

| Bath & North East Somerset Council | | |
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| MEETING | Cabinet | |
| MEETING | 11 th September 2025 | EXECUTIVE FORWARD PLAN REFERENCE: |
| | | E 3633 |
| TITLE: | B&NES Homes Programme - Englishcombe Lane Supported Housing Scheme | |
| WARD: | Moorlands | |
| AN OPEN PUBLIC ITEM WITH EXEMPT APPENDIX | | |
| List of attachments to this report: | | |
| EXEMPT Appendix 1: Business Case Appendix 2: Equality Impact Assessment | | |

1 THE ISSUE

- 1.1 In 2024 the Council received planning permission for its proposed 16-unit specialist supported housing development on land to the rear of 89 – 123, Englishcombe Lane, Southdown.
- 1.2 The Council is now in a position to proceed with implementing the proposed development and this report seeks final authority and budget approval to do so.

2 RECOMMENDATION

The Cabinet is asked to agree to;

- 2.1 To agree to implement the development, composed of 16 units of specialist supported housing, as approved in planning application reference number 24/01168/REG03, or its successors in function.
- 2.2 To delegate authority to the Director of Capital & Housing Delivery to accept Homes England Grant, associated with the development, and other relevant significant delivery decisions

3 THE REPORT

Background

- 3.1 In April 2018 the Council submitted a planning application to develop 37 homes, including 14 affordable homes, on land to the rear of 89 – 123, Englishcombe Lane, Southdown, Bath. Planning committee approved the application subject to conditions including the completion of a s106 agreement. However, due to

concerns, principally around potential risk to the on-site ecology, it was decided not to pursue the application.

- 3.2 The site is allocated for residential development in the Local Plan and the Council has demonstrably high local housing need and a demanding housing delivery requirement. Doing nothing is therefore not a realistic option. As such officers were tasked with investigating whether a smaller scale alternative and ecologically acceptable development was feasible.
- 3.3 Having identified a lack of sufficiency in the local care and support market of supported living provision for people with complex needs, the decision was taken that pursuing a scheme which directly addressed that unmet need, provided the most impactful option, especially given the added benefit that this would reduce reliance on expensive out of area placements.
- 3.4 Officers worked with social care professionals and a specialist design team to create a scheme that offered the maximum practical benefit to the intended client group.

Scheme Benefits

- 3.5 The consented scheme delivers a low density, sensitive and small-scale scheme that uses the ecological value of the site as an asset and opportunity to create a peaceful housing environment for people with specialist housing needs. The scheme would be able to provide supported housing with care to around 16 tenants and is expected to provide the following headline benefits:
 - Creates an environment which is sensitive to the particular needs of the client group, thereby enabling people with learning disabilities and or autism to live as independently as possible in their own homes with the care and support then need on site.
 - Provides an opportunity to meet the bespoke needs of individuals especially those with sensory needs and requiring accessible accommodation. The site provides a peaceful and low stimulus environment which will suit many individuals with sensory needs.
 - Reduces the necessity for people to move out of area to access housing, care, and support, enabling people to remain in the district, close to family, community and friends and care teams.
 - Provides an opportunity for those: inappropriately housed in residential accommodation (often out of area) to return to the district if they wish; ability for clients to step down in more independent living; or those who are living in family or other inappropriate accommodation and ready to move into further independence.
 - Opportunity to integrate and test latest assistive technology.
 - Provides opportunity for revenue savings from the Councils Specialist Commissioning revenue budget. Revenue savings can be achieved in part by reducing reliance on costly out of area placements.

- The scheme would support some the Council's most complex individuals who are most at risk of being placed out of area. This will include some of those transitioning into adults from children's services.

Delivery Mechanism

3.6 Scheme delivery will be managed by B&NES and implemented via a two-stage procurement to include the build.

Operating Model

3.7 B&NES will own the completed scheme.

3.8 B&NES Homes will provide housing management services, including liaison with social care commissioners for the purposes of obtaining nominations for potential residents and dealing with any issues which may arise.

3.9 Adult Social Care will commission the care and support needed.

Timescales

3.10 The table below shows high level scheme timescales

| Stage | Date |
|------------------------|----------------|
| Invitation to Tender | September 2025 |
| Contract Award | November 2025 |
| Enabling Works to Site | February 2026 |
| Start on Site | July 2026 |
| Practical Completion | March 2028 |

4 STATUTORY CONSIDERATIONS

4.1 The delivery of specialist housing is supported by the following:

- Local Authorities (Land) Act 1963 which allows Councils to develop land for the benefit or improvement of their area.
- Local Government Act 2000 (section 2) which allows Councils to act to promote or improve the economic, social or environmental wellbeing of their area.
- Localism Act 2011 (sections 1) which provides the local authority's general power of competence.
- The Council is registered with the Regulator of Social Housing as a Local Authority Registered Provider of Social Housing.

4.2 There are further statutory considerations in relation to the provision of welfare and support to clients with learning difficulties and/or autism, including:

- The Care Act 2014 (part 1) provides Local Authorities with a general duty to promote an individual's well-being.
- Children and Families Act 2014 (section 25) promoting integration and wellbeing

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 The scheme Business Case is shown at Appendix 1.

5.2 The scheme will be funded by a combination of borrowing supported by net rent and service savings resulting from the scheme, Homes England Grant and S106 Commuted sums.

6 RISK

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

6.2 The key risks at this stage include:

| Risk | Summary | Mitigation |
|--|--|---|
| Funding Delays | Delay in funding confirmation may impact programme timelines. | Programme planning includes parallel delivery options and ongoing engagement with funders. |
| Ground & Infrastructure Cost Uncertainty | High proportion of groundworks may lead to cost increases. | Ground investigations completed and planned; cost risks quantified with specialist contractor input. |
| Market Engagement Challenges | Technical complexity and pricing may reduce contractor interest. | Two-stage tendering informed by market testing and specialist procurement advice. |
| Ecological Sensitivities | Environmental concerns may affect public perception and support. | The scheme exceeds biodiversity requirements and includes ecological oversight during construction. |
| Retaining Wall Design Complexity | Design challenges may increase costs. | Contractor-led design approach with specialist input to manage risk. |
| Demand Risk | Potential for low demand leading to void costs. | Scheme co-designed with Adult Social Care to align with identified needs. Allowance for voids included within Business Plan. |
| Construction Traffic & Access Disruption | Safety and reputational risks from traffic and access issues. | Contractor to implement traffic management and community liaison plans. |
| Drainage | Risk of reputational harm if existing drainage issues are wrongly linked to the new development. | Proactive communication during construction to clarify planned infrastructure improvements on site. Drainage engineers to provide detailed and robust drainage calculations to support the design and enable effective mitigation strategies. |

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| Construction Complexity | Technical and logistical challenges may cause delays or safety issues. | Contractor selection based on experience; risks managed through KPIs and contract terms. |
|-------------------------|--|--|

6.3 A Project Risk Register will be used to manage risks and this will be kept under review as the project progresses, under the supervision of the project manager and reported regularly.

7 EQUALITIES

7.1 An Equality Impact Assessment / Equality Analysis was undertaken for the proposed project using the 'Bath and North East Somerset Council and NHS B&NES: Equality Impact Assessment Toolkit Bath and North East Somerset Council and NHS B&NES: Equality Impact Assessment Toolkit'.

7.2 The assessment / analysis showed that there were no actual or potential negative or adverse impacts.

8 CLIMATE CHANGE & BIODIVERSITY

8.1 Housing is a key contributor to climate change. The homes in this scheme have been designed to meet net zero requirements, thus contributing to meeting the Council's Climate Emergency targets.

8.2 In addition, the scheme has been designed to overachieve in terms of biodiversity net gain produced by the development and will achieve Building with Nature full accreditation.

8.3 In order to maximise nature benefit, the scheme has been designed to achieve Building with Nature full accreditation.

9 OTHER OPTIONS CONSIDERED

9.1 A number of other options were considered and dismissed as detailed below:

Option 1

Disposing of the site on the open market. This option was dismissed as the Council would lose control over the site, plus the Council has identified an unmet housing need which this site, within its ownership, could address. Option 2

- Do nothing. Not considered feasible given the site is allocated for residential development within the Council's adopted development plan and the Council has demonstrably high local housing need and a demanding housing delivery requirement.

Option 3

- Prior to arriving at the preferred option which went on to be the consented scheme, five options were considered for the site. These options varied in density but were all more sensitive to the site than the original scheme. The preferred option was selected on the basis of fitness for purpose and deliverability.

10 CONSULTATION

- 10.1 Extensive consultation and engagement was carried out in the lead up to the planning application being made. This took the form of dedicated letter drops, community meetings, a dedicated engagement 'open event' Ward Member engagements, a dedicated consultation website and specific points of contact being made available for residents to comment/ raise questions. The scheme was amended in light of feedback.

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| Contact person | Nick Plumley, Delivery Lead – Affordable & Specialist Housing 01225 477658 |
| Background papers | |
| Please contact the report author if you need to access this report in an alternative format | |

END

Access to Information Arrangements

Exclusion of access by the public to Council meetings

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| Information Compliance Ref: LGA-2534863 |
| Meeting / Decision: Cabinet |
| Date: 11 th September 2025 |
| Author: Nick Plumley |
| Report Title: B&NES Homes Programme - Englishcombe Lane Supported Housing Scheme List of attachments to this report: Exempt Appendix 1: Business Case |

The exempt appendix contains exempt information, according to the categories set out in the Local Government Act 1972 (amended Schedule 12A). The relevant exemption is set out below.

Stating the exemptions:

3. *Information relating to the financial or business affairs of any particular person (including the authority holding that information).*

The public interest test has been applied, and it is concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. It is therefore recommended that the exempt appendix be withheld from publication on the Council website. The paragraphs below set out the relevant public interest issues in this case.

PUBLIC INTEREST TEST

If the Cabinet wishes to consider a matter with press and public excluded, it must be satisfied on two matters.

Firstly, it must be satisfied that the information likely to be disclosed falls within one of the accepted categories of exempt information under the Local Government Act 1972. Paragraph 3 of the revised Schedule 12A of the 1972 Act exempts information which relates to the financial or business affairs of the organisations which is commercially sensitive. The officer responsible for this item believes that this information falls within the exemption under paragraph 3, and this has been confirmed by the Council's Information Compliance Manager.

It is necessary to weigh up the arguments for and against disclosure on public

interest grounds. The main factor in favour of disclosure is that all possible Council information should be public and that increased openness about Council business allows the public and others affected by any decision the opportunity to participate in debates on important issues in their local area. Another factor in favour of disclosure is that the public and those affected by decisions should be entitled to see the basis on which decisions are reached.

Other factors in favour of disclosure include:

- furthering public understanding of the issues involved.
- furthering public participation in the public debate of issues, in that disclosure would allow a more informed debate.
- promoting accountability and transparency by the Council for the decisions it takes.

Weighed against this is the fact that the exempt appendix contains strategic/financial information which could prejudice the commercial interests of the Council if disclosed at this time. It is in the public interest that the Council is able to deliver cost-effective solutions and achieve best value. This depends partly on the Council being able to protect its commercial position while the detailed terms of relevant schemes are agreed. It is also important that the Cabinet should be able to retain some degree of private thinking space while decisions are being made, in order to discuss openly and frankly the issues under discussion relating to any negotiations.

Therefore, it is recommended that exemption set out above applies. The Council considers that the public interest has been served by the fact that a significant amount of information regarding the report has been made available – by way of the main report. The Council considers that the public interest is in favour of not holding this matter in open session at this time and that any reporting on the meeting is prevented in accordance with Section 100A(5A)

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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Equality Impact Assessment / Equality Analysis

(Updated December 2022)

| Item name | Details |
|--|--|
| Title of service or policy | Englishcombe Lane Supported Housing Scheme |
| Name of directorate and service | Regeneration and Housing |
| Name and role of officers completing the EIA | Nick Plumley - Housing Enabling & Development Manager Rebecca Hales - Project Manager |
| Date of assessment | 07 May 2024 |

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 main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.1 Identify the aims of the policy or service and how it is implemented

| Key questions | Answers / notes |
|--|---|
| 1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes | <p>A multi-disciplinary design team has been appointed through a mini-competition tender by the Project Manager. Design progress is in consultation with Adult Services and HCRG.</p> <p>In 2018, the Council submitted a planning application to develop 37 homes, on land to the rear of 89 – 123, Englishcombe Lane, Bath. The planning committee approved the application subject to conditions and a s106 Agreement. The administration decided not to pursue the application.</p> <p>The new scheme responds to the Pre-Application Planning Response received in late 2023, the scheme is a smaller sympathetic scheme with the following headline benefits:</p> <ol style="list-style-type: none"> 1. Realises the aspirations of people with a learning disability and/or autism to live as independently as possible in their own homes but with care and support as needed. 2. Provides an opportunity for some of the housing to meet the bespoke needs of individuals especially those with sensory needs and requiring accessible accommodation. The site provides a peaceful and low |

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| | <p>stimulus environment which will suit many individuals with sensory needs.</p> <ol style="list-style-type: none"> 3. Reduces the necessity for people to move out of area to access housing, care, and support, enabling people to remain in the district, close to family, community and friends and care teams. 4. Provides an opportunity for those: inappropriately housed in residential accommodation (often out of area) to return to the district if they wish; ability for clients to step down in more independent living; or those who are living in family or other inappropriate accommodation and ready to move into further independence. 5. Opportunity to integrate and test latest assistive technology. 6. Repatriating people from out of area residential care settings back into supported living within their local communities. <p>The delivery of high-quality adapted housing for vulnerable client groups has a positive impact on equality. It provides housing options for those residents who are unable to cope or compete on the open-market and may otherwise be forced to leave the area or reside in unsuitable housing conditions.</p> <p>The scheme proposes the erection of 16 no. supported living units (Use Class C3(b)) with an associated communal hub (to include ancillary carers' accommodation), access, landscaping and ancillary works'.</p> <p>10 of the dwellings are proposed to be 1-bed bungalows, 4 are 2-bed split level and 2 are 2-3 bedroom dwellings, accommodating 16 residents and providing overnight accommodation and/or office for their carers</p> |
| <p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). | <p>This is a new service.</p> <p>There is currently no similar service within B&NES.</p> |

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| <ul style="list-style-type: none"> How much room for review is there? | <p>Alternative design iterations have been considered through initial feasibility studies. Proposals strike the balance between responding to the constraints posed by the site and meeting the identified need.</p> <p>The scheme will be reviewed as the planning submission progresses and the next design stage is progressed.</p> |
| <p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p> | <p>The project objectives align with and complement the following council policies:</p> <p>Strategic Land Allocation SB17</p> <p>We have two core policies – tackling the climate and nature emergency and giving people a bigger say. The scheme specification responds to ecological and climate emergencies and is compliant with Planning Policy SCR6.</p> <p>The scheme translates our purpose into commitments and also complies with our extended ambitions so far as we are working towards a resilient future and improving frontline services whilst protecting the most vulnerable.</p> <p>The scheme complies with further priorities- The right homes in the right places, Clean, safe and vibrant neighbourhoods, Support for vulnerable adults and children.</p> <p>This scheme will improve people's lives and will deliver a housing option which is currently not met within county.</p> <p>The delivery of specialist housing is supported by the following:</p> <p>Local Authorities (Land) Act 1963 which allows Councils to develop land for the benefit or improvement of their area.</p> |

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| | <p>Local Government Act 2000 (section 2) which allows Councils to act to promote or improve the economic, social or environmental wellbeing of their area.</p> <p>Localism Act 2011 (sections 1) which provides the local authority's general power of competence.</p> <p>The Council is registered with the Regulator of Social Housing as a Local Authority Registered Provider of Social Housing.</p> <p>The Care Act 2014 (part 1) provides Local Authorities with a general duty to promote an individual's well-being.</p> <p>Children and Families Act 2014 (section 25) promoting integration and wellbeing.</p> |
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2. Consideration of available data, research and information

| Key questions | Data, research and information that you can refer to |
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| 2.1 What equalities training have staff received to enable them to understand the needs of our diverse community? | <p>Equality, Diversity, and Inclusion training has been undertaken by the Project Manager.</p> <p>Design Team consultants have a strong personal understanding of Autism Spectrum Disorder (ASD) and neurodivergence, active involvement in related professional and personal causes, and leadership of the recently launched National Neurodiversity in Planning Network (NNPN) and worked with key health bodies contributing to Health Building Notes (HBNs) and Health Technical Memorandum (HTMs).</p> |

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| <p>2.2 What is the equalities profile of service users?</p> | <p>People with a learning disability and/or autism.</p> <p>A strategic review of the local care and support market was undertaken by the Specialist Commissioning team in 2021. It identified a significant under supply of supported living provision in the district which in turn results in an over reliance on meeting people's needs through out of area residential care placements. At that point there were 52 people with learning disabilities and/or autism on the Council's housing demand matrix who needed a move or supported housing.</p> |
| <p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p> | <p>Five scheme options were investigated before developing a master plan for Pre Application submission.</p> <p>Throughout the design process, information has been collected from local residents through consultation and with HCRG and Adult Services. Soft consultation has been ongoing with local residents since 2022.</p> <p>Prior to submission, a Pre Planning Public Exhibition and Pre Planning Public Consultation took place, further details can be found at https://englishcombelanesupportedhousing.com/ and https://newsroom.bathnes.gov.uk/news/revised-plans-supported-housing-englishcombe-lane-site-go-public-view.</p> <p>A dedicated email address is also available for queries relating to the scheme.</p> |
| <p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p> | <p>The results from and details of the public consultation are included in the planning submission.</p> <p>Application Reference: 24/01168/REG03.</p> |
| <p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include</p> | <p>Further consultation will take place with HCRG colleagues and Adult Services.</p> <p>The public consultation for the Planning Application is live until the end of May 2024.</p> |

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| equalities considerations within this? | |
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3. Assessment of impact: 'Equality analysis'

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:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

| Key questions | Examples of what the service has done to promote equality | Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this |
|---|--|---|
| 3.1 Issues relating to all groups and protected characteristics | The service realises the aspirations of people with a learning disability and/or autism to live as independently as possible in their own homes but with care and support as needed. This will have a positive impact on equality. | |
| 3.2 Sex – identify the impact/potential impact of the policy on women and men. | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.3 Pregnancy and maternity | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people | This project does not discriminate on the grounds of this protected characteristic. | |

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| <p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p> | <p>A clear interior circulation path is provided around a central storage space in each property, which creates a circulation path for residents to move around.</p> <p>All entrance doors will be designed to meet the requirements of Part M.</p> <p>Transitional lighting will be provided between the exterior and interior of the units.</p> <p>All areas accessible to residents would be provided on a single level, with step-free access.</p> <p>All rooms accessible to residents are designed to be compliant with the spacial requirements of Building Regulations Part M4(3). All other rooms are designed to be at least compliant with the requirements of Part M4(2).</p> <p>Wheelchair transfer space will be provided next to every entrance.</p> <p>All internal doors will have a 300mm clear space on the pull side, to the side of the leading edge of the doors.</p> | |
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| | <p>The clear opening widths of doors will be a minimum of 800 mm wide.</p> <p>The key aims for landscape design Have been informed by an inclusive and accessible design for neurodiversity and a legible access and movement strategy.</p> <p>This will have a positive impact on equality.</p> | |
| 3.6 Age – identify the impact/potential impact of the policy on different age groups | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.7 Race – identify the impact/potential impact on across different ethnic groups | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally? | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion. | This project does not discriminate on the grounds of this protected characteristic. | |
| 3.11 Socio-economically disadvantaged* – identify the impact on | This project does not discriminate on these grounds. | |

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| people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority). | | |
| 3.12 Rural communities* identify the impact / potential impact on people living in rural communities | This project does not discriminate on these grounds. | |
| 3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are 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). | This project does not discriminate on these grounds. | |

*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, the Armed Forces Bill (which came in on 22 Nov 2022) introduces 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 Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. 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 |
|-------------------|------------------|---------------------|---------------------|---------|
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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), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:

Mike Plumley

(Divisional Director or nominated senior officer)

Date: 03/07/24

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