



Environmental Impact Assessment [version 1.1]

Proposal title: HRA Housing Investment Plan 2025/26		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Nathan Muggeridge	
Service Area: Housing and Landlord Services	Lead Officer role: Asset Strategy Lead	

Step 1: What do we want to do?

The purpose of this Environmental Impact Assessment is to help you develop your proposal in a way that is compliant with the council's policies and supports the council's strategic objectives under the [One City Climate Strategy](#), the [One City Ecological Emergency Strategy](#) and the latest [Corporate Strategy](#).

This assessment should be started at the beginning of the project proposal process by someone with a good knowledge of the project, the service area that will deliver it, and sufficient influence over the proposal to make changes as needed.

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please contact the [Environmental Performance Team](#) early for advice and feedback.

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

Briefly explain the purpose of the proposal and why it is needed. Please use plain English, avoiding jargon and acronyms.

This cabinet report sets out the proposals for the 25/26 Housing Revenue Account (HRA) Housing Investment Plan budget to enable the HRA to deliver its essential repairs, maintenance, and improvements to the housing stock.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by the [Environmental Performance Team](#).

If 'Yes' complete the rest of this assessment.

Yes No [please select]

1.3 If the proposal is part of an options appraisal, has the environmental impact of each option been assessed and included in the recommendation-making process?

If 'Yes' please ensure that the details of the environmental impacts of each option are made clear in the pros and cons section of the [project management options appraisal document](#).

Yes No Not applicable [please select]

If 'No' explain why environmental impacts have not been considered as part of the options appraisal process.

Step 2: What kinds of environmental impacts might the project have?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered. See detailed [guidance documents](#) for advice on identifying potential impacts.

2.1 Does the proposal create any benefits for the environment, or have any adverse impacts?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support [our corporate environmental objectives](#) and the wider [One City Climate and Ecological Emergency strategies](#).

Consider how the proposal creates environmental impacts in the following categories, both now and in the future.

Reasonable efforts should be made to quantify stated benefit or adverse impacts wherever possible.

Where the proposal is likely to have a beneficial impact, consider what actions would enhance those impacts. Where the proposal is likely to have a harmful impact, consider whether actions would mitigate these impacts.

Enhancements or mitigation actions are only required when there is a likely impact identified. Remember that where enhancements or mitigation actions are listed, they should be assigned to staff and appropriately resourced.

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city in achieving a Just Transition to net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing</p>	<p>Benefits</p>	<p>A number of the proposals contained within this budget will reduce emissions by improving energy efficiency within our HRA housing stock. However, as this budget reduces the level of capital funding available for energy efficiency works for the three year period 2026/26 - 2027/28, the pace at which we decarbonise our social housing estate will be slower than previously anticipated.</p> <p>The Energy & Renewables Manager has already developed our HRA Energy Efficiency Strategy, which reinforced our 'fabric first' approach to decarbonisation. A 'Heat Decarbonisation Strategy' is also being developed which will set out how we plan to transition away from gas heating over time – this is due to go to the Housing PCCB in May 2025. We will continue working closely with the Sustainable City and Climate Change team and Bristol City Leap to identify opportunities and joined up working on targets, goals and carbon accounting.</p>
	<p>Enhancing actions</p>	<p>A budget is included for a rolling Retrofit programme, initially this will target insulation and ventilation measures at many of our worst-performing homes, with the option to deploy low-carbon heating where the right conditions are satisfied. Retrofits will be completed to a certified standard – PAS2035 with a target that all homes achieve an EPC rating of C or better. These are national standards and are a requirement under Government grant-funded schemes. We have submitted a funding bid to the Warm Homes Social Housing Fund Wave 3. The budget allows for energy efficiency works to the properties included within this bid. We have modelled the carbon savings associated with the programme (once completed), estimated</p>

<p>emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>		<p>to be 431 tonnes per year and have demonstrated how these will be achieved as part of the bid.</p> <p>The budget includes for a proportion of the vehicles used for maintenance activities being replaced with low carbon alternatives.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		
	<p>Adverse impacts</p>	<p>Vehicle use associated with works will generate emissions.</p> <p>There will be embodied emissions from the materials and products used.</p> <p>As stated, the budget allocation associated with this proposal reduced the level of capital funding available for energy efficiency works for the three-year period 2026/26 - 2027/28, and therefore the pace at which we decarbonise our social housing estate will be slower than previously anticipated.</p>
	<p>Mitigating actions</p>	<p>Suppliers will be asked whether they can use electric or low emission vehicles for carrying out this work, as well as using suitable vehicles efficiently (e.g., suitable timing, routing, speed, number of journeys and zoning of teams). Suppliers will need to comply with the Bristol Clean Air Zone.</p> <p>Suppliers will be asked if they can provide Environmental Product Descriptions (EPDs) and Life Cycle Analysis (LCAs) to establish the carbon impact of products or materials to establish whether there are lower impact options available that would meet requirements. EPDs and LCAs are not available for all product.</p> <p>Materials will be BRE Green Guide A or B rated materials and products unless there are significant technical or financial reasons why this cannot be achieved. Equivalent ranking schemes will be considered.</p> <p>All timber and wood-derived products for supply or use in performance of the works delivered under this budget must be from independently verifiable legal and sustainable sources as defined by UK Government guidance.</p> <p>Durable, renewable, recycled and recyclable materials and components will be specified where appropriate.</p> <p>Equipment will be re-used and upgraded wherever reasonably practicable to reduce the demand for materials provide replacements.</p> <p>Responsive repairs volumes will be monitored to ensure maintenance and replacement cycles are at an appropriate level.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

<p>ENV2 Ecological recovery: Wildlife and habitats BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>It is possible for works and construction materials associated with this budget to:</p> <ul style="list-style-type: none"> • Impact upon legally protected species or habitats • Impact on priority species or habitats • Remove or damage trees.
	<p>Mitigating actions</p>	<p>Timber must be used in accordance with the requirements set out in the Consumption of Non-Renewable resources section above.</p> <p>Where works have the potential to disturb protected species or impact upon their habitat, guidance from a suitably experienced and qualified ecological consultant will be sought and followed at the earliest opportunity.</p> <p>Any works requiring Planning Permission will be reviewed by a Council Ecologist as part of the Planning process.</p> <p>Wherever possible existing trees will be retained and works affecting these trees will be undertaken in accordance with “BS 5837: Trees in relation to design, demolition and construction – Recommendations”.</p> <p>Consideration will be given to enhancing biodiversity to ensure that HRA activities will result in more biodiversity than previously existed. This is a goal in the One City Ecological Emergency Strategy and a general duty for public authorities to conserve and enhance biodiversity was introduced by the Environment Act 2021, as was a 10% increase in biodiversity net gain for projects requiring planning permission.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p>	<p>Benefits</p>	

<p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Waste will arise during the delivery of the works delivered by this budget.</p>
	<p>Mitigating actions</p>	<p>Contractors and Direct Labour will be required to take responsibility for their waste, including adhering to the waste duty of care and waste hierarchy by:</p> <ul style="list-style-type: none"> • Reducing waste. • Reusing waste where legal and practicable. • Using products which are readily recyclable. • Recycling as much waste as possible. <p>Hazardous wastes will be stored and disposed of in a legally compliant manner. Electrical items will be disposed of in compliance with the WEEE Regulations.</p> <p>Where appropriate contract documents will promote the recycling of scrap metal, with any income returning to Bristol City Council.</p>
<p>Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>		
<p>ENV4 Climate resilience: Bristol’s resilience to the effects of climate change</p> <p>Bristol’s climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Benefits</p>	<p>The improvements to energy efficiency measures listed in the ‘Emissions of Climate Changing Gases’ section above will improve Bristol’s resilience to fuel scarcity.</p>
	<p>Enhancing actions</p>	<p>Water efficient products such as showers, dual flush toilets and low flow taps will be used where appropriate.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Some HRA properties will be located in flood risk areas. Some HRA properties will be at risk of overheating during periods of extreme weather.</p>
	<p>Mitigating actions</p>	<p>The public Flood Risk Management information will be used to identify sites at risk of flooding and flood risk measures will be considered.</p>
<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>		

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	<p>Generator or other power use associated with works will generate emissions.</p> <p>Works delivered under this budget are likely to involve the use and storage of materials that could contaminate land, watercourses and surface water drains, if accidentally released.</p> <p>Works are likely to create dust and noise.</p> <p>Transport to deliver works will create air pollution.</p>
	Mitigating actions	<p>Suppliers will be asked to use the lowest emission options wherever possible, and should be encouraged to avoid the use of generators favouring mains connection where possible due to emissions from generators.</p> <p>Contractors and Direct Labour will be required to work in accordance with all relevant regulatory guidance and also ensure appropriate procedures and equipment are in place to:</p> <ul style="list-style-type: none"> • Securely store any potentially polluting materials and keep them away from watercourses and surface drains. • Avoid washing out containers of paints, pesticides, or similar materials into drains. • Ensure that drainage connections are correct, with sewage entering foul sewers, not storm drains. • Minimise noise and dust. • Contain any spillages. • Communicate best practice. <p>Homes and Landlord Services will continue to build on previous progress made to programme works in a manner which reduces the transport impacts of staff and contractors.</p>
Persistence of effects: <input checked="" type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Actions

3.1 Action Plan

Use this section summarise and assign responsibility for any actions you have identified to improve data, enhance beneficial, or mitigate negative impacts. Actions identified in section two can be grouped together if named responsibility is under the same person.

This action plan should be updated at each stage of the project. Please be aware that the Sustainable City and Climate Change Service may use this action plan as an audit checklist during the project's implementation or operation.

Enhancing / mitigating action required	Responsible Officer	Timescale
Sustainability requirements to be set for materials, transport and waste management of contractors (See full ENV IA for full details).	Chris Brake (To be replaced by Senior Contract Manager in 2025)	As projects are progressed through procurement and planning
Any works requiring Planning Permission will be reviewed by a Council Ecologist as part of the Planning process and consultations will take place if any habitats are at risk through works.	Housing Repairs Managers / Supervisors	As projects are progressed through procurement and planning
Public Flood risk mapping information will be referenced when relevant to a project.	Housing Repairs Managers / Supervisors	As projects are progressed through procurement and planning
Heat vulnerability information will be referenced when relevant to a project.	Sam Robinson	As projects are progressed through procurement and planning

Step 4: Review – for completion by the Environmental Performance Team

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal. Please seek feedback and review from the [Environmental Performance Team](#) before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here and included on the cover sheet of the decision pathway documentation.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):
Overall, this proposal will have long term beneficial impacts through retrofitting, insulation works and the fitting of more efficient fixtures and fittings. The investment will lead to reduced bills for tenants, creating a beneficial impact from the perspective of a Just Transition. The overall carbon saving, once the programme has been completed, is estimated to be 430 tonnes CO ₂ e per year.
Summary of significant adverse impacts and how they can be mitigated:
There are short term negative impacts arising from this proposal through construction works which will be mitigated through the procurement procedures and mitigation actions listed here, with focus on specifications for materials used, waste management procedures and travel methods.

Environmental Performance Team Reviewer: Daniel Shelton	Submitting author: Nathan Muggeridge
Date: 07/01/2024	Date: 27/11/24

¹ Review by the Environmental Performance Team confirms there is sufficient information for decision makers to consider the most relevant environmental impacts at the current stage of the proposal. This is not an endorsement or approval of the proposal.