATORIES

DECISION MAKER

Signed:

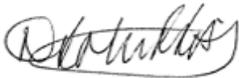


Note: If electronic signature used email from Director confirming decision and allowing use of electronic signature must be attached

S151 Officer

Title: **Director of Finance/s151 Officer**

Signed:



Date: 23 October 2020

Consultees

Title: **Deputy Mayor
Cabinet member for Finance, Governance, Property and Culture**

Signed:



Date: 23 October 2020

Note: If electronic signature used email from the relevant certifier confirming consultation and allowing use of electronic signature must be attached. If consultation undertaken verbally Director must record date and time of the conversation and any agreement/concerns raised by consultee.



Officer Executive Decision Form

DECISION DETAILS:

1. Subject:

Supported Housing Oversight Pilot Bid- Ministry of Housing, Communities & Local Government (MHCLG) 2020/2021

2. Full details of the decision taken:

MHCLG invited Bristol to submit a bid to pilot methodologies to raise the standards of accommodation and support within the 'non-commissioned' sector. We bid for funds to develop a multi-disciplinary team comprising Environmental Health, Safeguarding and Support Review Officers, to inspect Bristol's non-commissioned supported accommodation. Appropriate actions will be taken should any issues be identified, and will feed back the results to MHCLG who will use the pilots to consider developments to national policy.

We are also developing a 'toolkit' which could be used by other Local Authorities to assist in their approach to examining new and existing supported accommodation schemes.

We will explore a range of alternative housing models, including those currently in use, for effectiveness, while also considering the role of the non-commissioned sector in any future homelessness pathway models. This will be aligned with linked work looking at routes and barriers into more permanent move on accommodation. We will also review our data design and gaps in data collection in collaboration with stakeholders to inform our understanding of short-term housing demand.

3. Monetary value involved:

£249,099

4. Contract number:

Not applicable

5. Reason for identifying as an OED:

The proposed resource commitment is between £100,000 and £499,999. It has not been deemed a key decision as it will not have a significant impact on two or more wards.

6. Date of decision: *insert date*

7. Reasons for the decision:

It is considered beneficial to Bristol and those residing in non-commissioned accommodation to bid for these funds. The property inspections will improve standards in the accommodation and inform national policy.

8. Details of alternative options considered and rejected:

There are no alternatives to the bid structure

9. Any conflict of interest declared by a Cabinet Member consulted by the officer taking the decision, together with a note of any dispensation granted by Audit Committee in relation to the conflict of interest (if applicable):

Not applicable



1. Capital Programme Summary

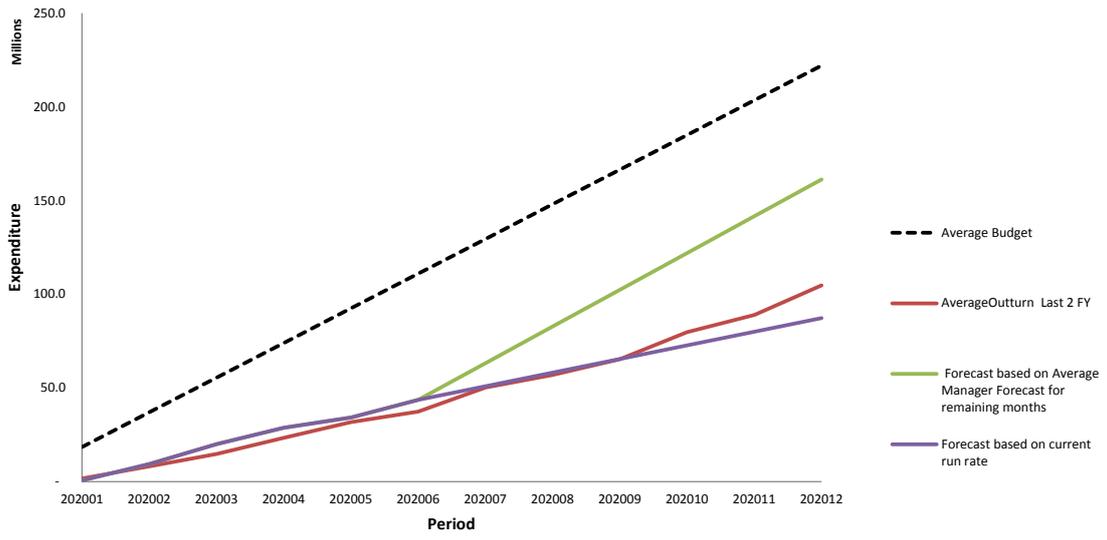
- 1.1. The following table below (Figure 1) sets out the forecast Capital Outturn position for 2020/21 by Directorate with a full programme summary at the end of this report.
- 1.2. The overall programme for 2020/21 has slipped from the original planned £295.1m to a forecast of £209.1 million.
- 1.3. The overall forecast assumes that the average monthly spend for the remainder of the year will increase significantly from the current spend run-rate and also in comparison to previous years. This is due to forecast at project level containing a level of optimism bias which when accumulated across the wider programme gives a high forecast than other comparable information would suggest.
- 1.4. Approval is sought to re-profile the budget between financial years to match the latest forecast position for each scheme. In the majority of cases this is deferring spend to future years as projects have slipped. Where this is financed by borrowing it delays the borrowing and leads to a delay in occurring financing costs, this has already been assumed in the revenue position as is contributing to the mitigations to impact of Covid-19.
- 1.5. For any delayed schemes which are financed by grants, the grant conditions will be reviewed to ensure there is no adverse impact to the Council by delaying the scheme.
- 1.6. There has been an acceleration in the spend of the IT Transformation project, which will bring forward planned spend from 21/22, this is financed by capital receipts and there are sufficient capital receipts already received and not applied that this doesn't create any adverse implications on the budget. It reduced anticipated cash balances at the end of the year but this is offset by the wider slippage in the programme.
- 1.7. Further detail on directorate capital project spend is available in Appendices A1-6.

Figure 1 - Capital Forecast Outturn position for 2020/21 by Directorate

| Approved Budget (Feb 20) | Budget Changes upto P6 | Directorate | Revised Budget | Actual Spend to date | Budget Spend to date % | Forecast Outturn | Variance |
|--------------------------|------------------------|--------------------------------|----------------|----------------------|------------------------|------------------|---------------|
| £m | £m | | £m | £m | | £m | £m |
| 32.3 | 8.1 | People | 40.4 | 5.6 | 14% | 31.8 | (8.6) |
| 14.3 | 2.3 | Resources | 16.6 | 13.2 | 80% | 17.9 | 1.3 |
| 164.0 | (3.5) | Growth and Regeneration | 160.5 | 23.3 | 15% | 108.3 | (52.2) |
| 210.6 | 6.9 | Sub-total | 217.5 | 42.1 | 19% | 158.0 | (59.5) |
| 1.5 | (0.6) | Corporate | 0.9 | 0.0 | 0% | 0.9 | 0.0 |
| 83.0 | 0.0 | Housing Revenue Account | 83.0 | 12.1 | 15% | 50.2 | (32.8) |
| 295.1 | 6.3 | Total Capital Programme | 301.4 | 54.2 | 18% | 209.1 | (92.3) |

Figure 2: Capital Programme Spend run rate comparators

Cumulative run rates



Gross Expenditure by Programme

| Ref | Scheme | Current Year (FY2020) - Period 6 | | | | Performance to budget | |
|----------------------------------|--|----------------------------------|---------------------|---------------|----------------|-----------------------|-------------|
| | | Budget | Expenditure to Date | Forecast | Variance | Expenditure to date | Forecast |
| | | £000s | | | | % | |
| People | | | | | | | |
| PE01 | School Organisation/ Children's Services Capital Programme | 25,298 | 4,572 | 24,555 | (743) | 18% | 97% |
| PE02 | Schools Organisation/SEN Investment Programme | 3,128 | 222 | 2,764 | (364) | 7% | 88% |
| PE03 | Schools Devolved Capital Programme | 2,685 | 148 | 1,263 | (1,421) | 6% | 47% |
| PE05 | Children & Families - Aids and Adaptations | 266 | 20 | 155 | (111) | 7% | 58% |
| PE06 | Children Social Care Services | 2,455 | 468 | 1,085 | (1,370) | 19% | 44% |
| PE06B | Adult Social Care – Better Lives at Home Programme | 6,049 | 101 | 1,967 | (4,082) | 2% | 33% |
| PE08 | Care Management/Care Services | 5 | 5 | 5 | 0 | 96% | 100% |
| PE10 | Sports Capital Investment | 546 | 24 | 80 | (466) | 4% | 15% |
| Total People | | 40,431 | 5,560 | 31,874 | (8,557) | 14% | 79% |
| Resources | | | | | | | |
| PL21 | Building Practice Service - Essential H&S | 3,301 | 776 | 2,200 | (1,101) | 24% | 67% |
| PL27 | Vehicle Fleet Replacement Programme | 2,344 | 212 | 1,244 | (1,100) | 9% | 53% |
| RE01 | ICT Refresh Programme | 5,253 | 4,931 | 5,643 | 389 | 94% | 107% |
| RE02 | ICT Development - HR/Finance | 517 | 233 | 517 | 0 | 45% | 100% |
| RE03 | ITTP – IT Transformation Programme | 5,175 | 7,015 | 8,317 | 3,142 | 136% | 161% |
| Total Resources | | 16,590 | 13,166 | 17,921 | 1,330 | 79% | 108% |
| Growth & Regeneration | | | | | | | |
| GR01 | Strategic Property – Temple Meads Development | 6,054 | 27 | 5,446 | (608) | 0% | 90% |
| GR03 | Economy Development - ASEA 2 Flood Defences | 8,568 | 314 | 8,032 | (536) | 4% | 94% |
| GR05 | Strategic Property - Hawkfield Site | 500 | 0 | 167 | (333) | 0% | 33% |
| GR06 | Innovation & Sustainability - OPCR 2 | 1,846 | 184 | 1,846 | 0 | 10% | 100% |
| GR08 | Delivery of Regeneration of Bedminster Green | 225 | 46 | 225 | 0 | 21% | 100% |
| HIF | HIF BID match funding | 6,000 | 0 | 0 | (6,000) | 0% | 0% |
| NH01 | Libraries for the Future | 609 | 77 | 527 | (82) | 13% | 87% |
| NH02 | Investment in parks and green spaces | 1,378 | 430 | 1,776 | 398 | 31% | 129% |
| NH03 | Cemeteries & Crematoria - Pending Business Case Development | 789 | 46 | 270 | (519) | 6% | 34% |
| NH04 | Third Household Waste Recycling and Re-use Centre | 5,624 | 344 | 1,921 | (3,703) | 6% | 34% |
| NH06 | Bristol Operations Centre - Phase 1 | 286 | 129 | 150 | (136) | 45% | 52% |
| NH06A | Bristol Operations Centre - Phase 2 | 1,876 | 156 | 529 | (1,348) | 8% | 28% |
| NH07 | Private Housing | 3,110 | 1,422 | 3,110 | 0 | 46% | 100% |
| PL01 | Metrobus | 172 | 246 | 1,923 | 1,751 | 142% | 1115% |
| PL02 | Passenger Transport | 1,487 | (93) | 955 | (532) | -6% | 64% |
| PL03 | Residents Parking Schemes | 3 | 0 | 3 | 0 | 0% | 100% |
| PL04 | Strategic Transport | 534 | 1,451 | 568 | 33 | 271% | 106% |
| PL05 | Sustainable Transport | 9,524 | 3,055 | 6,885 | (2,639) | 32% | 72% |
| PL06 | Portway Park & Ride Rail Platform | 3,038 | 274 | 1,726 | (1,312) | 9% | 57% |
| PL08 | Highways & Drainage Enhancements | 191 | (62) | 191 | 0 | -33% | 100% |
| PL09 | Highways infrastructure - bridge investment | 2,849 | 26 | 577 | (2,272) | 1% | 20% |
| PL09A | Highways infrastructure - Cumberland Road Stabilisation Scheme | 5,140 | 395 | 3,854 | (1,286) | 8% | 75% |
| PL10 | Highways & Traffic Infrastructure - General | 11,628 | 3,503 | 10,189 | (1,438) | 30% | 88% |
| PL10B | Highways & Traffic - Street Lighting | 591 | 60 | 291 | (300) | 10% | 49% |
| PL10C | Transport Parking Services | 1,881 | 179 | 1,135 | (746) | 10% | 60% |
| PL11A | Cattle Market Road site re-development | 2,858 | 378 | 1,307 | (1,551) | 13% | 46% |
| PL14 | Bristol Legible City Scheme | 315 | 75 | 130 | (185) | 24% | 41% |
| PL15 | Environmental Improvements Programme | 319 | 39 | 140 | (179) | 12% | 44% |
| PL17 | Resilience Fund (£1m of the £10m Port Sale) | 53 | 1 | 53 | 0 | 2% | 100% |
| PL18 | Energy services - Renewable energy investment scheme | 1,678 | 109 | 886 | (792) | 6% | 53% |
| PL18A | Energy Services – Bristol Heat Networks expansion | 16,480 | 2,999 | 7,867 | (8,613) | 18% | 48% |
| PL18B | Energy Services - School Efficiencies | 151 | 66 | 0 | (151) | 44% | 0% |
| PL18D | Energy Services - EU Replicate Grant | (115) | 23 | 26 | 141 | -20% | -23% |
| PL19 | Energy Services Phase 2 Investment & commercialisation opportunities | 1,200 | 0 | 180 | (1,020) | 0% | 15% |
| PL20 | Strategic Property | 332 | 0 | 86 | (246) | 0% | 26% |
| PL22 | Strategic Property - Investment in existing waste facilities | 1,057 | 0 | 521 | (536) | 0% | 49% |
| PL23 | Strategic Property - Temple St | 355 | 30 | 30 | (326) | 8% | 8% |
| PL24 | Bristol Beacon | 19,468 | 6,720 | 19,468 | 0 | 35% | 100% |
| PL25 | Strategic Property - Community Capacity Building | 998 | 0 | 0 | (998) | 0% | 0% |
| PL30 | Housing Strategy and Commissioning | 30,296 | 611 | 11,734 | (18,561) | 2% | 39% |

Gross Expenditure by Programme

| Ref | | Scheme | | Current Year (FY2020) - Period 6 | | | | Performance to budget | |
|--|--|---|--|----------------------------------|---------------------|----------------|-----------------|-----------------------|-------------|
| | | | | Budget | Expenditure to Date | Forecast | Variance | Expenditure to date | Forecast |
| | | | | £000s | | | | % | |
| PL30A | | Housing Programme delivered through Housing Company | | 9,500 | 0 | 13,000 | 3,500 | 0% | 137% |
| PL32 | | Western Harbour Design Development | | 480 | 0 | 0 | (480) | 0% | 0% |
| PL35 | | Harbour Operational Infrastructure | | 739 | 0 | 179 | (561) | 0% | 24% |
| PL36 | | Investment in Markets infrastructure & buildings | | 444 | 42 | 382 | (62) | 9% | 86% |
| Total Growth & Regeneration | | | | 160,510 | 23,305 | 108,283 | (52,228) | 15% | 67% |
| Corporate Funding & Expenditure | | | | | | | | | |
| CP03 | | Corporate Contingencies | | 861 | 0 | 861 | 0 | 0% | 100% |
| Total Corporate Funding & Expenditure | | | | 861 | 0 | 861 | 0 | 0% | 100% |
| Total General Fund | | | | 218,392 | 42,031 | 158,938 | (59,454) | 19% | 73% |
| Housing Revenue Account | | | | | | | | | |
| HRA1 | | Planned Programme - Major Projects | | 12,587 | 1,672 | 7,122 | (5,465) | 13% | 57% |
| HRA2 | | New Build and Land Enabling | | 43,378 | 4,936 | 27,233 | (16,146) | 11% | 63% |
| HRA3 | | Building Maintenance and Improvements | | 21,026 | 5,350 | 15,292 | (5,733) | 25% | 73% |
| HRA4 | | HRA Infrastructure | | 6,000 | 186 | 524 | (5,476) | 3% | 9% |
| Total Housing Revenue Account | | | | 82,991 | 12,144 | 50,171 | (32,820) | 15% | 60% |
| Total Capital Programme | | | | 301,383 | 54,175 | 209,109 | (92,274) | 18% | 69% |

Decision Pathway – Report

PURPOSE: For reference

MEETING: Cabinet

DATE: 03 November 2020

| | | | |
|--|--|--|--|
| TITLE | Director of Public Health Annual Report 19-20 Investing In Bristol’s Mental Wealth | | |
| Ward(s) | All | | |
| Author: Christina Gray | Job title: Director of Public Health | | |
| Cabinet lead: Asher Craig | Executive Director lead: Jacqui Jensen | | |
| Proposal origin: <i>BCC Staff</i> | | | |
| Decision maker: Cabinet Member Decision forum: <i>Cabinet</i> | | | |
| Purpose of Report: The Health and Social Care Act 2012, sets out a requirement for all Directors of Public Health to produce an annual independent report on the health of their local population and for their local authority to publish it. This year the report focusses on the concept of mental wealth, how we understand, quantify and invest in our mental wealth and what does it mean for us as a city. The report explores this concept and sets out a series of recommendations which include ensuring citizens feel they belong in the city, using our rich cultural capital to develop our human and social capital, investing in communities so they are resilient, ensuring young people feel valued, are seen and are engaged and recognising early when people are disconnected. | | | |
| Evidence Base JSNA data profiles, particularly mental health and well-being. JSNA data reports, particularly children and young people’s mental health. | | | |
| Cabinet Member / Officer Recommendations: That Cabinet: 1. Note the contents of the Annual Report of the Director for Public Health 2019-20 | | | |
| Corporate Strategy alignment: Wellbeing - Embed health in all our policies to improve physical & mental health and wellbeing, reducing inequalities and the demand for acute services. | | | |
| City Benefits: Create healthier and more resilient communities where life expectancy is not determined by wealth or background | | | |
| Consultation Details: Public Health internal consultation. | | | |
| Background Documents: Health and Social Care Act 2012 | | | |

| | | | |
|--|--|---|--|
| 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:

1. Finance Advice: The Director of Public Health’s annual report examines the concept of mental wealth, and looks at Bristol’s wellbeing through the lens of “thrive-o-nomics”. It sets out a series of recommendations to create a thriving city by investing in our mental wealth in a way that everyone can benefit “individually, socially, economically and in harmony with each other and the environment”. At this stage, there are no specific financial implications in relation to the recommendations made in the report, which sets out general intentions in terms of what Bristol’s investment in mental wealth might look like. Any future spending proposals will therefore need to go through a new decision pathway, for sign off of any spend.

Finance Business Partner: Denise Hunt, Finance Business Partner 8/10/2020

2. Legal Advice: Part 3 of the National Health Service Act 2006 (as amended by the Health and Social Care Act 2012) requires the director of public health for a local authority to prepare and publish an annual report on the health of the people in the area of the local authority. The publication of the Director for Public Health Annual Report City of Bristol 2019-20 ensures compliance with this statutory duty.

Legal Team Leader: Sarah Sharland, Team Leader Litigation Regulation and Community Team, 12th October 2020

3. Implications on IT: Not applicable as no decision is required

IT Team Leader: N/A

4. HR Advice: As the report is stands there are no HR implications for Bristol City Council employees, however we may need to reconsider the impact if there are any actions arising from the recommendations.

HR Partner: Lorna Laing, People HR Business Partner, 08/10/2020

| | | |
|--|-----|-----|
| EDM Sign-off | N/A | N/A |
| Cabinet Member sign-off | N/A | N/A |
| For Key Decisions - Mayor’s Office sign-off | N/A | N/A |

| | |
|---|------------|
| Appendix A – Further essential background / detail on the proposal Director for Public Health Annual Report 2019-20 | 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 |



Director of Public Health Annual Report | City of Bristol 2019–2020

Investing in Bristol's *mental wealth*

The theory and practice of *Thrive-o-nomics*

ACKNOWLEDGEMENTS

To all of you who challenge, require and agitate for us to be bigger, braver, and better in seeing and meeting our challenges, don't ever stop.

To those of you who have lived and breathed the importance of positive mental health, happiness and thriving over many years, keep inspiring us.

To Geraldine Smyth, Lyn Stanley, Mark Allen and Victoria Bleazard whose individual and collective contributions continue to make a difference in large and small ways.

And at a very practical level, to Leonie Roberts, Jo Williams, Andrea Dicken, David Thomas, Rachel Metcalfe and James Fry for working with me on this report, getting the words on the page and the pages to print, thank you.



Christina Gray
Director of Public Health, Bristol City Council

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INTRODUCTION

Prior to the coronavirus outbreak, Bristol was booming, of that there is no doubt. We are one of the most successful cities in the UK. However, as coronavirus has taught us, economic growth alone will not create the conditions for a happy, fulfilled life. Neither will it address who benefits, who is left behind – and what the cost of this might be.

As Megan said to Harry ‘it’s not enough to survive, you have to be able to thrive’; and indeed this is a view shared by such worthy institutions as the World Bank, the International Monetary Fund, the Organisation for Economic Co-operation and Development and the United Nations, who all recognise that wellbeing is an essential component not only of personal health but of wealth creation, sustainability and the healthy economy of nations.

In my first report as Director of Public Health for Bristol I have chosen to focus on this most interesting of questions: if economics alone is not enough, what do we know about the alternative, thrive-o-nomics? How do we understand, quantify and invest in our *mental wealth* and what does that mean for us and our city?

What might the balance sheet look like? What are our assets and what are our liabilities? Have we got money in the bank – or are we living on our overdraft? What is our investment plan?

This report examines the concept of *mental wealth*, what it means for Bristol, and sets out a series of recommendations for investing in our mental wealth in a way that everyone can benefit.

This report was due for publication in March 2020. However, the global Coronavirus pandemic has since overtaken us and publication was unavoidably delayed. In reviewing the text I wondered if the content would remain valid as we adjust to impacts of lock down and the ‘new normality’ of living with a virus in our midst.

On reflection, it seems that the concepts of ‘mental wealth’ and ‘thrive-o-nomics’ are even more important than before. Or, at least, than we understood they were before. We have learned much during weeks of lock down, about ourselves, about each other and about the society we live in. We have learned about the value of connecting with others and we have experienced the richness of kindness. We have lifted our heads and looked at each other and the world differently. We have been

shocked at the deep vein of inequality which has been exposed and we have been forced to see that we are not all in this together. But we have had a glimpse of something different and better; and we have found that we do know how to create the conditions to enable us to thrive - individually, socially, economically and in harmony with each other and the environment. So in that sense, this report could not be more timely.

1. THRIVE-O-NOMICS

Governments have long been interested in ensuring that they have strong economic growth. This is measured through the concept of Gross Domestic Product often referred to as GDP¹.

GDP calculates all of a country's spending and income. GDP values goods and services produced in a specific time period and this can include anything from hospitality to car production. However, GDP has limitations because the value of public goods such as healthcare or education is not fully calculated and other factors such as voluntary efforts and time making are not given any value.

The concept of Gross National Happiness (GNH) was an idea first promoted by King Jigme Singye Wangchuck in the 1970s in Bhutan⁴. He observed that when people and governments strive for economic wealth, those people who manage to achieve this usually do live a comfortable life. However, he also observed that resources are not equally distributed, that not everyone benefits, that many people live in poverty and furthermore that the strive for economic growth does not take into account the damage to the environment and the natural world. King Jigme Singye Wangchuck recognised that people need good living standards, housing, education, health, income, and well-balanced time use in order to be happy. But he also recognised that people thrive through friends, cultural life, healthy family relationships and a positive community spirit. He went on to develop a framework for Gross National Happiness based on four pillars: good governance, sustainable socio-

economic development, environmental conservation, and promotion of culture.

You may find this short film about Gross National Happiness interesting <https://vimeo.com/groups/techteachers/videos/36961162>

The Organisation for Economic Co-operation and Development (OECD) built on the approach developed in Bhutan, recognising the importance of human and social capital alongside economic growth. The OECD developed a further framework for wellbeing which focuses on eleven dimensions including income, education, housing, friends and family, and environment and identifies four types of essential assets: natural, economic, human and social⁵.

In 2007, the *Beyond GDP* initiative was launched at a conference in Europe with the objective of clarifying which indices are most appropriate to measure progress⁶. This work

“GDP..... counts air pollution and cigarette advertising, ... the destruction of the redwood and the loss of our natural wonder in chaotic sprawl... Yet it does not allow for the health of our children, the quality of their education, or the joy of their play... the beauty of our poetry or the strength of our marriages... it measures everything, in short, except that which makes life worthwhile²”

Bobby Kennedy (1968)³



has developed into a global movement with the purpose of finding more relevant concepts and new economic models which have a longer term view of the world and its people.

“ We have to go back to being ourselves, to our cultures. Another world is possible; that is what we are working toward. Ancestral knowledge is science. “Living Well” is contrary to the dictatorship of having and consuming ”

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Bolivian Chancellor
David Choquehuanca (2014)⁷

The World Bank (1998⁸, 2004⁹, 2019¹⁰) and the International Monetary Fund (2000¹¹, 2019¹²) have both recognised that an economic model alone won’t deliver the benefits required in a modern world and that attention to human capital and social capital are essential elements of effective and sustainable growth. In 2019 the World Bank sponsored an event called The Happiness Exchange¹³ which brought together experts and officials from Bhutan, Ecuador, Mexico,

Venezuela and Bolivia to look at the progress their countries are making with respect to measuring the population’s well-being - the purpose being not soft fluffy stuff, but how these countries can thrive politically, socially and economically.

The New Zealand treasury has adopted a Living Standards Framework¹⁴ which utilises a range of well-being measures, including cultural identity, environment, housing, income and consumption, and social connections to look at current and future state.

“ Wealth is about so much more than [...] dollars can ever measure. It’s time we admitted that there’s more to life than money, and it’s time we focused not just on GDP, but on GWB - general well-being ”

New Zealand Prime Minister
Jacinda Ardern (2019)¹⁵



THRIVE-O-NOMICS IN THE UK

The UK has also had an interest in the developing concept of wellbeing as an economic driver. Good levels of positive wellbeing have been identified as a national ambition and wellbeing measures are included in the census.

The census measures for wellbeing are limited however in that they focus on individual, subjective level indicators rather than social or environmental indicators and are collected every four years.

Of greater interest is the dashboard of wellbeing indicators developed by ONS, which has a much broader view of social and economic factors which look beyond GDP¹⁶. The personal and economic well-being dashboard includes factors for income and consumption, subjective wellbeing, and unemployment. The dashboard is updated quarterly and shows trends as well as being sensitive to in-year changes.

The February 2020 report¹⁷ found that household income and household net financial wealth had increased since the previous year and that the unemployment rate had dropped. Income inequality remained static, with, in effect, no progress in addressing this; however, household debt reduced and poor life satisfaction also receded.

The June 2020 report¹⁸ looked specifically at the impact of the Coronavirus pandemic during the period 20th March to 7th June.

Interestingly, the June 2020 report finds that emotions like happiness and anxiety improved at the beginning of the lockdown; however general life satisfaction has remained subdued since the beginning of lockdown, with varying levels of expectation about the future.

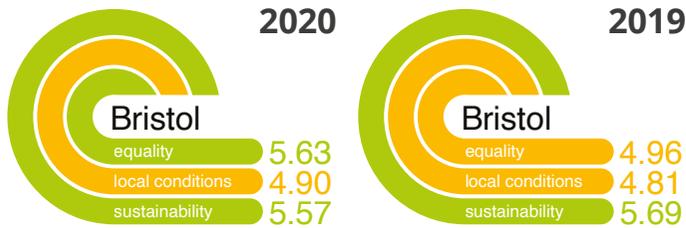
The economic impacts of the Coronavirus are only slowly emerging. It will be a national and a local challenge to mitigate the potential effects of job loss, industry failure and the changing nature of education and work, all of which will have direct and indirect impacts on physical and mental health.

The shock to the economy is reflected in an estimated 12.5 million people who reported that their households had been affected financially by the impacts of the coronavirus (COVID-19). The number of people actively

working fell in the first two weeks of lockdown and by June 2020 the % actively working across different sectors was between 67% - 79%. Half of all self-employed people reported having reduced financial income, while a third had experienced temporary closures of their businesses.

Income inequality appears to have been exacerbated, with people on lower personal incomes reporting reduced income, while people on higher incomes appear to have been less impacted financially. Parents were more than twice as likely to report reduced income, with more than half unable to cover a large, necessary expense. Parents were also more likely to have been furloughed than adults without children in the house, with over 20% finding childcare impacting their work.

However, what this national index does not reveal are the significant differences in life experience and life satisfaction which exist at local level; and it falls to us to understand what is happening in our city.



The 2020 report presented here was produced pre-Covid.

According to these measures Bristol has improved its scores since 2019 in the Equality domain and Local Conditions domain. However scores have dropped slightly in the Sustainability domain. Although some significant subdomain scores have increased, such as education scores for children and for adults, as well as, cohesion, local environment and safety, other subdomain scores have reduced, notably: mortality and life expectancy, mental health and unemployment. There are no scores close to a full score of 10, so there is plenty of room for improvement.

Looking at the subthemes for Equality, the index scores remain low for employment and social mobility and this reflects back to us what we know from other sources. We know from the Strategic Needs Assessment²³ and Public Health Outcomes Framework²⁴ that not everyone in Bristol has an equal opportunity to thrive. We have an inequality in life expectancy of up to 10 years and inequality in healthy life expectancy of up to 20 years between our most wealthy and least wealthy neighbourhoods. See table opposite.

The Local Conditions domain has a low score in both 2019 and 2020. This domain is the most complex with a high number of sub indicators. However, what the index reflects

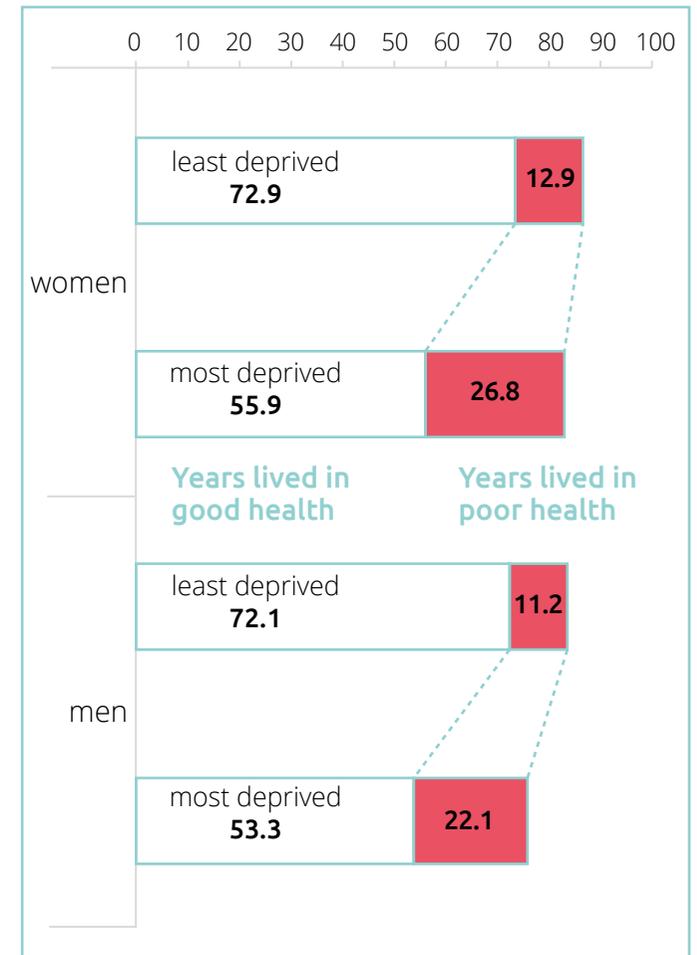
are issues relating to safety, mental health, cohesion and children’s education. All of which are highlighted in our Joint Strategic Needs Assessment (JSNA)²⁵ and Health and Wellbeing Reports²⁶.

Helpfully, Bristol is the birth place of the Happy City movement¹⁹. Happy City has worked closely with the New Economics Foundation²⁰ to develop a Thriving Places index designed to measure whether the conditions are in place for a city to thrive at a local level²¹.

The Thriving Places index²² takes a broad set of indicators and divides them into three themes:

- Local conditions: good physical and mental health, a good job, access to green space, affordable and good quality housing, culture, community cohesion, and educational opportunities.
- Sustainability: CO₂ emissions, household recycling, energy consumption, land use, renewables.
- Equality: health inequality, income inequality, wellbeing inequality, employment inequality, social mobility.

The three themes are calculated using a 27 sub-domain index which is averaged to create a domain score and a headline element score of between 0-10.



Bristol Health Needs: A Highlight Report, January 2020

| Headline element | Domain | Sub-domain | Score | |
|-------------------------|----------------------------|-------------------------------|-------|---|
| Local conditions | | | 4.90 | ● |
| | Place and environment | | 5.15 | ● |
| | | Local environment | 4.96 | ● |
| | | Transport | 6.78 | ● |
| | | Safety | 4.12 | ● |
| | | Housing | 4.72 | ● |
| | Mental and physical health | | 4.54 | ● |
| | | Healthy and risky behaviours | 6.14 | ● |
| | | Overall health status | 4.31 | ● |
| | | Mortality and life expectancy | 3.95 | ● |
| | | Mental health | 3.78 | ● |
| | Education and learning | | 5.64 | ● |
| | | Adult Education | 7.14 | ● |
| | | Children’s education | 4.14 | ● |
| | Work and local economy | | 4.97 | ● |
| | | Unemployment | 6.08 | ● |
| | | Employment | 5.57 | ● |
| | | Basic needs | 4.82 | ● |
| | | Local business | 3.41 | ● |
| | People and community | | 4.21 | ● |
| | | Participation | 5.25 | ● |
| Culture | | 4.18 | ● | |
| Community cohesion | | 3.21 | ● | |
| Sustainability | | | 5.57 | ● |
| | Energy use | 6.76 | ● | |
| | Waste | 6.10 | ● | |
| | Green infrastructure | 3.85 | ● | |
| Equality | | | 5.63 | ● |
| | Health | 5.27 | ● | |
| | Income | 6.62 | ● | |
| | Gender | 7.45 | ● | |
| | Social | 3.91 | ● | |
| | Ethnicity | 4.84 | ● | |

Key:

● High ● Medium ● Low

Source: Thriving Places Index

BUILDING OUR MENTAL WEALTH THROUGH SOCIAL CAPITAL

Human beings are social animals. Social relationships affect mental health, health behaviour, physical health and ultimately the risk of dying prematurely. Social relationships can have short and long-term effects on health and they represent a major opportunity to enhance not only the quality of life but survival.

Research shows that lacking social connections can be as damaging to our health as smoking 15 cigarettes a day²⁷.

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Coronavirus has taught us just how much we need human contact and how our physical and mental health is impacted by the experience of isolation or lack of social connectedness. The desire to contribute and the extraordinary motivation to help others that we have all witnessed, has contributed enormously to our collective wellbeing.

Volunteering is associated with improved wellbeing measures such as life satisfaction, happiness, and a greater sense of purpose, as well as improved general health. Volunteering is also associated with higher levels of self-efficacy and skills leading to enhanced education and employment outcomes. In 2014 the Chief Economist at the Bank of England gave a speech on the value of volunteering and he concluded that volunteering is big business with an annual

turnover well into three-figure billions²⁸.

As we are now all too well aware, we are connected to others through a series of different social networks. We have friends and family, we may go to work or volunteer, we may play a sport, we may belong to a club, we may belong to a faith group. However, social capital not only describes the connections between people, but it also looks at how productive and positive these connections are, who can you rely on to help you out in times of trouble or just simple things like looking after your children?

The Organisation for Economic Co-operation and Development (OECD) proposed four main approaches to conceptualising and measuring social capital. This was used by the Office for National Statistics in their measurement of social capital in the UK 2017.

Personal relationships describes the networks of people that an individual knows. This will be made up of both close ties such as family, and

| | Network structure and activities | Productive resources |
|------------|----------------------------------|-----------------------------|
| Individual | Personal relationships | Social network support |
| Collective | Civic engagement | Trust and cooperative norms |

wider acquaintances such as colleagues at work. This category describes the structure, size, source, and diversity of the network. These networks can both connect us to power, influence and decision making; or they can exclude us from this.

Social network support describes the different types of resources that an individual can receive from others in their network. This can be emotional, practical, financial, advice, guidance or professional support. Social network support can help people in times of need, for example, bereavement. Strong social network support can also help people succeed such as through employment opportunities.

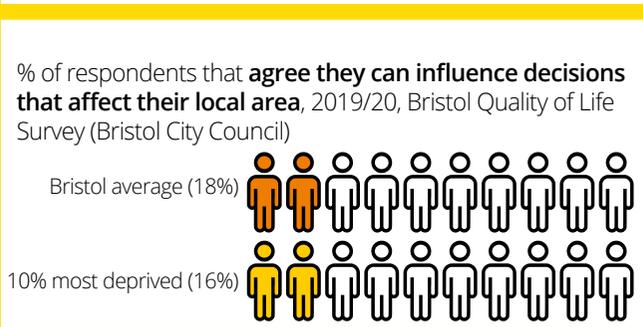
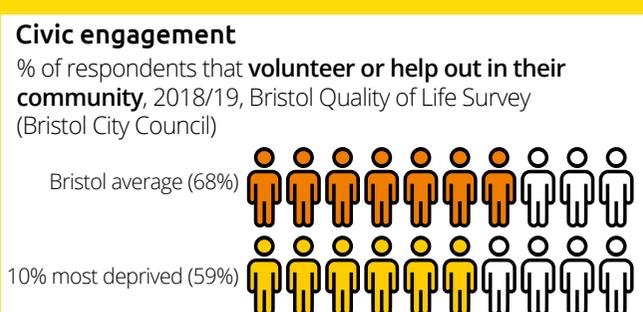
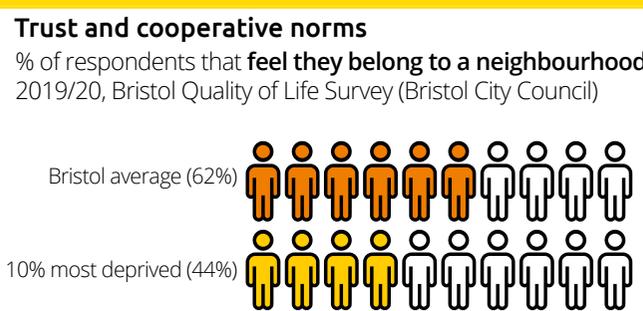
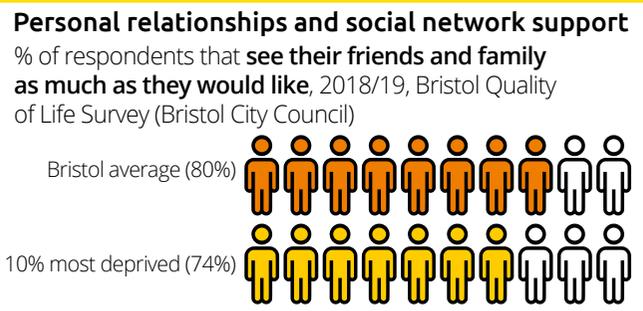
Civic engagement describes the activities which people contribute to community life. This includes volunteering, participation in political meetings, participation in clubs and activities, donating blood, donating clothes and food, and

other forms of community action.

Trust and cooperative norms refer to the qualities of trust, social norms and values which are shared by the group members. Trust includes trust in institutions such as national or local government, police and justice system as well as trust in others. The social norms are the rules, values and expectations that the group share. These are often unwritten and may include things such as what to wear, or how to behave in certain situations. Families, workplaces and communities all develop norms. These bind people together, but they can also make it difficult for new members to join these groups, and can leave people feeling on the ‘outside’.

We need to be aware that the impacts of individual social networks can be good and bad, both for individuals and for society. Exclusion from networks, from civic engagement or being outside of the ‘circle of trust’ can have negative impacts. Ever felt ‘left out’? If so, remember that feeling and what the experience was like physically and mentally, and then imagine what a lifetime of that might be like.

There is also such a thing as bad social capital and there are many fraudsters and money launderers in the business. People who are exposed to poor social relationships, for example domestic violence or exploitation, often have poor health and



wellbeing outcomes as a direct result of these relationships and contacts. Children and adults who are vulnerable may seek affirmation and connectedness from individuals and groups who act in ways which are harmful to them and others. Gangs, grooming and modern slavery all work on this very principle, exploiting human vulnerability and the need for connectedness.

The Bristol Quality of Life Survey (2019/20) records some data related to quality of social capital in Bristol²⁹.

The Happy City Index³⁰ suggests that Bristol could do better in terms of community cohesion, participation and equality, the domains which contribute to the People and Economy theme. Crime statistics tell us that we have issues with violence, with 15,559 incidents of violent crime and 6302 incidents of domestic violence registered by the police³¹

Based on this information, it would appear that while there is a great deal of positive social capital within Bristol, for example, levels of volunteering and a positive feeling of belonging, it is still a mixed picture. Less than 20% of respondents felt they could influence local decisions.

So in summary, we do have social capital in the Bristol savings account, and there are real opportunities to build on this through a forensic focus on connecting people to each other and connecting people to power.

BUILDING OUR MENTAL WEALTH THROUGH CULTURAL CAPITAL

The concept of cultural capital was first coined by the sociologist Pierre Bourdieu who defined cultural capital as 'familiarity with the legitimate culture within a society'³²

Bourdieu saw families passing on cultural capital to their children by introducing them to dance and music, taking them to theatres, galleries and historic sites, and by talking about literature and art over the dinner table.

He identified three sources of cultural capital: objective, embodied and institutionalised.

Objective: cultural goods, books, works of art

Embodied: language, mannerisms, preferences

Institutionalised: qualifications, education credentials.





Cultural Capital, is embedded in **our lives, our identities and communities**. It is the way we see ourselves and our place in the world. It is where we live, who we are and how we learn. It is how we live our lives. It is how we dress, communicate, eat and drink. It is how we build and decorate our homes. It is how we express ourselves – from music to sport. It is how we design and inhabit our streets and open spaces. It is what we do and why we do it.

Culture is also our heritage and history. It is our memories and stories, lived through our friends and relatives, here and elsewhere. It is what we imagine ourselves to be. It is our possessions and artefacts. It is the built and natural landscape. It is our story and how we tell it. It is who we were and who we are becoming.

Cultural Capital in a civic sense is visible in our museums, galleries, cinemas, music venues, theatres, libraries, festivals and events. It is how we record, collect, curate and present our identities and how we understand others’ identities. It is how we preserve and bring to life our stories. It is how we express our world to others.

Our diversity creates rich cultural capital bringing together many identities, stories and celebrations.

Bristol is a city full of art, cultural activity, energy and imagination.



Bristol is home to:

- Individual artists such as Banksy
- Museums and galleries such as M shed and Spike Island,
- Theatre such as Bristol Old Vic and Bristol Hippodrome
- Music venues large and small
- Community and faith festivals
- Bristol film festival
- Bristol Festival
- Graffiti Art
- Sports and physical activity events
- UNESCO Global network of Learning Cities.

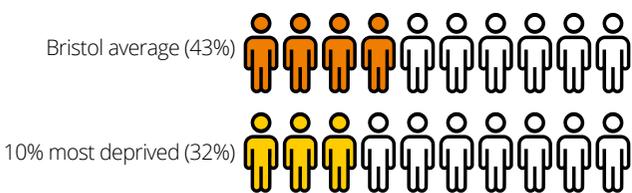
So, the question is - does everyone see themselves, their histories and cultures reflected in our public domain? And, how might it feel, and what effect might it have if we don't?. What more can we all do to learn about each other’s cultural capital, to make each other visible and to feel visible?.

The findings of Bristol Quality of Life Survey (2019/20) suggest that while we have some cultural capital in the bank, we have opportunities to strengthen our investment.

Interesting work is already being undertaken to try to address these inequalities and opportunities.



% of respondents that **participate in cultural activities at least once a month**, 2019/20, Bristol Quality of Life Survey (Bristol City Council)



The Bristol Cultural Investment Programme³³ provides opportunities for people and communities across the city to take part in the cultural life of Bristol, whether that is by attending a world-class music performance, a cutting-edge theatre production or taking part in a workshop, festival or exhibition in their local community. Between 2017 and 2019 fifty three organisations and projects were supported to provide opportunities for Bristolians to access culture, and advance diversity and equality in arts and culture.

Culture is, of course, also an important industry in Bristol, bringing jobs and revenue and the added value of innovation, productivity and brand. It is the creative and digital businesses. It is the design, production and trade of intellectual property. It is tourism and retail. It is the competitiveness of the wider economy. Overall the arts and culture industry in Bristol is estimated to have a turnover of around £48 billion³⁴

Art and culture are also known to be health-promoting in their own right, attracting increasing interest for this reason. The World Health organisation (2019) has recently released the largest report to date on the evidence of the impact of art and culture on health. This report has shown the wide-ranging impact art and culture can have on the prevention of illness and promotion of good health.

And, reflecting on the indicators from the Healthy Places Index, which suggest that Bristol could do better in terms of safety and cohesion, it is worth noting that art and culture can promote social bonding and can help form a bridge between different groups. For example, activities such as dance, art and theatre have been shown to foster greater social inclusion in patients with dementia and their carers, children and adults with and without disabilities, police and ex-offenders and adults across different generations. This all builds social and community capital within societies³⁵.

As this report goes to print individuals and communities in Bristol have come together, with those across the world, to insist that *Black Lives Matter*. Opinion and communities are divided over the unauthorised removal of the statue of Edward Colston, who made his wealth from the trafficking of people through slavery; and a painful conversation

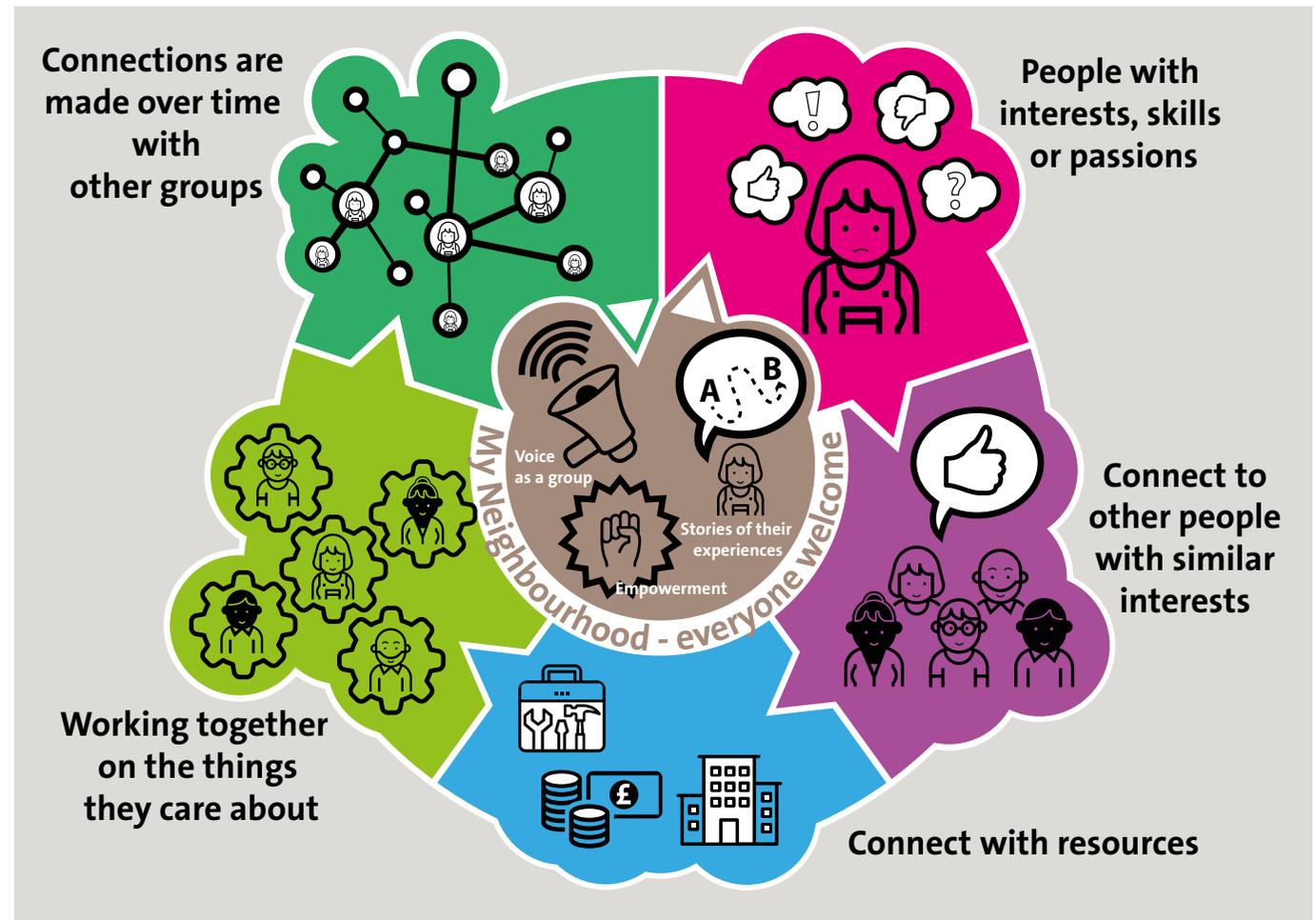
has begun as we examine this legacy and our own individual and collective histories. In this endeavor, we will begin to reshape a new sense of identity and shared culture within which we all need to feel we belong.

INVESTING IN OUR MENTAL WEALTH IN COMMUNITIES

Communities are live, dynamic, delicate eco-systems established through the connection and action of the people who are part of that community.

As we have so recently experienced through Coronavirus, communities are not always linked to a place or neighbourhood, but may be virtual, on line, or be a dispersed community of people with common interests and bonds.

Thriving communities grow social, economic and democratic capital – the greater the participation and engagement, the more people are involved, the more energy the community has and powerful it becomes.



An asset-based approach to community-building, is predicated on the principle that individuals and communities themselves have untapped resources, knowledge and skill, and that it is communities, not public authorities who are best placed to address local issues. Taking an asset-based community development approach, the Bristol Community Development Team engage in over 8000 community building conversations a year.

Applying our knowledge about social capital to communities, we need to be mindful that communities are not always benign. ‘In-groups’ can also result in ‘out-groups’ and bullying, exclusion and isolation. If communities become closed rather than open, exclusive rather than inclusive, then this is likely to be a liability rather than an asset to society as a whole. This is true for any community, anywhere.

The human need to belong and to connect, leads us to find this where we can. Gang membership brings identity, status, sense of belonging and protection. The stories of young women and men who have been sexually exploited, are almost always stories about looking for love, affection, attention. The induction of young people into extremist ideology of every sort, works on precisely this principle.

We noted earlier that only 62% of people in Bristol felt they belonged. That’s almost 40% who don’t feel they belong. That’s a lot of people.

In short, we cannot take community for granted. Community and social connectedness is the essential DNA of our mental wealth. We therefore must invest in these connections and in the positive assets which are in every individual, every household and every community.

We need to be proactive in supporting all of our young people in feeling valued, seen and engaged. We need to be mindful of inadvertently excluding those who feel ‘outside’ of the community and who feel cut off or alienated. We need to be able to see the signs, listen to the anger, hear the silences. We need to reach out and respond.

This will require us to build bridges between communities and to build bridges between communities and decision makers.

For this to happen, we need to learn how to celebrate, and experience many different versions of ourselves.

#WeAreBristol

www.wearebristol.co.uk

INVESTING IN OUR MENTAL WEALTH AT WORK

A skilled, healthy, diverse, inclusive, and productive workforce is essential for the economy.

Work also provides people with an income, a sense of fulfilment and is part of a person's identity. There is a strong economic and business case to ensure that the workforce is mentally and physically healthy.

The figure opposite describes how an unhealthy and unsafe workplace can impact on our physical and mental health. It clearly sets out the case for ensuring workplaces are healthy and safe.

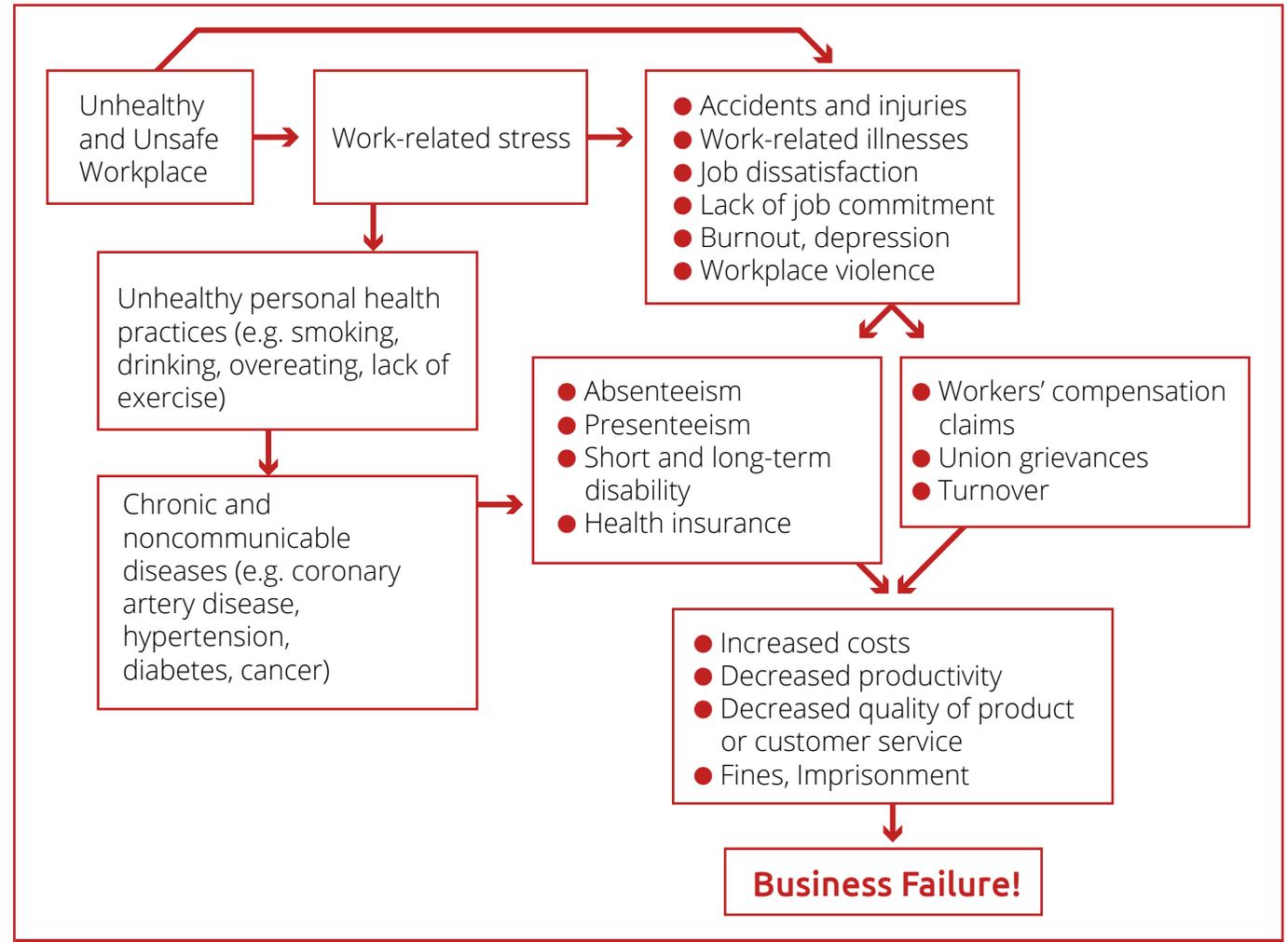


Fig 2: The business case in a nutshell – WHO Healthy Workplace Framework and Model³⁶.



In Bristol there are around 18,335 businesses in total, and from our population of just under 500,000 some 268,100 are employed or self-employed.

Bristol has a thriving economy with a range of employers of different sizes and sectors. In 2019 the *Inter Departmental Business Register records for Bristol*³⁷ shows:

- 90 large business (employing 250+)
- 335 Medium (employing 50-249)
- 1,800 Small (employing 10-49)
- 16,110 Micro (employing 0 to 9).

During the same period in 2019, 15,600 people were on long-term sick in Bristol. (ONS Annual Population Survey³⁸). A further 20,050 were claiming employment and support allowance (ESA) and incapacity benefits (DWP benefits claims).

In Bristol the cost of absenteeism is estimated to be around £84.101 million per year; with cost of lost productivity amounting to £168.21 million per year; and staff turnover around £29.12 million per year.³⁹

The Stephenson and Farmer Review (2017)⁴⁰ suggests six core standards which employers can use to build mental wealth at work:

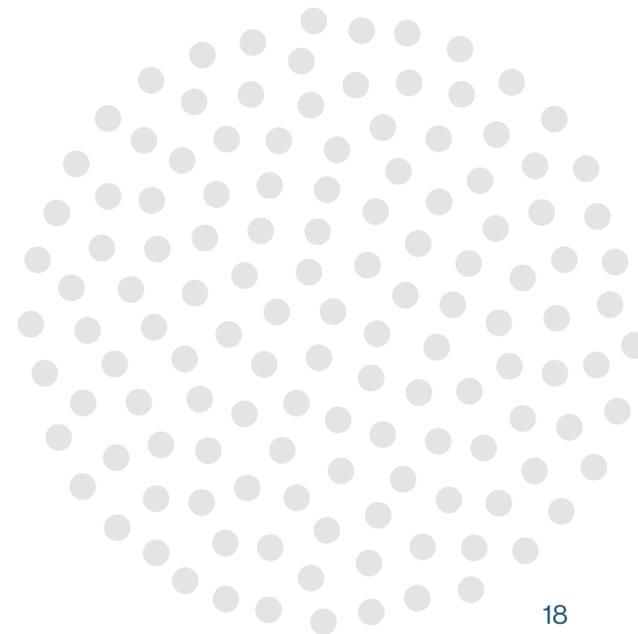
- Produce, implement and communicate a mental health at work plan
- Develop mental health awareness amongst employees
- Encourage open conversations about mental health and the support available when employees are struggling
- Provide employees with good working conditions and ensure they have a healthy work life balance and opportunities for development
- Promote effective people management through line managers and supervisors
- Routinely monitor employee mental health and wellbeing

The impact of health at work is much wider than the individual and the employer. The ripple effect on family, friends and the wider economy is considerable. If someone is out of work, there is a higher risk of getting into debt and of subsequent strain on relationships.

Thriving at Work Bristol is a collaboration of local employers focusing on improving mental health and wellbeing across our workplaces. Twenty-five public, private and voluntary organisations are working together to consider how best practice can be implemented at scale across the city. The group is chaired by

Bristol Mind and the law firm Burges Salmon, and includes representatives from Hargreaves, Deloitte, Rolls Royce, Windmill Hill City Farm, the NHS and unions. These employers across Bristol are testing and learning from interventions in the areas of culture and behaviour, led by OVO energy. Economics equals Thrive-o-nomics. Mental Wealth at work is worth the investment.

As we face the economic shock waves from Coronavirus, the protective nature of meaningful work becomes self-evident. We have the opportunity to work together to protect, invest in and reimagine our local industries and employment to create a sustainable future in which no-one is left behind. To truly build a Thriving City.



INVESTING IN OUR MENTAL WEALTH THROUGH URBAN DESIGN

Our places and spaces shape how we live our lives; The type of housing we live in, how safe we feel, how easily we can get about, whether we can walk, if the air is clean, and if we can sleep without too much noise disturbance.

How we live our lives shapes our places; whether we choose to walk, cycle, take the bus or drive; whether we drop rubbish; whether we recycle; whether we notice and talk to people around us.

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How wealthy, or not, we are impacts on our experience of the place we live in; the type of housing, our neighbourhood, the activities we can afford to take part in; the shops we use.

Urban planning and the development of place impact on the health, well-being and quality of life of people in cities, for better or for worse. For this reason Bristol has been an active member of the WHO European Healthy Cities Network and the University of the West of England hosts the WHO Healthy City Collaborating Centre

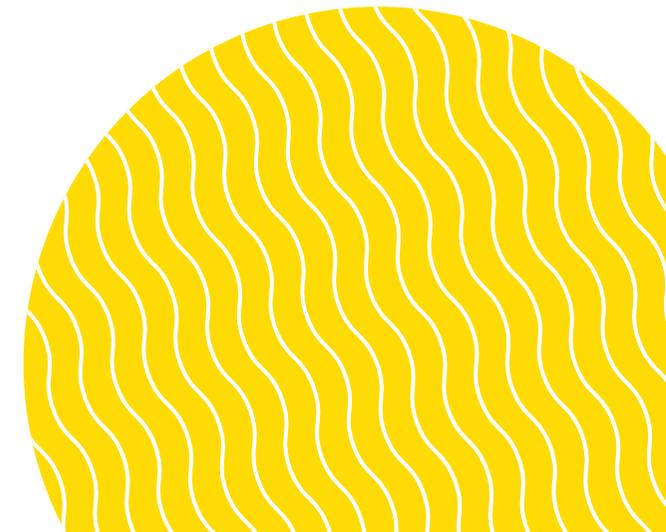
The Centre for Urban Design and Mental Health is an international think tank that seeks to answer the particular question of how can we build better mental health into our cities?⁴¹. They suggest four aspects of urban design that are particularly important for mental health and wellbeing.

- (i) Creating green places which reduce stress and help reduce pollutants.
- (ii) Being active by design – creating environments which support people walking, cycling and taking exercise.
- (iii) Creating spaces and places where people can gather, meet celebrate and socialise. This might include shops, plazas, cafes and parks, as well as indoor spaces such as halls, community and faith centres.
- (iv) And, of course designing safe places and spaces – which are well used by all, are well lit, open and comfortable.

There is a growing global body of expertise to draw upon. This includes work undertaken: in London by the host Olympic and Paralympic

Boroughs who produced an Urban Planning Checklist to promote healthy urban planning by ensuring that the health and wellbeing implications of local plans and major planning applications are consistently taken into account;⁴² in Canada⁴³ which has taken a national policy approach to Healthy Urban Design⁴⁴; in Utrecht who get mentioned in dispatches for their innovative approach to sustainable integrated transport and economy; and Latin America who have some innovative design programmes focus on cities, housing and infrastructure⁴⁵.

As Bristol expands and builds new developments, new homes and new commercial areas, we have an opportunity to include mental wealth in our place making.





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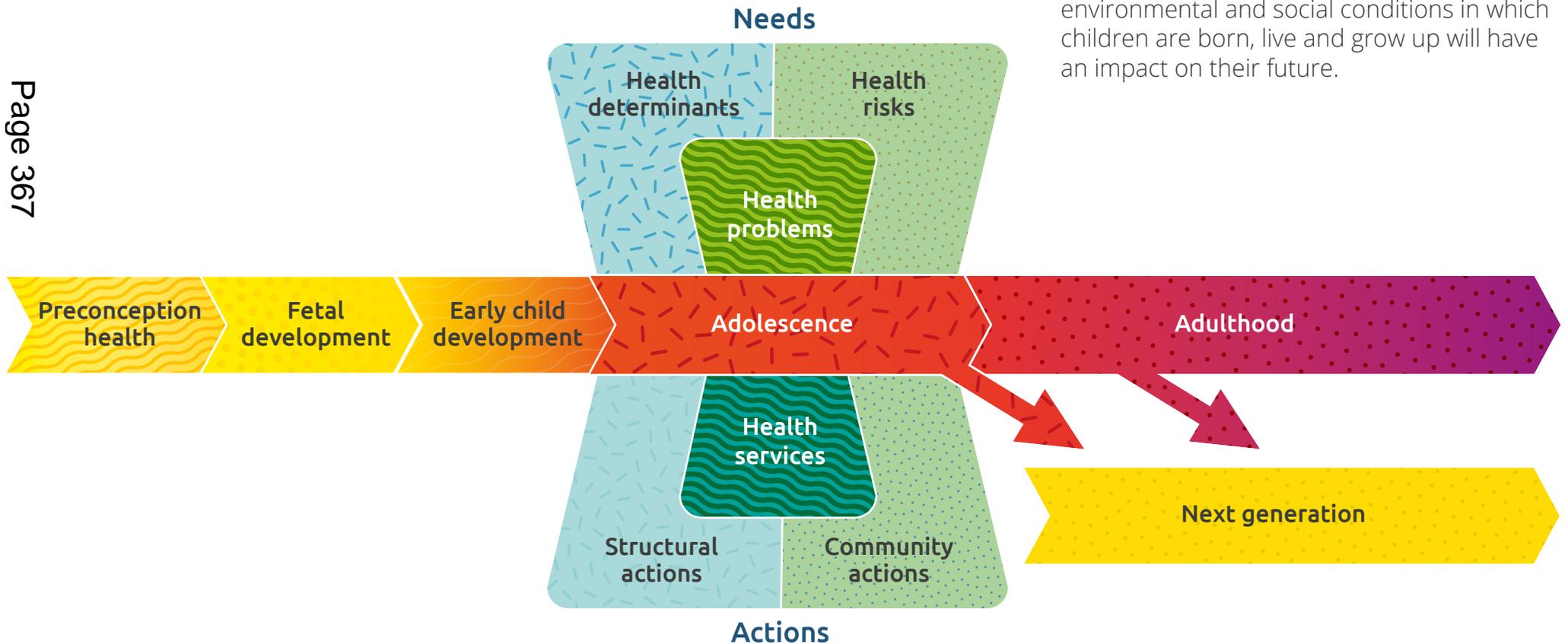
INVESTING IN OUR MENTAL WEALTH FOR THE FUTURE

We are fortunate in Bristol in that we are a young city, with more children aged 0-15 than people aged over 65.

In fact, Bristol is the ‘youngest’ city in the UK. In 2018 there were 5,820 births in Bristol. There are 85,700 children aged 0–15 and 73,000 young people aged 16–24^{46,47}.

Our young people are also even more diverse than the city as a whole with 38% of school age children being from Black, Asian, and other Ethnic Minority communities.

To develop well, children and young people need to be loved, supported and cared for. They need to have opportunities to learn, to play and build loving relationships. The environmental and social conditions in which children are born, live and grow up will have an impact on their future.



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There is a great deal of evidence about the importance of the early years. The brain develops at an exponential rate in these early days and is influenced by nutrition and positive social interactions. The brain needs to be free from adverse childhood experience such as abuse and other forms of chronic stress⁴⁸.

Adolescence and early adulthood are also critical periods when young people acquire the emotional and cognitive skills necessary for adult life. To support this the brain is going through another significant period of development and adjustment. The quality and quantity of social relationships are crucial during this period⁴⁹.

On the positive side of the balance sheet, most school aged children and young people in Bristol say that they are happy most of the time (95% of primary school children and 65% of secondary school pupils). However there are several things that many young people worry about. More than half of primary aged children say they are worried about their family. They also worry about war and terrorism, crime, the environment, keeping safe and moving on to secondary school. 29% of primary and 67% of secondary pupils say that they experience frequent bullying⁵⁰, which leads to an increased risk of overall mental health problems, anxiety, and depression^{51,52}.

A very positive finding is that many children and young people say that there are people they can talk to when they have a problem, especially parents, carers and family members.

Healthy Schools⁵³ are focused on improving the health and wellbeing of the whole school community including pupils, staff, parents and the wider community. The Healthy Schools aim is that 90% of Bristol schools will have achieved the Essential Healthy Schools Award by 2025.

If we review young people mental wealth, we do find some areas of concern however:⁵⁴

- 19.7%, one fifth of Bristol’s children under 16 are living in low income families
- 193 per 10,000 of Bristol’s children are *in need* due to abuse or neglect
- 402 per 100,00 are first time entrants to the youth justice system

It is clear that our investment is not equitably distributed, and that some of our children, young people and families – one fifth in fact, if we focus on the low-income measure – are not benefitting as they could do from the opportunities the City has to offer.

Poverty is one of a number of factors which can adversely affect a young person’s life. Childhood trauma, including abuse, neglect and dysfunctional family life, has been associated with poor mental health. Traumatic events in childhood are also associated with a wide range of health harming behaviors, in children and adults, such as drug and alcohol misuse, smoking, risky sexual behaviour and involvement in criminal activity. Children who experience multiple adverse experiences are at the greatest risk of poor mental and physical health over their lifetime⁵⁵.

The children and young people of today are our future carers, parents, volunteers, nurses, artists, cleaners, bus drivers, teachers, inventors, scientists, business leaders. We must invest, and invest fairly. Because their future is ours.

SUMMING UP AND WHAT NEXT?

So what does Bristol’s balance sheet look like for Mental Wealth; and what might our investment portfolio look like? And where do we sit in the light of Covid-19?.

In spite of the challenges of Coronavirus, we remain a wealthy city. We have wealth in our assets of both people and place, our creativity, in our energy and our collective intent. However, now, more than ever, we need to make sure that our capital is ethically invested, so that everyone can benefit.

It’s good to see that 62% of people in Bristol feel that they belong in the city. But let’s reach out to the 30% and make Bristol a place where everyone can feel they belong.

We can use our rich cultural capital to develop our human and social capital.

We can invest in positive, connected, communities which will provide the resilience against future economic and social shocks.

We can make sure that all of our young people feel valued, seen and engaged. This will build our futures account.

We have opportunities to be mindful of those who are not on the inside of connectedness and influence. We can make sure we see the signs, listen to the anger, hear the silences and invest in these areas before the fraudsters do.

We can connect people to each other and we can connect people to power.

We can recognise not only the value of work, but the value of investing in mental wealth at work.

We have opportunities to invest in creating healthy homes and urban spaces and places which support us to connect, be active, be safe and to thrive.

We can invest in and through a “circular economy” where we pay attention to how inputs can be reused or recycled in future production.

We can invest in environmental accounting which can support companies to take account of environmental as well as financial impacts.

As Bristol booms and even, or perhaps especially when it doesn’t, we can make sure that we are making the very best of our social and human capital and that everyone is protected from shocks and benefits equally from any windfall.

We can be at the forefront of a global movement which recognises the importance of thrive-o-nomics as the basis for Bristol’s future mental wealth portfolio.

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