

APPENDIX F



Environmental Impact Assessment [version 1.0]

Proposal title: Proposal to introduce new property licensing schemes		
Project stage and type: <input type="checkbox"/> Initial Idea Mandate <input type="checkbox"/> Outline Business Case <input checked="" type="checkbox"/> Full Business Case		
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review	<input type="checkbox"/> Changing
Directorate: Housing & Landlord Services	Lead Officer name: Tom Gilchrist	
Service Area: Private Housing	Lead Officer role: Private Housing Service Manager	

Step 1: What do we want to do?

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

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

It is good practice to take a team approach to completing the Environmental Impact Assessment. See further [guidance](#) on completing this document. Please email environmental.performance@bristol.gov.uk early for advice and feedback.

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

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

The proposal is to licence all smaller privately rented Houses in Multiple Occupation (HMOs) (with 3 or 4 unrelated occupants sharing some facilities) across the city and to target most other privately rented properties in three wards – Bishopston and Ashley Down, Cotham and Easton. This potentially would mean licensing just over 8,000 HMOs and 3,000 other PRS properties in the three targeted wards. For each licence issued the property will be inspected and checked to ensure that the properties meet the licensing standards appropriate for the licence type.

1.2 Will the proposal have an environmental impact?

Could the proposal have either a positive or negative effects for the environment now or in the future? If 'No' explain why you are sure there will be no environmental impact, then skip steps 2-3 and request review by sending this form to environmental.performance@bristol.gov.uk

If 'Yes' complete the rest of this assessment.

Yes No [please select]

The introduction of licensing would bring a general improvement of property conditions that are adversely affecting the occupants in the area. This will be achieved by inspecting every property that will be subject to licensing proposals to identify and remedy serious hazards. This will be remedied through enforcement under Part 1 of the Act or other enforcement powers as appropriate, to ensure compliance with licensing conditions.

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

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

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Not applicable	[please select]
------------------------------	-----------------------------	--	-----------------

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

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

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

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

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

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

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

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

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

GENERAL COMMENTS (highlight any potential issues that might impact all or many categories)		
<p>ENV1 Carbon neutral: Emissions of climate changing gases</p> <p>BCC has committed to achieving net zero emissions for its direct activities by 2025, and to support the city</p>	<p>Benefits</p>	<p>Based on existing licensing schemes which have led to improved energy efficiency, it is expected that the proposal will lead to further improvement through works which will reduce emissions over the lifetime of the buildings to meet minimum housing standards and ensure properties are Minimum Energy Efficiency Standards (MEES) compliant for all private rented properties inspected.</p>

<p>in achieving net zero by 2030.</p> <p>Will the proposal involve transport, or the use of energy in buildings? Will the proposal involve the purchase of goods or services? If the answer is yes to either of these questions, there will be a carbon impact.</p> <p>Consider the scale and timeframe of the impact, particularly if the proposal will lead to ongoing emissions beyond the 2025 and 2030 target dates.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	<p>Enhancing actions</p>	<p>All properties that come under the licensing requirement will be inspected and enforcement action taken if the properties do not meet licensing standards and improvements will be required.</p> <p>Inspections will identify measures that could assist landlords and tenants as well as those that are necessary to meet licensing standards. This should include fuel poverty reduction, climate benefits and low embodied emission impacts.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	<p>Physical inspections of more than 11,000 properties will lead to emissions associated with transport. These inspections are likely to result in landlords being required to carry out works to improve their properties. Any new vehicles procured for these additional inspections will be battery electric vehicles.</p>
	<p>Mitigating actions</p>	<p>Route planning should be considered to ensure that inspections are carried out efficiently, using the least number of car miles possible, with preference given to sustainable travel options wherever possible.</p> <p>It is not possible to predict the types of works that may be required after properties are inspected, but it would offer a good chance to engage with private landlords on the benefits of making sustainability improvements to their properties for them and their tenants. A British Gas report issued last week found private landlords to be poorly informed and unwilling to make such improvements, so engagement could be needed.</p>
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years</p>	
<p>ENV2 Ecological recovery: Wildlife and habitats</p> <p>BCC has committed to 30% of its land being managed for nature and to halve its use of pesticides by 2030.</p> <p>Consider how your proposal can support increased space for nature, reduced use of pesticides, reduce pollution to waterways, and reduce consumption of products that undermine ecosystems around the world.</p> <p>If your proposal will directly lead to a reduction in habitat within Bristol, then consider how your proposed mitigation can lead to a biodiversity net gain. Be sure to refer to quantifiable changes wherever possible.</p> <p>Further guidance</p>	<p>Benefits</p>	
	<p>Enhancing actions</p>	
	<p>Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years</p>	
	<p>Adverse impacts</p>	
	<p>Mitigating actions</p>	

<input checked="" type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		
<p>ENV3 A cleaner, low-waste city: Consumption of resources and generation of waste</p> <p>Consider what resources will be used as a result of the proposal, how they can be minimised or swapped for less impactful ones, where they will be sourced from, and what will happen to any waste generated</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits			
	Enhancing actions			
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years			
	Adverse impacts	Remedial works will lead to some production of waste.		
	Mitigating actions	BCC has no direct control over waste generated as these works will be arranged privately by individual landlords, however standard requirements for disposal of waste will ensure that correct disposal routes are followed.		
<input type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years		
<p>ENV4 Climate resilience: Bristol's resilience to the effects of climate change</p> <p>Bristol's climate is already changing, and increasingly frequent instances of extreme weather will become more likely over time.</p> <p>Consider how the proposal will perform during periods of extreme weather (particularly heat and flooding).</p> <p>Consider if the proposal will reduce or increase risk to people and assets during extreme weather events.</p> <p>Further guidance</p> <p><input type="checkbox"/> No impact</p>	Benefits	A number of properties will receive energy efficiency upgrades improving their overall performance and resilience to climate change.		
	Enhancing actions	Improved energy efficiency measures will be required where the property does not meet minimum standards (currently EPC E) under the Minimum Energy Efficiency Standard Regulations that are applicable to all private rented homes. If improvements are not made, enforcement action will be commenced against the landlord/managing agent.		
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input checked="" type="checkbox"/> 5+ years			
	Adverse impacts			
	Mitigating actions			
<input type="checkbox"/> No impact		Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

<p>Statutory duty: Prevention of Pollution to air, water, or land</p> <p>Consider how the proposal will change the likelihood of pollution occurring to air, water, or land and what steps will be taken to prevent pollution occurring.</p> <p>Further guidance</p> <p><input checked="" type="checkbox"/> No impact</p>	Benefits	
	Enhancing actions	
	Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years	
	Adverse impacts	
	Mitigating actions	
Persistence of effects: <input type="checkbox"/> 1 year or less <input type="checkbox"/> 1 – 5 years <input type="checkbox"/> 5+ years		

Step 3: Action Plan

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

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

Enhancing / mitigating action required	Responsible Officer	Timescale
Route and timing planning for inspection teams will reduce the impact of additional travel.	Paul Tregale	Throughout the five-year term of the scheme
Procurement of battery electric vehicles if any additional vehicles are needed for inspection.	Paul Tregale	Officers will use BCC pool cars, public transport or walk/cycle to inspections.
A comprehensive landlord engagement package will be created to allay their concerns, demonstrate the benefits of being proactive and provide any help they need.	Shona ALi	Ongoing - We already have landlord liaison and tenant liaison officers in post and landlords, managing agents and tenants have been consulted on these proposals to meet the legal requirements for introducing a licensing scheme.

Enhancing / mitigating action required	Responsible Officer	Timescale
Inspectors will be trained and inspection reports formatted to identify measures that could assist landlords and tenants as well as those that are necessary to meet licensing standards. This would include measures to reduce fuel poverty, emissions and cost of living. It would include improving climate resilience and using materials with low embodied emissions.	Paul Tregale	Officers are trained to inspect rented properties against the licensing standards. These properties must meet licensing standards. Licensing conditions are prescribed by legislation and government guidance and restricted by case law decisions. Where suitable measures can be introduced to reduce fuel poverty, emissions and cost of living these will be implemented. However licensing conditions are restricted by legislation and the service would not be able to require measures not prescribed by licensing regulations or guidance.

Step 4: Review

The Sustainable City and Climate Change Service need at least five working days to comment and feedback on your impact assessment. Assessments should only be marked as reviewed when they provide sufficient information for decision-makers on the environmental impact of the proposal.

Please seek feedback and review by emailing environmental.performance@bristol.gov.uk before final submission of your decision pathway documentation¹.

Where impacts identified in this assessment are deemed significant, they will be summarised here by the Sustainable City and Climate Change Service and must be included in the ‘evidence base’ section of the decision pathway cover sheet.

¹ Review by the Sustainable City and Climate Change Service confirms there is sufficient analysis for decision makers to consider the likely environmental impacts at this stage. This is not an endorsement or approval of the proposal.

Summary of significant beneficial impacts and opportunities to support the Climate, Ecological and Corporate Strategies (ENV1,2,3,4):

Summary of significant adverse impacts and how they can be mitigated:

Environmental Performance Team Reviewer:
Giles Liddell, Environmental Performance Co-ordinator

Submitting author:
Jan Hamilton

Date:
24/11/2023

Date:
28/11/23