

**Appendix 2 – Equality Impact Assessment**

## Equality Impact Assessment / Equality Analysis

<b>Title of service or policy</b>	Houses in Multiple Occupation Supplementary Planning Document – Update 2021
<b>Name of directorate and service</b>	Planning Policy
<b>Name and role of officers completing the EIA</b>	Alice Nunn, Senior Planning Officer
<b>Date of assessment</b>	15 <sup>th</sup> December 2021

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council’s and NHS Bath and North East Somerset’s websites.

<b>1. Identify the aims of the policy or service and how it is implemented.</b>		
	<b>Key questions</b>	<b>Answers / Notes</b>
<b>1.1</b>	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>Preparation, consultation and adoption of an updated Supplementary Planning Document (SPD) setting out the Council’s approach to the distribution and dispersal of Houses in Multiple Occupation (HMOs) across the City. The SPD is an update to the currently adopted 2017 HMO SPD.</p> <p>The updated SPD seeks to ensure a balanced mix of housing in Bath, by setting out criteria for assessing planning applications for HMOs. This update includes the following key changes to the 2017 HMO:</p> <ul style="list-style-type: none"> <li>● Removal of the census output area test currently used to assess some applications, to ensure that all applications are fairly assessed using the same test;</li> <li>● Provision of guidance on assessing flatted developments using the sandwich test, and;</li> <li>● Provision of additional guidance relating to updates to policy H2 set out within the Local Plan Partial Update Draft Plan, with a particular focus on provision of good quality accommodation for occupiers.</li> </ul> <p>The guidance supports policy H2 in the Placemaking Plan, and once adopted it will support policy H2 of the Local Plan Partial Update. Also of relevance are Core Strategy Policies</p>

		<p>CP10 (Housing Mix) and B1 (Bath Spatial Strategy).</p> <p>The responsibility for drafting the SPD is with the Planning Policy team. The Development Management team will be responsible for implementing the SPD and using it to determine planning applications. The guidance will also require ongoing input from the Housing team and the GIS team to provide and analyse data on HMO numbers in Bath.</p> <p>The intended outcomes of the HMO SPD overall include:</p> <ul style="list-style-type: none"> <li>• Response to local resident concerns relating to over-concentration of HMOs within some areas of the city, and the issues commonly associated with this;</li> <li>• Dispersal of HMOs, rather than concentrations in certain areas of Bath, therefore leading to more choice in areas to rent privately across the City;</li> <li>• More balanced communities, meaning a wider mix of residents in many areas.</li> </ul> <p>Specific intended outcomes relating to the updated version of the SPD include:</p> <ul style="list-style-type: none"> <li>• Ensure that all planning applications are assessed using the same tests, providing a simpler and more consistent set of tests for users;</li> <li>• Provide guidance on how to assess flatted developments when carrying out the tests, in order to avoid ambiguity for users;</li> <li>• Improve the quality of HMOs for occupiers.</li> </ul>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> </ul>	<p>This SPD is an update to the HMO SPD adopted in 2017. The 2017 HMO was itself an update to a previous HMO SPD adopted in 2013.</p> <p>Each iteration has sought to set out the Council’s approach to the distribution and dispersal of HMOs, with the aim to encourage a sustainable community in Bath by encouraging a balanced housing mix across the city.</p> <p>The 2017 HMO SPD set out a two stage approach to assess planning applications. The tests</p>

<ul style="list-style-type: none"> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>included:</p> <ul style="list-style-type: none"> <li>● Criteria 1 Sandwich test, which ensures that the introduction of a new HMO would not result in an existing C3 residential property being sandwiched by any adjoining HMOs on both sides;</li> <li>● Criteria 2 Stage 1: Threshold assessment - census output area test, which assesses whether a proposal is located in a census output area with over 10% concentration of HMOs. If the proposal is located in such an area, stage 2 below must also be carried out;</li> <li>● Criteria 2 Stage 2: Threshold assessment – radius test, which assesses whether there is a 10% concentration of HMOs within the immediate 100m surrounding the application property.</li> </ul> <p>Following stakeholder engagement with various groups, and scenario testing across the city, the latest SPD has been revised to remove the criteria 2 stage 1 census output area test, which is not considered to be required any longer, due to the Council’s HMO mapping data being made publicly available. The removal of this part of the test will ensure that all planning applications are assessed using the same tests, providing a simpler and more consistent approach for users.</p> <p>The sandwich test set out in the 2017 HMO SPD did not provide guidance on assessing planning applications relating to flatted developments, other than confirming that this should be carried out on a case by case basis. The revised SPD therefore includes additional guidance on how to assess flatted developments when carrying out the sandwich test, in order to avoid ambiguity for users.</p> <p>Policy H2 of the Placemaking Plan is being updated as part of the Local Plan Partial Update. The update includes a policy requirement that all new or intensified HMOs provide good quality accommodation for occupiers and meet Energy Performance Certificate ‘C’. The revised HMO SPD therefore provides guidance relating to how these policy requirements might be achieved, including details relating to:</p> <ul style="list-style-type: none"> <li>● Minimum bedroom space standards;</li> </ul>
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		<ul style="list-style-type: none"> <li>• Guidance on Energy Performance Certificate C, including exclusions;</li> <li>• Potential sound reduction measures; and</li> <li>• Ventilation.</li> </ul> <p>The revised guidance document was consulted publicly for a period of 7 weeks. Details of the consultation have been recorded in a Consultation Statement, which is available to view on the Council's website.</p> <p>It is proposed that publicly available maps showing the location of HMOs will be updated on a quarterly basis to reflect any changes in local areas.</p> <p>Once the SPD is in place its impact will be monitored and there will be periodic opportunities for review.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The updated SPD will support policy H2 in the Placemaking Plan and will also support revised policy H2 in the Local Plan Partial Update, once this document is adopted next year. Some of the guidance in the revised SPD will only apply once the Local Plan Partial Update has been adopted, such as the guidance relating to providing a good standard of accommodation.</p> <p>The Council recently declared a climate and ecological emergency. The guidance relating to a requirement for all new and intensified HMOs to meet Energy Performance Certificate 'C', links to the Council's overall strategy to be carbon neutral by 2030.</p> <p>The benefits of the SPD are highlighted in Section 1.1 and 1.2.</p> <p>Several challenges relating to the overall HMO SPD have been identified including that it:</p> <ul style="list-style-type: none"> <li>• May push rental prices up in some areas (particularly Oldfield Park, Westmoreland and Widcombe areas), potentially leading to inequality in terms of where HMO residents can afford to live.</li> <li>• May mean HMO residents in new areas feel isolated if there is a lack of public</li> </ul>

		<p>transport and they lack access to personal transport.</p> <ul style="list-style-type: none"> <li>• Students living over a wider area may mean that some areas are not well served by public transport, leading to an increase in those using private modes to access the university campuses.</li> <li>• If the SPD leads to a perception that HMOs are not welcome in Bath, then this may lead to a shortage in affordable private rented property. This may make it harder for employers to attract certain types of employees, particularly those at the start of their careers, including new graduates.</li> </ul> <p>The revised HMO SPD does not amend the percentage of HMOs that the Council considers to be a balanced mix in an area (currently set at 10%), therefore it is not considered that the above challenges will be exasperated any further than the current situation.</p> <p>However, another challenge which could arise due to the revised SPD requirement relating to new and intensified HMOs meeting Energy Performance Certificate C includes:</p> <ul style="list-style-type: none"> <li>• Potential for costs of works to bring properties up to EPC 'C' rating could be passed on to tenants in the form of increased rents.</li> <li>• Potential costs of works to bring properties up to EPC 'C' rating may discourage property owners to convert properties to HMOs, leading to a decline in the number of new HMOs available in the city.</li> </ul>
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## 2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken

- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
<b>2.1</b>	What is the equalities profile of the team delivering the service/policy?	The HMO SPD is being delivered by the planning policy team. The team is made up of a mix of genders, ages and ethnicities.
<b>2.2</b>	What equalities training have staff received?	Planning policy team have received corporate equalities training and EQIA training.  A number of the service deliverers within the Council will have received corporate equalities training.
<b>2.3</b>	What is the equalities profile of service users?	Through equalities mapping and population profile analysis (including B&NES Joint Strategic Needs Assessment) we now know more about the wider groups of users who will benefit from any improvements.  Data is available from the Higher Education Statistics Agency, on the gender, age and socio-economic profile of students at the Higher Education Institutions in Bath.  The 2011 census provides data across B&NES wards on items such as population age profile, tenure profile, affordable housing profile and location of accredited properties.  The 2019 Indices of Deprivation provides data on socio-economic inequality across B&NES.
<b>2.4</b>	What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction)	<ul style="list-style-type: none"> <li>• Since the introduction of additional HMO licensing to the whole City of Bath in 2019, data and mapping relating to the location of HMOs has become much more readily available.</li> </ul>

	<p>surveys, consultation findings). Are there any gaps?</p>	<ul style="list-style-type: none"> <li>• 2020 demand survey sent to agents provided some data relating to demand for HMOs by student and non-student occupiers.</li> <li>• Results of stakeholder engagement sessions with various groups, including accommodation manager at Bath Spa University. (Further details in section 2.5).</li> <li>• Mapping of data relating to location of council tax exempt student properties now available, which goes some way to provide information on the split between student and non-student occupiers in an area.</li> <li>• Data providing information of the location and frequency of complaints made about HMOs and student properties is available from the Housing Team, which is grouped by 'type' of complaint made.</li> <li>• Summarised data from Bath Student Community Partnership relating to complaints made about student properties has been reviewed.</li> </ul> <p>Gaps in the data comprise:</p> <ul style="list-style-type: none"> <li>• Data on the profile of landlords / HMO developers.</li> <li>• Data on the profile of non-student HMO occupiers.</li> </ul>
<p><b>2.5</b></p>	<p>What engagement or consultation has been undertaken as part of this EIA and with whom?</p> <p>What were the results?</p>	<p><b>Stakeholder Engagement</b></p> <p>As part of the revised SPD process, numerous stakeholder engagement sessions have been held in order to scope stakeholder views on associated issues. The aims of the workshops were:</p> <ul style="list-style-type: none"> <li>• To bring stakeholders together to share and understand different perspectives related to HMOs;</li> <li>• To share data related to both need for HMOs and impacts of HMOs;</li> </ul>

		<ul style="list-style-type: none"> <li>• To test potential interventions that might help to create balanced and sustainable communities;</li> <li>• To investigate whether the current 10% threshold is working successfully;</li> <li>• To discuss how the current SPD might be updated to create a more user friendly document.</li> </ul> <p>A wide range of stakeholders were represented at the workshops, including:</p> <ul style="list-style-type: none"> <li>• Ward Councillors from across Bath</li> <li>• Councillors on the Planning Committee, B&amp;NES Council</li> <li>• Development Management Officers, B&amp;NES Council</li> <li>• Housing, Transport, Council Tax Officers, B&amp;NES Council</li> <li>• Bath Spa University</li> <li>• Bath Student Community Partnership</li> <li>• Estate Agents</li> <li>• Local Resident Associations</li> </ul> <p>The general results of the engagement sessions comprised:</p> <ul style="list-style-type: none"> <li>• Mixed views regarding whether the 10% threshold is appropriate.</li> <li>• General support for proposed amendments to the SPD tests, particularly any changes to make them clearer and more consistent.</li> <li>• General support for EPC C requirement, but with some concern that costs of works to</li> </ul>
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		<p>bring properties up to EPC 'C' rating could be passed on to tenants in the form of increased rents.</p> <ul style="list-style-type: none"> <li>• General support for inclusion of requirements in SPD relating to providing a good standard of accommodation for occupiers.</li> </ul> <p>Additional details relating to the information collated at the stakeholder engagement sessions is summarised within the Consultation Statement, which is available to view on the Council's website.</p> <p><b>Webinars</b></p> <p>A webinar relating to proposed amendments to the SPD was held for the public in January 2021. A second webinar was held on 6th September 2021, to update the public on the content of the Draft HMO SPD and inform them of the formal consultation taking place.</p> <p><b>Statutory Consultation</b></p> <p>Statutory consultation under Regulation 12 (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 was undertaken for 7 weeks on the Draft HMO SPD, between 27th August and 18th October 2021.</p> <p>64 responses were received, summaries of which are set out in the Consultation Statement available to review on the Council's website.</p> <p>Two equalities related comments were received, stating that:</p> <ul style="list-style-type: none"> <li>• 10% HMO concentration threshold should be increased, allowing for more HMOs, to ensure young professionals aren't continued to be priced out of the rental market, requiring them to commute into Bath.</li> <li>• Proposed minimum space standards are not large enough, forcing HMO occupiers to live in unsatisfactory homes.</li> </ul>
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2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	No further consultation is proposed.	
<b>3. Assessment of impact: 'Equality analysis'</b>			
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> <li>● Meets any particular needs of equalities groups or helps promote equality in some way.</li> <li>● Could have a negative or adverse impact for any of the equalities groups</li> </ul>		
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b>
3.1	<b>All groups</b>	<p>Overall, the continued use of the tests set out in the SPD should lead to a more dispersed pattern of HMOs in Bath, with HMOs in a wider range of neighbourhoods than currently experienced. The intention of the SPD is to encourage and maintain balanced and mixed communities that support the needs of all groups in society. It should also provide greater choice in terms of areas to live.</p> <p>Promoting a more balanced community, helping to make all feel welcome.</p>	<p>Potential negative impacts of a more dispersed set of students or young professionals over a larger area could lead to feelings of isolation for young people who are forced to live further out and may feel unsafe travelling at night.</p> <p>NB this will apply to all the groups considered below</p> <p><b>Action:</b> Ongoing monitoring of the SPD. Ongoing monitoring of planning permissions granted along public transport corridors.</p>

		<p>The revisions to the HMO SPD include guidance on how landlords can aim to improve the quality of HMOs for occupiers, in relation to room sizes, noise reduction measures and ventilation. The requirement for new HMOs to meet Energy Performance Certificate 'C' could lead to more comfortable, energy efficient homes, with cheaper energy bills for occupants.</p> <p>NB this positive impact will apply to all the groups considered below.</p>	<p>Potential negative impacts of the requirement for new and intensified HMOs to meet Energy Performance Certificate 'C' include:</p> <ul style="list-style-type: none"> <li>- Potential for costs of works to bring properties up to EPC 'C' rating could be passed on to tenants in the form of increased rents.</li> <li>- Potential costs of works to bring properties up to EPC 'C' rating may discourage property owners to convert properties to HMOs, leading to a decline in the number of new HMOs available in the city and a decline in choice of location for occupiers.</li> </ul> <p>NB this will apply to all the groups considered below</p> <p><b>Action:</b> <i>Exemption relating to cost included in SPD, therefore capping the cost of works for landlords / owners. Ongoing monitoring of planning applications to understand whether there has been a decline in the number of HMO applications overall.</i></p> <p>Potential negative impacts of minimum space standards being too small, leading to HMO occupiers living in unsatisfactory homes.</p> <p>NB this will apply to all the groups considered below.</p>
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			<p><b>Action:</b> Space standards in SPD comply with HMO licensing standards and provide officers with a reason to refuse a planning application which does not meet these standards. Ongoing monitoring of licencing regulations to understand if increases in room sizes will be proposed.</p>
3.2	<p><b>Sex</b> – identify the impact/potential impact of the policy on women and men.</p>	As in 3.1 above	<p>Dispersal of HMOs to areas with poorer public transport options may lead to issues relating to perceived safety for men and women having to walk further, particularly at night. Perceived safety issues likely to be intensified for women.</p> <p><b>Action:</b> Ongoing monitoring of impact of SPD on location / dispersal of HMOs and their relationship with public transport corridors.</p>
3.3	<p><b>Pregnancy and maternity</b></p>	As in 3.1 above	<p>Issues relating to the dispersal of HMOs to less sustainable areas with poorer access to public transport experienced by all groups may be intensified for pregnant women or parents with new children.</p> <p><b>Action:</b> Ongoing monitoring of impact of SPD on location / dispersal of HMOs and their relationship with public transport corridors.</p>
3.4	<p><b>Gender reassignment</b> – identify the impact/potential impact of the policy on</p>	As in 3.1 above	<p>The proposals are unlikely to create an impact on people in relation to gender reassignment. However, the Council would</p>

	transgender people		consider any representations made in this regard.
3.5	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	As in 3.1 above	<p>Issues relating to the dispersal of HMOs to less sustainable areas with poorer access to public transport experienced by all groups may be intensified for disabled people.</p> <p><b>Action:</b> <i>Ongoing monitoring of impact of SPD on location / dispersal of HMOs and their relationship with public transport corridors.</i></p> <p>The completion of planning applications and licence applications forms can be difficult for some disabled people. The tests set out in the SPD may also be difficult for some disabled people.</p> <p><b>Action:</b> <i>Guidance to be offered to applicants to complete the planning application process, and reasonable adjustments for disabled people are always considered. Pre-application advice option for officers to carry out tests for potential applicants.</i></p>
3.6	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	<p>As in 3.1 above and;</p> <p>Current issues associated with HMOs include isolation/ feelings of vulnerability among older people, the proposal should lead to more balanced communities as there is a greater choice in areas to live.</p>	<p>As in 3.1 above and;</p> <p>May push up rental prices in some areas (particularly Oldfield Park, Westmoreland and Widcombe area), often affecting those on lower incomes, including young professionals and students, who tend to be younger people.</p>

		<p>The SPD helps to manage new HMOs in areas with a high concentration, allowing more families to stay in certain areas, and maintaining more balanced communities.</p> <p>More choice of high quality HMOs across the city will make it easier to attract young professionals/lower paid employees to Bath.</p>	<p><b>Action:</b> <i>Future provision of purpose built accommodation on transport corridors in site allocations plans.</i></p> <p><b>Action:</b> <i>Ensure good levels of amenity and public transport in the alternative areas where younger people may end up living.</i></p> <p>May lead to students and young people living in peripheral areas of the City possibly leading to feelings of isolation for young people that are forced to live further out.</p> <p><b>Action:</b> <i>Ongoing monitoring of impact of SPD on location / dispersal of HMOs and their relationship with public transport corridors.</i></p>
3.7	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups	As in 3.1 above	<p>Wards with the most ethnically diverse populations also have high proportions of HMOs, so these groups may be adversely affected by the potential inflated rental prices that arise out of the proposals.</p> <p><b>Action:</b> <i>Ongoing monitoring of impact of SPD. Ongoing monitoring of planning permissions granted along the public transport corridors.</i></p>
3.8	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual	As in 3.1 above	<p>There is no evidence of any potential negative impacts in respect of sexual orientation. This is due to lack of data and knowledge about HMO landlords and HMO</p>

	people		dwellers in B&NES
<b>3.9</b>	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	As in 3.1 above	None identified
<b>3.10</b>	<b>Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	As in 3.1 above	As in 3.1 above; and  May push up rental prices in some areas (particularly Oldfield Park, Westmoreland, and Widcombe areas) that will affect those with lower incomes.  <i><b>Action:</b> Ongoing monitoring of impact of SPD. Ongoing monitoring of planning permissions granted along the public transport corridors.</i>
<b>3.11</b>	<b>Rural communities*</b> – identify the impact / potential impact on people living in rural communities	Potentially increasing the choice in areas to live within the city, e.g. young people living at home in rural areas, may be able to move out, as HMOs are dispersed across the city	Potential for feeling that HMOs are unwelcome within the City and for greater numbers of HMOs to appear outside the city in more rural areas.  <i><b>Action:</b> Ongoing monitoring of impact of SPD on dispersal to more rural areas.</i>

<p><b>3.12</b></p>	<p><b>Armed Forces Community</b>  ** serving members; reservists; veterans and their families, including the bereaved. Public services will soon be required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>As in 3.1 above.</p> <p>More choice of high quality HMOs across the city providing shared housing options across B&amp;NES for ex armed forces.</p>	<p>Potential negative impacts of HMO dispersal to less sustainable locations could lead to feelings of isolation for ex armed forces who are forced to live further out.</p> <p>Potential positive impacts relating to better standard of shared accommodation being secured, providing high quality shared housing options for ex armed forces.</p> <p><b>Action:</b> <i>Ongoing monitoring of impact of SPD on location / dispersal of HMOs and their relationship with public transport corridors.</i></p>
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\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, when the Armed Forces Bill becomes law there will be a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

## 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Ensure the HMO SPD is designed appropriately, and that additional support is available for equalities groups.	Ensure document had been checked by web team in relation to accessibility; incorporate standard text on documents (e.g. about availability in other formats)	Carry out accessibility of document checks prior to publication.	Planning Policy Team	Prior to publication.
HMO occupants forced to live in other areas, due to rising prices in central locations.	Ensure good levels of amenity and public transport in the alternative areas where people may end up living	Review in conjunction with local transport policy & plans.  Review accessibility of areas in Bath where numbers of HMOs are likely to grow. Planning policy team to monitor.	Planning Policy Team	Ongoing
Potential feelings of isolation for students and other HMO residents who live in less accessible areas	Information provision, e.g. on transport access, local amenities, safety measures, and support helplines	Included within student information and housing packs	Student Community Liaison Officer	To coincide with students arriving at University and during housing week

Potential for feeling that HMOs are unwelcome within the city and for greater numbers of HMOs to appear outside the city in more rural areas.	Monitoring of impacts of SPD and Article 4 Direction on dispersal of HMOs to more rural areas.	Monitoring licensing applications	Housing and Planning Policy Team	Ongoing
Potential for costs of works to bring properties up to EPC 'C' rating could be passed on to tenants in the form of increased rents.	Exemption relating to cost included in SPD, therefore capping the cost of works for landlords / owners.  Monitoring of planning and licensing applications to understand associated costs.	Monitoring planning and licensing applications	Housing and Planning Policy Team	Ongoing
Potential costs of works to bring properties up to EPC 'C' rating may discourage property owners to convert properties to HMOs, leading to a decline in the number of new HMOs available in the city and a decline in choice of location for occupiers.	Exemption relating to cost included in SPD, therefore capping the cost of works for landlords / owners.  Monitoring of planning and licensing applications to understand whether there is a decline in the number of HMO applications overall.	Monitoring planning and licensing applications	Housing and Planning Policy Team	Ongoing
Potential negative impacts of minimum space standards being too small, leading to HMO occupiers living in unsatisfactory homes.	Space standards in SPD comply with HMO licensing standards and provide officers with a reason to refuse a planning application which does not meet these standards. Ongoing monitoring of licencing regulations to understand if	Monitoring licencing regulations	Housing and Planning Policy Team	Ongoing

	increases in room sizes will be proposed.			
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## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:**

(Divisional Director or nominated senior officer)

**Date:**