

Notice of Meeting

Executive

Councillor Temperton (Chair),
Councillor Neil (Vice-Chair),
Councillors Bailey, Bidwell, Gillbe, Jefferies, Purnell and Wright

Tuesday 23 April 2024, 5.30 pm

Council Chamber - Time Square, Market Street, Bracknell, RG12

1JD



Agenda

*All councillors at this meeting have adopted the Mayor's Charter
which fosters constructive and respectful debate.*

Item	Description	Page
1.	Apologies	
2.	Declarations of Interest	
	<p>Members are asked to declare any Disclosable Pecuniary or Affected Interests in respect of any matter to be considered at this meeting.</p> <p>Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members interests the Monitoring Officer must be notified of the interest within 28 days.</p> <p>Any Member with an Affected Interest in a matter must disclose the interest to the meeting. There is no requirement to withdraw from the meeting when the interest is only an affected interest, but the Monitoring Officer should be notified of the interest, if not previously notified of it, within 28 days of the meeting.</p>	
3.	Minutes	3 - 24
	To consider and approve the minutes of the meeting of the Executive held on 19 March 2024.	
4.	Urgent Items of Business	
	Any other items which, pursuant to Section 100B(4)(b) of the Local Government Act 1972, the Chairman decides are urgent.	

Executive Key Decisions

The items listed below all relate to Key Executive decisions, unless stated otherwise below.

5.	Development of a New Housing Allocations Policy	25 - 124
	Proposed changes to the housing allocation policy were presented to Executive in November 2023, along with a draft of the new policy and the	

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	<p>rationale for the proposed changes. Executive gave its approval to launch a period of public consultation to enable residents, service providers and local organisations to give their views on the key proposals.</p> <p>This report provides the findings and responses to the public consultation on the proposed new housing allocation policy</p> <p>Reporting: Brian Daly, Head of Housing</p>	
6.	Household Support Fund and Financial Hardship Action Plan	125 - 138
	<p>To seek approval of the process to distribute additional grant funding received as part of the Household Support Fund. To update on the final outcomes of the Financial Hardship Action Plan.</p> <p>Reporting: Katie Flint, Policy and Performance Lead</p>	
7.	Biodiversity Action Plan 2024-2029 – Consultation Approval	139 - 204
	<p>To seek approval of the draft Bracknell Forest Biodiversity Action Plan (BAP) 2024-2029 as the basis for a 4-week public consultation</p> <p>Reporting: Andrew Hunter, Executive Director: Place</p>	
8.	Social Value Policy	205 - 220
	<p>The adoption of a Social Value Policy to be applied across all Council commissioning and procurement, in line with the Social Value Act</p> <p>Reporting: Alistair Little, Head of Corporate Procurement</p>	

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Published: 15 April 2024

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EXECUTIVE
19 MARCH 2024
5.30 - 6.21 PM

Present:

Councillors Temperton (Chair), Neil (Vice-Chair), Bailey, Bidwell, Gillbe, Jefferies, Purnell and Wright

72. **Minutes**

RESOLVED that the minutes of the meeting of the Executive on 6 February 2024 together with the accompanying decision records be confirmed as a correct record.

73. **Declarations of Interest**

There were no declarations of interest.

74. **Urgent Items of Business**

There were no Urgent Items of Business.

Executive Decisions and Decision Records

The Executive considered the following items. The decisions are recorded in the decision sheets attached to these minutes and summarised below:

75. **Adoption of the Bracknell Forest Local Plan**

That Executive **RECOMMENDS** to Council that it:

- i. Adopts the Bracknell Forest Local Plan incorporating the Main Modifications recommended by the Inspectors and non-material additional modifications (see Appendix A).
- ii. Agrees to make the alterations to the Policies Map (see Appendix B) that are necessary to give effect to the policies of the Bracknell Forest Local Plan, as modified.
- iii. Agrees that on adoption, the Bracknell Forest Local Plan will become part of the Development Plan for the Borough and that its policies will supersede all saved policies in the Bracknell Forest Borough Local Plan (adopted 2002), the Core Strategy (adopted 2008) and Policies CP1, SA11, SA12 and SA13 of the Site Allocations Local Plan (adopted 2013) for the purposes of decision making in Bracknell Forest.
- iv. Agrees that any other non-material additional modifications to the Bracknell Forest Local Plan, can be agreed by the Executive Director: Place Planning and Regeneration in consultation with the Executive Member for Planning and Transport, prior to final publication.

- v. Carries forward adopted Supplementary Planning Documents, as related to relevant policies in the Bracknell Forest Local Plan (see Appendix C).
76. **Approval to consult on the Town Centre Masterplans Supplementary Planning Documents (SPDs)**
RESOLVED that:
- i. A public consultation on the Bracknell Town Centre Masterplans SPD Consultation Draft (Appendix 1) and supporting documents is agreed, beginning on 8 April 2024 and ending on 20 May 2024 as set out in section 7 of this report.
 - ii. Authority be delegated to the Executive Director Place Planning and Regeneration in consultation with the Executive Member for Planning and Transport to agree any necessary minor amendments to the Bracknell Town Centre Masterplans SPD Consultation Draft, and supporting documents, prior publication for public consultation.
77. **Highways and Transport Capital Programme 2024/25**
RESOLVED that the Highways and Transport Capital Programme for 2024/25 is approved.
78. **Long-Acting Reversible Contraception Reprocurement**
RESOLVED that
- i. The procurement route for of provision of Long-Acting Reversible Contraception (LARC) service, and the Emergency Hormonal Contraception (EHC) Service is agreed.
 - ii. Bracknell Forest continues to host the contracting of LARC and EHC for the 3 local authorities across Berkshire East (Bracknell Forest, Slough and Royal Borough of Windsor and Maidenhead).
79. **Service plans 2024/25**
RESOLVED that
- i. the new service plan content for 2024-25 be endorsed, noting the actions committed to by each directorate to support the delivery of the Council Plan.
 - ii. the plans be published on the Council website in April and to monitor their delivery through the review of the Council Plan Overview Report.
80. **Council Plan Overview Report Q3**
RESOLVED that the performance of the council over the period from October to December 2023 highlighted in the Overview Report in Annex A is noted, this includes any recommendations made by Overview and Scrutiny in Annex B.
81. **SEND Written Statement of Action**

RESOLVED that the Executive notes the progress made on implementing the SEND WSOA to improve services to children and families and the feedback from the DfE and NHS England to the end of November 2023.

82. **Joint Venture Business Plan Review**

RESOLVED that

- i. the progress made by Bracknell Forest Cambium Partnership for the period December 2022 to December 2023 be noted.
- ii. the proposed JV Business Plan for the Bracknell Forest Cambium Partnership as set out in Annex A and the financial budget and forecast as set out in Confidential Annex B.

CHAIRMAN

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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I119510
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1. **TITLE:** Adoption of the Bracknell Forest Local Plan

2. **SERVICE AREA:** Place, Planning & Regeneration

3. **PURPOSE OF DECISION**

To seek a recommendation from Executive to Council to:

1) Adopt the Bracknell Forest Local Plan incorporating the Main Modifications recommended by the Inspectors and Additional Modifications

2) Agree to make the alterations to the adopted Policies Map that are necessary to give effect to the policies of the adopted Bracknell Forest Local Plan as modified.

3) Withdraw the saved policies in the Bracknell Forest Borough Local Plan (adopted 2002), policies in the Core Strategy (adopted 2008) and policies CP1, SA11, SA12 and SA13 of the Site Allocations Local Plan (adopted 2013).

4 **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

That Executive **RECOMMENDS** to Council that it:

- i. Adopts the Bracknell Forest Local Plan incorporating the Main Modifications recommended by the Inspectors and non-material additional modifications (see Appendix A).
- ii. Agrees to make the alterations to the Policies Map (see Appendix B) that are necessary to give effect to the policies of the Bracknell Forest Local Plan, as modified.
- iii. Agrees that on adoption, the Bracknell Forest Local Plan will become part of the Development Plan for the Borough and that its policies will supersede all saved policies in the Bracknell Forest Borough Local Plan (adopted 2002), the Core Strategy (adopted 2008) and Policies CP1, SA11, SA12 and SA13 of the Site Allocations Local Plan (adopted 2013) for the purposes of decision making in Bracknell Forest.
- iv. Agrees that any other non-material additional modifications to the Bracknell Forest Local Plan, can be agreed by the Executive Director: Place Planning and Regeneration in consultation with the Executive Member for Planning and Transport, prior to final publication.
- v. Carries forward adopted Supplementary Planning Documents, as related to relevant policies in the Bracknell Forest Local Plan (see Appendix C).

7. **REASON FOR DECISION**

It is important that the Council has an up to date and robust planning framework to guide development which reflects current national policy and guidance. The Bracknell Forest Local Plan contains a spatial strategy and policies for managing development that help meet the environmental, social and economic opportunities and challenges facing the area. It also helps achieve the aims of the Council Plan and is a key corporate document.

8. ALTERNATIVE OPTIONS CONSIDERED

The Bracknell Forest Local Plan can only be adopted with all of the Main Modifications recommended by the Inspectors. Not adopting the Bracknell Forest Local Plan would result in a waste of resources incurred in preparing the Plan and existing out of date local policies would remain in place. This could result in speculative planning applications and subsequent appeals which might lead to significant costs. It could also provoke intervention by the Secretary of State under Section 27 of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'). This can be applied if it is thought that a local planning authority is failing or omitting to do anything it is necessary to do in connection with the preparation, revision or adoption of a local plan. Such intervention by the Secretary of State has recently been undertaken in respect of West Berkshire and Mole Valley Councils' local plans.

9. **DOCUMENT CONSIDERED:** Report of the Executive Director: Place, Planning & Regeneration

10. DECLARED CONFLICTS OF INTEREST:

Date Decision Made	Final Day of Call-in Period
19 March 2024	26 March 2024

**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I115428
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1. **TITLE:** Approval to consult on the Town Centre Masterplans Supplementary Planning Documents (SPDs)

2. **SERVICE AREA:** Place, Planning & Regeneration

3. **PURPOSE OF DECISION**

To agree to consult upon town centre masterplans to guide development at the Southern Gateway and the Eastern Gateway in line with the emerging Local Plan.

4 **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that:

- i. A public consultation on the Bracknell Town Centre Masterplans SPD Consultation Draft (Appendix 1) and supporting documents is agreed, beginning on 8 April 2024 and ending on 20 May 2024 as set out in section 7 of this report.
- ii. Authority be delegated to the Executive Director Place Planning and Regeneration in consultation with the Executive Member for Planning and Transport to agree any necessary minor amendments to the Bracknell Town Centre Masterplans SPD Consultation Draft, and supporting documents, prior publication for public consultation.

7. **REASON FOR DECISION**

- i. The emerging BFLP contains site-specific strategic policies that allocate the Eastern Gateway (Policy LP 9) and Southern Gateway (Policy LP10) sites for comprehensive well-designed mixed-use development.
- ii. The sites are Council-owned, sustainably located and form key gateways into the town centre, and their development will make an important contribution to the town centre's continued regeneration.
- iii. The Council has committed to ensuring that development is plan-led, that achieves a high standard of design that positively contributes to placemaking. Policy LP28 – 'Design principles' in the emerging Local Plan states that for larger, complex and more sensitive developments to be delivered in a structured and coherent way, a masterplan and design code would be required to be produced and agreed with the Council to establish an overall vision and strategy for a development as a whole. The policy specifically requires these of the Eastern Gateway and Southern Gateway sites. Further to this, both policies LP9 and LP10 make specific reference to a forthcoming 'Bracknell Town Centre Masterplans' SPD. This SPD provides the Masterplan element, and a design code would be required to submitted as part of

subsequent planning applications for these sites.

- iv. The High Street Car Park has recently been closed and, for structural reasons, can no longer function as a car park; the site will therefore require redevelopment. This site is not specifically allocated in Local Plan policy but falls within the town centre area on the Local Plan Policies Map. Guidance for this site is included in the SPD given its proximity and significance as a natural continuation of the Southern Gateway development. It also provides an opportunity for a key connection between the town centre to the east, and Market Street and Peel Centre to the west.
- v. Given that the emerging Local Plan is anticipated to be soon adopted as part of the Council's development plan, it is important for the masterplans to be progressed ready for the submission of planning applications on these sites.
- vi. A statutory stage in the production of an SPD is public consultation on a draft document. Therefore, an effective consultation on the Bracknell Town Centre Masterplans SPD will ensure it can be adopted and become a material consideration in determining planning applications affecting the sites. The SPD will allow the comprehensive masterplanning of the site through the planning application process.
- vii. The preparation of the SPD contributes towards the Council Plan (2023-2027) priority for a 'Thriving and connected economy' to ensure that 'Bracknell town centre continues to thrive and be a destination of choice'. This is to be measured by increasing visits and the development of new homes within the town centre.

8. ALTERNATIVE OPTIONS CONSIDERED

- i. Production of the SPD could be delayed, however this would result in a lack of guidance to support emerging Local Plan policies LP9 and LP10, and to guide the beneficial redevelopment of the High Street Car Park site. Given that a masterplan is required to be agreed with the Council prior to the submission of any planning applications for the gateway sites (Policy LP28), delay to SPD adoption would also have knock-on delays for the development of these strategically important sites.
- ii. The Council could opt not to take a lead on the production of masterplans for these sites, and instead leave this for future developers to undertake. This approach would put the Council in a weaker, more reactive position to control development on these sites.
- iii. The absence of an adopted up to date SPD would make the Development Management process more difficult to implement if planning applications are received, potentially leading to uncoordinated, piecemeal development. This is a particular concern for these strategically important sites that are key components of the continued regeneration of Bracknell town centre. Production of the SPD will assist potential developers by providing clarity on the Council's expectations and requirements for the sites.

9. **DOCUMENT CONSIDERED:** Report of the Executive Director: Place, Planning & Regeneration

10. **DECLARED CONFLICTS OF INTEREST:** None

Date Decision Made	Final Day of Call-in Period
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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I119555
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1. **TITLE:** Highways and Transport Capital Programme 2024/25

2. **SERVICE AREA:** Place, Planning & Regeneration

3. **PURPOSE OF DECISION**

To approve the Highways and Transport Capital Programme for 2024/25 and its implementation as set out within the report.

4. **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that the Highways and Transport Capital Programme for 2024/25 is approved.

7. **REASON FOR DECISION**

The proposals seek to facilitate transport in line with the council's Local Transport Plan 3 (LTP3) and ensure that the highway is maintained in as good a condition as resources allow, having due regard to the council's intervention policy based on network condition

8. **ALTERNATIVE OPTIONS CONSIDERED**

- i. Failure to approve the Highways and Transport Capital Programme would prevent the delivery of the council's obligations as a Highway Authority and be contrary to the position set out in the council's adopted Transport Policy (LPT3).
- ii. Given the demands placed upon highway maintenance funding levels in previous years, it would not be appropriate to allocate resources to anything other than the priorities identified through methodical and objective needs assessments.

9. **DOCUMENT CONSIDERED:** Report of the Executive Director: Place, Planning & Regeneration

10. **DECLARED CONFLICTS OF INTEREST:** None

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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I119618
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1. **TITLE:** Long-Acting Reversible Contraception Reprourement

2. **SERVICE AREA:** Place, Planning & Regeneration

3. **PURPOSE OF DECISION**

Long-Acting Reversible Contraception Reprourement - to be undertaken through the Provider Selection Regime - BFC to act as Host for RBWM & SBC

4 **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that

- i. The procurement route for of provision of Long-Acting Reversible Contraception (LARC) service, and the Emergency Hormonal Contraception (EHC) Service is agreed.
- ii. Bracknell Forest continues to host the contracting of LARC and EHC for the 3 local authorities across Berkshire East (Bracknell Forest, Slough and Royal Borough of Windsor and Maidenhead).

7. **REASON FOR DECISION**

- i. Local authorities commission LARC and EHC services as part of their responsibility for commissioning sexual health services (part of the public health grant functions). LARC includes the fitting and removal of Intra-uterine devices and systems and the EHC service is targeted to women aged 15-24 to ensure provision of a sexual health consultation alongside the provision of emergency contraception. The cost of the services are free to the patients.
- ii. These services are offered in addition to the specialist integrated sexual health service provision to increase patient choice in the settings through which patients can access contraception. GPs are the main provider outside of specialist sexual health settings to provide LARC and pharmacies are the main provider commissioned to provide an EHC service. This is because of the staffing and facilities needed to provide these services. These services are intricately linked to the provision in the specialist setting because insufficient provision in either service area could impact patient flows into the specialist setting.
- iii. Bracknell Forest Council is the commissioning authority for the specialist sexual health service, and it has been agreed by the Chief Executives of Bracknell Forest Council, Slough Borough Council and the Royal Borough of Windsor and Maidenhead that the current public health shared team functions for leadership,

commissioning and contract management of this service area remains in Bracknell Forest. It is on this basis that the Royal Borough of Windsor and Maidenhead and Slough Borough Council have agreed to continue the arrangement with Bracknell Forest Council hosting if Bracknell Forest are willing. This is advantageous all round as the EHC and LARC service provision impacts the flow of patients requiring the specialist service, so having oversight across supports governance and oversight of this service area.

- iv. Local authorities are one of the relevant authorities (RA) required to follow PSR when procuring health care services, irrespective of whether the providers are from the NHS, independent or the voluntary sector. PSR replaced Public Contracts Regulations 2015 when arranging health care services. Services within scope include sexual health services arranged by local authorities.
- v. While the LARC and EHC primary care services (meaning in primary care settings) have previously been commissioned with primary care providers, the provision through PSR will mean that any provider that meet the requirements can request a Contract (i.e., including both private and community sector providers). Current providers will be notified to register their Expression of Interest on the portal. A Prior Indication Noticed (PIN) will be issued to the marketplace to notify all potential providers of the opportunity.
- vi. The opportunity will be advertised on the following websites:-
 - 3.6.1. Find A Tender
 - 3.6.2. Contracts Finder
 - 3.6.3. South East Business Portal
- vii. The provisions of the Transfer of Undertakings (Protection of Employment) Regulations will not apply on expiry of the current contractual arrangements

8. ALTERNATIVE OPTIONS CONSIDERED

To not complete and leave Berkshire East without a LARC provision is not an option as providing access to contraception is part of the prescribed functions of the local authority grant. Providing access to EHC for women aged 13-24 is important to reduce the risk of teenage pregnancy and encourage adoption of contraception to reduce the risk of unplanned pregnancy

9. **DOCUMENT CONSIDERED:** Report of the Executive Director: Place, Planning & Regeneration

10. **DECLARED CONFLICTS OF INTEREST:** None

Date Decision Made	Final Day of Call-in Period
19 March 2024	26 March 2024

**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I116282
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1. **TITLE:** Service plans 2024/25
2. **SERVICE AREA:** Chief Executive's Office
3. **PURPOSE OF DECISION**

To present the directorate service plans for 2024-25, setting out key activity to deliver the council's strategic aims.

4. **IS KEY DECISION** Yes
5. **DECISION MADE BY:** Executive
6. **DECISION:**

RESOLVED that

- i. the new service plan content for 2024-25 be endorsed, noting the actions committed to by each directorate to support the delivery of the Council Plan.
- ii. the plans be published on the Council website in April and to monitor their delivery through the review of the Council Plan Overview Report.

7. **REASON FOR DECISION**

Departmental Service Plans describe how directorates are working towards the delivery of the Council Plan and form a key part of the council's overall local performance framework. It demonstrates the work of services in delivering the objectives set out in the Council Plan and provides the basis for the quarterly service reports and the council plan overview report.

8. **ALTERNATIVE OPTIONS CONSIDERED**

Amendments have been made as part of the development process and have contributed to the final completion of the plans.

9. **DOCUMENT CONSIDERED:** Report of the Chief Executive
10. **DECLARED CONFLICTS OF INTEREST:** None

Date Decision Made	Final Day of Call-in Period
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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I117044
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1. **TITLE:** Council Plan Overview Report Q3

2. **SERVICE AREA:** Chief Executive's Office

3. **PURPOSE OF DECISION**

To report on the progress of the council in delivering the commitments within the Council Plan from October to December. This includes performance information and highlights.

4. **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that the performance of the council over the period from October to December 2023 highlighted in the Overview Report in Annex A is noted, this includes any recommendations made by Overview and Scrutiny in Annex B.

7. **REASON FOR DECISION**

To brief the Executive on the council's performance, highlighting key areas, so that appropriate action can be taken if needed.

8. **ALTERNATIVE OPTIONS CONSIDERED**

None applicable.

9. **DOCUMENT CONSIDERED:** Report of the Chief Executive

10. **DECLARED CONFLICTS OF INTEREST:** None

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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I116886
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1. **TITLE:** SEND Written Statement of Action

2. **SERVICE AREA:** People

3. **PURPOSE OF DECISION**

To provide the Executive with an update on progress that has been made on delivery of the WSOA action plan since the last Executive report in September 2023.

4. **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that the Executive notes the progress made on implementing the SEND WSOA to improve services to children and families and the feedback from the DfE and NHS England to the end of November 2023.

7. **REASON FOR DECISION**

When the WSOA was produced it was agreed that the executive would have updates on progress made on implementation of the plan, following the DfE and NHS England reviews

8. **ALTERNATIVE OPTIONS CONSIDERED**

None

9. **DOCUMENT CONSIDERED:** Report of the Executive Director: People

10. **DECLARED CONFLICTS OF INTEREST:** None

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**Bracknell Forest Council
Record of Decision**

Work Programme Reference	I117755
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1. **TITLE:** Joint Venture Business Plan Review

2. **SERVICE AREA:** Resources

3. **PURPOSE OF DECISION**

To review progress made by Bracknell Forest Cambium Partnership 2023- 2024 and to agree the aims and strategy for the Joint Venture Business Plan for 2024-2027.

4. **IS KEY DECISION** Yes

5. **DECISION MADE BY:** Executive

6. **DECISION:**

RESOLVED that

- i. the progress made by Bracknell Forest Cambium Partnership for the period December 2022 to December 2023 be noted.
- ii. the proposed JV Business Plan for the Bracknell Forest Cambium Partnership as set out in Annex A and the financial budget and forecast as set out in Confidential Annex B.

7. **REASON FOR DECISION**

- i. The recommendations 2.1 and 2.2 support the fulfilment of Bracknell Forest Cambium Partnership's objectives and aligns with the legal agreements entered into by the partners, which require the agreed JV Business Plan to be formally reviewed each year.
- ii. The scope of the JV Business Plan has not changed materially since inception in 2020, although the Jubilee Gardens site is now be considered as part of a wider master planning of secondary sites, such as the Southern Gateway and Eastern Gateway Development area, The Southern Gateway also now includes High Street car park as Phase 1 of the Southern Gateway development. To note a separate report is being considered by Executive in March 2024 on the proposals for the Southern gateway and wider consultation. There is no obligation for the Council to enter into any exclusivity arrangements on additional sites and each site will be subject to Executive approval prior to any initial site development proposal (ISDP) being put to the Council for consideration.
- iii. The Executive has agreed the ISDP for the Depot site in October 2023 which will now be developed for planning submission and subsequently a Settled Site Development Plan will be put to Executive for approval prior to land being drawn down into the JV.
- iv. The Business Plan includes ambitions for the Southern Gateway which supports the

council in its vision for the Town centre. The key points are to blend build form and landscape, improve connectivity on foot; cycling and for public transport; supporting the town centre economy with new cultural activities; mixed use; green spaces and high-quality offices and homes.

8. ALTERNATIVE OPTIONS CONSIDERED

Members could choose not to endorse the Business Plan and instruct the Partnership to rework any parts that cause concern. However, as there are no proposed significant amendments to the Business Plan 2020-23 that have not previously been considered and endorsed by Members, it is felt that this would not be easily justified.

9. DOCUMENT CONSIDERED: Report of the Executive Director: Resources

10. DECLARED CONFLICTS OF INTEREST: Councillors Bidwell and Neil declared affected interests in relation to item 12 being the Council's representatives on the Board overseeing the joint venture and would leave the meeting for the duration of the item.

Date Decision Made	Final Day of Call-in Period
19 March 2024	26 March 2024

To: Executive

Date: 23 April 2024

Development of a New Housing Allocations Policy for Bracknell Forest Executive Director of People

1 Purpose of Report

1.1 Proposed changes to the housing allocation policy were presented to Executive in November 2023, along with a draft of the new policy and the rationale for the proposed changes. Executive gave its approval to launch a period of public consultation to enable residents, service providers and local organisations to give their views on the key proposals.

1.2 This report summarises the outcome of the consultation on the proposed changes, which are set out in more detail in the consultation report. Executive is asked to consider the consultation report and the recommendations in this report, and to approve the new housing allocation policy attached to this report.

2 Recommendations

2.1 Executive is asked to:

- (i) Consider the outcome of the consultation on proposed changes to the Council's Housing Allocation Policy.**
- (ii) Approve the proposed changes set out in this report and the new Housing Allocations Policy appended to this report**
- (iii) Delegate to the Executive Director of People, in consultation with the Executive Member for Adult Services, Health and Housing, the authority to make minor revisions to the Housing Allocation Policy, including changes required in future statutory guidance, as considered necessary to give effect to the operation of the Policy.**

3 Reasons for Recommendations

3.1 The current housing allocation policy is over seven years old. A new policy is required to take account of legislative changes, to support the Council's homelessness and housing strategies, and to address shortfalls in housing supply against demand in Bracknell Forest.

3.2 A report was presented to Executive in November 2023 setting out the proposed changes to the current housing allocation policy. At that meeting Executive gave approval to commence consultation with a wide range of stakeholders to obtain their comments and feedback on the proposals.

3.3 This report summarises the consultation responses for each of the main proposed changes. These are set out in more detail in the attached consultation report. The proposed new housing allocation policy, which incorporates the changes, is also appended to this report. Its approval by Executive will enable the policy to be adopted as Council policy.

4 Alternative Options Considered

- 4.1 The current policy is out of date and no longer reflects the housing needs of the residents of Bracknell Forest and those seeking housing assistance in the borough and so the option of doing nothing has not been considered.

5 Supporting Information

Background

- 5.1 All housing authorities are required to have an allocation scheme for determining priorities and for defining the procedures to be followed in allocating housing accommodation. The council's current housing allocation policy was drafted in 2016 with a minor update in 2021.
- 5.2 The housing service is committed to developing a new housing allocation policy to effectively manage the housing needs of the local area. Given the limited stock of social housing available for allocation, it is important to ensure that the policy prioritises those in greatest housing need.
- 5.3 The key objectives in revising the policy, as set out in the report to Executive in November 2023, were to:
- Manage demand and reduce waiting times for larger homes.
 - Support work to prevent and reduce homelessness.
 - Ensure the policy takes account of statutory guidance.
 - Recognise and give appropriate priority to key groups in housing need.
 - Reduce complexity and unfairness in the current policy.
- 5.4 Stakeholder consultation on changes to the housing allocation policy was undertaken between December 2023 and January 2024. It focused on seven proposed changes to the policy and included the following elements:
- An online survey which ran for 8 weeks between 4 December 2023 and 31 January 2024.
 - A number of consultation sessions held separately with Councillors, Registered Providers and the Bracknell Forest Homeless Forum (comprising a range of local voluntary and public sector agencies).
 - Meetings/presentations with internal & external stakeholders at their request.

Consultation outcomes

- 5.5 A total of 318 people completed the online survey. The vast majority were housing register applicants (76%) and local residents (19%). In addition, nearly 40 people attended the workshops held for councillors, voluntary and public organisations and housing providers.
- 5.6 A detailed consultation report has been produced which presents the responses to each of the seven main proposals, a summary of the comments made for each, and officers' responses to the points raised. The consultation report is appended to this report.

Recommendations

Proposal 1. Adoption of the bedroom standard

- 5.7 There was strong support for this proposal with 65% of survey respondents in agreement and broad support in the consultation sessions. It is recommended therefore that the proposal is adopted.

- 5.8 The policy wording will make clear that exceptions may apply in individual cases. It is not proposed to set out a list of standard exceptions as each household's circumstances will be different. Instead, the policy will consider individual cases where there are specific circumstances and make an assessment of the need for an extra bedroom based on the supporting evidence.
- 5.9 In response to other feedback, the policy will give a high priority to people wishing to downsize where they are occupying a larger property. Officers are working on a separate strategy to support under-occupying households to move.

Proposal 2. Non-dependent adult children

- 5.10 45% of respondents agreed with the proposal to exclude non-dependent adult children from assessments of need and 32% did not. The remainder were undecided. There was strong support for the proposal in the consultation sessions.
- 5.11 Some respondents were concerned that young people would be forced to move out of the family home. This is not the case. The proposal is that adult, non-dependent, children will no longer be included when assessing a household's need for a move to a larger property.
- 5.12 It is recommended that the proposal is adopted. This will ensure that the limited supply of larger homes available to let are prioritised for overcrowded households with dependent children, who have fewer options than those with older adult children.
- 5.13 The policy wording will consider household members over the age of 21 who have always lived as part of the household, and are not able to live independently. An additional bedroom requirement may be considered, subject to a formal assessment undertaken by a relevant professional.
- 5.14 The policy also allows non-dependent children in overcrowded households to make an application for rehousing in their own name. The waiting time for a one bedroom property is currently significantly shorter than for larger family homes which are in short supply. Outside of the housing register, the Council will continue to work with other providers to ensure that accommodation and support are available to young people and to provide advice on the Council's website.

Proposal 3. Reducing the residency requirement

- 5.15 A majority of respondents (55%) agreed with the proposal to reduce the residency requirement to qualify for the housing register from 4 years to 2 years. There was support for the proposal in the consultation sessions.
- 5.16 It is recommended that the proposal is adopted. The policy will include a list of exemptions from the proposed two-year residency requirement.
- 5.17 The proposed change will help to ensure that the Housing Allocations Policy works alongside the Homeless Reduction Act 2017. The Council is actively trying to prevent people from being made homeless so that they can get an offer of social housing. The potential increase in applications to the housing register resulting from the change is preferred if it helps to reduce homelessness applications.
- 5.18 This proposal is in line with Government guidance issued in 2013 which states that a reasonable period of residency would be at least two years. As noted in section 6 below, the Government is consulting on a social housing allocations and its recommendation is that a minimum two-year residency requirement is adopted by local authorities.
- 5.19 Existing applicants who meet the current four-year residency requirement and are already on the housing register will keep their effective date of registration. As

applicants in the same band are prioritised in date order, they will retain an advantage in bidding for properties over newer applicants.

- 5.20 With the change to a two-year residency requirement, all new applicants will still have to have an assessed housing need under the new policy and must be able to demonstrate and provide evidence of a connection to the area.

Proposal 4. Introduction of an income cap

- 5.21 There was strong support for the proposal to introduce an income cap, with 54% of respondents in agreement and remaining responses split between disagree (24%) and don't know (22%).
- 5.22 It is recommended that the proposed income caps are adopted at the levels proposed. Providing a range of caps based on property size is a fairer approach than using a single figure, as it recognises the increased costs for larger households needing a bigger property.
- 5.23 Whilst it is recognised that cost of living pressures affects many households, and that those with a relatively high income may be constrained in their ability to afford private accommodation, it is considered right to prioritise those on lower incomes with the least housing options.
- 5.24 The proposed income caps have been set at a level that is 4 times the relevant local housing allowance for the household size (i.e. the maximum amount of housing benefit or Universal Credit housing costs that a household would receive). It is considered that in most cases a household on this income could access housing in the private sector.
- 5.25 The policy allows for exceptions to be considered on a case by case basis, where there are specific circumstances indicating that a household cannot afford market accommodation.
- 5.26 The policy wording will make clear what income is counted, including earnings and benefits, and which financial resources are excluded, and how the caps will be increased over time in line with inflation.

Proposal 5. Ending additional priority for working households

- 5.27 The survey results showed that 38% of respondents agreed with the proposal to remove the additional priority given to working households above non-working households, compared to 44% that disagreed. In the consultation sessions there was broad support for the proposal.
- 5.28 The survey responses suggest that there was some confusion about the proposed change as many of those objecting thought it would result in working households losing their existing priority, based on their assessed housing need. In fact, it is proposed only to end the additional priority that is currently given to working households, which gives them an advantage over non-working households in bidding for properties.
- 5.29 An important consideration here is that case law exists which suggests that policies giving an additional advantage to working households above non-working households with a similar level of assessed need may breach equalities legislation. This is likely to be the case if they disadvantage protected groups, including people with a disability, women unable to work due to childcare responsibilities and older people no longer or unable to work.
- 5.30 For these reasons, a recommendation to remove the additional priority given to working households is proposed.

Proposal 6. Removal of cumulative preference

- 5.31 41% of survey respondents agreed with the proposal to end the cumulative preference rule which gives additional priority to those with 3 or more band reasons and 24% disagreed. The high number of 'don't know' responses (36%) is indicative of the complexity of this policy which is not well understood. This was also evident in the consultation sessions.
- 5.32 It is recommended that the proposal to end cumulative preference is adopted. This will remove complexity and simplify the policy through a single assessment of need.
- 5.33 Complex needs and circumstances will be fully evaluated under the new policy, without the need for the current cumulative preference rule. A composite assessment of each household's housing situation will take place and multiple needs will be considered as part of this. This will result in a single decision to award a particular band, rather than allowing separate categories of need to be added together to potentially lift a household into a higher band.

Proposal 7. Removal of additional priority after 6 years

- 5.34 Survey respondents were split almost evenly between those that agreed (41%) and those that disagreed (43%) with the proposal to end the additional priority awarded after six years, with 16% replying 'don't know'. There was qualified support for the proposal in the consultation sessions subject to clarification on some points.
- 5.35 There was a common misunderstanding of the proposal as many thought that it would mean applicants losing their existing priority after six years. This is not the case and households will continue to have the same level of priority and occupy the same band after six years.
- 5.36 One of the key aims of the proposal is to simplify the policy so that an applicant's band and waiting time are the sole factors in determining need, without applying additional criteria or policies to alter this.
- 5.37 The current policy, which gives an automatic additional priority to households after six years on the housing register, mainly benefits households with a low housing need. They are moved into a higher band, alongside those with a higher assessed need, which can increase waiting times for households already in that band.
- 5.38 For these reasons, a recommendation to remove the additional priority given after six years is proposed.

Other changes to the policy

- 5.39 In addition to the above recommendations, a number of other changes to the policy were set out in the report to Executive in November 2023 including:
- Ensuring that particular groups are recognised and given appropriate priority in the banding system, including care leavers, armed forces personnel and their families, foster carers and those needing to move from supported and safe accommodation.
 - Ensuring that households seeking to downsize from large family social or affordable rented homes receive a high priority for rehousing.
 - Giving high priority to families with dependent children living in the most overcrowded homes who cannot resolve their housing need in other ways.
 - Introducing an additional 5th band to allow the Council to comply with the statutory code of guidance by allowing those in a 'reasonable preference' group, whose actions may have disqualified them from the housing register, to remain on the housing register.

- 5.40 These changes have been included in the new housing allocation policy attached to this report.

Implementation of the policy

- 5.41 Subject to approval, work on implementing the new policy will commence from May 2024 onwards. This will involve updating the IT housing management system to incorporate the changes and re-assessing all applicants under the new policy.
- 5.42 Existing applicants will be contacted prior to the new policy being implemented, asking them to reapply using their existing application number (if possible) within a 2 month window. This process will not affect the advertising and letting of properties on a weekly basis via the Council's choice-based lettings scheme, BFC Mychoice.
- 5.43 New applications received during this window will not be processed at the time, as the reassessment of current applicants will be prioritised. However, new applicants will not suffer any detriment as they will retain their date of application. Exceptions can be made for urgent, exceptional cases where required.
- 5.44 Officers estimate approximately 300 existing applicants will either no longer qualify for rehousing or will have reduced priority as a result of the policy change. An equalities impact assessment has been undertaken to consider the impact of the proposed changes.

Government Consultation on Proposed Changes to Statutory Guidance

- 5.45 On the 30 January 2024, the Government launched a consultation on proposed changes to statutory guidance for housing allocation schemes [Consultation on reforms to social housing allocations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/consultation-on-reforms-to-social-housing-allocations). This was one day prior to Bracknell Forest Council's public consultation due to end.
- 5.46 The Government's intention is to provide greater consistency across the country by mandating new national qualification criteria and policies. They include a local connection period of at least two years and a fixed income threshold. These are currently matters for each local authority to decide on and are areas that have been consulted on and included within the proposed changes to the Housing Allocation Policy. Although our proposals in these areas are broadly aligned to the Government's proposals, the Council will be required to adopt new national eligibility policies if introduced.
- 5.47 Other areas on which the Government is consulting are new qualification and eligibility requirements for applicants, including a UK connection, anti-social behaviour, and terrorism test. Also proposed are new provisions to deal with applicants that have engaged in repeated anti-social behaviour (a three strikes and you're out policy), terrorist activity and fraudulent declarations. As above, if the Government's proposals in these areas are adopted, the Council will be required to include these within its own policy.

6 Consultation and Other Considerations

Legal Advice

- 6.1 Government guidance [Allocation of accommodation: guidance for local authorities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/allocation-of-accommodation-guidance-for-local-authorities) states that all Housing authorities must have an allocation scheme for determining priorities, and for defining the procedures to be followed in allocating housing accommodation; and they must allocate in accordance with that scheme.

- 6.2 When an alteration is made to a scheme reflecting a major change of policy, an authority must ensure within a reasonable time that those likely to be affected by the change have the effect brought to their attention, taking such steps as the housing authority considers reasonable.
- 6.3 Before adopting an allocation scheme, or altering a scheme to reflect a major change of policy, authorities must:
- send a copy of the draft scheme, or proposed alteration, to every private registered provider with which they have nomination arrangements, and
 - ensure they have a reasonable opportunity to comment on the proposals.

Financial Advice

- 6.4 The main financial impact associated with the introduction of a new housing allocations policy is the cost of making changes to the housing needs IT system. This is provided through a contract with Abritas and the cost of the change has been set at £15,000 and was agreed in the Budget report in January

Other Consultation Responses

- 6.5 As detailed in the report, detailed public consultation has been undertaken with stakeholders, partners, councillors, key service areas within the Council, applicants, and residents.

Equalities Impact Assessment

- 6.6 In developing the new Allocations Policy, the council must have due regard for advancing equality and assess the impact of the proposed policies on groups included within the protected characteristics set out in the Public Sector Equality Duty. An initial equalities impact assessment has been undertaken to assess the impact on groups with protected characteristics, including race, disability, age, gender and so on.
- 6.7 It is recognised that some of the proposals, such as the adoption of the bedroom standard and exclusion of non-dependent household members from housing applications, are likely to impact more on certain groups, including those with a protected characteristic, as these groups are over-represented among households on the housing register. However, it is considered that the proposals are justified as they will ensure that overcrowded households with dependent children who are most likely to suffer negative impacts on their health, welfare and education, will be prioritised for rehousing. There are mitigations included in the policy to take account of the circumstances of some households, e.g. where there is a disabled member or care needs.
- 6.8 One of the proposed changes to the policy to end the additional priority given to working households above non-working households, will have a positive impact on groups such as disabled people, people with caring responsibilities and people unable to work policy and will ensure that equality objectives are supported.

Strategic Risk Management Issues

- 6.9 Managing the number of homeless households placed in temporary accommodation is an ongoing risk for the Council. The new policy will retain the ability to make direct lets to homeless households to alleviate pressures in temporary accommodation, where necessary.

Climate Change Implications

- 6.10 The recommendations in Section 2 above are not expected to have any impact on emissions of CO₂.

Health & Wellbeing Considerations

- 6.11 Access to good quality housing is recognised to be one of the key protective factors in maintaining health and well-being. The Housing Allocation Policy will support the Health and Wellbeing Strategy, by increasing rehousing opportunities for overcrowded households living in unsatisfactory conditions, which negatively impact on the health, welfare and education impacts of such families, and supporting more vulnerable households, including young people and those with poorer health, including mental health, to access suitable independent accommodation.

Background Papers

Draft Housing Allocation Policy
Equalities Impact Assessment
Consultation Report

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Bracknell Forest Housing Allocation Policy

April 2024



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Draft

Section 1. Introduction to Bracknell Forest Council My Choice. (BFCMyChoice)

1.1 Introduction.

Section s166A(1) of the Housing Act 1996 requires that every local housing authority in England publishes an allocation scheme for determining priorities (and the procedure to be followed) in allocating social and affordable housing accommodation.

The Bracknell Forest Housing Allocation Policy describes how social housing is allocated through Bracknell Forest Council's My Choice (referred to as 'MyChoice' throughout this document). The Policy describes how the scheme operates, how to apply to our housing register, how we manage the register, who qualifies for social housing, your choice about where you wish to live, how we assess applications and how we allocate properties in a fair and transparent manner.

Bracknell Forest Council does not have its own housing stock and therefore works closely with Registered Providers (Housing Associations). The allocations scheme applies to properties in Bracknell Forest whereby Bracknell Forest Council has the right to nominate applicants to become a tenant of a Housing Association. The scheme prioritises those people most in need of social housing and is also open to existing social housing tenants who have an identified housing need to transfer to a different property.

The provisions of this Housing Allocation Policy will apply to all new applicants to the Council's Housing Register after the effective date for the implementation of this Policy. They will also apply to all existing applicants on the Council's Housing Register at the time of the effective date of this Policy. Any prior Allocation Policy published by this authority will no longer be valid.

A summary of the Housing Allocation Scheme is published and is available free of charge to any person who requires a copy. This document is the full version of the Allocations Scheme and is available for inspection at Bracknell Forest Borough Council Office, Time Square, Market St, Bracknell RG12 1JD. It can also be viewed on or downloaded from the website www.BFCMyChoice.gov.uk

1.2 The key aims and objectives for the Policy are:

- To ensure that social rented housing in the borough is let to those in greatest need and manage expectations about the availability of housing stock.
- To provide applicants with sufficient information to enable them to make informed choices.
- To support the best use of the social housing stock in Bracknell Forest.
- To ensure that vulnerable applicants are supported.
- To assist the Council in the prevention of homelessness and minimise the need for temporary accommodation.
- To ensure that for properties that have been adapted for people with disabilities, preference is given to households needing those adaptations.

In formulating this policy, the Council has also given consideration to the following key requirements for an allocations scheme:

- The scheme must meet the legal requirements placed on Bracknell Forest Council, namely, to give appropriate priority to applicants who fall within the Housing Act 1996 Part VI “reasonable preference” categories.
- The scheme should contribute to creating balanced and sustainable communities by offering choice to people about where they live.
- The scheme should be simple to understand, use and to make the process of nominating to Housing Associations as open and transparent as possible.

This policy does not cover offers of licences, non-secure, or assured shorthold tenancies granted to homeless households in pursuance of any member of the Council’s homelessness duties under Part 7 of the 1996 Act. This policy does not cover offers of tenancies excluded from an allocation scheme by virtue of S.159 (4A) and s.160 of the 1996 Act.

1.3 Legal context.

This is the Bracknell Forest Council Housing Allocation Policy as required by Part 6 of the Housing Act 1996.

In developing this policy, the Council has followed and fully considered the following housing legislation, regulations, statutory guidance, and strategies:

- The Housing Act 1996, Part 6 as amended by Localism Act 2011 (England)
- The Housing Act 1996, Part 7 as amended by the Homelessness Reduction Act 2017.
- The Allocation of Accommodation: Guidance for Local housing Authorities in England (2012, DCLG) “the Code”.
- Providing social housing for local people: Statutory guidance on social housing allocations for local authorities in England (DCLG, December 2013) “Supplementary Code”.
- Improving access to social housing for members of the armed forces: Statutory guidance issued by MHCLG June 2020.
- Allocation of Housing (Procedure) Regulations 1997, SI 1997/483.
- Allocation of Housing (England) Regulations 2002, SI 2002/3264.
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294, and all subsequent amendments.
- Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012, SI 2012/1869.
- Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012, SI 2012/2989.
- The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015.
- The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)’
- Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) Regulations 2020:

- Right to Move guidance (DCLG, 2015)
- Social Housing for Victims of Domestic Abuse in Refuges or other Types of Temporary Accommodation, guidance (MHCLG, 2018)
- Homelessness code of guidance for local authorities (MHCLG, 2018)

In framing the allocations scheme regard has also been given to the Council's Homelessness Strategy 2021-2026, Tenancy Strategy 2013, Bracknell Forest's Housing Strategy 2023-2028, as well as the Equality Act 2010 and Care Act 2014.

The Council has considered the need to safeguard and promote the welfare of children, in accordance with the Children Act 2004, Section 11. This procedure and administration will accord with the objectives and actions set out in the Council's joint working protocols agreed by Housing and Children Services.

1.4 Reasonable Preference.

Bracknell Forest Council determines the priority that is applied to each application to the Housing Register. Where applicants meet the eligibility criteria and are also qualifying persons, they will be placed in the appropriate band based on an assessment of their housing need. This will ensure that the Council makes a nomination to a Housing Association to those in the highest need to meet our legal obligations.

The law sets out five groups of applicants to whom the Housing Allocations Policy must give reasonable preference:

- People who are homeless (within the meaning of part 7 of the Housing Act 1996, as amended by the Homelessness Act 2002) and have been assessed by the Council as being owed a homelessness duty.
- People who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under section 192 (3).
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- People who need to move on medical or welfare grounds, including grounds relating to a disability.
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others)

1.5 Statement of Choice.

The demand for social and affordable housing in the Bracknell Forest Council area is high and far outstrips the supply that is available. We will balance providing choice and housing need to ensure that housing is offered in a way that helps best manage the housing stock whilst prioritising those with the greatest need of housing. This means that for many households, the chances of being offered a property by the Council are extremely low and other housing options may be more suitable.

Available properties will be advertised online at www.BFCMyChoice.org.uk. Property details will provide valuable information about the property to help applicants to make informed decisions about which accommodation they want to be considered for and where they wish to live. All nominations to Housing Associations will be made in accordance with the published Allocations scheme.

Whilst the aim of Bracknell Forest Council is to provide choice in the allocation of social and affordable housing in the Bracknell Forest Council area, there will be some situations where this will not be possible. In such cases, the home will be let as a direct offer, and not advertised in the scheme. The Council also recognises that there may be exceptional circumstances that are not covered by the Allocations Policy and in these cases the lead officer responsible for the Housing Service will have delegated authority to make decisions outside of the scheme as they consider appropriate. Any such decision will be fully documented.

1.5.1 Choice and Statutory Homeless Applicants.

All statutory homeless households as defined in the Housing Act 1996 Part VII who are owed a statutory duty by Bracknell Forest Council under section 188, 192, or 193 of the Act will be registered to bid at the point that the duty is accepted.

To discharge the Council's statutory duty to a homeless applicant Bracknell Forest Council will make one offer (known as a final offer). To be deemed as a final offer, the accommodation must be suitable and reasonable for the needs of the household.

1.5.2 Move-on from Supported Accommodation.

Bracknell Forest Council has protocols in place to assist applicants who are ready to move-on to independent accommodation. Those with move-on priority will receive one suitable and reasonable offer of accommodation to facilitate a move-on.

1.6 Housing Allocation Policy Contents and Information.

The allocation scheme requires that applicants participate in searching for housing. Our aim is to provide advice and assistance to ensure that no person is disadvantaged in the way that the scheme operates and to ensure that all applicants are informed about:

- How applicants can apply to the MyChoice scheme.
- Who is a qualifying person to register for MyChoice.
- Who is eligible to join MyChoice.
- How an applicant's assessment of housing need is made.
- How priorities are determined.
- What banding and size of property the applicant is eligible for
- How applications from statutory homeless households are assessed.
- How properties will be advertised.
- How successful applications are selected to be nominated to a Housing Association.
- How applicants can ask for a review of a decision made on their application
- How the policy will be monitored and reviewed.

- How the Council will comply with GDPR.
- What information and documentation are needed to verify their circumstances and when this information needs to be provided.
- The reasons for any suspensions or cancellations.

Where an applicant is assessed as being a non-qualifying person, the applicant will be given advice and information on other housing options open to them. An applicant has the right to request a review of decisions made on their application.

1.7 Equality Statement.

The Council is committed to ensuring that the Allocation Policy and the implementation of all associated guidance and procedures are non-discriminatory and that all applicants are able to access the service, especially taking account of any vulnerability or other specific needs, and also the needs of different groups protected by the Equality Act 2010; the Human Rights Act 1998; and for Children, Section 11 of the Children Act.

To identify the needs of our applicants the application contains specific questions relating to vulnerability, ethnic origin, sexual orientation, disability, and other relevant criteria. The information obtained will be used to monitor the impact of the policy on minority and specific needs groups and to evidence the need for amendments, as may be required.

Under the Equality Act 2010, and in particular section 149 of the Public Sector Equality Duty, Councils are required to give due regard to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not, when exercising a public function such as their legal Housing Allocation Policy.

The protected characteristics are:- age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

1.8 Policy Review and Monitoring.

The Council will monitor the outcomes of lettings and review the policy on an annual basis to ensure that it is meeting all legal requirements and that the aims and objectives set for the policy are being met. Monitoring will be used to ensure that:

- Those in the 'reasonable preference' categories are given priority for housing.
- The Policy complies with the Council's Equality Act duties.
- There is overall customer satisfaction with the scheme.

A copy of the Corporate Equality Policy, Putting People First can be accessed by the website at:

<https://www.bracknell-forest.gov.uk/council-and-democracy/strategies-plans-and-policies/strategy-and-policy-documents/community-learning-strategies-and-policies/equality-and-diversity>

The results of monitoring will be used to review this policy which may lead to minor amendments from time to time, for example when there are changes to relevant legislation. When this is necessary, changes will be authorised in accordance with the Council's corporate decision-making protocols.

Should any major amendments to the policy be needed in response to legislation or the annual review of lettings, these will only be made following consultation with all relevant stakeholders and fully ratified by the Council.

Section 2 Eligibility and Qualification Criteria

2.1 Who can join the Housing Register.

To register on MyChoice, an applicant must: -

- Qualify for the MyChoice scheme.
- Be eligible for an allocation of housing under Part 6 of the Housing Act 1996.
- Be aged 16 years or over and not on another household's application (upon allocation of a property an applicant aged 16 or 17 years of age will be required to have an adult who can hold a tenancy as a trustee until they are 18.)
- Where more than one eligible applicant wishes to have a shared application, they will become joint applicants. For a joint application, all applicants have to qualify and meet the conditions on eligibility. A joint application will not be accepted from a person from abroad who is deemed to be ineligible.
- Must be residing in the United Kingdom.

2.2 Eligibility for an allocation of housing

Under sections 160ZA (1), (2) and (4) of the Housing Act 1996 the Council cannot allocate a tenancy, or nominate a person for housing, if they are a person who is ineligible for an allocation of housing accommodation by virtue of being a person subject to immigration control, or a person from abroad, who is prescribed as ineligible for an allocation of housing if they are:

- A person subject to immigration control within the meaning of the Asylum and Immigration Act 1996 (unless he is of a class prescribed by regulations made by the Secretary of State).
- A person who falls within a class of persons from abroad who have been prescribed by the Secretary of State as being ineligible to be allocated housing accommodation by a local housing authority.
- A person who falls into any other class of person prescribed by the Secretary of State as not qualifying to be allocated housing accommodation by a local housing authority.

The key relevant regulations that apply to eligibility are:

- Regulations 3 and 4 Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294
- All subsequent amendments including 'The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)
- The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) Regulations 2020 (SI 2020/667) implemented from the 24 August 2020.

The above is not a complete list. The latest eligibility regulations can be found in Appendix 1.

2.3 Persons who Qualify for BFCMyChoice.

In addition to the Government's 'persons from abroad' rules setting out when a person is ineligible for an allocation of housing accommodation, the Localism Act 2011 and section 160ZA of the Housing Act 1996 Part VI provides local authorities with the power to determine for themselves what classes of persons are, or are not, persons qualifying to be allocated social housing in their areas.

The qualification rules for Bracknell Forest's MyChoice schemes are set out below.

2.3.1 Qualification rule 1: The requirement to have an assessed housing need as defined in Bands A – E.

Applicants who do not meet the housing need criteria for an award of Bands A-E will not be admitted to the Housing Register.

The exception to the requirement to have an assessed housing need will be applicants over the age of 55 who are only willing to consider sheltered housing and do not have the financial resources and have no assessed statutory housing need. The exemption applies to accommodation classified as sheltered housing only and does not apply to other units of older person housing.

2.3.2 Qualification rule 2: Local connection through living in Bracknell Forest for a minimum of 2 years prior to the date of application.

To establish a local connection to Bracknell Forest, a period of residency by the applicant, must be demonstrated.

To qualify for the Housing Register an applicant or joint applicant must have been voluntarily resident in Bracknell Forest for a period of at least two years preceding the application date.

Once registered an applicant must continue to meet the residency qualification. If the applicant no longer meets this condition, they will be removed from the register as they will no longer qualify for inclusion due to no longer being resident.

If an applicant has lived in Bracknell Forest for 2 continuous years in circumstances in which they have been placed into temporary accommodation in the borough by

another local authority, they will not qualify to join the Housing Register. The local authority that has placed the household into temporary accommodation in Bracknell Forest will retain the legal responsibility for helping the applicant to obtain long term settled housing.

For the purposes of determining local connection for residence, the Council will accept the following circumstances as demonstrating normal residence:

- Residency in a non-traditional dwelling, such as a mobile home that is placed on an official managed site, or an official pitch.
- People who are forced to sleep rough in Bracknell Forest if they meet the qualification for residency.

The exceptions to the 2 years residency qualification rule are:

- Where an applicant is homeless, and Bracknell Forest Council has accepted the main section 192(2) housing duty under the Housing Act 1996, and they are not intending to refer the applicant to another Council.
- Where the Council has placed an applicant into temporary accommodation outside of Bracknell Forest.
- Where the Council agrees that on the evidence provided there are significant and special circumstances requiring a move into Bracknell Forest. This will be decided on a case-by-case basis following a request from the applicant or from the information submitted on their housing register application. Examples would include but are not limited to:
 - i. Reasons of safety, i.e. when an applicant is fleeing domestic abuse or other forms of violence and it is not safe to return to an area where they have a local connection.
 - ii. The applicant is on a witness protection programme and the Council has agreed that there is an essential reason why they need to move to Bracknell.
 - iii. Where the Council agrees there is an exceptional need to live in Bracknell Forest to provide or receive essential support.
 - iv. Verified Rough Sleepers in Bracknell Forest who are actively working with the Council's Rough Sleeper Team.
 - v. Where an applicant has left or will shortly leave an institution such as a prison, a secure unit or hospital, a rehabilitation centre or refuge, that is not in Bracknell Forest and the applicant was normally resident in the Council's area for a minimum of two preceding years before they were accommodated in that institution.
 - vi. The Council will consider any application from a gypsy or traveler household where the applicant may not meet the continuous period of residence rule due to travelling during this period. The Council will consider the facts of each case when deciding whether the rule should be waived.
 - vii. Care Leavers below the age of 25 where the Council has an ongoing duty to them as a care leaver, having been looked after by Bracknell Forest's Children's Services under section 29 of the Children's Act 1989, and who has been accommodated

anywhere in the UK, will be treated as having a local connection. Care Leavers who have been placed in the borough by another local authority for a considerable period may also be considered.

- Applicants that satisfy the Allocation of Housing (Qualification Criteria for the Armed Forces) (England) Regulations 2012, These are:
 - i. Applicants who are serving members of the regular armed forces.
 - ii. Applicants who served in the regular armed forces with the 5 years immediately prior to their application.
 - iii. Members of the regular armed forces or reserve forces who suffer from a serious injury, illness or disability sustained as a result of their service.
 - iv. Applicants who are a bereaved spouse/civil partner of a former serving member of the regular armed forces and have recently ceased (or will soon cease) to be entitled to reside in services accommodation following the death of their spouse/civil partner.
 - v. The divorced or separated ex-spouse of a member of HM Armed Forces, who is currently serving or going through resettlement, will be exempt from a local connection criteria for a period of six months following the divorce or separation.
- Applicants who satisfy the right to move criteria.
- Older persons households over the age of 55 who are seeking supported or sheltered housing for those aged 55+ without a direct local connection to Bracknell Forest who have a need to move to the borough due to welfare reasons and do not have the financial resources to resolve their housing needs.
- A person from outside of Bracknell Forest and fleeing domestic abuse who at the time of application is living in Bracknell Forest, or who is in a refuge or other similarly provided emergency accommodation and would be at risk in the area(s) where they do have a local connection.
- A person who does not meet the local connection criteria but is owed a prevention or relief duty by Bracknell Forest Council.
- Rough Sleepers who have been working with the Council for a minimum of six months.

For the purposes of determining a local connection through residency the following living arrangements will not be considered:

- Occupation of a mobile home, caravan, motor caravan, or houseboat which is not placed on a residential site; or
- Occupation of a holiday letting which includes a permanent building, hotel or bed and breakfast accommodation for the purposes of a holiday letting.
- Applicants placed in an institution, prison, hospital or in Bracknell Forest who otherwise have no local connection to the area.
- Applicants placed in temporary accommodation by another local housing authority.
- Residents in a bail hostel or other such accommodation

The above list is not exhaustive, and Bracknell Forest retains discretion to determine whether any individual applicants can establish a local connection or not based on each applicant's individual circumstances.

2.3.3 Qualification rule 3: Circumstances where an applicant has current or former social housing rent arrears or another relevant recoverable housing related debt and has reasonable preference.

For this purpose, a housing related debt is associated with either a current or former tenancy where this relates to any social housing provider in the UK. The definition of a housing debt will not include debts that are barred by statute. The debt will be considered statute barred where an applicant, or their representative, or someone else they held the account with, has not:

- Made a payment in the last 6 years.
- Written to the creditor acknowledging the debt in the last 6 years, defined as 6 years from the date the debt was last acknowledged and 6 years from the date rent arrears became due.
- Had a county court judgement (CCJ)

For the purposes of this qualification rule housing related debts include:

- Current or former tenancy rent arrears if a social housing tenancy.
- Outstanding re-chargeable repairs
- Current and former housing related service charge arrears
- Bed and breakfast or other temporary accommodation charge arrears for a licence or a tenancy
- Failing to adhere to the terms of an agreed payment plan in relation to rent arrears or housing debt for a social housing tenancy or temporary accommodation.
- Any court costs associated with any of the above debts.

Housing related debts apply to both the applicant and to any members of their household that are included in the application unless it was an act of omission in good faith and the applicant was unaware of the relevant facts.

If accepted on to the housing register, the applicant will be placed into band E until the housing related debt has been resolved. Once resolved the applicant's application will be re-assessed in line with the allocation scheme and the effective date will be taken from the date they moved into the banding.

Although accepted on to the Housing Register, the Housing Association will decide whether to accept the Council's nomination.

2.3.4 Qualification rule 4: Unacceptable behaviour.

The qualification rule for unacceptable behaviour will apply where an applicant, or any member of their current or prospective household, has behaved in an unacceptable way that, in the view of the Council, means that at the time of their application or during their application they are not considered as a qualifying person.

The Council will use its discretion to determine what unacceptable behaviour is, and cases will be considered on an individual basis. Based on the facts of the case the Council will decide whether:

- a) The applicant should not qualify to be included on the Housing Register due to their (or a household member's) serious unacceptable behaviour, or
- b) Will be allowed to qualify but will be placed into a band E until the applicant (or household member) has demonstrated to the satisfaction of the Council that their behaviour has changed.

The application will be placed into a band E until the unacceptable behaviour has been resolved. Once resolved the applicant's application will be re-assessed in line with the allocation scheme and the effective date will be taken from the date they moved into the new banding.

Examples of unacceptable behaviour could include, but are not limited to:

- Having been evicted for anti-social behaviour or rent arrears on a previous tenancy within the last 5 years.
- Being verbally or physically abusive towards a member of the Council's staff or other professionals.
- Being subject to a court order for any other breach of tenancy conditions
- Conviction for illegal or immoral purposes.
- Causing nuisance and annoyance to neighbours or visitors.
- Committing criminal offences in or near the home and still posing a threat to neighbours or the community.
- Being violent towards a partner or members of the family.
- Allowing the condition of their current property to deteriorate.
- Paying money illegally to obtain a tenancy.
- Unlawfully subletting their social housing tenancy.
- Applicants that have been convicted of housing fraud.
- Applicants that have been convicted of welfare benefit fraud where the conviction is unspent under the Rehabilitation Offenders Act 1974.
- Having unspent convictions where the assessment concludes that the applicant is unsuitable to be a tenant due to a significant risk to potential neighbours and/or communities.
- Being responsible for any racial harassment or other hate crime. Racial harassment and Hate Crimes are defined as racist, religiously aggravated, faith, gender, age, disability, and transphobic or homophobic or gender re-assignment harassment or hate crime. A hate crime or racist incident is defined as any incident which is perceived to be racist or hate crime related by the complainant or any other person.

The unacceptable behaviour disqualification rule will also apply to applicants currently on the register. An applicant's eligibility to remain on the Housing Register will be kept under review during their time on the register.

An applicant may be rendered non qualifying at any time during the process should the Council become satisfied that the rule relating to unacceptable behaviour should be applied to their case.

Any new application will normally only be reconsidered where it is made by the applicant directly, and where made, as a guideline, the Council will consider whether there has been any reasonable cause for complaint or concern against the applicant (or members of their prospective household) for a period of 12 months.

Where an applicant has resolved their behaviour to the satisfaction of the Council it may still be the case that the original Housing Association that dealt with the issue might decide that they do not want to consider rehousing their former tenant. However, this will not prevent an applicant from being considered for housing by another Housing Association.

2.3.5 Qualification rule 5: Financial resources

Social and affordable housing provided through MyChoice is for people who are considered to have insufficient resources to meet their own housing need by either renting privately or buying their own.

Applicants who are considered to have sufficient financial resources to buy or rent suitable accommodation in Bracknell Forest will not qualify for the Housing Register.

Households with a gross household income more than four times higher than the highest Local Housing Allowance level in Bracknell Forest at the point of application, or at the time of offer, are normally considered to be able to meet their housing need, through either renting privately or owner occupation.

The income thresholds per annum for households needing the following accommodation sizes in 2023/24 are:

1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
£38,272	£47,869	£61,031	£76,589

These figures will be renewed on an annual basis in line with DWP guidelines.

Information on Local Housing Allowance rates are also available at: <https://lha-direct.voa.gov.uk>

The capital, savings, and equity available to a household will also be assessed to determine whether a household can resolve their own housing need within the local housing market. A savings threshold of £16,000 will be counted towards income for applicants seeking general needs accommodation.

A combination of income and financial assets will be used for the purpose of a financial assessment.

When considering gross household income, both earnings and benefits are taken into account. However, the following types of income are fully disregarded:

- Attendance Allowance.
- Disability Living Allowance.
- Personal Independence.
- War pension.
- Savings, investments of any children.
- A lump sum payment received as compensation for an injury or disability, for example by members of the armed forces.

Although this qualification rule will mean that an applicant cannot join the Housing Register, it does not prevent them being considered for any low-cost home ownership schemes, such as rent to buy, shared ownership/equity, discounted market sale and starter homes or lower demand properties.

Information can be given on request regarding which Housing Associations or developers are currently operating any of the above schemes in Bracknell Forest and how applications can be made.

Applicants who do not qualify under the financial resource rules may be considered as an exception if:

- They are an existing social housing tenant within Bracknell Forest, and they are downsizing to smaller accommodation.
- They require sheltered housing accommodation where it has been identified that there is a medical or social need for this type of accommodation.
- They have a physical or mental health problem which would prevent the household finding suitable accommodation in the private rented sector.
- They require a specially adapted home that is either not available or affordable to buy or rent or is not eligible for or has been declined for a Disabled Facilities Grant.

Applicants will be asked to provide evidence of their income and financial assets. If this is not provided an application cannot be assessed and will not progress.

2.3.6 Qualification rule 6: Homeownership, or legal interest in homeownership

Owner-occupiers and applicants who own other residential property (freehold or leasehold) anywhere in the world will not normally qualify for inclusion on the Housing Register. Applicants who have previously owned a property and have sold it will be asked to provide proof of the sale, together with evidence of the proceeds received from the sale and what has become of them.

Applicants who own or part own accommodation, or who have a legal interest in home ownership (for example through marriage or civil partnership in accommodation owned by their spouse or civil partner) also may not qualify.

Unless it is proven that they are unable to meet their housing needs from their own resources and require an adapted property or supported housing, owner-occupiers will not qualify for inclusion on the Housing Register.

Owner-occupiers may qualify for inclusion on the Housing Register if they fall within one of the following groups:

- They are over 55 and have been assessed as being unable to meet their housing needs from their own resources.
- They have a disability and require an adapted property and their current property cannot be adapted through a disabled facilities grant, and they have been assessed as being unable to meet their housing needs from their own resources.
- Where someone is a homeowner and statutory homeless due to domestic violence, and whose property has not yet been sold, a decision will be made as to whether to treat this as an exemption based on the facts and circumstances of each case.
- They are experiencing financial hardship and are unable to sustain their accommodation and do not have the resources to resolve their housing by purchasing another property or privately renting.

In reaching a decision, the Council will take the following into account:

- the applicant's income, capital, and any equitable interest they hold in their existing home and any other property.
- a current valuation of the property.
- the expected equity after a proposed sale of the property.
- their ability to get a mortgage for the size and type of property they require.
- the applicant's current financial circumstances and commitments.
- the supply and affordability of private rented accommodation or other forms of accommodation suitable for the applicant's specific needs.

If relevant documentation is not provided the application cannot be assessed and will not progress further.

Consideration will also be given to the supply and affordability of private rented or other forms of accommodation suitable for the applicant's needs and an assessment made whether the applicant's housing need can reasonably be met in the private sector.

The Council will also take into consideration any previous disposal of assets which will include disposals for nil (transfer of ownership) or below the market rate value.

Applicants whom the Council decides cannot afford to buy a property on the open market or meet their housing need through other housing options will be given a band E to recognise that they have reasonable preference.

2.3.7 Qualification rule 7: Fraud or giving False Information

Applicants who are found to have withheld or given false information may be removed from the register and will not be able to reapply for a period of 12 months. Decisions to remove the person from the register will be made based on the seriousness of the false information given, or an assessment of why important information was withheld.

Section 171(1) of the Housing Act 1996 makes it an offence for anyone, in connection with the exercise by a local housing authority of their functions under Part VI of the Housing Act 1996 (and therefore in seeking an allocation of accommodation) to:

- Knowingly or recklessly make a materially false statement on their housing application or
- Knowingly withhold information that the Council reasonable required him/her to provide.

Where there is a suspicion or allocation that an applicant, or any person acting on behalf of the applicant has provided false information the application will be suspended whilst the application is investigated to establish whether possible false and misleading information has been provided.

Following an investigation, if it is established that the applicant, or any person acting on their behalf did not provide false information the application will be reinstated to the housing register.

Should the Council decide that false or misleading information has been provided, the Council will take legal action against the applicant. Should a person be found guilty by a Court, the person is liable on summary conviction to a fine at the date of this scheme document of up to £5,000.

In addition, making a fraudulent application for housing may also constitute a criminal offence under the Theft Act 1968 and/or the Fraud Act 2006.

Should anybody be found guilty of an offence Bracknell Forest Council will disqualify the person from registering on the Housing Register for a period of up to five years.

2.3.8 How exceptional circumstances will be considered for any of the qualification rules.

The Council retains the ability, in exceptional circumstances, to exercise its discretion when applying any of the qualification rules. It is for the applicant to request that discretion should be applied for exceptional circumstances and once requested this will be considered by a panel of senior operational managers from the Council. A request for a review of a decision that an applicant does not meet the qualification rule will be taken as a request for any exceptional circumstances to be considered. Any case given exceptional circumstances will have this fully documented on the housing database.

3. How the Housing Register works.

3.1 How to apply for the Housing Register.

People wishing to be considered to join the housing register must apply through the 'MyChoice' website: <https://www.bfcmychoice.org.uk>

On receipt of an application to the housing register, Bracknell Forest Council will consider whether the applicant/s are eligible and whether they qualify under the scheme.

Any applicant who needs help in completing their online application can contact the Housing Register and Allocations team on 01344 352045 or via email housing.register@bracknell-forest.gov.uk, where they will be guided through the process of making their application online.

An advocate (for example, family member, friend, or support agency) can complete the application form on behalf of a vulnerable person. The applicant's signature will always be required and permission to discuss the case with the advocate must be provided.

There is free access to the 'internet' at libraries, and at some community facilities. An office appointment can be made when an applicant has no access to the 'internet' or is unable to use the 'internet.'

Multiple applications to MyChoice are not allowed, and a person can be included on only one application.

3.2 Who can be included in the application.

3.2.1 Household members.

An applicant can only include in their application family members who are reasonably expected to reside with them and require rehousing with them. An applicant's household will normally comprise of the applicant or applicant and partner, along with any dependent children (if applicable) that are normally resident with the applicant.

In assessing the application, the Council will assess which persons reasonably require re-housing with the applicant. Any non-dependent adult over the age of 21 not in full time education may not be considered as part of the household as they are able to make an application in their own name.

Household members over the age of 21 who have always been living as one household will only be considered as part of the household if they are not able to live independently. In these cases, a formal assessment undertaken by a relevant professional will be required to support the request, at the time of application.

For the purpose, of assessing overcrowding, dependent children are expected to share rooms with other children in the same extended family regardless of whether they are siblings.

3.2.2 Carers.

If an applicant states that they need an extra room for a carer, the Council will carry out an assessment of the applicant's need and decide whether, or not, an extra room is required.

To qualify for an additional bedroom for a carer, the applicant must demonstrate that this care is provided by someone who would not otherwise live with the applicant, and if they are a relative or friend, they must be in receipt of Carers Allowance or Attendance allowance.

In addition, the Council's Adult Social Care service should be able to provide evidence that the applicant needs a live-in carer, and where such support is not currently provided, that the applicant would qualify for funding for a live-in carer.

Where the Council is satisfied that there is a need for a live-in carer who is not already co-habiting with another member of the household, the household will qualify for an additional bedroom.

3.2.3 Applicants with a medical or social need for a larger property.

In some circumstances, applicants may be able to apply for an extra bedroom due to their medical or social needs. In each case, the specific circumstances will be considered and evidence supporting the need for an extra bedroom will be required. In exceptional circumstances, an extra bedroom may be awarded where evidence is provided that a substantial amount of specialist equipment needs to be installed and this cannot be stored elsewhere.

If the household includes a disabled child who cannot share a bedroom with another child because of their disability, they may be considered for an additional bedroom. The following conditions must be met:

- The disabled child must be entitled to the middle or higher rate care component of Disability Living Allowance; and
- The local authority must be satisfied that the child's disability means they cannot share a bedroom with another child. Evidence will be required from secondary care health professionals (e.g., Child and Adolescent Mental Health Services or by a specialist consultant) to confirm this.

If an extra bedroom is awarded this is purely for MyChoice and would not affect any decision made by the DWP.

3.2.4 Approved Foster Carer/Adopter with insufficient bedrooms.

Households undertaking long-term fostering may be eligible to include foster children as part of their application to enable them to qualify for a property with sufficient bedrooms. Long term fostering is classed as fostering for a period in excess of three years. To be included as part of the application it is essential that written confirmation of the fostering arrangement is obtained from Children's Social Care at the time of submitting an application.

Short-term fostering arrangements will not normally be included under these arrangements. However, they may be considered on a case-by-case basis, by the Housing Panel, where there are exceptional circumstances that warrant the provision of an additional bedroom.

3.2.5 Separated Parents and dependent children.

Applicants who have a shared residency order or have staying access for children will not automatically be considered for a property size that includes their children as household members. The Council will apply the test in Section 189(1)(b) of Part 7 of the Housing Act 1996 to decide whether any child both lives with, and is dependent on, the applicant. Unless this test is passed an applicant will only be considered for the size of accommodation relevant to their circumstances.

The general principle is that a child needs one home of an adequate size. The Council will take into consideration the available supply of the type of accommodation requested, the demand from other households for that type of accommodation, and any under-occupation that may result where a child spends time with one parent and then another parent.

Decisions will be made on a case-by case basis and will be based on the local authority's decision as to which parent or guardian the child is dependent on in terms of their primary day-to-day care.

3.2.6 Split families.

Where a family is not currently residing together, but have previously lived together as a family unit, and there is a reasonable expectation that they should reside together, the family will be considered as a split family.

An assessment of need will be undertaken which will consider the current accommodation options available to the family and determine which accommodation option would best suit the family's need. In all cases, at least one of the applicants must have retained their local connection with Bracknell Forest.

3.2.7 Parents with dependent children who are in foster care or being looked after by Bracknell Forest Council.

When assessing bedroom entitlement, the Council may consider children who are currently in foster care or being looked after by the Bracknell Forest Council where there is a reasonable likelihood that any children may return to live with the applicant. In these circumstances, confirmation will be required from Children's Social Care that any looked after children will be able to live with the applicant when the applicant is rehoused in accommodation of a suitable size.

3.2.8 Special Guardianship.

Where a household has been granted a Special Guardianship and is being supported by Bracknell Forest Council's Children's Social Care service, one or more children may be included as household members within the housing application.

Where a child or children have been placed on an interim care order with a family member, supported by Bracknell Forest, the children will not be considered as permanent members of the household and will not be taken into consideration until the interim care order has been made permanent.

3.2.9 Joint Social Housing Tenants.

Where an existing social housing tenant applies for a transfer, a check will be undertaken to establish whether they are in possession of a sole tenancy. If the tenancy is in joint names and the application does not include all named tenants, the applicant will be registered as a first-time application. Unless there are specific circumstances that apply and are approved, no offer will be made which results in the under occupation of the remaining joint tenant of their existing property. Unless the applicant's existing tenancy has been lawfully terminated, they will not be considered for rehousing.

3.2.10 Right to Move.

To qualify for rehousing under the Right to Move, applicants must be an existing social housing tenant and be able to demonstrate that moving to Bracknell Forest would help to avoid hardship by enabling them to continue or take up work that they have been offered in the local area. The Council will need to establish that the tenant needs to move for work reasons and will take into consideration the nature of the work and whether similar opportunities are available closer to home.

3.2.11 Councillors, members of staff and their relatives.

Any application for housing or re-housing that is received from elected Members, Council employees, or their close relatives must be disclosed at the time of application. A close family member is classed as a parent, spouse, sibling, or adult children.

Elected members, Council staff and their relatives are treated as any other applicant and will not gain any advantage or any preferential treatment in their application nor shall they be disadvantaged. Their application will be assessed in line with the Allocation Policy.

Staff members must not be involved in any area of the application of any family member or friend. Should any elected member, staff or family member be nominated for an offer of accommodation this must be approved by the Head of Service for sign off.

3.2.12 Non-Qualifying or Eligible Persons.

Following an assessment, if an application to join the housing register is not accepted the applicant will receive written confirmation of the Council's decision and how this decision was reached.

The applicant has the right to request a review of a decision not to accept them on to the Housing Register. See section 8 for further information on reviews.

3.3 Consent and Declaration.

All applicants will be required to sign a declaration, or to give informed consent, to confirm their understanding that:

- The information that they have provided is accurate.
- That they will notify the Council of any change in their circumstances.
- They consent to their personal information being provided to a Housing Association to which they have been nominated for accommodation under the allocations scheme.
- They consent to the Council making inquiries with any relevant person to assess their application.
- They consent to credit checking and to the use of referencing companies to confirm that the information they have given on the application form is correct.

3.4 Verification checks of Housing Register applications.

The Council's Housing Register and Allocations team will be responsible for processing applications and undertaking initial verification checks before applications are made active.

It is the responsibility of the applicant to provide all the information requested to assess their circumstances, along with any supporting information or documents that are required.

Incomplete applications will not be made active until such time as the Council is satisfied that it has in its possession all the information it requires to complete its assessment.

All incomplete applications will be cancelled after a period of 28 days measured from the date information was requested if it has not been provided.

If an application is cancelled this does not prevent the applicant making a subsequent application at a later date. In such cases the effective date of registration would not be backdated to the earlier application date.

3.5 Notification of change in circumstances

Applicants must notify the Council of any changes in their circumstances which could affect their application. Examples of a change in circumstances include:

- someone leaving or joining the household.
- the birth of a child.
- a change of address.
- an increase in household income.
- a purchase/acquisition of a home, including through inheritance.
- a change in health of the applicant or a member of the household.
- the applicant being asked to leave their current accommodation.

Where there is any change in an applicant's circumstances, an applicant must update their housing register application via their MyChoice account. If, as a result of informing the Council of a change of circumstances, there is a change in the priority band in which they have been placed, applicants will be informed in writing. The onus is on applicants to inform the Council when there is a relevant change in their circumstances.

If the change in circumstances results in placement in a higher priority band, the effective date will be the date they moved into the higher band. If the applicant moves to a lower band there will be no change to their effective date.

3.6 Renewal of housing applications

All applicants are required to renew their application annually. The applicant will be sent a reminder to confirm that they still wish to be registered and that their circumstances have not changed.

Should their circumstances have changed, the applicant should notify the Council of the change of circumstances.

The applicant will have 28 days to renew their application from the date the request is sent.

If an applicant has not responded after 28 days a second reminder will be sent. Should no response to the second renewal request be received the housing register application will be cancelled and removed from the Housing Register. No further correspondence will be sent.

Any subsequent application to the Housing Register will be treated as a new application and will not be back dated to the date of the cancelled application.

3.7 The Suspending and Cancellation of an Application

3.7.1 Suspension of an Application

An application will be suspended if:

- An applicant has been asked for information to support an application and a reply has not been received within an agreed timescale.
- An applicant has changed address and not provided a change of circumstances form.
- An applicant has refused two properties and/or has failed to attend the viewing appointment. The applicant will be suspended from bidding for a period of 12 months.
- An applicant accepted onto the housing register on the grounds that the authority has accepted a homelessness duty has refused a final offer of accommodation. The applicant will be suspended from bidding until the housing register application has been re-assessed.
- An application will be suspended whilst a re-assessment of housing need takes place.
- An applicant has omitted to include information relevant to their application or information provided by the applicant has been found to be false or misleading. The application will be suspended from bidding for a period of 12 months.
- An applicant has not bid on a property for 12 months and there is no reasonable cause for them not bidding.

3.7.2 Cancellation of an Application.

An application will be cancelled if:

- The applicant has requested that their application be cancelled.
- The applicant has been housed as a result of a successful bid under the MyChoice lettings scheme or a direct let of a property.
- The applicant no longer qualifies for inclusion on the Housing Register.
- The applicant has been housed into the private rented sector under the Council's homelessness duties.
- The applicant fails to renew their housing application.
- The applicant has not provided the information requested to make an assessment on their application.
- The applicant has not responded to an offer of housing within an agreed timescale.
- The applicant has moved and not provided their new address.
- The applicant has given false or misleading information and been referred to the fraud department.
- The applicant has died.

In the event of an application being cancelled the Council may agree to re-instate the application and reinstate the effective date of the application if the applicant re-applies within 3 months. Should an applicant re-apply after this period this will be treated as a new application and a new effective date will be given if they qualify for housing.

Where an applicant, is considered to be potentially vulnerable, the local authority will contact the applicant, or, if appropriate, an agency that they are working with, to check their circumstances before cancelling the application.

Any applicant whose application has been cancelled has the right to ask for a review of the decision.

4. Assessment of Housing Need

4.1 How is housing need assessed?

Once an application has been received, the Council will make an assessment to establish the priority of the application. This assessment will take into account the applicant's existing accommodation, and any other accommodation that they may be entitled to occupy and any medical or welfare needs that they have.

An applicant is entitled to occupy accommodation as an owner, lessee, leaseholder or by virtue of a court order; an express or implied licence to occupy (i.e., lodger or living with family); or any other enactment or rule of law giving the right to remain in occupation.

The assessment of the application will determine:

- The number of bedrooms that the applicant is entitled to.
- The effective date of the application.
- Which of the priority bands the applicants is placed in, based on their welfare, medical or other housing need.

These are explained below.

4.1.1 Government Bedroom Standard

In making its assessment and deciding what size of property an applicant is entitled to, the Council will use the Government's Bedroom Standard, set out in Appendix 3.

This states that a bedroom is allocated for each of the following:

- A couple
- A single person aged 21 or over.
- Two children under 10 regardless of sex
- Two adolescents aged 10-20 of the same sex.

In exceptional circumstances the Council may exercise discretion in deviating away from the bedroom standard, for example, a social housing tenant releasing a large family home. In all cases applicants will need to evidence that the property is affordable at the time of offer. Any deviation from the policy will be documented by the Senior Officer of the decision made. See Appendix 3 for the size of property that your household will qualify for.

4.2 Notification of the assessment.

When the Council has assessed the application, the applicant will receive a notification of the outcome of the assessment.

The notification will:

- Confirm whether the applicant is eligible and qualifies for the housing register.
- Confirm the unique reference number for the application.
- Confirm what band the applicant has been placed in.
- Confirm the size and if, applicable the type of property the applicant can bid for.
- Confirm the effective date which should be the same as the registration date for new applications.
- Provide details about how and when a change of circumstances should be notified to the Council.
- Provide information about requesting a review of the decision.

4.3 Deciding the Effective Date.

The Effective Date is the date used to determine the priority of the application and enables applications in the same band to be prioritised in date order from the date that they went into the band.

Where there is a change in banding following a re-assessment, the effective date will be amended to the date the application was awarded a higher banding. Where an applicant is placed into a lower banding, they will keep the original date of application.

The effective date ensures that where applicants within the same band bid on the same property, the applicant with the longest waiting time will be prioritised and will be first to receive an offer of accommodation.

Where two applicants with the same band and effective date apply for the same property the applicant with the earliest registration date will be given priority for an offer of accommodation. If both applicants also have the same registration date the Team Leader for the Housing Register and Allocations Team will determine which applicant is given priority.

4.4 Priority Bands

Applicants will be placed into a priority band A-E, (A being the highest priority band) according to an assessment of need based on the information which has been provided on their housing application.

The criteria for the bands are set out in detail in Appendix 4. The assessment process is explained below.

4.5 Medical Assessments

Where an applicant's current housing is detrimental to their health, or a move to more suitable accommodation would have a positive effect on their health, they should complete a medical self-assessment form.

Medical priority will **not** normally be awarded where health problems are not affected by rehousing. Examples would be :

- Where the applicant has a health issue, that is not adversely affected by the accommodation that they currently occupy and would not be improved by rehousing, regardless of the severity of the condition.
- Where rehousing would only make a marginal improvement to the applicant's health condition.
- Where defects in the applicant's current accommodation can be rectified within a reasonable timeframe.
- Neighbour disputes and Anti-Social behaviour unless the Council is satisfied that the landlord, police, Anti-Social Behaviour team, or Environmental Health team have done everything possible to resolve the anti-social behaviour.
- Homeless households in temporary accommodation (4.5.1)
- Overcrowding, dealt with already in banding scheme.
- Where the health condition is of a temporary nature, rather than a long-term condition (e.g. pregnancy-related problems or a broken leg).
- Where the medical issue relates to an individual who is not part of the application.

Each case will be looked at on an individual basis.

4.5.1 Homeless Applicants

Homeless households who have been accepted for the main housing duty under the homelessness legislation and are being provided with temporary accommodation by Bracknell Forest Council (in pursuance of its homelessness duty under Part VII of the Housing Act 1996) will not be entitled to a priority banding on medical or welfare grounds.

In this situation the household has a statutory right to request a review of the suitability of the temporary accommodation that has been secured for them. This will be conducted outside of the Allocations Policy and in accordance with current homelessness legislation. The Council will keep the suitability of the temporary accommodation under ongoing review and will respond to any change of circumstances that arises.

4.5.2 Assessing a medical need.

A Housing Officer will consider all the information provided and may consult a qualified medical advisor, if required. Extra information may be sought from other professionals to assess the extent to which the applicant's health is affected by their housing conditions and the expected benefits of providing suitable alternative housing.

The Housing Officer will look at:

- How the current accommodation is causing or affecting the medical condition.
- The severity of the effect that housing is having on the medical condition.
- The duration of the condition and any expected recovery time
- Whether other options are viable that could improve the situation
- Whether the medical condition would be alleviated or significantly improved by moving.

Applicants who have been awarded a medical priority due to mobility problems, are unable to manage stairs, and need ground floor accommodation, will not usually be considered for a property with either an internal or external staircase unless there are appropriate adaptations or a lift in place.

Where it is determined that the applicant has a medical condition, but that this is not significantly worsened by their current housing and would not be improved by a move to different housing, no medical priority will be awarded.

Following the assessment of their medical need and housing conditions, the applicant will be notified of the outcome of their application and the band in which they have been placed. More information on the bandings can be found in Appendix 4.

An applicant has the right to a review of the decision made on their application. Following the outcome of the review the Council will not undertake any further assessments for 12 months unless there has been a significant change in circumstances.

4.5.3 Reviewing Medical Priority Banding.

Applicants are required to inform the Council of all changes in their circumstances relating to their housing application, including their health or the health of any member of their household. Such changes may result in an increase or decrease in the level of priority awarded.

The Council reserves the right to review the applicant's priority banding on an appropriate periodic basis to ensure that this still reflects the medical need and will be reviewed at the time of offer. Where an applicant already registered notifies a change in their medical circumstances and/or the impact of their current housing on this, the applicant's priority will be re-assessed using the same process.

4.6 Assessing Welfare and Hardship Grounds.

Some applicants may need to move on welfare or hardship grounds that are unrelated to a medical condition. These applicants may need to move, not due to a medical need, but because they would suffer hardship if they were not able to move to a more suitable location within the borough.

All cases will be assessed individually and recorded to ensure that decisions are consistent and fair. Welfare and hardship grounds can include, but are not limited to:

- Where at least one person in a household is vulnerable and could not be expected to find their own settled or suitable accommodation, for example someone with learning difficulties who wishes to live independently.
- Where a move is required to provide or receive care or support. This could include foster carers, those approved to adopt who need to move to a larger home in order to accommodate a looked after child, or a child that was previously looked after by Bracknell Forest Council, and special guardians.
- Where an applicant needs to move to a different locality in order to give or receive care, to access specialised medical treatment, or to take up a particular employment, education, or training opportunity.
- Where an applicant has experienced Domestic Abuse and has spent a period of recovery in a refuge.
- Where an applicant has been discharged from hospital and cannot return home.

In all cases applicants will be advised of their right to request a review of the decision made on their application. Applicants who have been accepted for a main housing duty under homelessness legislation (Part VII of the Housing Act 1996) will not be considered for any additional priority on welfare grounds. Any request will be considered under section 193 of the Housing Act 1996 Part VII.

4.7 Approved Move-On from Supported Housing.

For some applicants ready to move to independent accommodation from supported accommodation there may be a protocol in place between the Housing Provider and the Council. In consideration of the pathway to independence for that applicant, an assessment will be carried out to determine what type of housing is suitable to meet their needs. If it is established that the client needs a more supported environment, they may be prioritised for move on to social housing.

In assessing the suitability of move on to social housing, the move on panel will look at whether the applicant has acquired the necessary skills to live independently, has managed their current tenancy, has a clear rent account for a minimum of 6 months, and would not be able to manage or not in suitable private rented accommodation.

4.8 Care Leavers under a Staying Put arrangement.

To recognise the responsibilities of the Council as a corporate parent, care leavers within a Staying Put arrangement will be placed in band C and will be given a registration date from their 18th birthday, unless they have an earlier registration date. In this case the registration date will also become the effective date.

4.9 Households owed a homelessness prevention duty.

Where an applicant has approached Bracknell Forest for assistance and the Council is satisfied that a prevention duty is owed, they will be assessed based on their existing accommodation and awarded the banding that reflects their current circumstances.

Where a suitable offer of accommodation has been made by the Council under the prevention duty and has been refused by the applicant without good reason, the Council will have discharged its duty to prevent homelessness and no further offer of accommodation will be made. Where an offer of accommodation has been accepted and the prevention duty has been discharged, the housing register application will be re-assessed to establish whether the applicant should remain on the housing register.

4.10 Households assessed as having deliberately worsened their circumstances.

The Council will consider whether an applicant has deliberately made their housing situation worse in order to improve their chances of rehousing through the housing register.

To reduce the likelihood of applicants moving deliberately into poorer accommodation in order to qualify for higher priority and quicker re-housing, applicants who are deemed to have deliberately worsened their circumstances will normally be placed in a band E for a period of 12 months. At the end of this period, the applicant can request that their application is re-assessed. All relevant facts and information available will be considered in the re-assessment process.

Some examples of worsening housing circumstances are given below:

- Applicants who have abandoned or voluntarily given up a social housing property.
- Moving without good reason to accommodation which is more overcrowded or is considered to be more unsatisfactory than their previous accommodation.
- Selling a property or giving notice on a tenancy without having alternative accommodation available to them.
- Allowing a property to become overcrowded by inviting additional households to move in.
- Applicants who have allowed family members to move into their property who previously had suitable accommodation, or the financial means to secure their own accommodation, and this has resulted in the property being overcrowded.
- Moving out of a property against housing advice when the applicant was able to remain in the accommodation.
- Moving out of a property that has been adapted to meet the needs of a household member into accommodation without adaptations.
- Homeowners who have transferred their property to another family member within the last 5 years before making an application to the housing register.
- Applicants who have given up affordable and suitable private rented accommodation which they were able to maintain, to move in with other relatives/friends, or to move to a smaller private rented property creating a situation of overcrowding or sharing.
- Requesting or colluding with a landlord of family member to issue them with a Notice to quit.

Where an applicant has no, or no effective, control over their move to alternative accommodation, this should not be considered as a deliberate worsening of circumstances.

5 Finding a Home through Choice Based Lettings.

Applicants accepted onto the Housing Register can bid for available properties that are appropriate to their housing need. The key aim of a Choice-Based Lettings scheme is to enable people seeking rehousing through the housing register to exercise choice about where they live.

Some Housing Associations may decide not to advertise all of their available homes through MyChoice. This will depend on the level of nominations rights the Council has with the Housing Association. In some cases, a home may be excluded from advertising because the property will be needed for a direct let, temporary accommodation or an internal move for the Housing Association.

All applicants who are eligible and qualify for MyChoice will be able to bid on properties advertised on www.BFCMyChoice.org.uk

The property details provided in the adverts should enable the applicant to make an informed choice before they make a bid. There is no limit to the number of bids a person can make in a week.

5.1 Restrictive Labelling and how it is applied under this scheme.

Restrictive labelling may be applied to certain properties in order to prioritise them for particular types of applicants. This will be made clear in the advert for the property.

The reason for restrictive labelling is to help meet local needs and targets by making the best use of social housing stock. For example, the Council may restrict some properties to enable transfer applicants to be given preference or to reduce the numbers of households in temporary accommodation by giving preference to households accepted as homeless by the Council.

Some examples of restrictive labelling include:

- Transfer applicants only.
- Homeless applicants only.
- Ground floor accommodation needed.
- Larger households.
- Properties where a Local Lettings Plan is in place.
- Disabled or adapted properties.
- Properties designated for sensitive letting.
- Age restricted properties.
- Properties where pets are not allowed.

There are more details about some of these in the sections below.

Adverts will clearly indicate any restrictions on bidding and will detail any particular criteria that apply. Where restrictive labelling is applied, bids from applicants who do not meet all of the eligibility criteria for the property will not be considered.

5.2 Local Lettings Policies.

S166A (6) of the Housing Act 1996 enables housing authorities to allocate accommodation to particular people and there will be occasions when a local letting policy is needed to address issues such as child density, vulnerable households, and households in employment, in order to ensure that the housing development contributes towards a sustainable and balanced community in the local area.

Local lettings policies usually apply to new build developments with the aim of ensuring:

- a mix of household types/client groups.
- a range of households of different ages.
- a mix of people who are in paid employment and those who are not in paid employment.
- a balance of families with different numbers and ages of children.

Where a local lettings policy applies, this will be made available to applicants on request.

In all cases, local lettings policies will take account of the overall housing need in the area, whilst ensuring that vulnerable households are not unduly disadvantaged and that policies focus on ensuring tenancy sustainability.

5.3 Sensitive Lettings (single property).

On occasions, a Housing Association may ask for a sensitive letting for a property in order to address and manage localised issues within an area.

The request may be made to reduce the concentration of certain groups where this is creating housing management problems or having a negative impact on neighbours, or to promote a more balanced community by seeking to select/not select households with particular characteristics.

Where the Council agrees, a sensitive letting will be applied to match the property to a suitable household.

5.4 Bidding on an available home.

Properties are advertised on a weekly cycle. Weekly adverts are published on every Thursday at midnight and are available for applicants to make bids until the following Tuesday at Midnight. Applicants may express an interest through bidding on any advertised property that meets their needs.

Applicants can check their position on the list at the time of the bid, together with the total number of bids already placed by logging into their MyChoice account. This allows applicants to make informed decisions about their choice of property and the likelihood of being successful. For example, if they are making bids where they are consistently low down in the priority for properties, they may want to consider other property types or areas to increase their chance of a successful bid. Within the bidding period, applicants may withdraw bids and make further bids.

In certain circumstances applicants may bid for properties by proxy. Council staff and support agencies may be able to make bids on behalf of applicants if they are not able to use the bidding system or are not actively making bids. In order, to minimise stays in temporary accommodation, the Council may bid for properties on behalf of homeless households, to enable them to move into household's long-term accommodation.

Property adverts will usually include a photograph of the home and a full description. The description will include:

- Type of property.
- Whether the property is being let at an affordable rent or social rent.
- Any age restrictions.

- Any special criteria e.g. local lettings plan or sensitive lets.
- Number of bedrooms.
- The maximum size of household that can apply for the property (for example, 3-bedroom 5-person house).
- The location of the property by street and town.
- Floor level (if appropriate).
- Any adaptations (for example, disabled facilities).
- Access to the property (for example whether there is ground-level access, a ramp or lift).
- Type of parking (if any).
- Access to a garden (if any, or if shared).
- Heating Type.
- Rent and service charge.
- Type of tenancy.
- Services provided (for example, extra care).
- Information about the surrounding area.
- Whether pets are allowed.

Once the advert cycle has closed a shortlist of all bids will be produced.

5.5 Determining Priority between shortlisted applicants.

When applicants bid on a property they will be placed on a shortlist. Any applicant who bids on a property where they do not satisfy the advertised criteria will not be included on the shortlist.

Once the advertising period has closed, the housing system will automatically create a shortlist of applicants for each property, arranged in priority order (as determined by the allocations scheme).

For each property, advertised bids will be ranked in the following order:

- Priority Band (Band A will have a higher priority than Band B and so on).
- Effective date of band.
- Date of registration.
- Local connection.

The successful applicant will normally be the applicant who is eligible for the size and type of property being offered and who is in the highest band (at the point in time when the advert cycle closed). Where there is more than one applicant in that band, priority will be decided by the effective date of the application (relating to that band).

The top three applicants on the shortlist will be put forward or 'nominated' to the Housing Association that has the vacancy.

The prioritisation of shortlisted applicants will take into consideration any additional criteria stipulated by the Housing Association for the occupation of the property. Should the applicant with the highest priority on the shortlist not accept the property,

the property will be offered by the Housing Association to the next applicant on the shortlist, and so on, until the property is accepted.

5.6 Verifying and Nominating an Application.

5.6.1 Verifying a Nomination.

Before any nomination is made, the successful applicant's details will be checked to ensure that:

- They are still eligible and qualify for MyChoice.
- That there has been no material change of circumstances since their banding was assessed.
- They have been placed in the correct priority banding based on information provided by the applicant.
- They are suitable for the size and type of property.

The Council may conduct unannounced home visits to assist in the verification of applications. Applicants will also be required to provide documentary proof to confirm statements made in their application.

If an applicant is not able to provide the necessary information within the timescale given or the Council is not able to contact the applicant, the applicant will not be nominated to the Housing Association.

Where it is found that an applicant is no longer eligible or a qualifying person their application will be cancelled.

Where it is found that an applicant's circumstances have changed from the information held by the Council are incorrect, their application will be re-assessed.

If this re-assessment finds that their priority band is reduced, the applicant will no longer be nominated to the Housing Association and their application will be placed in the appropriate band.

Cases will be referred to the Council's legal service if it is evident that there has been a deliberate action to defraud the Council by not notifying the Council of a change in circumstances.

It is important for applicants to be aware that should they be successful in bidding on a property, and it has been established that they have rent arrears, the bid will not be accepted, and the application will be placed into a band E until the arrears have been cleared. Once the arrears have been cleared, the application will be re-assessed, and they will be placed in a new band (if appropriate) and the effective date of their application will be the date on which the arrears were cleared.

Where applications have been cancelled or have had their priority band reduced, the Council will write to the applicant informing them of the decision made and how that decision was reached. The applicant will also be notified of their right to review any such decision.

5.6.2 Making a Nomination.

The Council does not own any housing stock, and so all rehousing offers are made through nominations to the Housing Association advertising the property.

Some Housing Associations operate their own Allocations policy which may differ from MyChoice and on occasions, a nomination made by the Council will not be accepted by the housing association. In addition, some housing associations will undertake their own housing assessment including a financial assessment to ensure that the applicant can afford the property before making an offer of a tenancy.

Once the Housing Association has the details of the nominations made by the Council, the Housing Association will contact the applicant with a time to view the property. It is the responsibility of the applicant to attend the viewing at the stated time and respond to the timescales that the Housing Association requests to establish whether the first nominated applicant wishes to accept the offer of a tenancy. If the applicant does not contact the Housing Association or fails to attend the viewing the Housing Association reserves the right to withdraw any offer of a tenancy and to offer the tenancy to next person on the shortlist.

The Housing Association will inform an unsuccessful applicant of the reason behind their decision. The Council reserves the right to discuss any refusal of a nomination with the Housing Association if it believes the decision to be unreasonable or perverse.

5.6.3 Direct Match.

Whilst the aim of MyChoice is to provide choice in the allocation of social housing in Bracknell Forest, there will be exceptional situations where this is not possible. It may be necessary to nominate a particular household directly to a property to make best use of housing stock. In these situations where an applicant is directly matched to the property these properties will not be advertised on MyChoice. To ensure transparency, the Council will report on properties that have been as allocated through direct matches.

The following are examples of circumstances where a direct match may be made:-

- A homeless applicant owed a relief or main housing duty where they have failed to regularly bid on available properties on MyChoice.
- A homeless applicant where the Council has accepted a main housing duty and there is a strategic need to move the applicant.
- Where a property is needed to provide emergency accommodation for a homeless household.
- Where an existing social housing tenant living in Bracknell Forest has been assessed as needing an urgent move and this will avoid a homelessness application being made.
- A request made through the National Witness Protection Service.
- Where an applicant has been assessed by the Multi-Agency Protection Panel and it is decided that the Applicant should be offered social housing.

- Where a specially adapted property has been built, acquired, or adapted to meet the needs of a specific client.
- Where any delay in providing suitable accommodation would have a negative impact on the or the applicant.
- Where it is necessary to comply with a Court Order to fulfil an urgent statutory or legal duty.
- Where a certain type and location of property is needed to assist in a case of child protection or public protection.
- Where an applicant needs to move urgently because of a critical medical or welfare need where there are serious safeguarding implications.

5.6.4 Withdrawal of an advert or nomination.

There may be exceptional circumstances in which a housing association that has advertised a property or made an offer of a tenancy to an applicant needs to withdraw this property from MyChoice. This could be for the following reasons:

- An error has been made in the advertising criteria.
- The property has been advertised, but the existing tenant has rescinded their notice.
- There is a right of succession to the property.
- The property has been advertised but further inspections have established that the property needs major works which will take several months.
- The property has been advertised but needs to be withdrawn for an urgent case as a direct let.
- The Housing Association needs the property for an urgent management move.
- The nominee does not qualify under the Housing Association's own Housing Allocations Policy.

Withdrawal of an advert or an offer can be done right up to the point before a tenancy is signed.

6. Refusals.

6.1 Transfer or First-Time Applicants.

Where a transfer or first-time applicant has successfully bid on a property and has been made an offer of accommodation by the Housing Association, and they fail to accept it, and they have refused a total of two suitable offers, their applications will be suspended for a period of 12 months. During this period, the applicant will not be permitted to bid on any properties.

If an applicant successfully bids for a property but the Housing Association is unable to contact the applicant within a reasonable amount of time, the Housing Association will offer the property to the next eligible applicant on the shortlist. Lack of contact will be classed as a refusal for the purpose of suspending an application.

6.2 Homeless applicants.

If an applicant who is homeless and occupying temporary accommodation secured under s193 of the Housing Act 1996 Act Part VII is made an offer of accommodation and fails to contact the Housing Association or refuses a suitable direct match as a final offer the Council will discharge its homelessness duty.

The applicant will be invited to reconsider the offer and will be encouraged to accept this offer. Any applicant who refused a final offer of accommodation has the right to request a review of the suitability of the offer of accommodation.

If, following the conclusion of the review, the Reviewing Officer decides that the offer was not suitable, the applicant will receive one further offer of suitable accommodation.

Where an applicant refuses a final offer of suitable accommodation and does not take up the offer, the Council's duty to accommodate them in temporary accommodation will cease.

Subject to the outcome of any review the Council will instigate legal proceedings to recover possession of the temporary accommodation. The applicant will have to make their own arrangements for housing and their housing register application will need to be re-assessed.

6.3 Direct Matches.

If a transfer or first-time applicant refuses a direct match to a property, the Council will consider the reasons for refusing the offer of accommodation, including whether the offer was suitable to meet the needs of the applicant and their household.

Where the Council decides that the direct match was not appropriate, it will make one further offer of accommodation to the applicant. Should the applicant refuse any subsequent direct match, the urgency of the case may be reviewed and re-assessed to a lower band to reflect this.

7. Feedback on Lettings.

The main aim of the Bracknell Forest Choice scheme is to operate an open and transparent lettings system.

The result of lettings made through the scheme will be published on the MyChoice website by showing:

- Each letting made by size, type, and location.
- The number of applicants who have bid for each property.
- The band and effective date of the successful bidder.

This information will enable applicants to make informed decisions about which properties to bid for by giving them a better idea of which properties or areas attract

the greatest number of bids and how long they would normally have to wait for an offer. The results published do not contain any personal data relating to an applicant.

8. Request for a Review.

The Council is committed to making the correct decisions on all applications. The Council will notify the applicant in writing of the decision made and give full details of how that the decision was made.

Under section 166A(9) of the Housing Act 1996 an applicant has a legal right to request a review of any of the following decisions reached by the Council on their housing application:

- A decision that an applicant is not eligible.
- A decision that an applicant is not a qualifying person to join the housing register.
- A decision regarding the band an applicant has been awarded.
- The effective date awarded of going into a band.
- A decision to remove an applicant from the housing register.
- Any decision about the facts of the case that has been used to assess their application.
- Where an applicant considers that a decision has been based on incorrect information.

Requests for a review must be submitted in writing or e-mail, to the Council within 21 days of the date when the notification was received.

Review requests will only be considered where it can be demonstrated that the policy has been incorrectly applied.

The request should refer to the relevant section or paragraph of the policy. Cases where new or additional evidence is provided will be considered by the relevant team as a re-assessment of the application rather than a review.

8.1 How a request for a review will be dealt with.

Upon receiving a request for a review:

- The applicant will receive a notification that the review has been received and the review should be concluded within 56 days.
- The review will be carried out by a Senior Officer who was not involved in the original decision.
- The applicant may be asked to provide additional information to support their review.
- On completion of the review the applicant will be notified in writing of the outcome.

If further information is required, the review period may be extended with the agreement of all parties. Once a review has been completed, the applicant cannot request a further review of the same decision unless there has been a material change in their circumstances.

9. Confidentiality, data protection and information sharing.

9.1 Data Protection.

Any information provided as part of the application process will be handled sensitively and subject to the appropriate General Data Protection regulations.

Bracknell Forest Council shall comply with the requirements of the Data Protection Legislation and any equivalent or associated legislation in relation to the storing of computer records, processing and sharing of personal data in connection with this Allocation Policy.

To assess an application, the applicant's personal data will be used, and the Council will contact third parties to obtain and share information in order to comply with the statutory obligation of processing the applicant's housing/homelessness application or where disclosure of information is a legal requirement.

Applicants have the right to request any information held by the Council under a Subject Access Request.

9.2 Sharing personal information.

Personal information obtained from the applicant that applies to the housing register or homeless application will only be used in ways that the applicant reasonably expects in order for the Council to process their application.

The details provided by the applicant may be shared with third parties to comply with statutory obligations, which include but may not be limited to:

- Housing Associations
- Statutory and voluntary services, for example other housing providers, health trusts, police, probation service, social services, DWP, Housing Benefits, CAB
- GP's
- Private landlords/letting agents.
- For statistical and reporting purposes including government departments such as the Department for Levelling Up, Housing and Communities (DLUHC). Such reports will be statistical only and will not identify any individual.

9.3 Councillor or MP enquiries on behalf of Applicants.

The Council will provide Councillors and MPs with personal data about the Applicant if the Applicant provides permission to do so or if the Councillor or MP reasonably needs it to carry out their duties. However, the Councillor and/or MP must not use it for other purposes.

10. Complaints.

Complaints are separate to the circumstances where an applicant wishes to seek a review of a decision made on their application. A request for a review should be made under the review procedure set out above and not through the Council's complaints procedure.

Where an applicant is dissatisfied with any aspect of the way in which their application for housing has been conducted and wishes to make a complaint, this should be made using the Council's complaints procedure. A copy of the current complaints procedure is available on the Bracknell Forest Council website and can be accessed here: <https://www.bracknell-forest.gov.uk/council-and-democracy/get-touch/complaints>

Where a complaint relates to how an applicant has been dealt with under this policy an applicant who remains dissatisfied after following the internal complaints process has the right to continue with their complaint to the Local Government Ombudsman Service if they are unhappy with the response to their complaint.

The Local Government Ombudsman is an independent service run by Central Government to make sure that Councils provide the required standard of service to their customers.

The Ombudsman can investigate complaints about how the Council has done something, but they cannot question what has been done simply because someone did not agree with it. For further details contact: www.lgo.org.uk

Appendix 1

Immigration Control Persons from Abroad

Persons subject to immigration control

1.1 The regulations setting out which classes of persons from abroad are eligible or ineligible for an allocation are the [Allocation of Housing and Homelessness \(Eligibility\) \(England\) Regulations 2006 \(SI 2006 No.1294\)](#) ('the Eligibility Regulations').

1.2 The term 'person subject to immigration control' is defined in [s.13\(2\) of the Asylum and Immigration Act 1996](#) as a person who under the [Immigration Act 1971](#) requires leave to enter or remain in the United Kingdom (whether or not such leave has been given).

1.3 The provisions of [section 7\(1\) of the Immigration Act 1988](#) and the Asylum and Immigration Act 1996 have been saved for the purpose of housing legislation to protect the rights of EEA citizens, and their family members, who have citizens' rights pursuant to the Withdrawal Agreement.

This will ensure that EEA citizens, and their family members, who:

- 1) have acquired limited leave to enter and remain in the UK (also known as pre-settled status) by virtue of Appendix EU of the Immigration Rules ("the EU Settlement Scheme"); or
- 2) were frontier working in the UK prior to 31 December 2020.

will continue to be treated as 'persons not subject to immigration control' in the instances where they would previously have been, so that their eligibility for the allocation of social housing can be judged on the basis of [Regulation 4 of the Eligibility Regulations](#) as was the case prior to 31 December 2020.

1.4 EEA citizens, and their family members, who have been granted indefinite leave to enter or remain (also known as settled status) under the EU Settlement Scheme, do not need the savings to apply to them. Their eligibility should be judged on the basis of [Class C of Regulation 3 of the Eligibility Regulations](#), as is the case for persons subject to immigration control who have been granted indefinite leave to remain. In general, they should be eligible provided they can demonstrate habitual residence in the Common Travel Area.

For the purpose of this guidance references to "the Withdrawal Agreement" in this note are to the ["Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community \(2019/C 384 I/01\)"](#). Equivalent provisions are to be found in separation agreements relating to the [European Economic Area/European Free Trade Agreement](#) and the [EU/Swiss Free Movement of Persons Agreement](#), which are also given effect in domestic law by the [European Union \(Withdrawal Agreement\) Act 2020](#).

1.5 The following categories of persons do not require leave to enter or remain in the UK:

- (i) British citizens
- (ii) certain Commonwealth citizens with a right of abode in the UK
- (iii) Irish citizens, who are not subject to immigration control in the UK because the Republic of Ireland forms part of the Common Travel Area (see paragraph 3.14 (iii) below) with the UK which allows free movement.
- (iv) by operation of the savings provisions referred to in paragraph 3.9 above, EEA citizens, and their family members, who have established citizens' rights in accordance with Part 2 of the Withdrawal Agreement, i.e. those who were residents and exercised a right to reside in the UK derived from European Union law or any provision under section 2(2) of the European Communities Act 1972, and those who were frontier working, before 31 December 2020. Whether an EEA citizen (or family member) has exercised a particular right to reside in the UK or rights to be treated as a frontier worker will depend on their circumstances, at that particular time. For example, whether the EEA citizen is, for the purposes of [the Immigration \(European Economic Area\) Regulations 2016 \(SI 2016/1052\)](#) ('the EEA Regulations') (as preserved by the savings provisions) a jobseeker, a worker, a self-employed person and so on.
- (v) persons who are exempt from immigration control under the Immigration Acts, including diplomats and their family members based in the UK, and some military personnel.

For the purpose of this guidance, 'EEA citizens' means citizens of any of the EU member states, and citizens of Iceland, Norway, Liechtenstein, and Switzerland.

1.6 Any person who does not fall within one of the four categories in paragraph 3.11 will be a person subject to immigration control and will be ineligible for an allocation of accommodation unless they fall within a class of persons prescribed by [regulation 3 of the Eligibility Regulations](#) (see paragraph 3.14 below).

1.7 If there is any uncertainty about an applicant's immigration status, it is recommended that authorities contact the Home Office.

Persons subject to immigration control who are eligible for an allocation of social housing.

1.8 [Regulation 3 of the Eligibility Regulations](#) provides that the following classes of persons subject to immigration control are eligible for an allocation of accommodation:

- (i) a person granted refugee status: normally granted 5 years' limited leave to remain in the UK.

- (ii) a person granted exceptional leave to enter or remain in the UK granted outside the provisions of the Immigration Rules; and whose leave to enter and remain is not subject to a condition requiring them to maintain and accommodate themselves, and any person who is dependent on them, without recourse to public funds. Exceptional leave to remain now usually takes the form of 'discretionary leave.'
- (iii) a person with current leave to enter or remain in the UK with no condition or limitation, and who is habitually resident in the UK, the Channel Islands, the Isle of Man or the Republic of Ireland (the Common Travel Area): such a person will have indefinite leave to enter or remain and will be regarded as having settled status. However, where indefinite leave to enter or remain was granted as a result of an undertaking that a sponsor would be responsible for the applicant's maintenance and accommodation, the applicant must have been resident in the Common Travel Area for five years since the date of entry - or the date of the sponsorship undertaking, whichever is later – in order to be eligible. Where the sponsor has (or, if there was more than one sponsor, all of the sponsors have) died within the first five years, the applicant will be eligible for an allocation of accommodation.
- (iv) a person who has humanitarian protection granted under [paragraphs 339C – 344C of the Immigration Rules](#);
- (v) a person who has limited leave to enter or remain in the United Kingdom on family or private life grounds under [Article 8 of the Human Rights Act](#), such leave granted under [paragraph 276BE \(1\)](#), [paragraph 276DG](#) or [Appendix FM](#) of the Immigration Rules, and who is not subject to a condition requiring that person to maintain and accommodate themselves, and any person dependent upon them, without recourse to public funds;
- (vi) a person who is habitually resident in the Common Travel Area and who has been transferred to the United Kingdom under [section 67 of the Immigration Act 2016](#) and has limited leave to remain under [paragraph 352ZH of the Immigration Rules](#);
- (vii) a person who is habitually resident in the Common Travel Area and who has Calais leave to remain under paragraph 352J of the Immigration Rules. (Effective from 1 November 2018);
- (viii) a person who is habitually resident in the Common Travel Area and who has limited leave to remain in the UK as a stateless person under paragraph 405 of the Immigration Rules;
- (ix) a person who has limited leave to enter and remain in the UK as the family member of a 'relevant person of Northern Ireland' by virtue of Appendix EU of the Immigration Rules;
- (x) a person who has limited leave to enter or remain in the United Kingdom under Appendix Hong Kong British Citizen (Overseas) of the Immigration Rules, who is habitually resident in the Common Travel Area, and who is not subject to a condition requiring that person to

maintain and accommodate themselves, and any person dependent upon them, without recourse to public funds.

- (xi) a person who has been granted leave by virtue of the Afghan Relocations and Assistance Policy or the previous scheme for locally employed staff in Afghanistan; and
- (xii) a person with leave to enter or remain in the United Kingdom who left Afghanistan in connection with the collapse of the Afghan government that took place on 15th August 2021 and who is not subject to a condition of no recourse to public funds and has not been given leave to enter or remain as a result of an undertaking that a sponsor would be responsible for the applicant's maintenance and accommodation. However, a person who was sponsored will be eligible for housing assistance if the applicant has been resident in the Common Travel Area for 5 years since the date of entry (or the date of the sponsorship undertaking, whichever is later) or their sponsor(s) have died.
- (xiii) a person in the UK who left Ukraine in connection with the Russian invasion on 24 February 2022 and had resided in Ukraine immediately before 1st January 2022, and who has been granted leave in accordance with Immigration rules made under section 3(2) of the Immigration Act 1971.
- (xiv) a person in the United Kingdom who has limited leave to remain granted in accordance with Appendix Ukraine Scheme of the immigration rules pursuant to an application made by that person from within the United Kingdom.

Other persons from abroad who may be ineligible for an allocation.

1.9 By virtue of [regulation 4 of the Eligibility Regulations](#), a person who is not subject to immigration control and who falls within one of the following descriptions is to be treated as a person from abroad who is ineligible for an allocation of accommodation:

- (i) a person who is not habitually resident in the Common Travel Area (Subject to certain exceptions - see paragraph 3.17 below).
- (ii) a person whose only right to reside in the UK is derived from his status as a jobseeker (or his status as the family member of a jobseeker). 'Jobseeker' has the same meaning as in [regulation 6\(1\)](#) of the 'EEA Regulations';
- (iii) a person whose only right to reside in the UK is an initial right to reside for a period not exceeding three months under [regulation 13 of the EEA Regulations](#);
- (iv) a person whose only right to reside in the UK is a derivative right to reside to which they are entitled under [regulation 16\(1\) of the EEA Regulations](#), but only in a case where the right exists under that regulation because the applicant satisfies the criteria in regulation 16(5) of those Regulations;

- (v) a person whose only right to reside in the Common Travel Area is a right equivalent to one of those mentioned in sub-paragraph (ii) to (iv) above.

1.10 For the purposes of determining eligibility for an allocation of social housing, a person who is not subject to immigration control and who falls within categories (ii) or (iii) in paragraph 3.15 above should be treated as ineligible. This is regardless of whether such person has been granted limited leave to enter or remain in the UK by virtue of [Appendix EU of the Immigration Rules](#); or a family permit issued under the EU Settlement Scheme granting them limited leave to enter the UK by virtue of [the Immigration \(Leave to Enter and Remain\) Order 2000](#).

Persons exempted from the requirement to be habitually resident.

1.11 The following persons from abroad are eligible for an allocation of accommodation even if they are not habitually resident in the Common Travel Area:

- (i) an EEA citizen who has been granted pre-settled status and is in the UK as a worker (which has the same meaning as in [regulation 6\(1\) of the EEA Regulations](#));
- (ii) an EEA citizen who has been granted pre-settled status and is in the UK as a self-employed person (which has the same meaning as in [regulation 6\(1\) of the EEA Regulations](#));
- (iii) a person who is treated as a worker for the purpose of the definition of 'qualified person' in regulation 6(1) of the EEA Regulations pursuant to regulation 5 of the [Accession of Croatia \(Immigration and Worker Authorisation\) Regulations 2013](#) (as amended), (right of residence of an accession State citizen subject to worker authorisation);
- (iv) a person who is a family member of a person referred to in (i) to (iii) above and has been granted pre-settled status.
- (v) a person who is in the UK as a result of their deportation, expulsion, or other removal by compulsion of law from another country to the UK.
- (vi) a person who is in the United Kingdom as a frontier worker for the purpose of the [Citizens' Rights \(Frontier Workers\) \(EU Exit\) Regulations 2020 \(SI 2020/1213\)](#) (as defined in paragraph 3.18 below);
- (vii) a person who is a family member of a person referred to in (vii) above and has a right to reside by virtue of having been granted limited leave to enter or remain in the United Kingdom, as a family member of a relevant EEA citizen, under the Immigration Act 1971 by virtue of Appendix EU to the Immigration Rules made under section 3 of that Act.
- (viii) a person who left Afghanistan in connection with the collapse of the Afghan government that took place on 15th August 2021.
- (ix) a person who left Ukraine in connection with the Russian invasion on 24 February 2022 and had resided in Ukraine immediately before 1st January 2022 and is not subject to immigration control.

1.12 A person who is no longer working or no longer in self-employment will retain his or her status as a worker or self-employed person in certain circumstances. A

person who is no longer working does not cease to be treated as a 'worker' for the purpose of [regulation 6\(1\)\(b\) of the EEA Regulations](#), if he or she:

- (i) is temporarily unable to work as the result of an illness or accident or
- (ii) is recorded as involuntarily unemployed after having been employed in the UK, provided that he or she has registered as a jobseeker with the relevant employment office, and
 - (a) was employed for one year or more before becoming unemployed, or
 - (b) has been unemployed for no more than 6 months, or
 - (c) can provide evidence that he or she is seeking employment in the UK and has a genuine chance of being engaged, or
 - (d) is involuntarily unemployed and has embarked on vocational training, or
 - (e) has voluntarily ceased working and embarked on vocational training that is related to their previous employment.

1.13 EEA citizens who have established citizens' rights in accordance with Part 2 of the Withdrawal Agreement can be joined by close family members (spouses, civil and unmarried partners, dependent children and grandchildren, and dependent parents and grandparents) who live in a different country at any point in the future, if the relationship existed before/on 31 December 2020 and still exists when the family member wishes to join the EEA citizen in the UK. The family member will have 3 months from their date of arrival to apply to the EU Settlement Scheme. If the family member is a third country citizen, they can apply for an EU Settlement Scheme family permit or EEA family permit. Information relevant to this can be found at: <https://www.gov.uk/family-permit/>. 'Family member' does not include a person who is an extended family member who is treated as a family member by virtue of regulation 7(3) of the EEA Regulations. When considering the eligibility of a family member, housing authorities should consider whether the person has acquired indefinite leave to remain in the UK in their own right, for example, a family member at the point they are eligible and are granted settled status under the EU Settlement Scheme.

Appendix 2

Reasonable Preference

The Housing Act 1996 requires that the Bracknell Forest Housing Allocations scheme must give reasonable preference to certain groups of people. The Reasonable Preference groups are listed in Section 166A (3) of the Housing Act 1996 as follows:

- i. People who are homeless (within the meaning of Part 7 (Homelessness) of the Housing Act).
- ii. People who are owed a duty by any local housing authority under Part 7 (Homelessness) of the Housing Act 1996 because they are: - Homeless and in priority need but homeless intentionally.
- iii. People who are homeless and in priority need and not intentionally homeless.
- iv. People who are threatened with homelessness and in priority need and not intentionally homeless.
- v. People who are not intentionally homeless but not in priority need.
- vi. People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- vii. People who need to move on medical or welfare grounds (including grounds relating to disability).
- viii. People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship to themselves or others.

However, in deciding how one applicant should be prioritised compared to another with similar needs, the Bracknell Forest Housing Allocation scheme will also take into account factors such as local connection, behaviour, and the financial resources available to each applicant.

For example, an applicant who: (i) falls into one of the reasonable preference categories and (ii) who has a local connection to a district area will be placed in a higher priority band than an applicant with similar needs who does not have a local connection to the district area.

Appendix 3

SIZE OF FAMILY - SIZE OF PROPERTY Government Bedroom Standard

Size of family	Size of property Required
Single	Bedsit/1bedroom
Couple	1 bedroom
Exceptional cases where 2 adults need to live together	2 bedrooms
Parent(s) with one child	2 bedrooms
Parent(s) with two children of the same sex under the age of 21	2 bedrooms
Parent(s) with two children of the opposite sex both aged under 10	2 bedrooms
Parent(s) with two children of the same sex and the oldest is aged 21 years or more and the eldest child is assessed as not being able to live independently or in full time education	3 bedrooms
Parent(s) with two children of opposite sex where the older child is aged 10 years or over	3 bedrooms
Parents with three children where two children can share (because they are (i) same sex both under 21 or (ii) different sex both under 10)	3 bedrooms
Parents with four children where it is possible for two pairs of children to each share a bedroom (because they are (i) same sex both under 21 or (ii) different sex both under 10)	3 bedrooms
Parents with three children where none of which can share (same sex over 21 and assessed as not being able to live independently or being in full time education, or different sex over 10)	4 bedrooms
Parents with four children where only two can share (same sex both under 21, or different sex both under 10)	4 bedrooms
Parents with five or more children with any children over the age of 21 assessed as not being able to live independently or being in full time education	4 bedrooms

In exceptional circumstances the Senior Housing Officer may exercise discretion in deviating from the Bedroom Standard. For example, where applicants require larger accommodation on health grounds, the Senior Housing Officer will consider this on a case by case basis, considering the advice of a qualified medical advisor.

In all cases applicants will need to demonstrate that the property is affordable at the time of offer.

Appendix 4

Housing Bands

Band A

1. Social Housing tenants (including successors) within the Bracknell Forest area who are under-occupying family accommodation and are wishing to downsize.
2. Social Housing tenants within the Bracknell Forest area who are living in a property that has been built or adapted for a person with a disability which is no longer needed.
3. Urgent medical. Households who are suffering severe, long term medical conditions (chronic or progressive) or a severe disability because they cannot physically access their home or essential facilities within their current home, and it is not possible for adaptations to be undertaken to enable access.
4. Applicants who are ready to be discharged from hospital who have somewhere to live but are unable to return to their accommodation due to their medical needs and whose accommodation cannot be adapted, nor do they have the assets to adapt their current accommodation or move to another property.
5. Applicants or a member of their household who are living within the Bracknell Forest area who have been referred by a statutory agency and the Council is satisfied that the household has an urgent need for rehousing because if they are not rehoused their life will be in serious danger, and where a homeless application is not appropriate.
6. Applicants assessed by the Safeguarding Board where there is a critical and serious threat to the wellbeing of a child and their accommodation is a major contributory factor to the risk.
7. Applicants where the Council has agreed on the recommendation of the MAPPa partnership that the applicant requires, and is suitable for, independent housing. They must qualify for the housing register and, after considering the evidence submitted, the Council must be satisfied that due to the nature and extent of the circumstances of the MAPPa case, accommodation in the private rented sector would, through its short-term nature, have a detrimental effect on the multi-agency planning for that individual.
8. Families with children living in accommodation where there are two or more bedrooms short compared to their household bedroom need under the bedroom standard or the property is statutorily overcrowded. Where the household contains any non-dependent adult, they will be disregarded from this assessment.

9. An immediate prohibition order which is served due to the serious risk to life.
10. Two Registered Provider tenants living within the Bracknell Forest area, both giving up general needs accommodation who are wishing to move to one property as a household as joint tenants.
11. Homeless households who received a final offer of accommodation via Part VI of the Housing Act 1996 and moved into the accommodation who were subsequently successful in their request for a review.
12. Decants of Bracknell Forest owned property that is due for demolition or major repairs.

Band B

1. Families with children living in accommodation where they are one bedroom short compared to their household bedroom need under the bedroom standard.
2. Register Provider tenants within the Bracknell Forest area moving from 1 bed general needs accommodation to older persons accommodation.
3. Applicants with a proven social care need, where rehousing will support the delivery of another statutory service within the Bracknell Forest area. To be approved by a panel of Housing and Social Care Managers.
4. Bracknell Forest care leavers in housing need who are ready for independent living within an agreed move on protocol and annual quota.
5. Foster carers/Adoption with approval from Bracknell Forest's Children's Social Care service, and there is a need to move to a larger home to accommodate a looked after child within an agreed annual quota.
6. Corporate Parenting and Guardianships taken on by family members to prevent a child from becoming looked after by Bracknell Forest Children's Services with an agreed annual quota.
7. Move on from supported housing commissioned by Bracknell Forest Council where there is a move on protocol in place with an annual quota.
8. Armed Forces personnel who have been medically discharged.
9. Medical Severe. Applicants who need to move on medical grounds because their current home is having a severe impact on the health of a member of the household. By re-housing to more suitable accommodation this will help to reduce the impact and their health will deteriorate if the household is not moved to more suitable accommodation. Priority band B will only apply where the applicant is bidding on properties that will reduce the impact on the health of the member of the households.

Band C

1. Families with children living with another household and there is no overcrowding.
2. Homeless Applicants where the main housing duty has been accepted by Bracknell Forest Council.
3. Medical Adverse Impact. Applicants who need to move on medical grounds because their current home is having an adverse impact on the health of a member of his or her current accommodation and their health will not deteriorate in their current accommodation, but the adverse impact will be significantly reduced with a move to more suitable accommodation.
4. Singles or couples who are in insecure accommodation.
5. Verified Rough Sleepers working with the Council's rough sleeper team who are not being considered under a relief duty.
6. Applicants with a local connection who have been assessed as adequately housed but have had a prevention duty accepted by Bracknell Forest Council.
7. Safer Accommodation provided by Bracknell Forest Council or in a refuge and no homeless application has been made.
8. CAT 1 Hazards. Applicants who are living in insanitary or unsatisfactory conditions which would include properties affected by lack of amenities or services, severe damp, major structural defects, flooding, collapse of roof or statutory nuisance and these conditions cannot be rectified within a reasonable period. (As assessed by the Council against the relevant legislation including housing standards and relevant safety rating systems) decide banding.
9. Care leavers in a staying put arrangement supported by Bracknell Forest Council.

Band D

1. Applicants who are serving in the armed forces (or have served in the armed forces within the five-year period immediately preceding their application) and who do not satisfy any of the reasonable preference categories.
2. Applicants needing to move to the locality to give/receive support to avoid hardship.

3. Applicants in supported accommodation who are not part of the move on criteria.
4. Applicants who are in care under Bracknell Forest's Children's services who wish to register and are under the age 18.
5. Applicants who are owed a relief duty within the meaning of Part VII of the Housing Act 1996 and who have been assessed by the Council and qualify with a local connection via Part VI.
6. Applicants who have applied for assistance to the Council under Part VII of the Housing Act 1996 where the Council has reached a decision that they are homeless but not in priority need.

Band E

1. Applicants who are homeless within the meaning of Part VII of the Housing Act 1996 and who have been assessed as being owed a prevention or relief duty by the Council, but they do not have a qualifying local connection.
2. Applicants who have applied for assistance to the Council under Part VII of the Housing Act 1996 where the Council has reached a decision that they are homeless and in priority need but have been determined to be homeless intentionally s191(3).
3. Applicants who have been assessed as having worsened their circumstances.
4. Applicants who have unreasonably refused to co-operate (s193c (4)). This band applies to applicants who would ordinarily be deemed as unintentionally homeless and having a priority need but the relief duty has been ended due to their failure to co-operate. The relief duty will have been discharged in accordance with the non-co-operation procedure.
5. Applicants accepted under the Right to Move. Applicants who are able to demonstrate the need to move nearer their place of work within the Bracknell Forest area because they have secured or have permanent employment (over 16 hours per week average) in the area (evidence of the employment must be provided) and are currently a social housing tenant and would experience hardship if unable to move to the area.
6. Rent arrears or any housing related debt at time of application.
7. Rent arrears or any housing related debt at time of offer.
8. Owner occupiers who have a reasonable preference and do not have the resources to resolve their housing need.
9. Applicants who have had a change of circumstances and have not told the Council.

10. Applicants who are seeking aged persons accommodation due to having a high welfare and support need, and need to move to Bracknell Forest to receive family support but do not currently live in Bracknell Forest.

11. Applicants who have been evicted for rent arrears in the past five years.

12. Applicants who have been evicted for anti-social behaviour in the past five years.

13. Applicants living in Bracknell in a reasonable preference category who do not meet the residential qualification.

Appendix 5

Explanation of terms used in this policy.

Act	The Housing Act 1996
Allocation (Nomination)	The allocation (nomination) process by which a person becomes an assured or assured shorthold tenant of housing accommodation held by a registered provider
Applicant	The person making the application, whether as a single person or a couple
BFC MyChoice	The name of Bracknell Forests Housing Allocation Policy
Bracknell Forest	The administrative area of Bracknell Forest Borough Council
Change of circumstances	A change in household circumstances (e.g. address/accommodation, addition of an adult household member) that may affect BHC qualification and/or priority banding
Child/Dependent	A person under the age of 21
Disabled Adapted Properties	Disabled adapted properties are properties that have been specially built or adapted for people with disabilities
Effective Date	Date used to prioritise applications in a band based on the date that the band was awarded
First Time Applicant	Applicants who have been accepted onto our housing register as being eligible to apply for social housing
Homeless Applicant	Applicants found to be homeless, and where a homelessness duty has been accepted by Bracknell Forest Council
Household	The term “household” includes all eligible adults and dependent children included in the applicant’s application. Short-term sharing arrangements or temporary part time arrangements will not normally be classified as a household member Section 3
Housing Association/Registered Provider	The official name for housing associations, and housing companies that are registered with Homes England
Housing Register	A database of applicants seeking social and affordable housing.

Nomination	The name put forward, by Bracknell Forest Council, from the housing register to be considered for a property owned by a Housing Association.
Reasonable Preference Categories	A list of groups that the Council must allow on to the housing register.
Registration date	The date the applicant's Housing application was received.
Right to Move	Social housing tenants who have a reasonable preference and need to move to Bracknell Forest to avoid hardship, and need to move because the tenant works in the borough, or they need to move to take up an offer of work
Social/Affordable housing	Housing that you rent from a Housing Association
Transfer Tenant	A transfer applicant is a secure tenant or an assured tenant of a Housing Association living in Bracknell Forest who has been accepted on to the housing register

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Housing Allocation Policy Consultation

Consultation Report

Responses to the consultation undertaken
December 2023 - January 2024



Housing Allocation Policy. Consultation Report. March 2024

Introduction

Stakeholder consultation on changes to the Housing Allocation Policy was undertaken between December 2023 and January 2024.

The consultation focused on seven proposed changes to the policy, listed below:

1. Adoption of the national bedroom standard
2. Removal of non-dependent adult children from assessments of need
3. Reducing the residency requirement from 4 years to 2 years
4. Introduction of an income cap
5. Removal of the additional priority given to working households
6. Removal of the cumulative preference policy
7. Removal of the policy giving additional priority after 6 years.

The details of the proposals were set out in a consultation document published on the Council's website, alongside a copy of the revised draft policy and an information guide to the Housing Allocation Policy.

The consultation document explained the reasons why the changes were being proposed, details of how they would be implemented, including where discretion or exclusions might apply, and the potential impact of the proposals. The links to these documents are provided below.

[Draft Housing Allocations Policy.pdf](#) (Size: 605.77K)

[Guide to the Housing Allocation Policy.pdf](#) (Size: 127.82K)

[Housing Allocation Policy Consultation Details.pdf](#) (Size: 226.5K)

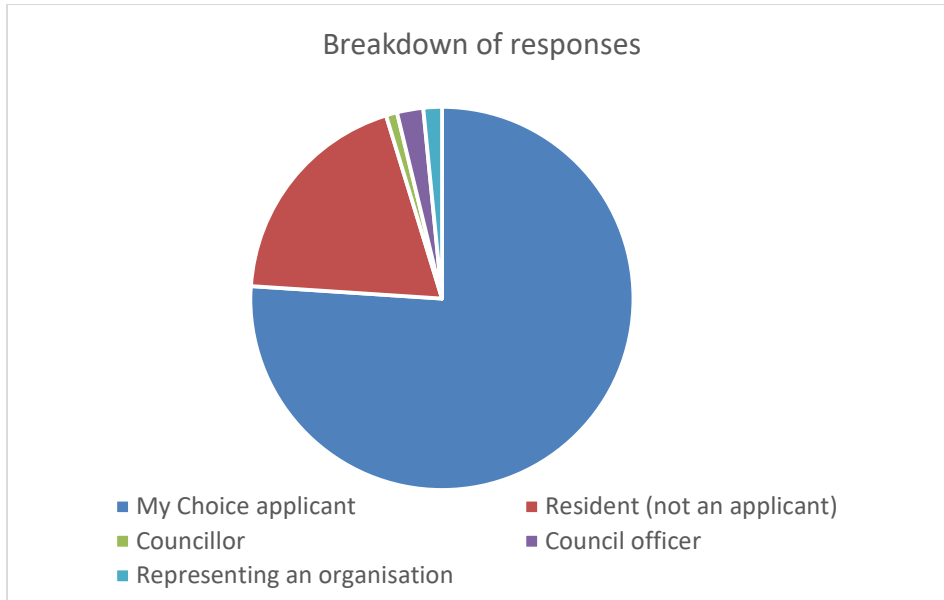
The consultation was mainly based on an online survey which was widely promoted to local residents, housing register applicants, local voluntary and public sector organisations, council officers, Councillors and housing providers.

In addition, three workshop sessions were held with Councillors, Registered Providers and Bracknell Forest Homeless Forum and meetings/presentations took place with stakeholders at their request.

This report presents the outcome of the consultation. The first part covers the responses received through the online survey. The second part summarises the discussion and comments made in the workshop sessions.

Part 1: Results of the online survey

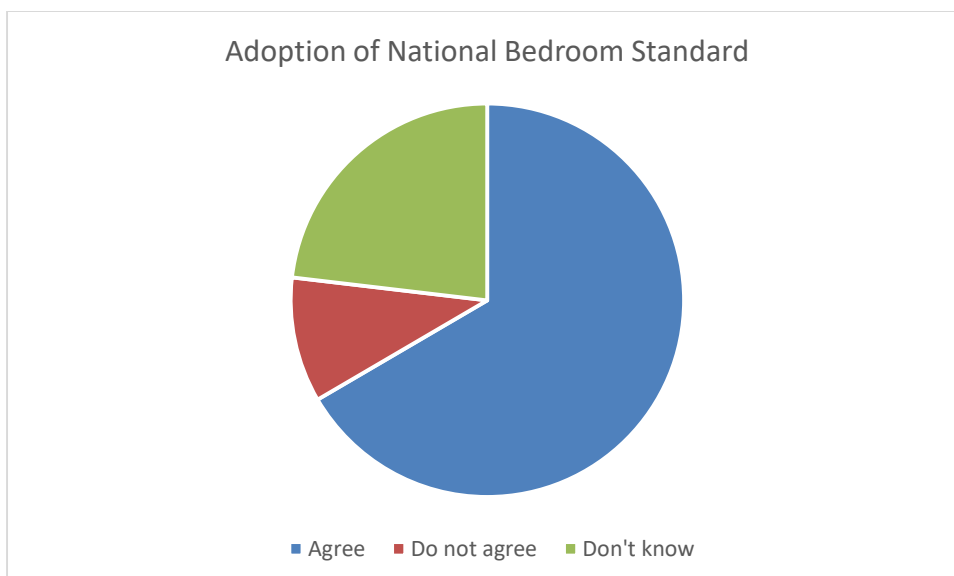
The online survey ran for 8 weeks between 4 December 2023 and 31 January 2024. A total of 318 people completed the survey.



The vast majority of respondents were housing register applicants (76%) and local residents (19%). The remainder were Councillors, council officers from other service areas, and representatives from other public or voluntary organisations.

Proposal 1. Adoption of the national bedroom standard

There was strong support for this proposal with 65% of respondents in agreement.



Comments made by respondents (officers' responses below in bold)

Many of the comments referred to various reasons why it might not be appropriate for children to share a bedroom and a range of circumstances in which an additional room would be needed.

- Some adults/children need separate bedrooms due to long-term illness or disability.
- It's not always safe or appropriate for children to share – children with SEND or ADHD or where there is a large age difference, or are not siblings (even if same sex)

Officers agree that in certain cases, households might apply for an additional bedroom where there are specific medical or welfare needs. For example, a household that includes a disabled child who cannot share a bedroom with another child because of their disability. This is covered in the policy under exceptional circumstances. We do not provide a list of exceptions as each case is assessed individually.

Some respondents said that children should not have to share a bedroom at any age:

- Older children should have a separate bedroom regardless of sex and not have to share.
- Under 10s need their own room/privacy and shouldn't have to share - sharing is only suitable up to age 7 or 8.

Providing a separate bedroom for each child is not sustainable and is not a housing need, as it is considered reasonable for children of the opposite sex to share a bedroom up until the age of 10. This is in line with the DWP (Department for Work and Pensions) and Statutory Guidance on Housing Allocation Schemes¹.

Some comments referred to the use of living rooms and small rooms:

- The size of rooms needs to be taken into account as they may be too small to share.
- People should not be expected to sleep in living rooms.

We do not consider living rooms as spaces for sleeping when assessing housing need for the housing register. Where rooms are exceptionally small and cannot be slept in by more than one person, the applicant may be considered for a move to a similar sized property with larger bedrooms.

Other comments focused on the impact on households who would no longer be able apply for a larger home.

- If you can only apply for a larger home once children reach the age of 10, they will be sharing a room for years before they are rehoused.
- The proposal is unfair as many households will be removed from the register.

¹ [Allocation of accommodation: guidance for local authorities - Chapter 4: Framing an allocation scheme - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/allocation-of-accommodation-guidance-for-local-authorities)

It is recognised that rehousing times are currently long for households needing a larger property, but by bringing in this change it should be possible to reduce the length of wait that applicants with an assessed housing need are waiting for alternative accommodation. Applicants will have their application re-assessed to establish their housing need and requirements under the new policy. This will mean that some applicants will be considered to be adequately housed. Unfortunately, those households with no assessed housing need will be removed from the housing register.

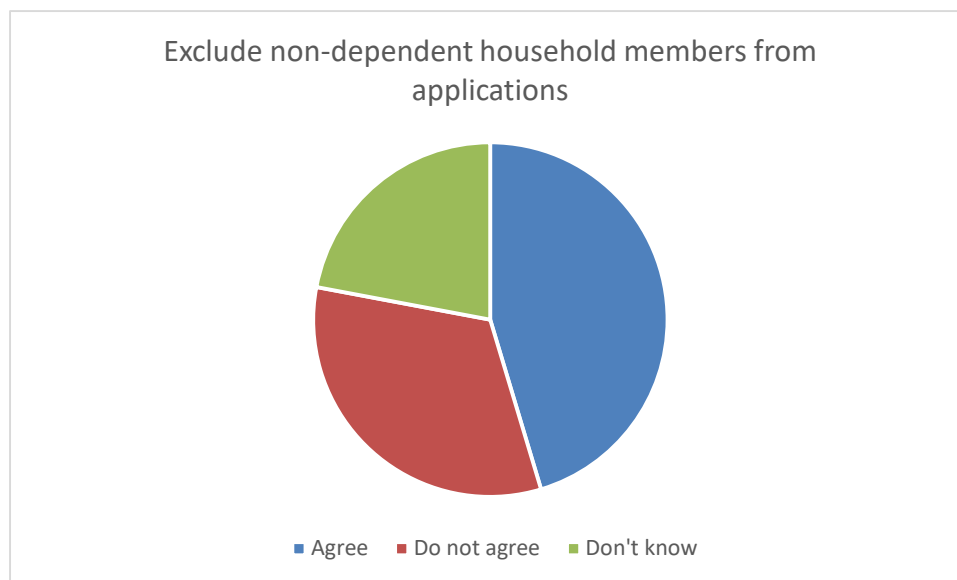
Finally, some people asked why the Council did not free up larger homes occupied by single older people who did not need them.

- The Council should focus on moving older people out of large properties they do not need so that there are more larger properties for families.

Existing tenants have secure, lifetime tenancies, which means that they are entitled to remain in their properties even if they are larger than they need. Under the new policy it is proposed to give people wishing to downsize to a smaller property a high level of priority. In addition, officers are working on a separate strategy to support people to downsize.

Proposal 2. Non-dependent adult children

45% of respondents agreed with the proposal to exclude non-dependent adult children from assessments of need and 32% did not. The remainder were undecided.



Comments made by respondents (officers' responses below in bold)

A large number of comments received related to the limited financial means of young people and the high cost of accommodation.

- Cost of housing (PRS and buying) is so high and young people's earnings are low so that most children cannot realistically afford their own accommodation at that age.

House prices in the private rented sector, whether for buying or renting, are at a historic high and represent a challenge for all young people looking to leave home. Unfortunately, proposed changes to the housing allocation policy cannot change the situation in the private market. Outside of the housing register, the Council will continue to work with other providers to ensure that accommodation and support are available to young people and to provide advice on the Council's website.

Other concerns were:

- This will increase homeless applications from young people.
- It will create more pressure on the housing register as older children will need to be rehoused.

There is no evidence to suggest that homeless applications will increase - a high proportion of current homeless applications (75%) are already from single people. Whilst there may be an increase in housing register applications made by non-dependent children currently living with their families, there is a relatively higher supply of one bedroom properties. Also, the impact of the policy will be to reduce demand for larger properties as some existing applicants will no longer have an assessed housing need for a larger property.

Many of the comments received suggested that young people were being forced to leave the family home:

- This is wrong - children should not be forced to move out of their home at 21.
- Important for families to stay together - this is breaking up extended families.

To be clear, the policy does not force anyone to move out of the home or cause families to break up. Rather, the policy proposes that household members over the age of 21 who have been living as part of the household will no longer be taken into account when assessing housing need. This means that these households will not be entitled to apply for additional bedrooms to meet the accommodation needs of older, non-dependent children.

As with the previous proposal, respondents cited various exceptional cases in which an older child may need to continue living within the household.

- Some have support needs e.g. foster children or have autism and are not ready or able to live alone at 21, or provide care - each case needs to be looked at separately.
- Children at university need somewhere to come back to.

It is recognised that not everybody over the age of 21 can live independently and this has been covered in the policy. In these cases, a formal assessment undertaken by a relevant professional will be required to support the request and a decision will be made whether to include the non-dependent as part of the application. Children at university may

remain on the application, in most cases until they finish their education, but can also make their own application to the housing register.

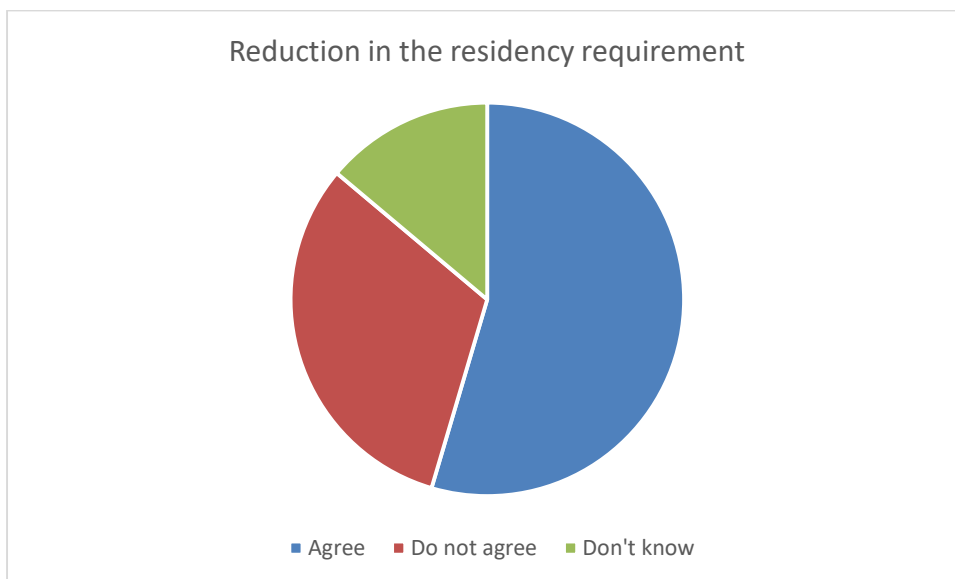
Some people found it unfair that households with older children would be treated differently from those with young children.

- It's not fair that households with older children are treated differently to younger children and have to suffer overcrowding with no chance to make an application.
- Some overcrowded households applied years ago for rehousing and are still waiting but now that their children have got older they will no longer qualify.

It is considered important to ensure that the limited supply of family homes is prioritised for those with dependent children who are likely to have a long-term need for a larger home, rather than households containing older children who may leave home and no longer need a larger home.

Proposal 3. Reducing the residency requirement

A majority of respondents (55%) agreed with the proposal to reduce the residency requirement to qualify for the housing register from 4 years to 2 years.



Comments made by respondents (officers' responses below in bold)

The most common point of disagreement was the view that long-standing residents should have priority over those who had moved to the borough more recently.

- Only long-term residents should qualify, not those with little connection to the area.
- Those who qualify as a result of this change should be placed at back of the queue, after existing applicants.

- This is unfair to existing applicants as newer residents will leap-frog over them and get rehoused more quickly.

The proposed 2-year residency requirement was made in line with guidance from the Government. All applications are assessed on need and existing applicants will retain their registration date, so they will not be disadvantaged compared to newer applicants.

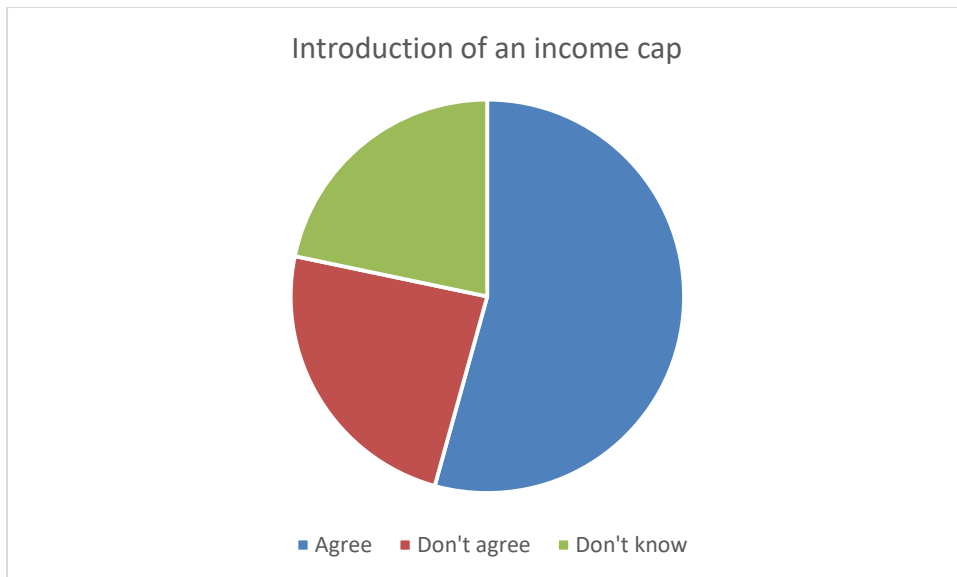
Another concern was that the policy would encourage more people to apply for rehousing, resulting in even more pressure on the housing register and longer waiting times for existing applicants.

- This will make the situation worse as it will mean more people applying, increased demand and a longer wait for rehousing.
- This will lead to more non-British nationals seeking housing in the area.
- It will encourage more homeless people to come here from other areas.

The Council is actively trying to prevent people from being made homeless so that they can get an offer of social housing and to ensure that the Housing Allocation Policy works alongside the Homeless Reduction Act 2017 to reduce homelessness. The issue is that a longer residency period increases homelessness applications as people not meeting the current residency qualification can apply to the Council as homeless, which enables them to register and bid for social housing property with a local connection of only 6 months. A shorter qualifying period will mean that more households will consider making a housing register application rather than seeking to resolve their housing issues through a homeless application. The Housing Act allows people who are legally entitled to be in the UK to apply to the Housing Register, providing they meet local residency requirements.

Proposal 4. Introduction of an income cap

Over half of respondents (54%) agreed with the proposal to introduce an income cap, with the remaining responses split between disagree (24%) and don't know (22%).



The survey also asked whether the proposed income caps were set at the right level. In response, 62% agreed that they were, 21% thought they were too high and 17% too low.

Comments made by respondents (officers' responses below in bold)

Those disagreeing with the proposal questioned whether households earning higher incomes above the proposed caps could afford to move into private rented accommodation.

- Cost of living increases mean that even if your earnings appear to be high you may not be able to afford private rented accommodation due to high cost of deposits, advance rent, furnishings, bills, poor credit history.
- Need to take into consideration individual circumstances - households may have high child maintenance payments or a poor credit history or high outgoings.
- It's unfair to households with lots of children who cannot afford a large property.

The levels that we are proposing are 4 times the local housing allowance and in most cases it is considered that households with incomes above this level will be able to afford private accommodation. We have decided to adopt different income caps in relation to the size of the household, as we recognise that larger families will need a higher income to afford market housing. The policy does allow for exceptions in individual cases and may consider child maintenance payments and other exceptional outgoings as part of the assessment.

Some people queried whether the income caps recognised that some affordable rented properties require you to have a high income:

- It doesn't make sense as many properties on MyChoice require you to have a high minimum income in order to bid for the property.

Even for those properties where a minimum income level is specified, the incomes required are well below the proposed income caps and so this would not present a problem.

Most of the other comments were about how the income caps would be implemented.

- You should only count net income after tax and NI, not gross earnings.
- This could disadvantage older people who receive a retirement lump sum payment.
- Caps should be increased with inflation each year.

The income caps are based on an assessment of gross income. The financial assessment would exclude things like an injury compensation payment or a retirement lump sum. It is recognised that the income caps will need to be updated over time.

Proposal 5. Removal of additional priority for working households

More people disagreed with the proposal to remove the additional priority given to working households above non-working households. 38% of respondents agreed with the proposal compared to 44% that disagreed.

However, quite a lot of the comments made by people who said they disagreed with the proposal recognised that the current working priority policy could be unfair to households that were not able to work. There also seemed to be some confusion or misunderstanding about what the proposal was, as some thought it meant that working households would lose all of their existing priority.

Comments made by respondents (officers' responses below in bold)

The most frequent comment among those who disagreed with the proposal was that working households 'deserved' to be awarded a higher priority and that this helped to reinforce the positive value of work.

- People who work hard to pay their rent are contributing members of society and should be rewarded.
- Working people who pay their own rent are more reliable tenants than those who rely on benefits.
- Social housing was built for low income working households.
- It would remove the incentive to work instead of relying on benefits.
- People who are working are often worse off than those on benefits and so should be prioritised.

Although some of these comments reflect common views about people in work and people on benefits, there is no substantive evidence to support some of the claims. The proposed change seeks to ensure that priority for rehousing is based on assessed housing need alone, without other criteria such as whether applicants are working or not adding a further layer of prioritisation. Working households will still have an advantage over those

in receipt of benefits in bidding for properties let at affordable rents, as only those in work are likely to meet the minimum income needed for these properties.

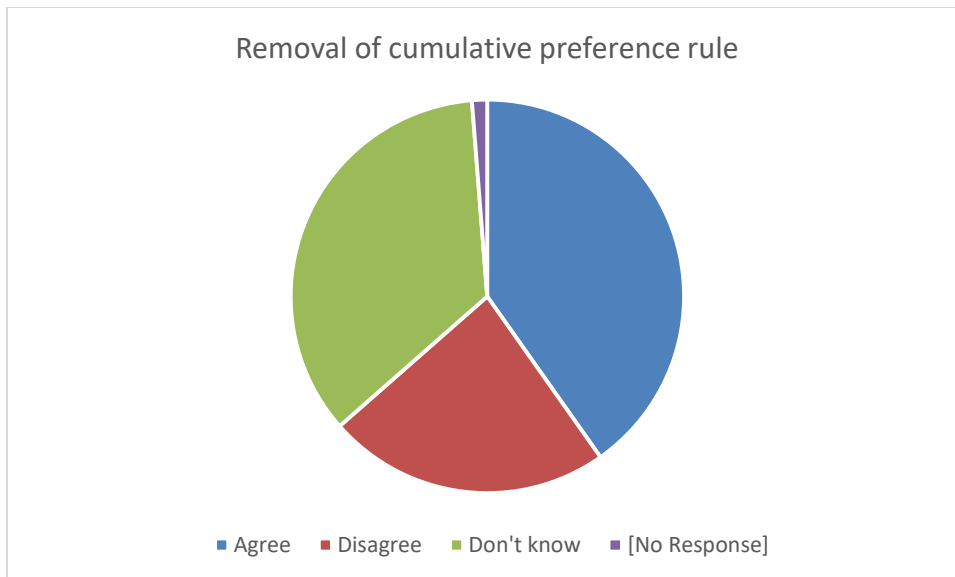
Many of the responses made, even by those that disagreed with the proposal, recognised that the current policy is unfair to some households that cannot work. Even where it was considered that working people should have priority, some said there should be exceptions for people who genuinely cannot work, e.g. due to severe illness or disability or caring responsibilities. Others went further than this, commenting that the policy was potentially discriminatory.

- People who are sick, disabled, have additional needs require social housing even more than someone healthy and able bodied.
- Some people cannot work due to disability which means that working people have more priority and that cannot be right as it discriminates against disabled people.
- It's extremely unfair to favour an able-bodied working individual, over a disabled person who cannot work, which is prejudiced against disabled people.
- Some people could be waiting so much longer through no fault of their own.

These comments highlight a significant issue with the current working households priority, that it unfairly discriminates against non-working households. There is some evidence from other areas that policies favouring working households breach equalities legislation as they have a negative impact on groups with protected characteristics, e.g. people with a long-term illness or disability and people with children. This is a strong reason to end this policy.

Proposal 6. Removal of the cumulative preference policy

41% of respondents agreed with the proposal to end the cumulative preference rule which gives additional priority to those with 3 or more band reasons. 24% disagreed with the proposal and 36% said that they did not know. The high number of 'don't knows' is evidence of the complexity of the policy which is not well understood by many people.



Comments made by respondents (officers' responses below in bold)

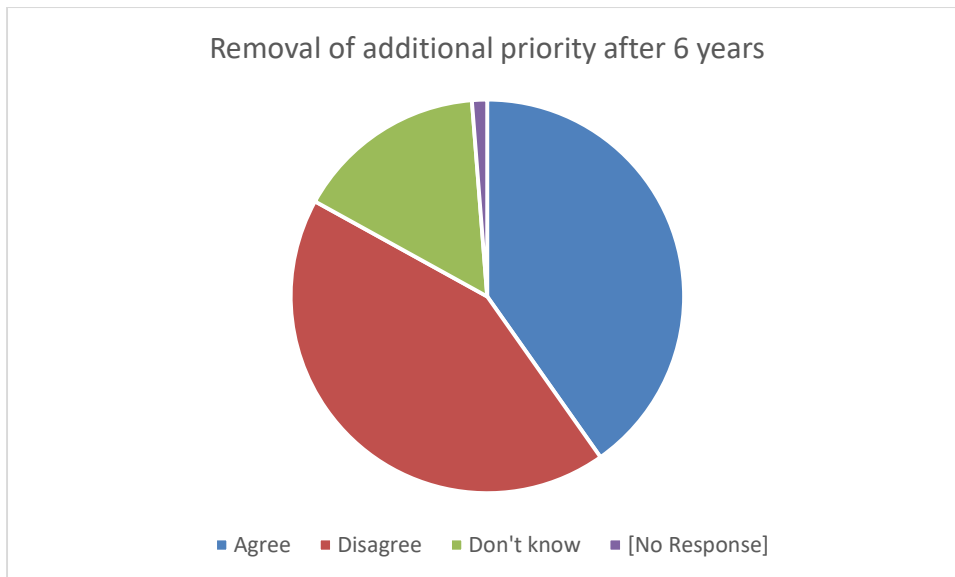
The most common reason for disagreeing with the proposal was the view that households with multiple needs are likely to have a higher need for rehousing than those with just one need, and should get a higher priority for rehousing.

- Policy should remain as some people have complex needs and more than one issue.
- People who qualify on 3 or more grounds clearly have more or higher needs and so should receive additional priority.
- The policy has the benefit of the old points system in recognising and adding together all needs.
- The policy should be retained as it allows people's different circumstances and specific needs and factors to be taken into account in the banding system.

The main impact of the current policy is to enable households with a relatively low level of need to add together various factors with a view to securing a higher banding. The policy allows these households to be placed in a higher band alongside households that have a higher assessed need for housing; this contributes to longer waiting times for those in that band. Under the new proposed policy, a composite assessment of the household's housing situation will take place and ensure that multiple needs are considered; however only one banding will be given.

Proposal 7. Removal of the policy giving additional priority after 6 years.

Respondents were split almost evenly between those who agreed with the proposed change (41%) and those that did not (43%), with 16% replying 'don't know'.



Comments made by respondents (officers' responses below in bold)

For those that disagreed with the proposed change, the most common reason was the view that people who have been waiting that length of time clearly have a high need to move and deserved to be given priority.

- No family should be waiting more than 6 years to be housed. If they have been waiting this long then they should have priority.
- Those waiting a long time should be given priority over those who have been waiting less time or have just joined the register.
- If overcrowded households do not get this additional priority their children will be too old by the time they get rehoused.

We will be addressing some of the concerns raised above by ensuring that the most overcrowded households (and others in high need, e.g. with severe medical needs) are awarded a high priority on the housing register to enable them to be rehoused more quickly. This is a fairer way of addressing the issue of long waits than a blanket policy that gives additional priority to all households waiting 6 years regardless of their housing need. It is considered unfair that those with a low housing need are awarded a higher priority after six years, as happens under the current policy, as this will have the effect of increasing waiting times for other households with a higher assessed housing need.

Other common reasons for disagreeing with the proposal was the view that households waiting for six years would be penalised or have their priority removed and also that it removed the hope of being rehoused after six years.

- Households that have been waiting a long time for a new home should not be penalised because there's not enough housing available.
- They shouldn't lose their priority and be removed from the register after 6 years.

- This will destroy the hopes of those waiting a long time who will never be rehoused especially if placed in a lower band.

Some of these comments indicate a misunderstanding of the proposed policy change. This will still give weight to those who are in greatest need and have been waiting longest for rehousing as bids for properties are prioritised both in terms of the band (priority) awarded and in date order. Under the new policy, households would not be removed from the housing register after waiting six years; they will continue to remain on the housing register with the same effective registration date and the same level of priority. Applicants who have been waiting a long time will usually be rehoused ahead of those in the same band who have recently applied. The only reason that a household would be removed from the housing register is that they no longer have a housing need and do not therefore need to move, e.g. their circumstances have changed or they have accepted an offer of rehousing.

8. Further comments

Respondents were invited to add any additional comments that they had about the proposed changes to the policy. The most common comments are summarised here with officers' responses below in bold.

More homes especially larger homes should be built.

Agreed, and other work is taking place to increase the provision of new larger homes.

More should be done to help get single and older people in large homes they don't need to move.

Agreed, but we cannot force people to move. However, we are looking to give high priority to those who want to move to a smaller property where it will release a family home and to provide increased assistance and support to help people with the move.

Care leavers in Staying Put accommodation should be given greater priority, similar to those leaving supported accommodation.

It is anticipated that those in Staying Put accommodation will gain time waiting whilst staying with a foster carer, as they are able to join the housing register from the age of 16. Due to registering at an early age, when the young person is ready to move from their Staying Put accommodation, they should be near the top of the housing register.

There should be more bands or sub-bands to take account of different circumstances.

We have made changes to the banding system in the proposed new policy to reflect a wider range of circumstances and groups in housing need and have introduced a new fifth band.

The proposals offer nothing to those already waiting for years. It can seem pointless bidding for properties as other people constantly seem to jump ahead of me.

The new policy could help with this. Band then date order will take precedence and the removal of existing policies giving additional priority to some households will prevent anybody assessed in the same band jumping over those who have been in the band longer.

More needs to be done to help working people, compared to those on benefits, as they cannot afford local rents.

Yes, it is recognised that rising private rents are making it extremely difficult for many households to afford accommodation. When it comes to higher affordable rents, these are more likely to be affordable to those in work compared to those on benefits.

Part 2. Feedback from the consultation sessions

To supplement the consultation on the housing allocation policy changes through the online survey, three separate workshop sessions were held with:

- Councillors
- Registered Providers (RPs)
- The Bracknell Forest Homeless Forum

The sessions were well attended. The Councillor session was attended by 17 Councillors, 10 people attended the Registered Provider session, representing 8 different RPs, and the Homeless Forum session included representatives from 10 external agencies.

The format of the sessions was similar for each group. Housing officers ran through each of the proposals in turn, including the reason for the proposed change, the issues they hoped to address and the details of the proposed policy changes and how they would be applied. There then followed a discussion and questions about each proposal and the group was asked whether they supported the proposal.

A summary of the discussion, the points raised and support for each of the proposals is given below.

1. Adoption of bedroom standard

Councillors asked questions about the details of the bedroom standard, including the need to ensure that room sizes were sufficient where people are sharing. Overall, they agreed that the proposal would help to manage the demand for larger homes arising from overcrowding.

RPs and Homeless Forum members indicated their support for the proposal providing that measures are in place allowing flexibility, recognising that in some cases it will not be appropriate for children to share.

Comments made by respondents (officers' responses below in bold)

Will the policy take account of minimum room sizes for people sharing?

Minimum room standards will apply, based on the standards set out in the 1985 Housing Act. These specify a minimum floor area of 110sqf for two or more people sharing.

Will the proposal allow some flexibility, e.g. to take account of children with a disability, recognising that it is not always appropriate for children to share?

Yes, whilst in general children would be expected to share, exceptions would be made on medical and welfare grounds, with consideration being given to individual circumstances.

Can more help be given to under-occupying households, by providing incentives and help that would enable people to downsize, to increase availability of larger homes?

The proposed policy gives a high level of priority to under-occupiers in larger homes and officers are developing a package of measures to provide a package of support and assistance to encourage more people to downsize.

2. Non-dependent adult children

Councillors gave their support to the proposal. RPs and Homeless Forum members broadly agreed with the proposal but wanted to see more support to enable young people to access their own accommodation, by promoting rehousing opportunities through the housing register, and providing advice and assistance and measures such as tenancy training.

Comments made by respondents (officers' responses below in bold)

How would we encourage young non-dependent adults to find their own housing solutions? Could we look at a scheme which gives young people in these situations a high rehousing priority?

Generally, we aim to assist young people by providing specific advice on their housing options, including private rented accommodation, supported housing, and applying to the housing register in their own right. The Council has just set up a new tool on its website (Advice Aid) which people in housing need, including young people, can use to get advice and assistance. We also work closely with a range of local agencies that can provide support and assistance to young people. Young people can make a separate application on the housing register from the age of 16. If they are living in an overcrowded household, they would receive a higher priority. The waiting time for a one bed property is much shorter compared to the wait for a larger 4 bed property.

Will the proposal consider the individual circumstances of households and children?

Yes, there would be exceptions to take account of medical and welfare issues. Also, to be clear, the policy is not saying that adult children will have to leave the family home once they reach the age of 21 but proposes that at this stage the household should not be entitled to apply for a larger property.

What is the evidence available from other areas that have implemented similar policies?

Experience from elsewhere suggests that where the policy has been applied it does help to free up accommodation for more overcrowded households.

3. Reducing residency requirement

Councillors asked for further information about how the proposal was intended to reduce homelessness and the forms of homelessness it sought to address. RPs raised no particular concerns or issues about the proposed change. The homeless forum asked some questions about the detail of the proposal and how it would be implemented.

Overall, there was broad support for the proposed change.

Comments made by respondents (officers' responses below in bold)

How will this proposal help to reduce homelessness and which groups of homeless households?

The most common causes of homelessness are due to loss of private rented accommodation or being asked to leave the homes of family or friends. Some of those affected have been living in the area for some time, but not long enough to meet the 4 year requirement. For these households the only way to qualify for the housing register in the local area is to apply and be accepted as homeless. A shorter residency requirement will mean that more of these households will qualify and be able to apply for housing on the housing register rather than applying as homeless.

Will the proposal allow for exceptions where people don't meet the requirement but there is good reason to accept them?

Yes, as with the current policy, there are a number of exceptions to the requirement, e.g. care leavers placed out of the area or older people needing to move to the area for medical or welfare reasons, plus discretion will be applied in particular circumstances.

How would people be able to prove their residency if they had been staying in the area through informal arrangements, sofa surfing and sleeping on friends' floors?

We would look at a range of evidence including contacting agencies that they have been in touch with that can verify they have been living in the area; also, benefit claims where these have been made. Rough sleepers would need only a 6 month local connection.

4. Income caps

Councillors supported the proposal but asked a number of questions about the level of the income caps, what incomes and savings would be included and what levels of discretion might be applied for households marginally over the caps. RPs raised no objections and indicated their support for the proposals. Homeless forum members also expressed their support for the proposal.

Comments made by respondents (officers' responses below in bold)

What income would be counted and would this impact on people receiving a large compensation payment?

The income caps would include all income – gross earnings and benefits. Compensation payments would not be included in the assessment of income/assets.

Will the proposal act as a disincentive to tenants seeking higher earning jobs?

The income caps only apply to applicants and not to tenants. Once they have been rehoused there are no income limits that apply to secure tenants.

Could people avoid the caps by deliberately earning less or working less hours at the point that their income is being checked and return to higher pay thereafter?

Checks are carried out at two stages, when the application is made, and when an offer of housing is made, to ensure no significant change in their income and circumstances.

Are there any statistics showing the number of households applying for social housing with high-income levels.

There is no firm data on this, but it is estimated that the vast majority of applicants have incomes below the income caps.

Is it possible that rising private rents (and mortgages) could mean some households with an income of over £60,000 could not afford market accommodation, and would not be able to join the housing register due to the income cap? Would discretion be applied for households at the cusp of the income caps.

The income caps will be applied with a level of discretion and flexibility where it is evident that a household cannot afford market accommodation. It is recognised that housing costs can be very high, even for households with a good income, but is important to ensure social housing is allocated to households that will benefit more from the lower rents.

5. Ending priority for working households

Councillors were in support of the proposal, following some clarification on affordable and social rent levels. RPs and homeless forum members did not raise any issues with regard to the proposal.

Comments made by respondents (officers' responses below in bold)

Is it likely that non-working households will still be disadvantaged, despite the proposed policy change, because many of the new properties becoming available are at affordable rents, which they could not afford if they are on benefits?

It is the case that working households are more likely to be able to afford affordable rented properties than those on benefits, as these are let at rents which are higher than traditional social rents. Whilst most new affordable homes over the last few years have

been at affordable rents, we are starting to see a shift back to new social rented homes It should also be noted that the majority of the existing social housing stock is still let at social rents.

Are keyworkers such as teachers likely to be considered a distinct group of working households that might be given priority?

There is no specific policy or priority for keyworkers in the current or proposed policy.

6. Cumulative preference rule

There were no concerns raised about this proposal by Councillors, RPs or Homeless Forum Members. Making the policy simpler is one of the aims here, and it was agreed that the current cumulative preference rule makes the policy unnecessarily complicated.

7. Additional priority after 6 years

Councillors and Homeless Forum members recognised that the existing policy could unfairly benefit households with a lower housing need. There were some questions about the situation of households with a high housing need that had been waiting longer than six years. There were no particular concerns or issues raised by RPs.

Given that one of the key aims is to remove complexity from the policy, there was overall support for the proposal.

Comments made by respondents (officers' responses below in bold)

Would the proposal result in households losing their priority or being removed from the housing register after 6 years?

It was confirmed that this proposal would not remove households from the housing register after they had waited six years. The proposal is that they would not get additional priority on top of what they already have.

For households that have already been waiting 6 years, perhaps in unaffordable private rented accommodation, is the additional priority justified because of the length of time they have waited?

As it stands, the policy is more likely to benefit households that have a relatively low need for rehousing additional priority, by raising them to a higher band. For those with a higher assessed housing need that have been waiting a long time to be rehoused, the issue is a shortage of suitable properties, which is not addressed by giving them additional priority after six years, as they already have a relatively high priority. The current policy can act to further lengthen rehousing times for households that have a high need, as it allows more households to move into the higher priority bands.

It is understood that households with a low level of need should not necessarily be awarded a higher priority, but is it possible to filter applicants to ensure that higher need applicants can continue to benefit by being given additional priority?

Whilst we understand the intention behind this, one of the key aims of the proposals is to try and simplify the policy so that applicants' band and waiting times are the sole factors in determining need, without having additional criteria.

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Initial Equalities Screening Record Form

Date of Screening: 8 August 2023	Directorate: People	Section: Housing. Early Help and Communities
1. Activity to be assessed	Development of a new Housing Allocations Policy	
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change	
3. Is it a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing	
4. Officer responsible for the screening	Ian Stone	
5. Who are the members of the screening team?	Ian Stone, Kathryn Hobman, Lisa Jones	
6. What is the purpose of the activity?	<p>Government Guidance states that all housing authorities must have a housing allocation scheme. Bracknell Forest's current allocations policy was introduced in 2016.</p> <p>The housing service is committed to the development of a new housing allocations policy which will provide a fair, transparent, and easily understood approach to meeting the housing needs of the local area, making best use of the stock available for allocation whilst prioritising those in the most pressing housing need.</p> <p>The new policy aims to bring the policy in line with legislative changes, support the Council's Homeless prevention agenda, address current housing supply and demand challenges facing the borough, and improve wording and policies that are unclear or difficult to apply. The proposed changes include:</p> <ul style="list-style-type: none"> Adoption of national bedroom standard in place of current entitlement to number of bedrooms Increasing priority for overcrowded households. Removal of non-dependent household members (aged over 21) from assessments of housing need. Increasing priority for under-occupying households Reducing priority for homeless households Reducing residency requirement from 4 to 2 years. New 5th band for 'reasonable preference' group with little or no need. Increasing priority for care leavers in housing need. Foster carers able to apply for larger family homes. Parents able to include children in care in applications. Increasing priority for ex-armed forces personnel that have been medically discharged and recognition for other armed forces personnel. Removal of priority given to working households. Removal of increased priority after six years. 	

7. Who is the activity designed to benefit/target?	Those affected will be current and future applicants on the Council's housing register – generally local residents who are unable to meet their housing needs through the housing market.		
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.	Y ✓	<p>N</p> <p><u>Adoption of national bedroom standard</u> The proposal does not disproportionately impact on disabled households. However, analysis has identified that there are approximately 30 household with a disabled member that will potentially be impacted by the change. Recognising that in many cases the need for an additional bedroom for a disabled member is fully justified, the policy will include appropriate mitigations to ensure that disabled households are not negatively impacted by the proposal.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> As above, this policy will include appropriate mitigations/exceptions for disabled people living with people who care for them to ensure that the proposal does not have an adverse impact.</p> <p><u>Increasing priority for under-occupying households</u> Older households are more likely to be impacted by this policy and are more likely to include disabled people. The policy will offer appropriate rehousing options that will aim to improve the living situation for disabled under-occupiers.</p> <p><u>Reducing priority for homeless households</u> Disabled households are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of those impacted are adequately housed in temporary</p>	<p>Analysis of the Housing Register shows that disabled households accounted for 21% of applicants in 2021/22, increasing to 23% of all applicants in 2022/23.</p> <p>Disabled households are more like to be single and require a one-bedroom property. Analysis of the housing register shows that 72% of disabled applicants require a one bed property and 11% a two-bed property. 17% require a larger 3+ bed property. Some disabled people live with a carer, or may be adult or dependent members of a larger family households.</p> <p>In 2022/23, 24% of general needs properties were let to disabled households and over 50% of sheltered properties. In total, disabled households received 30% of all properties let.</p> <p>The 2021 Homelessness Strategy found that in 2019/20, 12.9% of homeless applicants reported physical ill health issues and disability and 14% of homeless applicants were claiming benefit on the basis of long term illness or disability.</p> <p>National research shows that disabled households are less likely to be in work.</p> <p>Some disabled households are living in specialist provision out of borough due to lack of appropriate provision in the borough and may in future seek rehousing in general needs accommodation, with support, in the borough.</p>

			<p>accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p><u>Reducing residency requirement from 4 to 2 years.</u> There will continue to be exceptions for disabled people that have been placed by Bracknell Forest in specialist accommodation out of area that want to be rehoused in the borough.</p> <p><u>Increasing priority to ex-armed forces personnel that have been medically discharged</u> The proposed policy will benefit those who have been medically discharged from the armed services due to a disability.</p> <p><u>Removal of priority given to working households.</u> Disabled households are less likely to be in work and so this change will have a positive impact by ensuring that they are not disadvantaged for rehousing compared to working households.</p> <p>The other proposed changes will not have a positive or negative impact on disability equality.</p>	
9. Racial equality	Y ✓	N	<p><u>Increasing priority for overcrowded households.</u> Increasing the priority for the most over-crowded households will benefit black and Asian households who are more likely to be overcrowded and increase their share of applications in band B.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> This policy may impact more on Asian and other ethnic groups where extended households are more common. In some cases, non-dependent household members may play a caring role within the household and so the policy will therefore include mitigations where care is being provided. In other cases, whilst it is recognised that the policy may have a negative impact on some ethnic communities that have traditionally lived as extended households, the policy is justified because of the overwhelming evidence of negative health, welfare and educational impacts on</p>	<p>2021 Census data showing ethnic breakdown of Bracknell Forest population: 86% white British or other, 7% Asian, 2.5% Black British, African or Caribbean, 3% mixed ethnicity, 1.5% other.</p> <p>Housing register. A breakdown of applicants by ethnicity shows: 83.4% white British or other, 2.6% Asian, 4.8% Black British, African or Caribbean, 3% mixed ethnicity, 2.2 other. Therefore, Black British, African or Caribbean households are slightly over-represented on the housing register and Asian households are under-represented.</p> <p>Analysis of the housing register shows that Black and Asian applicants are more likely to be overcrowded and are over-represented among those needing a larger home of three or more bedrooms. 6.2% of those needing a larger home are Black British, African or Caribbean households and 3.7% are Asian households</p>

			<p>overcrowded households with dependent children, which means that meeting the housing needs of this group is a higher priority. For those households negatively affected, non-dependent members over 21 will be able to apply to the housing register as single applicants and will receive priority where they are living in overcrowded households.</p> <p><u>Increasing priority for under-occupying households</u> The proposed policy is likely to benefit older white households as under-occupying households are mainly older people and ethnic minority groups make up a lower share of the older population. However, the policy will release larger family properties which will benefit over-crowded households, among whom black and Asian groups are more highly represented.</p> <p><u>Reduced priority for homeless households</u> Black households are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of those impacted are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p>The other proposed changes will not have a positive or negative impact on ethnic equality.</p>	<p>(compared to 4.8% and 2.6% of all applicants respectively).</p> <p>Black households, in particular, are over-represented among homeless households. The 2021 Homelessness Strategy found that 5.2% of homeless applicants were Black British, African or Caribbean households, 1.7% were Asian, 2.3% were mixed ethnicity and 3% were other ethnic groups.</p> <p>Black British, African or Caribbean households are slightly under-represented in Bands A and B of the housing register. White households and mixed race households are slightly over-represented. Asian households are represented in line with their share of overall applications.</p> <p>Black and Asian households received a higher share of lettings relative to their share of applications in 2022/23. Other groups (white, mixed and other ethnic groups) have received slightly less than their share of applications.</p>
10. Gender equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> A majority of those affected by the proposal are female applicants. This is not surprising as female applicants account for two thirds of all applications and female headed households make up a large proportion of those applicants with dependent children. However, whilst some female applicants with children may be negatively impacted by the policy, others will potentially benefit through shorter waiting times for rehousing. Overall, the policy will have positive and negative impacts on female applicants according to their household circumstances.</p> <p><u>Increasing priority for overcrowded households.</u></p>	<p>A higher proportion of total applications on the housing register are from female applicants compared to male applicants. Female applicants make up 66% and males 34%.</p> <p>However, some caution needs to be applied in interpreting this as those recorded as female applicants include women that have made an application on behalf of a two adult households as well as lone female headed households.</p> <p>Women are over-represented in the homelessness statistics, with the Homelessness Strategy finding that women are at higher risk of homelessness.</p>

			<p>A significant proportion of overcrowded households are female headed households who will benefit from the change.</p> <p><u>Reducing priority for homeless households</u> Female applicants are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of female homeless applicants accepted in priority need are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p>The other proposed changes will not have a positive or negative impact on gender equality.</p>	<p>Female headed households (lone parent households) are highly represented among homeless applicants and those owed a duty.</p> <p>Older single people that are under-occupying are more likely to be female than male.</p> <p>Female headed households make up a large proportion of households fleeing domestic abuse who may be placed in refuge accommodation out of borough.</p>
11. Sexual orientation equality	Y	N ✓	<p>There is insufficient data or responses to identify any impact on sexual orientation equality as a result of the proposed changes.</p>	<p>Housing register analysis: 97% of applicants that responded to the question on sexual orientation identified themselves as heterosexual/straight. 2% of applicants described themselves as gay/lesbian and 0.7% as bisexual.</p> <p>There is some evidence nationally that young LGBT people have a higher rate of homelessness.</p>
12. Gender re-assignment	Y	N ✓	<p>There is insufficient data or responses to identify any impact on gender re-assignment due to the proposed changes.</p>	<p>There is no data available in relation to housing register applicants.</p> <p>National research suggests that Trans people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions and harassment by family, neighbours and members of their local community.</p>
13. Age equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> The proposed policy will impact disproportionately on households aged 25-44 years as this age group is most likely to have two or more dependent children. However, whilst some applicants within this age cohort may be negatively impacted, others will potentially benefit through shorter waiting times for rehousing. Age does not determine which groups are</p>	<p>2021 Census data: Older people (65+) make up 15% of the local population (cf 19.4% in south east). This equates to 18% of the adult population (over 16). 14% of the population are young people aged 20-24. Working age people make up 68% of the local population (with those between 25-44 accounting for 36%) .</p>


	<p>likely to be positively or negatively impacted by the proposed policy.</p> <p><u>Increasing priority for overcrowded households</u> A high proportion of overcrowded households are households aged 25-44 years and these applicants are most likely to benefit from the change.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> Removal of non-dependents will ensure that overcrowded households with dependent children will benefit through reducing waiting times. These households are most likely to be aged between 25 and 44 years.</p> <p><u>Increasing priority for under-occupying households</u> The majority of these households are older aged 55-64 and 65+. Older people who want to move to a more suitable home will benefit through the increased priority. Among this group, some older people will be vulnerable, have medical and mobility issues and wheelchair or accessible accommodation or care and support needs. These older people will be prioritised for the limited specialist accommodation available.</p> <p><u>Reducing priority for homeless households</u> Young people are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of young people accepted in priority need are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p><u>Reducing residency requirement from 4 to 2 years.</u> There will continue to be exceptions for young people and care leavers who have been placed by Bracknell Forest in out of area specialist accommodation and older people who want to return to the borough for family support.</p> <p><u>Removal of priority given to working households.</u></p>	<p>Housing Register: Age of applicants. The vast majority of applicants (80%) are of working age (25-64), with 60% aged between 25 and 44 years. Younger applicants (19-24) account for 12.7% and older applicants (65+) for 6.3%.</p> <p>This means that older people are under-represented on the housing register with working age households, especially those between 25-44, heavily over-represented. Young people are slightly below their share of the population.</p> <p>Homelessness Strategy 2021: 18–34 year olds are significantly over represented in the homelessness figures, with the 35 – 45 year old age group also over represented. Young people aged 18–24 are almost 3 times more likely to become homeless than those aged 45–54.</p> <p>Older households are highly represented among under-occupying households.</p> <p>Older households may be living outside of borough but need to return for family support or following breakdown of family support elsewhere.</p> <p>Older people more likely to be vulnerable, have medical and mobility issues needing wheelchair or accessible accommodation. Older people more likely to have dementia and other care needs requiring specialist accommodation with care and support.</p> <p>Young people may be vulnerable and require support to manage a tenancy.</p> <p>Some young people will be care leavers.</p>
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			<p>Older people are less likely to be in work and so this change will have a positive impact by ensuring that they are not disadvantaged for rehousing compared to working households.</p> <p><u>Increasing priority for care leavers.</u> The proposed change will positively benefit young people who are care leavers.</p> <p><u>Foster carers able to apply for larger family homes.</u> The proposed change will positively benefit young people in care.</p> <p><u>Parents able to include children in care in applications.</u> These proposed changes will benefit some young people under 18.</p> <p>The other proposed changes will not have a positive or negative impact on age equality.</p>	
14. Religion and belief equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> Analysis of household affected by the proposed change does not show a disproportionate impact on any religious group.</p> <p><u>Increasing priority for overcrowded households.</u> Some religious groups live in larger households and may be more likely to experience overcrowding. And so will benefit from this proposal.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> This policy may impact more on some religious groups associated with larger extended households (Muslims and Hindus). However, there are mitigations as those non-dependent members over 21 can apply to the housing register as single applicants and would receive priority where they are living in overcrowded households.</p> <p>The other proposed changes will not have a positive or negative impact religion and belief equality.</p>	<p>2021 Census data: 48% Christian, 40% no religion; 6% no response, 1% Buddhist, 2% Hindu, 2% Muslim, 1% Sikh.</p> <p>There is research to suggest that some religious groups (Muslims and Hindus) are more likely to live in larger, extended households, which contain more non-dependent members, compared to others (e.g. Christians).</p> <p>Analysis of applicants affected by the proposed bedroom standard policy has looked at the religion of those affected: 0.7% Buddhist, 34% Christian, 9.3% Prefer not to say, 0.7% Hindu, 2% Muslim, 46.7% No religion, 6% Other.</p>

<p>15. Pregnancy and maternity equality</p>	<p>Y ✓</p>	<p>N</p>	<p><u>Adoption of national bedroom standard</u> The proposed change will not impact on pregnant women. The change will impact on women in maternity with young children, as it will mean that some applicants with two or more young children will no longer be entitled to separate rooms and have lower priority under the new standard. It is therefore more likely to impact on women in maternity, some of whom will find themselves negatively impacted by the proposed change. However, the policy change is justified as it will ensure that those facing the worst impact of overcrowding (including some women in maternity with young children) will benefit through shorter waiting times.</p> <p><u>Increasing priority for overcrowded households.</u> The policy will ensure that the most overcrowded households are prioritised and rehoused more quickly including some women in maternity with young children.</p> <p><u>Reducing priority for homeless households</u> Pregnant women and those with young children are highly represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of applicants accepted in priority need due to pregnancy or having young children are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p><u>Removal of priority given to working households.</u> Women in maternity with young children are less likely to be in work and so this change will have a positive impact by ensuring that they are not disadvantaged for rehousing compared to working households.</p> <p>The other proposed changes will not have a positive or negative impact on pregnancy and maternity equality.</p>	<p>Pregnant women without children are not counted separately from single/couples without dependent children in homelessness data.</p> <p>Homeless pregnant households are usually considered to be in priority need.</p> <p>Pregnant households will usually require an additional bedroom once their child is born.</p>
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<p>16. Marriage and civil partnership equality</p>	<p>Y</p>	<p>N ✓</p>	<p><u>Adoption of national bedroom standard</u> The proposed change will impact on some households with children who will no longer be entitled to separate rooms and some of these will be households that are married or in a civil partnership. However, the proposed policy change does not impact disproportionately on households that are married or in a civil partnership compared to those that are not.</p> <p><u>Increasing priority for overcrowded households.</u> As above, the policy will ensure that the most overcrowded households are prioritised and rehoused more quickly which will include some households that are married or in a civil partnership – but the latter has no effect on which households benefit or not.</p> <p>There is no evidence to suggest that the other proposed changes will impact on marriage and civil partnership equality.</p>	<p>2021 Census: 48.3% of people are married or in a civil partnership in Bracknell Forest – slightly higher than SE and England averages. 35.4% have never been married, 2% are married but separated, 9.4% are divorced and 4.9% widowed. 63% are living in a couple and 37% not. Overall, nearly half of Bracknell Forest households are married or in a civil partnership</p> <p>Census 2021. 26.8% and 33.8% of people lived in single person or two person households. 17.8% and 14.4% lived in three and four person households. 6.3% of people lived in households with five or more people.</p> <p>Marriage and civil partnership are not recorded for applicants on the housing register.</p>
<p>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</p>	<p>Please explain</p> <p>Armed forces: The proposal gives additional priority to applicants who are serving or ex armed forces personnel, particularly those that have been medically discharged, and so this group will positively benefit.</p> <p>Households with higher incomes: The proposal places a cap on household income such that those earning above this cap will not be able to apply on the housing register; this is justified as such households are more easily able to meet their housing needs in the housing market, ensuring that the beneficiaries of the policy are low income households.</p> <p>Care-leavers: the proposed policy will ensure that those most in need of social housing for welfare or other reasons are awarded a higher priority.</p>			
<p>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</p>	<p>Please explain</p> <p>1. <u>Proposed policy excluding non-dependent household members from housing applications</u>: potential negative impact on some ethnic or religious groups where extended households are more common. The policy is justified as it ensures that overcrowded households with dependent children are prioritised above those with non-dependent members because of the well-established negative welfare, health and educational impacts on children and their families in overcrowded households. Mitigations will be included in the policy to take account of the specific circumstances in some households with non-dependent members, such as caring responsibilities.</p> <p>2. <u>Proposed adoption of bedroom standard</u>. This policy will impact more on certain households such as working age households between 25 and 44 years, female headed households, and women in maternity as these groups are over-represented among households with two or more dependent children. As a result, households from these groups are more</p>			

	likely to be adversely impacted by the proposed change. The justification for the policy is that it responds to the huge demand for the limited supply of larger properties available, and growing waiting times for rehousing, by ensuring that those households with dependent children that are most likely to be negatively impacted by overcrowding are prioritised above other households. Generally, the proposed policy does not advantage or disadvantage households in the above identified groups – as some households will benefit through shorter waiting times whilst others will not. The policy is justified in terms of increasing the opportunity for rehousing of those households most negatively affected by overcrowding.		
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	Please explain Households with a disabled member are likely to be more negatively impacted than other households by the proposed policy excluding non-dependent household members from housing applications. It was identified that about 30 disabled households would be affected. In recognition of the different circumstances and needs of these households, the policy will include mitigations and exceptions for disabled households.		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?	Y	N ✓	Please explain for each equality group
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	Consultation with applicants and a wide range of organisations and stakeholders will help in understanding the issues identified above, whether there are any additional equalities issues and impacts that need to be addressed and the particular mitigations that are needed.		
22. On the basis of sections 7 – 17 above is a full impact assessment required?	Y	N ✓	Please explain your decision. If you are not proceeding to a full equality impact assessment make sure you have the evidence to justify this decision should you be challenged. A thorough analysis of the equalities impact has been undertaken based on the detailed data available from the housing register and other sources. In relation to some groups, there is no or limited data available or the numbers are too small to identify any significant effect. In these cases it has been assessed that no additional information is available to inform the analysis and that any potential negative impacts are likely to be very small. The initial equalities that has been undertaken has identified some potentially negative impacts on some groups, but in all cases, a justification for the proposed policy has been provided and certain mitigations and exceptions have been included. If you are proceeding to a full equality impact assessment, please contact Samantha.wood@bracknell-forest.gov.uk or Harjit.Hunjan@bracknell-forest.gov.uk
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			

Action	Timescale	Person Responsible	Milestone/Success Criteria
Development of appropriate mitigations and exceptions where necessary, to be included in public/stakeholder consultation.	Feb 2024	Ian Stone, Kathryn Hobman, Lisa Jones	Analysis of consultation responses and changes made to policies, mitigations and exceptions where appropriate
Continue to monitor impact of the policy following implementation	2024/25	Ian Stone, Kathryn Hobman, Lisa Jones	Equalities monitoring continues to show no significant negative impacts on any specific cohort, or where it does, the application of the policy is reviewed.
24. Which service, business or work plan will these actions be included in?	The first action will be included within the consultation plan for the housing allocations policy. The second action is included within the housing service plan as part of the ongoing monitoring of housing and homelessness.		
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	Please list: Detailed consultation on the policy proposals involving applicants, the wider public, voluntary and statutory organisations, Council Members, Town and Parish Councils, Registered Providers of Social Housing, etc. to inform potential need for changes in the wording or mitigations included in proposed policies.		
26. Assistant Director/Director signature.	 Signature: Date: 5/10/23		

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To: Executive
23 April 2024

Household Support Fund Phase Five / Financial Hardship Action Plan
Assistant Director: Communities and Policy
Assistant Director: Early Help and Communities

1 Purpose of Report

- 1.1 To recommend the distribution of the fifth phase of the Household Support Fund to low-income residents. Proposals have been developed through the Officer Financial Hardship group and endorsed by the Member Welfare Advisory Panel.
- 1.2 To provide an update on the final outcomes of the Financial Hardship Action Plan, as the plan period has ended, and activity embedded to business as usual.

2 Recommendations

2.1 To distribute the Household Support Fund (phase five) through:

- 2.1.1 Purchasing supermarket vouchers, or for opted schools to make equivalent arrangements, for children qualifying for Free School Meals in Bracknell Forest primary and secondary schools. Households will receive a £15 voucher per child per week of the holidays.**
- 2.1.2 Enhancing the Local Welfare Scheme provision, to expand the support available via applications from households in need of emergency help, where assistance cannot be accessed elsewhere.**
- 2.1.3 The provision of application-based grants to voluntary, community, and faith sector organisations to build capacity and extend the reach of support to residents.**
- 2.1.4 Extending the incentivised debt support offer, where identified at-risk households with a housing benefit overpayment, or council tax arrears, are offered up to £1,000 to reduce their debt alongside attending a debt management session.**
- 2.1.5 Additional discretionary payment to reduce the Council Tax liability to £0 for six months for those that receive 80% reduction in Council Tax due to being on the highest rate of disability benefit.**
- 2.1.6 Should any funding remain unspent toward the end of the grant period, supermarket vouchers may be provided to properties identified in fuel poverty, particularly those who are in receipt of disability and/or carer benefits and/or EPC below E.**

- 2.2 To note the outcomes of the financial hardship action plan and the longer-term support available through business-as-usual services.**

3 Reasons for Recommendations

- 3.1 The Household Support Fund (HSF) is provided by the Department for Work and Pensions (DWP), but local authorities must determine how it is spent within the scope of the guidance issued. The local authority is required by the DWP to create a local eligibility framework to disburse the funding.
- 3.2 Recommendations have been established based on learning from how the previous phases of the funding have used and continued assessment of local need.

4 Alternative Options Considered

- 4.1 The Financial Hardship Officers' Group and Members Welfare Advisory Panel have considered a range of options for spending the HSF. It was concluded that the other options would not be as effective as those recommended in terms of efficiently disbursing funds to those most in need, whilst keeping within the guidelines set out by DWP. The proposals follow the previously agreed mechanism in distributing preceding tranches of funding, accounting for the learning from these.

5 Supporting Information

Household Support Fund (HSF)

- 5.1 The Household Support Fund has had four previous iterations, providing funding to local authorities since October 2021. Through these grants, over £2.5 million has been provided to Bracknell Forest Council. The grant, provided by the DWP, must be used according to the conditions of grant which have previously specified a focus on essential living costs, mainly related to food and energy.
- 5.2 Throughout the grant periods, the council has focused the use of the funding on directly supporting low-income residents, initiatives over recent years have included:
- Supermarket vouchers to pupils eligible for free school meals during holiday periods.
 - Grants to VCFS organisations to extend the reach of support related to food and energy costs.
 - Supermarket vouchers to low-income households who 'just miss out' on the national Cost of Living payments.
 - Targeted support to groups such as those in fuel poverty.
- 5.3 The current grant period was set to end on 31 March 2024. The council campaigned locally and nationally to have the funding extended, in recognition of the significant support it has provided in the community and the continued economic challenges. On 6 March 2024, the chancellor announced a further six months of HSF grant. The late notice prior to 1 April has meant that it has not been possible to agree the use of the funding prior to 1 April.
- 5.4 The guidance on the fifth phase was shared with councils on 26 March 2024. This has required extremely rapid organisation of resources and preparation of policy. Bracknell Forest Council will receive £555,468.03. The specific conditions of grant are highly similar to the previous phase of the household support fund. The funding must be used to meet immediate needs and help those who are struggling to afford household essentials including energy and water bills, food, and wider essentials.

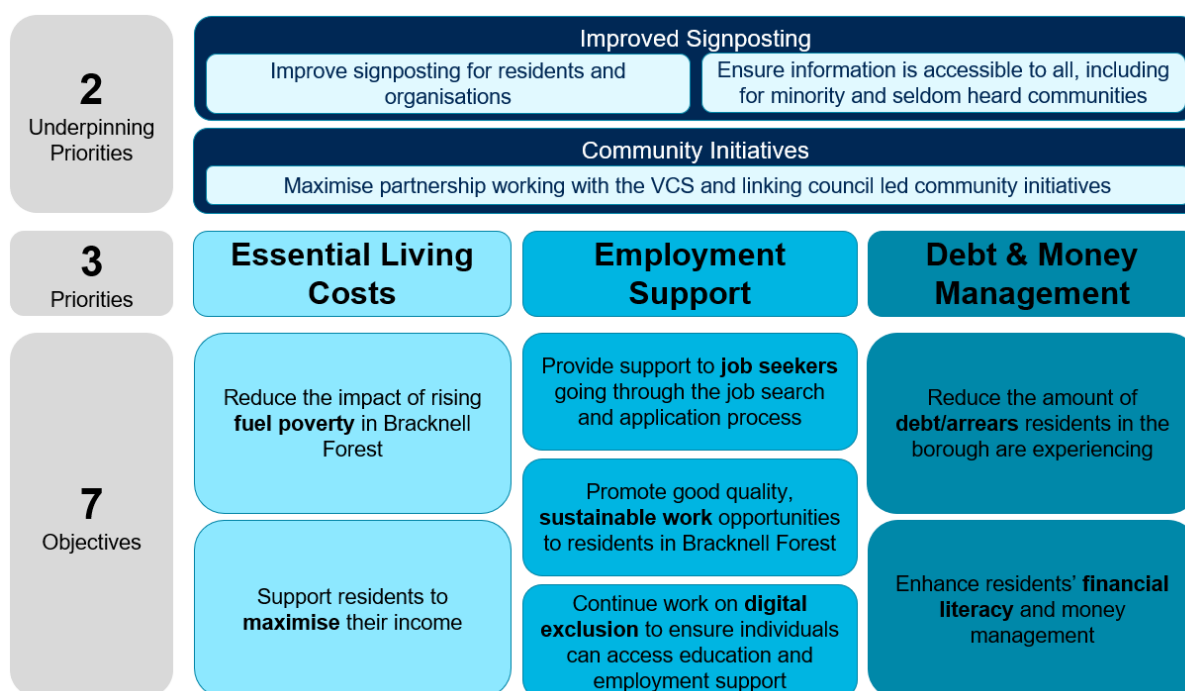
The local authority can determine the specific distribution method and must set this out in a policy/framework document. The grant must be used by 30 September 2024.

- 5.5 Taking this guidance, knowledge of local cohorts, and the assessment of existing mechanisms into account, along with discussions with the Officer Financial Hardship Group and Member Welfare Advisory Panel, the following routes for distributing the funding are recommended. These are summarised in appendix A:
- 5.5.1 Provide supermarket vouchers, or for opted schools to make equivalent arrangements, for Free School Meals eligible pupils in Bracknell Forest primary and secondary schools. Households will receive a £15 voucher per child per week of the school holidays, from May 2024 to September 2024. Specifically, this covers the May half term and summer holiday period. This would reach approximately 2,600 children, providing a total value of support of approximately £273,000.
 - 5.5.2 Use the existing Local Welfare Scheme application process to offer extended support under the HSF. This will provide direct support for costs related to energy and food. It also means a wider cohort such as FSM equivalent under-fives in an education setting, electively home education pupils, 16+ pupils, and SEND children attending out of borough schools can apply for an equivalent voucher. This will offer around £70,000 of support.
 - 5.5.3 Extend the previous application-based grant scheme for Voluntary, Community and Faith Sector (VCFS) organisations. This would specifically offer the grant funding where organisations can demonstrate they are supporting more residents, or those from seldom heard groups, which the council may not otherwise be able to reach. The money must be used to directly support residents and within the DWP grant conditions. Organisations would be able to apply for a maximum of £15,000 to support Bracknell Forest residents through their service. This would be allocated from a total of £120,000 from the funding.
 - 5.5.4 Offer up to £1,000 to clear or reduce outstanding balances related to housing benefit or council tax. Low income households with outstanding balances will be contacted and invited to attend a money management session to support longer term financial resilience. If the outstanding balance is less than £1,000, the entire balance will be cleared. It is expected that this route will provide around £20,000 of support.
 - 5.5.5 Make a payment to reduce the Council Tax liability to £0 for six months for those that receive 80% reduction in Council Tax support due to being on the highest rate of PIP/DLA support (disability benefit). This would be paid directly to council tax accounts. This is expected to reach approximately 372 household with approximately £50,000 of financial support.
 - 5.5.6 Administration costs for delivery can also be covered by the HSF. This will be required for the essential staffing costs to deliver the application and VCFS elements (5.5.2 and 5.5.3). It may also cover printing and postage costs, if required, for example for distributing supermarket vouchers. The council will seek to keep these costs less than 12% of the grant value.
- 5.6 The Household Support Fund policy will be updated to reflect these distribution routes, and the further detail, once approved. As with previous phases, it is recommended that should amendments be required to the approach, particularly

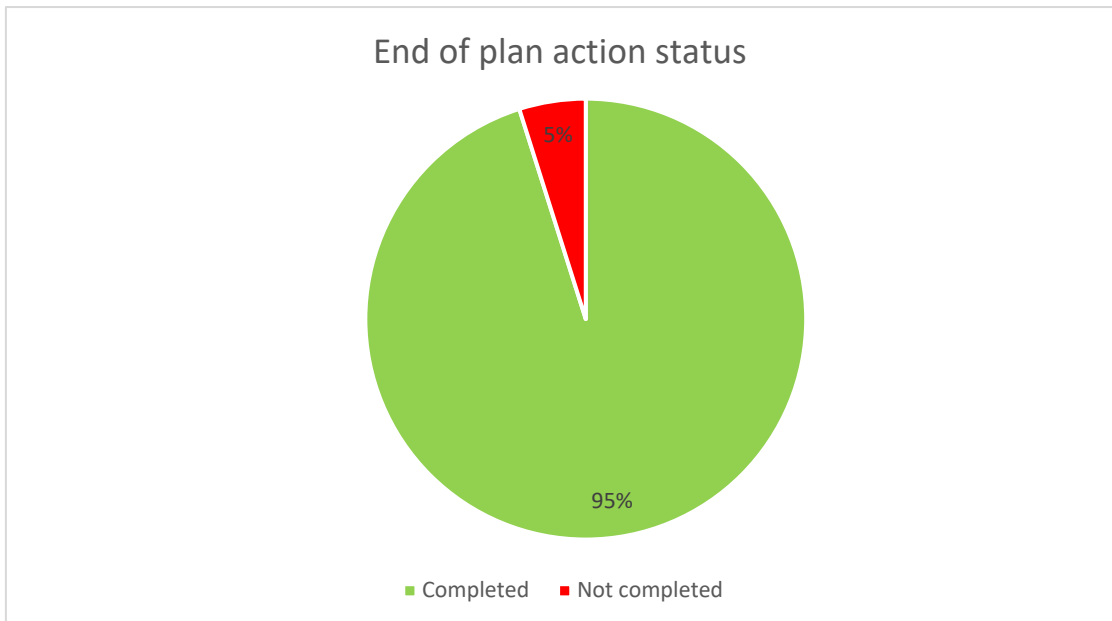
where additional funding is available through unused/returned vouchers, that the decision to amend the policy is delegated to the Chief Executive Officer.

Financial Hardship Action Plan

- 5.7 In October 2022, and following a needs assessment, an 18-month action plan was agreed to address local financial hardship challenges proactively and strategically. The aim of developing a new plan was to enhance joint working, better understand financial hardship in the borough and develop a plan which was tailored to the specific needs of Bracknell Forest.
- 5.8 The plan set out five key areas of focus: signposting, communities initiatives, essential living costs, employment, and debt & money management. Within this, specific objectives were identified, initially with 46 actions to address these. The plan was reviewed ahead of Winter 2023, to mark the first 12 months and to ensure suitability over the winter. At this point, activity was reprioritised to areas requiring most acute support and to reflect the changing economic climate. Therefore, three further actions were added, and eight were removed.



- 5.9 Oversight for the financial hardship action plan has been led by the Member's Welfare Advisory Panel and an Officer Financial Hardship Action Plan Delivery Group. Much of this plan has been enabled through the Household Support Fund.
- 5.10 Of the remaining actions at the end of the plan (41), the majority (39) have been completed. Highlights of those completed include the development of a comprehensive online cost-of-living website, the distribution of over £175,000 to the VCFS and the development of a VCFS financial hardship forum – increasing capacity within the sector in Bracknell Forest. Targeted campaigns to identify and deliver additional income to households has unlocked significant additional income for residents. Another successful part of the plan has been increasing the uptake of free 2-year-old provision, enabling more parents to return to work. A summary of highlights is included in appendix C.



- 5.11 The two actions not completed by the end of the plan were related to the partnership agreement with the DWP and the provision of energy saving advice sessions to the public (4.1.3, 5.1.3). Whilst relationships with the DWP have strengthened during the plan period, external pressures have meant that all local authority partnership agreements are currently under review by the DWP. This currently means the work is on hold. The second action has not been delivered as expected partly due changes in resourcing and reprioritising the climate change programme. Rather than delivering sessions directly to residents for home energy improvements, the focus has change to promote wider communications, tips and advice related to energy saving. Significant growth related to the whole climate and energy saving programme will be continuing as part of the Council’s priorities.
- 5.12 With the plan period now ended and considerable progress made in supporting the community, longer term support will be integrated as part of the council’s services business as usual. There are several routes through which support will continue.
- Financial Inclusion Team – Offering accredited money and debt advice to residents, and a cash grant to those in financial hardship through the established local welfare scheme.
 - The VCFS Financial Hardship Forum will continue to meet quarterly and will hold its first face to face meetings this year as a means of increasing networking opportunities and building capacity.
 - Council Plan 2023-2027 – Several goals within the new Council Plan relate to resident financial stability, including affordable housing and employment. The action plan priorities related to community initiatives and parts of the employment support work will be continued through the Council Plan.
 - Economic Strategy 2024-2034 - This new strategy will specifically continue the work of the action plan related to employment support.
 - Housing Strategy 2023-2028 - Meeting the challenge of a cost-of-living crisis is identified as a priority within the objective of preventing and reducing homelessness. This includes the commitment to continue to offer Discretionary Housing Payments (DHPs) and targeted work to prevent homelessness.
 - Climate Change Strategy 2020-2024 – This is due to be reviewed later this year and will further extend activity to combine climate friendly actions with cost saving opportunities related to energy and transport.

6 Consultation and Other Considerations

Legal Advice

- 6.1 This is a grant made under s 31 of the Local Government Act 2003. This is not a procurement so that the Contract Standing Orders do not apply, nor do the PCR.

However, any other relevant Standing orders would need to be followed.

The Subsidy Controls Act 2022 is now in force and regulates subsidies given by public bodies, but it is not considered that what is proposed would fall within the relevant definition.

Financial Advice

- 6.2 The anticipated financial implications are set out in the supporting information and grant funding is available to finance the planned expenditure.

Other Consultation Responses

- 6.3 The recommendations have been formed via consultation and development with the Officers Financial Hardship Group and Members Welfare Advisory Panel.

Equalities Impact Assessment

- 6.4 An equality impact screening was completed as part of previous HSF phases and the original action plan development. The screening has been reviewed to include the current recommendations for the fifth phase of the HSF. This concluded that there remain no groups adversely impacted by the recommendations. The proposals seek to reduce the inequality experienced by those facing financial hardship.

Strategic Risk Management Issues

- 6.5 There are no strategic risk management issues identified as part of these recommendations.

Climate Change and Ecological Impacts

- 6.6 The recommendations in Section 2 above are expected to slightly increase emissions of CO₂. Whilst this will not be a direct impact, reducing financial hardship is likely to increase economic activity and consumption, this in turn may generate more CO₂ emissions through activity such as purchasing essential items etc. However, it is considered vital that all households can meet their basic living costs, such as food and heating.

Health & Wellbeing Considerations

- 6.7 There is a direct link between financial hardship and health and wellbeing. These recommendations seek to reduce hardship and therefore this is anticipated to have a positive impact on residents' health and wellbeing.

Background Papers

[Current Household Support Fund Policy](#) (phase four)

Contact for further information

Sharon Warner, Welfare - 01344 351346
 Sharon.warner@bracknell-forest.gov.uk

Katie Flint, Communities and Policy – 01344 352217
 Katie.flint@bracknell-forest.gov.uk

Appendix A - Funding estimates summary

**Note that the cost may be different to the value received by the community due to purchasing costs/discounts.*

Route	Initiative	Value per household	Number reached	Cost
1	FSM pupils at Bracknell Forest schools	£15 per child per week of holidays (May and Summer)	2,600 children	£273,000
			Less previous unused vouchers	-£47,000
2	Application Local Welfare Scheme route	£105-£250	~500 awards	£70,000
3	Voluntary, Community and Faith Sector	Up to £15,000	1,000+ households	£120,000
4	Incentivised household debt management support	Up to £1,000	~35 households	£20,000
5	Council tax support for those with disability benefit	Up to £283	372	£50,500
Sub-total				£486,500
Admin	Additional staff for application, assessment and funding distribution	£66,650	n/a	£66,650
	Printing and Posting costs	n/a	n/a	£350
Admin Sub-total				£67,000
Total				£553,500

Appendix B - Equality Impact Screening

[Attached as a separate document]

Appendix C – Action Plan Highlights

Developed and created a **cost-of-living website** with over **2500** unique visitors a year



Distributed **£485,000** worth of food vouchers

to households in receipt of free school meals in 2023/24



Helped to establish a Voluntary, Charity and Faith Sector Financial Hardship Forum with over 25 organisations as members



Distributed over **2,000** hard-copy guides to help with the cost-of-living and debt advice for people who can't access the internet

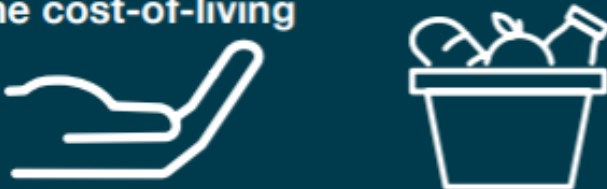


Increased income for 54 households in receipt of pension credit by a total of

£270,000 in 2023



Given over **£140,000** in grants to the charity sector in Bracknell Forest to help with the cost-of-living



Bracknell Forest Council



Reach Out

Supporting you with the cost-of-living




Initial Equalities Screening Record Form

Date of Screening: 13/03/2024	Directorate: People	Section: Early Help and Communities
1. Activity to be assessed	Household Support Fund Phase 5	
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change	
3. Is it a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing	
4. Officer responsible for the screening	Simon Ingle	
5. Who are the members of the screening team?	Simon Ingle, Katie Flint, Sharon Warner, Audrey Johnson.	
6. What is the purpose of the activity?	<p>Bracknell Forest Council have been allocated funding by the Department for Work and Pensions (DWP) to support financially vulnerable residents with cost-of-living pressures. The council has previously received and administered this funding in line with guidance as set out by the DWP. The guidance states that funding must be used to cover costs associated with food, energy (heating, cooking and lighting), wider costs, housing and advice. The current phase must be used between 01 April 2024 and 30 September 2024.</p> <p>The Household Support Fund has been established in a manner which gives local authorities discretion on how to administer support and determine eligibility. Any funding that is unused is to be returned to the Department of Work and Pensions at the end of the funding period.</p> <p>Specifically, the recommendation is to distribute the HSF phase five through:</p> <ul style="list-style-type: none"> • Vouchers and direct payments worth £15 per week to households in receipt of free school meals during school holidays throughout the household support fund award period. • Application based support to help with energy and water costs, and household essentials through direct payments of up to £250. • Application based support for low-income families that would not automatically receive help with free school meals such as households with children under 5 or those receiving home schooling. • Grants to the Voluntary, Charity and Faith Sector to provide support in line with the requirements of the household support fund agreement. • Payments towards priority debts such as housing benefit overpayment and council tax arrears following a full financial assessment for targeted households recognised as facing significant financial hardship. • Payments to top up council-tax support for households receiving the highest levels of assistance through personal independence payments or disability living allowance. 	
7. Who is the activity designed to benefit/target?	Households living in the borough who are experiencing financial hardship due to increased and unforeseen cost-of-living expenses. Households experiencing disadvantage due to low incomes.	

Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral, please give a reason.	What evidence do you have to support this? E.g., equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
<p>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</p>	Y	It is predicted that this activity will have a positive impact upon this characteristic	<p>The numbers of people receiving disability benefits in the UK has risen by 26% since 2019. People with disabilities are much more likely to be economically inactive, experience unemployment and face additional costs of £975 per month in comparison to non-disabled persons. Consequently, poverty rates are much higher for households with a disability.</p> <p>Current funding from the household support fund is being used to directly support households with a disabled person, and this will continue.</p> <p>Targeted campaigns to utilise the Household Support Fund will also support households in receipt of the highest levels of personal independence payments to top-up council tax support.</p>
<p>9. Racial equality</p>	Y	It is predicted that this activity will have a positive impact upon this characteristic	<p>Poverty rates between ethnic groups in the UK vary significantly. Figures from the Joseph Rowntree Foundation show that poverty rates for Bangladeshi (51%) and Pakistani (44%) ethnic groups are much higher than that of white ethnic groupings (19%).</p> <p>When analysing these figures further, minority ethnic communities also experience higher rates of in-work poverty, child poverty rates, lower wages, and insecure employment. This makes minority ethnic communities especially vulnerable to experience the consequences of financial hardship.</p> <p>Funding from the Household Support Fund will be aimed at low-income households such as those from minority ethnic backgrounds. Work will be done with colleagues across the council and VCFS to ensure that awareness of the fund amongst communities is maximised.</p>

10. Gender equality	Y		It is predicted that this activity will have a positive impact upon this characteristic	<p>In the UK research has found that females face significant economic disadvantage to comparative males. This is due to a wide range of factors – such as the gender pay gap, the higher proportion of females in part-time work, childcare commitments, and the higher proportion of unpaid female carers in the UK.</p> <p>During the previous HSF award period, around 65-70% of applicants to Bracknell Forest Council identified as female – representative of the wider financial disadvantage. The fund whilst having no specialised focus upon females is expected to be applied for by females and therefore will help to address this inequality.</p>
11. Sexual orientation equality		N	Neutral, no significant positive or negative impact is expected.	There is no anticipated direct impact to this characteristic.
12. Gender re-assignment		N	Neutral, no significant positive or negative impact is expected.	There is no anticipated direct impact to this characteristic.
13. Age equality	Y		It is predicted that this activity will have a positive impact upon this characteristic	<p>Aspects of the distribution of the funding will directly support families with children where poverty rates are highest. This includes through the distribution of supermarket vouchers to eligible school children. Other households will be able to apply for support if in receipt of eligible benefits.</p> <p>Low-income families with children under five in an education setting can specifically apply for additional support via a fast-track process. Alternatively, those not in an education setting can access the wider Local Welfare Scheme to apply for support through this funding.</p> <p>It is also recognised that pension age households can experience greater levels of poverty. There are already several national initiatives to support this, but the current recommendations also propose proactive support for this cohort.</p>

14. Religion and belief equality		N	Neutral, no significant positive or negative impact is expected.	There is no anticipated direct impact to this characteristic.
15. Pregnancy and maternity equality		N	Neutral, no significant positive or negative impact is expected.	Whilst the fund is expected to have a positive impact upon gender inequality there are no current ways of recognising any significant impact upon pregnancy and maternity equality.
16. Marriage and civil partnership equality		N	Neutral, no significant positive or negative impact is expected.	There is no anticipated direct impact to this characteristic.
17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.	This scheme is primarily targeted at cohorts with low or no income. This funding can also be accessed by carers, a group that is prone to have reduced household income and experience financial hardship. By using the Household Support Fund to support the VCFS, funds may also have a greater reach for other communities that the council is not fully aware of.			
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	No adverse or negative impacts have been identified. All payments will be made on the criteria of financial need and where a household does not qualify for one funding stream, they are able to apply for others under the Household Support Fund, this ensures that no group is excluded.			
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	The scheme is likely to positively impact hundreds of households across the borough who are in financial hardship. It is estimated that around 2,600 pupils will receive support for food during the holidays. It is estimated that a further 1,500 households across the borough will receive direct financial support through the scheme.			
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?		N	No	
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	As a requirement of the funding received from the DWP, a quarterly report which details how the funding is allocated must be compiled. This report includes a breakdown of cohorts which includes households with children, households with a pensioner and households with a disabled person. This will be the fifth round of funding and further data regarding the distribution of the funds can be accessed from previous Household Support Funds.			
22. On the basis of sections 7 – 17 above is a full impact assessment required?		N	A full impact assessment is not required as it has been evidenced above that no negative impacts upon equalities will occur as a result of the distribution of this funding	
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.				

Action	Timescale	Person Responsible	Milestone/Success Criteria
Promotion of the application based element of the scheme across different cohorts and linking to the community engagement team	30 Sept 2024	Welfare Team	Diverse applicants for support
Continued review of the uptake of the initiatives and amending the policy as needed.	30 Sept 2024	Welfare Team	Full distribution of all funding to low income households
Offer support to those who many not otherwise be able to access the support e.g. through telephone appointments and through the provision of support through the VCFS.	30 Sept 2024	Welfare Team	Full distribution of all funding to low income households
24. Which service, business or work plan will these actions be included in?	Welfare Service - Early Help and Communities		
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	This work aims to target the most vulnerable residents, as stated above are more likely to be affected by financial hardship. We will monitor the dispersal of funds to ensure there is no under representation and disparity in our practice.		
26. Assistant director's signature.	 <p>Signature: Date: 8th April 2024</p>		

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To: **Executive**
Date of Meeting: **23 April 2024**

Biodiversity Action Plan 2024-2029 – Consultation Approval **Executive Director of Place**

1. Purpose of Report

- 1.1. To present the draft Bracknell Forest Biodiversity Action Plan (BAP) 2024-2029, which is a partnership plan with the aim to conserve and enhance biodiversity within Bracknell Forest Borough.
- 1.2. To provide an overview of work completed to produce the plan and detail the proposal to take the plan forward for full public consultation.

2. Recommendations

- 2.1. Executive is asked to approve the draft Bracknell Forest Biodiversity Action Plan (BAP) 2024-2029 and supporting summary document as the basis for a 4-week public consultation.

3. Reasons for Recommendations

- 3.1. The BAP forms part of the statutory duty for all public authorities to consider what they can do to conserve and enhance biodiversity.
- 3.2. The recent Bracknell Forest Council declaration of a climate and biodiversity emergency reinforces the importance of action for biodiversity across the borough. The motion includes an item to “Revise the Biodiversity Action Plan to include audits of the state of nature in the borough and to highlight local biodiversity threats due to climate change” which has been taken into consideration in the revised plan.
- 3.3. The Bracknell Forest BAP demonstrates the commitment of the Council and local people to protecting and enhancing nature in the borough.
- 3.4. The draft plan for 2024-2029 builds upon the previous Biodiversity Action Plans. It is a partnership plan, having been co-produced with input from key stakeholders, including the Bracknell Forest Nature Partnership.
- 3.5. A full public consultation will allow the council to gather feedback more widely from anyone who lives in, works in or visits the borough. It will also allow those who have already contributed ideas to see how these have been incorporated into the draft plan and provide further feedback. Feedback will be used to refine and develop the final plan and a detailed action plan. The updated plan will then go to Executive with a recommendation to approve it.

4. Alternative Options Considered

- 4.1. The alternative option is to rely entirely on external policies and strategies to help guide and shape the future support for our local biodiversity. This approach would not focus specifically on the needs of Bracknell Forest’s wildlife and residents. It may reduce the opportunities to achieve the council’s objectives.

- 4.2. There is also the alternative option to not go for wider public consultation on the draft BAP. To use the current copy of the plan, which has been created by wildlife specialists and key stakeholders, as the basis with which to present to Executive, with the recommendation it is approved. This would be a missed opportunity to engage communities in delivering wildlife action. There are many local residents and community groups with an interest in nature conservation. It would mean they would miss out on giving their views, and the plan would be published without their important input.
- 4.3. Wide-scale consultations are usually run for 6-weeks. The proposed 4-week length of the BAP consultation takes into account consultation that has already been undertaken with stakeholders. Consulting for too long will unnecessarily delay progression of the BAP.

5. Supporting Information

BAP background information

- 5.1. The first Biodiversity Action Plan for Bracknell Forest was published in 1997. There has been a BAP in place since then, and the plan is currently reviewed on a 6-yearly cycle. The previous BAP ran from 2018-2023.
- 5.2. The Bracknell Forest BAP is a partnership plan. It demonstrates the commitment of the Council and local people to protecting and enhancing nature in the borough. The Bracknell Forest Nature Partnership oversees the implementation of the plan. The partnership is made up of local people and organisations with an interest in nature conservation.
- 5.3. Bracknell Forest Council acts as a coordinator for the Biodiversity Action Plan. The council hosts and chairs the Bracknell Forest Nature Partnership. The council gathers updates and reports on progress against the BAP targets.
- 5.4. The aim of the BAP is to conserve and enhance biodiversity within Bracknell Forest Borough. The draft plan consists of 10 overarching objectives. These objectives guide the plan and link through to each of the measurable targets. The targets are categorised according to the following:
 - General Themes – targets based on factors that influence the conservation of all species and habitats
 - Habitat Action Plans – targets are based on the 6 key habitat types that can be found in Bracknell Forest (grassland, woodland, rivers and wetlands, heathland, farmland and urban)

Development of the draft BAP 2024-2029

- 5.5. The draft BAP 2024-2029 builds upon the previous BAP 2018-2023.
- 5.6. The draft plan has been co-produced with key internal and external stakeholders (see Consultation Responses section below). The Biodiversity Officer has liaised with key stakeholders via workshops and one-to-one discussions to gather feedback on the previous BAP and ideas for the BAP 2024-2029. These have been used to develop the draft document.
- 5.7. Responses were gathered across the general and habitat themes. Examples of feedback which have been incorporated into the draft plan include a need to:

- Link up strategies (including work on the Berkshire Local Nature Recovery Strategy, Green Infrastructure, Biodiversity Net Gain and Climate Change)
 - Undertake wildlife surveys with clear aims and strategy
 - Plant trees and manage trees with potential to become veterans
 - Tackle invasive species in rivers/wetlands
 - Raise awareness of biodiversity across different habitats
 - Promote opportunities in gardens & urban areas
- 5.8. Some changes have been made compared to the previous BAP to make the plan easier to follow and make it easier to track progress. These include:
- One set of high-level objectives now links through to the targets in all the habitat chapters
 - More consistency in targets across the habitat themes
 - Some simplification and combining of similar targets to reduce the overall number of targets
 - Clear links with other strategies either through targets or supporting information
- 5.9. To support the declaration of a climate change and biodiversity emergency, the links between climate change and biodiversity have been highlighted much more clearly throughout the plan, in consultation with the Climate Change Officers. The plan also includes a target to produce an annual report on the state of nature in Bracknell Forest (in line with the declaration), and targets to collect key data from across different habitats to support this report.

Plan for consultation and communications

- 5.10. The proposal is for the draft document to go to full 4-week public consultation to gather wider views and use this feedback to develop the plan further.
- 5.11. The consultation will be mainly based online, on the Council's consultation portal. The draft BAP and a summary document will be available with a series of questions to gather feedback on the proposed objectives and targets and regarding the supporting information. Hard copies of the draft BAP and survey will be made available at key locations such as Time Square and libraries. Alternative formats (such as large print) will be provided on request. A phone number/contact details of an officer who can take feedback offline will be provided.
- 5.12. Communications are being planned to promote the consultation. This will include online communications, such as website updates, social media posts and a parks and countryside e-newsletter. The consultation will be promoted to users of parks and greenspaces via site notice boards. The Bracknell Forest Nature Partnership and other partners involved with the development of the draft will be sent the consultation directly via email. The Ranger team and Councillors will be provided with an information pack so that they can promote the consultation and answer questions while out on sites or working in the community.

Policy & legislation

- 5.13. The BAP forms part of the statutory duty for all public authorities to consider what they can do to conserve and enhance biodiversity. Section 40 of the NERC 2006 Act has been updated by the Environment Act 2021 to bring in an 'enhanced biodiversity duty'. Section 40A brings in associated reporting for public authorities. An extract of Section 40 is:

“40 Duty to conserve and enhance biodiversity

(A1) For the purposes of this section “the general biodiversity objective” is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England.

(1) A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

(1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)—

(a) determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and

(b) take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.

...”

- 5.14. The BAP contributes to the priority within the Council Plan 2023-2027 for a “Green and sustainable environment”.
- 5.15. The Council recently declared a climate and biodiversity emergency. One of the items within the declaration is to “Revise the Biodiversity Action Plan to include audits of the state of nature in the borough and to highlight local biodiversity threats due to climate change. Reports of these will be presented annually.”
- 5.16. Section 4 of the draft Biodiversity Action Plan 2024-2029 further describes key areas of legislation and policy which relate to the Biodiversity Action Plan. The plans and objectives of partner organisations have also been incorporated into the plan where possible. A list of relevant legislation, plans and policies is in Appendix 5 of the draft plan.

6. Consultation and Other Considerations

Legal Advice

- 6.1. A Biodiversity Action Plan is not a statutory requirement. A Biodiversity Action Plan is used to deliver policy and statutory requirements for biodiversity at a local level. The Bracknell Forest BAP is a partnership plan delivered by a range of stakeholders, coordinated by Bracknell Forest Council.
- 6.2. As a matter of good practice, the consultation process for the draft plan should reflect the following guiding principles set out in case law:
 - The consultation must be undertaken at a time when proposals are still at a formative stage.
 - The Council must give sufficient reasons for any proposal to permit intelligent consideration and response.
 - Adequate time must be given for consideration and response.
 - The product of consultation must be conscientiously taken into account in finalising any proposals.

Financial Advice

- 6.3. There will be no direct financial implications as the BAP is a strategy for guiding work for biodiversity across the borough
- 6.4. There may however be financial implications of delivering the targets. This will be explored over the plan period as projects are worked up and agreed. Where possible the Council will look to use existing revenue budgets or try to secure external funding to support larger projects. Where this is not possible the BAP will ensure the timely identification of budget requirements to be included within future years budget cycles.
- 6.5. Though not explored in detail in the BAP, there are wider economic benefits of biodiversity. A diversity of healthy habitats and species supports the delivery of ecosystem services such as pollination, flood risk reduction, carbon sequestration and recreation. The costs of not tackling the biodiversity crisis are likely to be greater than the costs of measures identified in the BAP.

Other Consultation Responses

Consultees involved with the co-production of the draft:

- 6.6. Workshop attendees: Crowthorne Village Action Group, Binfield Environment Group, Binfield Parish Council, Warfield Environment Group, Easthampstead Living Churchyard Group, Bracknell Forest Natural History Society, Priestwood Environment Group, Crowthorne Parish Council, Bracknell Forest Council - Rangers, Bracknell Conservation Volunteers, Wildlife in Ascot, Sandhurst Town Council, Involve, Moor Green Lakes, Crown Estate, Thames21 (Maidenhead to Teddington Catchment Partnership host), TVERC, Bracknell Forest Council – Climate Change Officer, Natural England
- 6.7. Feedback received outside of workshop from: Warfield Environment Group, Environment Agency, Hedge and Woodland Conservationists, Natural England (Thames Basin Heath Partnership)
- 6.8. Internal feedback on initial draft received from: Rangers, Climate Change Officers, Planning Policy, Tree Officers

Proposed public consultation:

- 6.9. The 4-week consultation on the draft plan is aimed at the general public.

Equalities Impact Assessment

- 6.10. An Equalities Impact Assessment screening has been undertaken (see Annex 1).

Strategic Risk Management Issues

- 6.11. As the report and recommendation seeks to undertake a consultation process, there are no strategic risk management issues to address currently.

Climate Change and Ecological Impacts

- 6.12. The recommendations in Section 2 above are expected to have positive impacts to biodiversity and climate change by allowing an action plan to be developed which will guide activity to improve biodiversity. Some of the targets will also help with mitigation and adaptation to climate change, as indicated within the plan.

Health & Wellbeing Considerations

6.13. The Biodiversity Action Plan includes objectives and targets to improve biodiversity across the Borough. Examples of how delivery of the targets may benefit health and wellbeing include:

- More wildlife attracted to the habitats, allowing residents to get close to nature. Access to nature has been proven to promote health and wellbeing.
- Getting volunteers involved with nature conservation and surveying, improving physical and mental health and community cohesion.
- Some of the targets will also help with mitigation and adaptation to climate change, as indicated within the plan.

Background Papers

Annex 1: Initial Equalities Screening Record Form

Attached separately:

- BAP 2024-2029 Draft for public consultation
- BAP 2024-2029 Draft Summary for public consultation

Contact for further information

Rosie Lear, Biodiversity Officer, Parks & Countryside

Email: bio.diversity@bracknell-forest.gov.uk

Tel: 01344 354441 (general enquiries line for parks & countryside service).

Annex 1: Initial Equalities Screening Record Form

Date of Screening:	Directorate: Place, Planning and Regeneration		Section: Parks and Countryside service
1. Activity to be assessed	Biodiversity Action Plan 2024-2029 – Consultation Approval		
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change		
3. Is it a new or existing activity?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing		
4. Officer responsible for the screening	Rosie Lear, Biodiversity Officer		
5. Who are the members of the screening team?	Rosie Lear, Biodiversity Officer Rose Wicks, Data & Communications Officer		
6. What is the purpose of the activity?	Approval of draft Biodiversity Action Plan 2024-2029 as basis for public consultation. The public consultation will be aimed at the general public and allow everyone (including staff, councillors, stakeholders who have already been involved and wider stakeholders) to give their views and these will be used to refine the document. The Bracknell Forest BAP is a partnership plan for protecting and enhancing nature in the borough.		
7. Who is the activity designed to benefit/target?	The Biodiversity Action Plan includes actions to improve biodiversity across the Borough. Access to nature has been proven to promote health and wellbeing, therefore everyone in the borough should benefit.		
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g. equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.	Y	N	Accessibility checks within Microsoft Word have been used to make the draft document as accessible as possible. The same will be done when the document is converted to a PDF and provided on our website. There is a potential for adverse impact where those with a sight impairment are not able to interpret drawings, figures and illustrations in the same way that someone without a visual impairment would be These webpages explain how the accessibility checkers flag issues and allow them to be fixed: <ul style="list-style-type: none"> • Make your content accessible to everyone with the Accessibility Checker - Microsoft Support • Create and verify PDF accessibility, Acrobat Pro (adobe.com)

			able to. A written description of pictures, maps etc. are provided as Alt text but in this context may not be as detailed as needed to give a comprehensive description of the concept. A phone number/contact details of an officer who can give further verbal guidance or explanation of the content of the document will be provided. Hard copies of the draft BAP and questionnaire will be made available key locations such as Time Square and libraries. Alternative formats (such as large print) will be provided on request.	
9. Racial equality	Y	N		
10. Gender equality	Y	N		
11. Sexual orientation equality	Y	N		
12. Gender re-assignment	Y	N		
13. Age equality	Y	N	There may be older residents who don't have access to online communications. Hard copies of the draft BAP and questionnaire will be made available key locations such as Time Square and libraries. Alternative formats (such as large print) will be provided on request.	Evidence from this research shows that this audience, while not necessarily opposed to ever going online, have many deeply entrenched barriers to using the internet. Overall for this group, the downsides of going online outweighed the perceived advantages. See full report for key barriers experienced. Microsoft Word - Life Offline - Report prepared by BritainThinks for Age UK FINAL.docx
14. Religion and belief equality	Y	N		

15. Pregnancy and maternity equality	Y	N		
16. Marriage and civil partnership equality	Y	N		
17. Please give details of any other potential impacts on any other group (e.g., those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.	The consultation will be mainly based online which may disadvantage those without access to the internet or who cannot use such technology for any other reason. Hard copies of the draft BAP and questionnaire will be made available at key locations such as Time Square and libraries. The Ranger team and Councillors will be provided with an information pack so that they can promote the consultation and answer questions while out on sites or working in the community. A phone number/contact details of an officer who can take feedback offline will be provided with the online documents, hard copies and in the information pack.			
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	N/A			
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?				
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?	Y	N		
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?				
22. On the basis of sections 7 – 17 above is a full impact assessment required?	Y	N	Please explain your decision. If you are not proceeding to a full equality impact assessment, make sure you have the evidence to justify this decision should you be challenged. If you are proceeding to a full equality impact assessment, please contact Harjit.Hunjan@bracknell-forest.gov.uk	
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.				

Action	Timescale	Person Responsible	Milestone/Success Criteria
Use accessibility checker feature within Microsoft Word to ensure the draft BAP document and draft summary document are as accessible as possible. Also conduct accessibility checks when converting the doc to PDF format	Ahead of consultation	Rosie Lear, Biodiversity Officer and Rose Wicks, Data and Communications Officer	No accessibility warnings present for draft full document or draft summary document.
Provide hard copies of consultation documents at various publicly accessible locations. Alternative formats (such as large print) to be provided on request.	During consultation period	Rosie Lear, Biodiversity Officer	Documents are in place when the consultation commences. Contact details provided with online consultation and hard copies.
Publish details of suitable contact who can provide further information/explanation or take feedback offline for those who require it.	During consultation period	Rosie Lear, Biodiversity Officer	Contact details provided with online consultation, hard copies and information pack for Councillors.
24. Which service, business or work plan will these actions be included in?			
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	See above.		
26. Assistant Director/Director signature.	Signature:		Date:

Bracknell Forest Council

Biodiversity Action Plan 2024-2029

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Foreword

Foreword to be added.

1 Background

1.1 Introduction to Biodiversity Action Plans

Biodiversity Action Plans were first developed following the 1992 United Nations 'Earth Summit'.

The government published the UK Biodiversity Action Plan in 1994. It provided plans for the conservation of nature across the UK. Since then, there have been changes in policy and the UKBAP was not continued after 2012. However, the priority habitats and species first identified in the UKBAP are still used to direct action for nature recovery. In this report they are mainly referred to as UKBAP species and habitats, but are also known as priority species and habitats, Habitats and Species of Principle Importance, or Section 41 species and habitats.

Bracknell Forest Council launched the first Biodiversity Action Plan (BAP) for the borough in 1997. The BAP is a partnership plan. It demonstrates the commitment of the Council and local people to protecting and enhancing nature in the borough. The BAP has changed over time to become a habitat-based plan. The 2024-2029 BAP is the 6th version.

1.2 Consultation

The BAP 2024-2029 has been developed by Bracknell Forest Council following consultation with partner organisations, the Bracknell Forest Nature Partnership and the public. The plan aims to reflect the views and priorities of the community.

2 Structure of the Plan

The plan is split into a General Themes Action Plan and 6 Habitat Action Plans. The Action Plans are a series of 'SMART' targets. Each Habitat Action Plan has flagship species to focus interest. Information about how the BAP species were chosen is in Appendix 4: Bracknell Forest BAP Species Selection Process.

In previous years each Habitat Action Plan had its own objectives and targets. For 2024-2029, the objectives have been brought together into an overarching list, and each Habitat Action Plan consists of a list of targets.

2.1 Aim

The aim of the BAP is to conserve and enhance biodiversity within Bracknell Forest Borough.

This will be achieved through:

- Targeted monitoring
- Positive management
- Effective communication
- Proactive policies

2.2 Objectives

The BAP has the following objectives:

(A) Track the condition of designated sites

(B) Monitor key sites, features and indicator species to understand trends and inform management

(C) Enhance, restore or create high quality habitats, through Biodiversity Net Gain (BNG) and Passive Open Space of Value (OSPV) projects and other project routes

(D) Designate the best sites for nature

(E) Improve habitat connectivity

(F) Enhance sites for wildlife by providing opportunities for nesting, foraging, hibernation and movement

(G) Build awareness and engage communities

(H) Contribute to related strategic plans and activities within Bracknell Forest and across administrative boundaries

(I) Contribute to climate change mitigation (lowering emissions and/or carbon storage)

(J) Contribute to climate change adaptation (improving the resilience of habitats, species and people to a changing climate)

The objectives link through to each of the targets in the plan. This is shown under each target.

2.3 Targets

Targets are set within the Habitat Action Plans. To ensure that progress can be achieved and reported against, the targets use SMART criteria:

- Specific
- Measurable
- Attainable
- Relevant
- Time-bound

3 Delivery of the Plan

3.1 Partnership working

The success of the Biodiversity Action Plan is dependent on local people and organisations working together.

Bracknell Forest Nature Partnership

The Bracknell Forest Nature Partnership oversees the implementation of the plan. The partnership is made up of local people and organisations with an interest in nature conservation. This includes local environmental groups, wildlife charities and Town and Parish Councils. The partnership has been closely involved with the review of previous targets and development of new targets.

Berkshire Local Nature Partnership

This is the nature partnership at a county level. Members include government bodies, wildlife charities, local and national authorities and businesses. The partnership has identified Biodiversity Opportunity Areas (BOAs), which are key areas to focus nature conservation efforts at a landscape scale. A map showing BOAs within Bracknell Forest is in Appendix 3: Designated sites.

Bracknell Forest Council

Bracknell Forest Council acts as a coordinator for the Biodiversity Action Plan. The council hosts and chairs the Bracknell Forest Nature Partnership. The council gathers updates and reports on progress against the BAP targets.

The BAP forms part of the statutory duty for all public authorities to consider what they can do to conserve and enhance biodiversity.

The council also plays a central role in the local community through education, public open space, highways, social care and many other roles that provide opportunities for biodiversity. As a Unitary Authority, Bracknell Forest Council is also responsible for the local planning process. Planning policy plays a key role in the protection and enhancement of biodiversity.

3.2 Monitoring

The Bracknell Forest Nature Partnership updates progress against the targets at 6-monthly meetings. Bracknell Forest Council collates progress updates and produces a mid-term review and end of term review.

Thames Valley Environmental Records Centre (TVERC) collates biological records across Berkshire and Oxfordshire. TVERC provide Bracknell Forest Council with data on species and habitats through a service level agreement. TVERC also survey Local Wildlife Sites (LWS) and Local Geological Sites (LGS). An independent panel assesses this information to review the designation of these important local sites.

3.3 Delivery Plan

A detailed plan will be produced in the first year of the BAP to provide options for implementing each of the targets, identify who may be involved and identify potential funding.

4 Legislation, policy and links with other plans

This section outlines some key areas of legislation and policy which relate to the Biodiversity Action Plan. The plans and objectives of partner organisations have also been incorporated into this plan where possible. A list of plans and policies is in Appendix 5: Relevant Legislation, Policies and Plans.

National

4.1 Environment Act 2021

The Environment Act 2021 has been described by Tony Juniper, Chair of Natural England, as “the most ground-breaking piece of environmental legislation in many years” (Natural England, 2021). It brings in new targets, tools and requirements for nature recovery, some of which are still in development at the time of writing the BAP 2024-2029. The work areas most closely linked to the BAP are Local Nature Recovery Strategies and Biodiversity Net Gain.

Local Nature Recovery Strategies

Local Nature Recovery Strategies (LNRSs) are county-scale spatial strategies to recover nature across England. Together, they will cover the country in a Nature Recovery Network. The Royal Borough of Windsor and Maidenhead is leading the development of the Berkshire LNRS. The plan will be developed with input from a wide range of stakeholders. The result will be a strategic plan with mapped priorities and actions for nature recovery. It is anticipated it will be published in spring 2025.

Biodiversity Net Gain

Biodiversity Net Gain (BNG) is a way to contribute to the recovery of nature while developing land. The new legislation will require all new developments to leave biodiversity in a measurably better state than it was before. Habitats can be created or enhanced on the development site, off-site, or through a combination of both. Biodiversity Net Gain becomes mandatory for many developments in 2024.

4.2 Environmental Land Management

The government is undertaking a significant reform of agricultural policy and spending in England. Environmental Land Management (ELM) schemes will pay farmers to provide environmental goods and services alongside food production. These include protecting, restoring and creating wildlife rich habitats, improving water quality, increasing resilience to floods and droughts, increasing tree and woodland cover and storing carbon (Defra, 2023, A).

Bracknell Forest

4.3 Climate Change Strategy

In September 2023, Bracknell Forest Council declared a Climate and Biodiversity Emergency. This included a commitment to achieve net-zero greenhouse gas emissions across the borough as close to 2030 as possible.

The council has a Climate Change Strategy (current version 2020-2024, upcoming version 2024-2028), and an associated Action Plan. The strategy has two main strands:

- Reduce carbon emissions that are under the council's control
- Influence and lead community action against climate change

The Joint Climate Action Board unites organisations in Bracknell Forest. The Board will play a central role in developing a Community Climate Emergency Strategy. It is supported by working groups from different sectors, including a biodiversity working group.

4.4 Local Plan

The emerging Bracknell Forest Local Plan (BFLP) provides the strategy for the growth of the borough up to 2037. At the time of writing the BAP, the Local Plan is at examination stage and it is anticipated to be adopted in 2024. In particular the BFLP:

- sets out the strategy for the level and distribution of development in the Borough;
- allocates sites for specific uses, including housing and economic development; and
- includes policies used to determine planning applications.

The plan vision includes protecting and enhancing green networks and securing a net gain in biodiversity. The key policy for biodiversity defines the expectations for developments to achieve net gain, provide suitable ecological information and work in accordance with the mitigation hierarchy to first avoid, then mitigate and then compensate for negative impacts on biodiversity.

4.5 Other linked Bracknell Forest Council strategies

In addition to the Climate Change Strategy and Local Plan discussed above, this plan supports the following council plans as part of its developing overall green infrastructure strategy:

- Council Plan 2023-2027
- Parks and Open Spaces Strategy (2012)
- Tree Strategy (2017)
- Rights of Way Improvement Plan 2017-2027
- Local Transport Plan 2011-2026, and any replacement strategy

- Relevant Development Plan policies
- Planning Obligations Supplementary Planning Document (2015), and any subject replacement SPD
- Thames Basin Heaths Special Protection Area Supplementary Planning Document (2018)

4.6 Designated sites

Designated sites are areas of special importance for nature, due to their rarity or importance for wildlife. Sites can be designated for their importance for nature at the local, national and international level. The following types of designated sites can be found in Bracknell Forest:

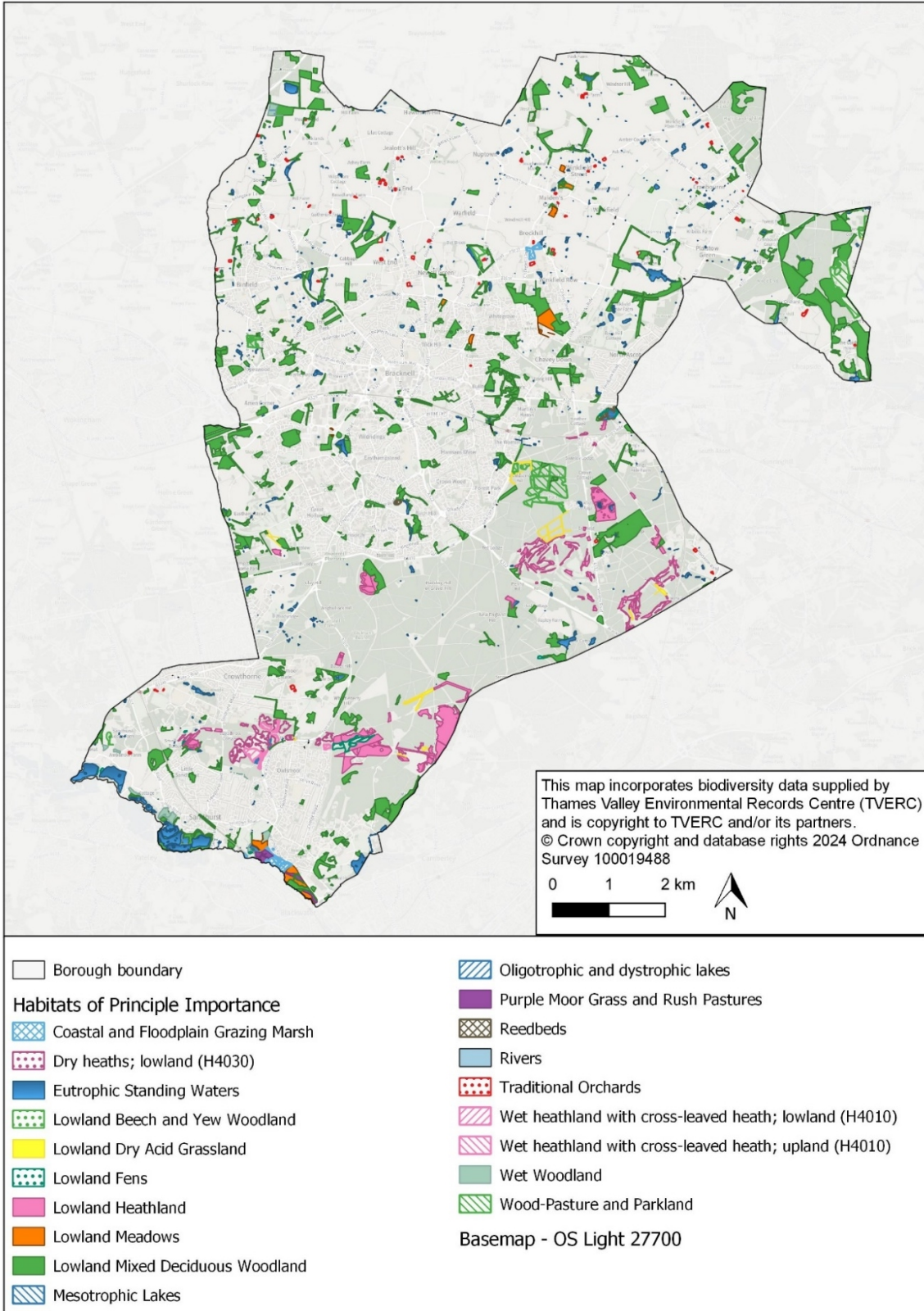
- Local Wildlife Site (LWS) – locally designated areas supporting important and rare habitats and species
- Local Nature Reserve – sites designated by local authorities as important for wildlife, geology, education and enjoyment
- Site of Special Scientific Interest (SSSI) – nationally designated as the best examples of the UK's flora, fauna, geological or physiological features
- Special Protection Area (SPA) – SPAs are strictly protected at a national level as the most important areas of habitat for certain rare and migratory birds
- Special Area of Conservation – SACs are a national-level network of high-quality sites supporting important habitats and species

For more information and a map of designated sites see Appendix 3: Designated sites.

There is opportunity to designate new sites and also to enhance non-designated sites for their habitat and species value. This may include open spaces of public value, verges, incidental open space areas, parkland and Suitable Alternative Natural Greenspaces (SANGs).

5 BAP Habitats

TVERC has mapped habitats using field survey data and interpretation of aerial photography. The map below shows habitats identified as Section 41 Habitats of Principal Importance (also known as UKBAP priority habitats). Many areas would require on-the-ground survey to confirm that they support the priority habitat shown.



6 General Themes Action Plan

The General Themes Action Plan covers factors that influence the conservation of all species and habitats. The targets take a borough-wide, rather than habitat-specific, view. Key considerations in the General Themes section are:

Network of designated sites

As described in Section 4.6, designated sites are some of the most important sites for wildlife. Their protection is vital for nature conservation. It is important that sites are appropriately designated, monitored and that a proactive approach is taken to improve the management of sites, especially where there are concerns they may be deteriorating.

Information

Up-to-date information is essential to take the correct decisions and actions. This information may be collected by volunteer recorders, consultant ecologists, organisations, landowners and the public more widely.

Community engagement

Education and engagement are vital to achieve the aims of the BAP and ensure it has a long-lasting impact. Local people have a key role to play through practical volunteering, surveying and raising awareness. Local businesses, schools, charities, community groups and landowners all have different opportunities to protect and enhance nature.

Strategy & multi-functional benefits

Activities to work towards the BAP targets will also contribute to the aims of other strategic plans, and vice versa. Linked strategic actions may include providing good quality open space and addressing the causes and impacts of climate change.

Work to conserve and recover nature at the local level will also contribute to ambitions across Berkshire and across the country. The development of the Local Nature Recovery Strategy provides a new opportunity for strategic planning and action. As the plan is under development, there is currently an opportunity to shape its development. There will then be opportunities to take action, though the precise nature of these actions is not yet known.

Resilience and climate change

Resilience is the ability to respond to change or disturbance, by resisting damage and recovering quickly. The diversity and connectivity of our species and habitats are factors which affect the resilience of nature in the borough and beyond. Pressures which species and habitats need to be resilient to, such as wind, fire or drought, may become more frequent with climate change. Therefore, working on habitat connectivity and nature conservation is essential in reducing the impacts of climate change.

Natural England and RSPB (2019) have assessed each priority habitat for the potential impacts of climate change. These are discussed in each habitat action plan.

6.1 Targets

1. Track condition of Sites of Special Scientific Interest (SSSIs)

Contributes to objective: **(A)**

2. Survey each Local Wildlife Site every 10 years

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Contributes to objective: (A) (B)

3. 75% Local Wildlife Sites in positive management

Contributes to objective: (A) (B)

4. Review the network of Local Nature Reserves and designate appropriate sites

Contributes to objective: (A) (D)

5. Produce an annual report on the state of nature in Bracknell Forest

Contributes to objective: (B) (H)

6. Promote wildlife recording including submitting records to TVERC

Contributes to objective: (B) (G)

7. Involve educational institutions in monitoring and management of biodiversity

Contributes to objective: (B) (G)

8. Hold or publish at least 30 events and articles each year promoting the importance of biodiversity within the borough (see also individual habitat plans), including links to climate change where possible

Contributes to objective: (G) (H) (I)

(J)

9. Host at least 8000 hours of volunteering for nature each year

Contributes to objective: (C) (F) (G)

(J)

10. Bring together, review and enhance the plans and strategies for green infrastructure in Bracknell Forest

Contributes to objective: (H) (I)

(J)

11. Secure and monitor at least 10% biodiversity net gain on relevant developments

Contributes to objective: (C) (H)

(J)

12. Engage with the development of the Berkshire Local Nature Recovery Strategy (LNRS)

Contributes to objective: (H)

13. Support the delivery of the Berkshire Local Nature Recovery Strategy (LNRS)

Contributes to objective: (H)

14. Support and work with the Joint Climate Action Board (JCAB), including the biodiversity working group

Contributes to objective: (G) (H) (I)

(J)

7 Grassland Habitat Action Plan

7.1 Bracknell Forest BAP Species for Grassland

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important grassland habitats in the borough.

Harvest Mouse (*Micromys minutus*)

Status: A UKBAP species, thought to have become much more scarce in recent years and requiring conservation efforts to reduce the decline.

Habitat requirements: Habitats with structural grasses, including tussocky grasslands, hedgerows, field margins, road verges and reedbeds.

Bumblebees (*Bombus spp.*)

Status: Bumblebees have been in decline over the past century. Two species became extinct in the UK during the 20th century.

Habitat requirements: Habitats with plenty of flowers during the whole of their active phase (spring until late summer).

Ragged Robin (*Lychnis flos-cuculi*)

Status: Widely distributed in the UK but declining and assessed as Near Threatened in England. Localised within the borough and largely reliant on protected sites.

Habitat requirements: Damp grassland managed by cutting or grazing to prevent more vigorous plants from becoming dominant.

Devil's Bit Scabious (*Succisa pratensis*)

Status: A plant of species-rich grasslands which have significantly declined over the past century.

Habitat requirements: Found in a range of habitats including neutral, calcareous and acid grasslands, purple moor-grass and rush pasture, fens and damp woodlands. In Bracknell Forest, mainly found in acid grasslands in the south of the borough where grazing keeps grasses in check.

Grassland species info from: Mammal Society (no date), Bumblebee Conservation Trust (2021), Freshwater Habitat Trust (no date), Magnificent Meadows (no date) and previous Bracknell Forest BAP.

7.2 UKBAP priority habitats

- Lowland dry acid grassland
- Lowland meadows
- Coastal and floodplain grazing marsh
- Purple moor grass and rush pasture

7.3 National status

Grassland covers 38% of England, with 5% of this being 'semi-natural' and 32% 'improved'. Improved grassland refers to modifying grassland to improve it for agriculture. It is unimproved grasslands, that have not been heavily modified or fertilised, which provide better grassland habitats for plants and wildlife. Grassland extent declined over the 20th

century. This loss slowed towards the 21st century, though underlying this trend is an indication that the condition, or quality, of broad grassland habitats has declined in recent years (Plantlife International, 2023).

7.4 Grasslands in Bracknell Forest

Grasslands in the borough reflect the underlying geology. Grasslands are neutral and more extensive in the north of the borough where agriculture is more prevalent. In the south of the borough, acid grasslands form mosaics with heathland.

7.5 Threats

Species-rich grasslands may be lost directly due to arable conversion or development. They are also sensitive to changes that affect the balance between wildflower and grassland species. Factors which can affect this include:

- Lack of management leading to scrub encroachment and invasion of coarse grasses. These can outcompete wildflower species.
- Overgrazing, particularly by horses, resulting in loss of species and trampling.
- Agricultural improvement through addition of fertiliser, reseeding or treatment with herbicide. These actions remove wildflower species and replaces them with coarse grasses.
- Invasive species such as Goat's Rue and Pampas grass

Impacts of climate change on priority habitats

Lowland dry acid grassland is the grassland priority habitat most commonly found in Bracknell Forest. This has been assessed as having a low sensitivity to climate change. Nonetheless, hotter, drier summers may affect the composition of species, such as favouring more drought tolerate species. Increased incidence of fires may also affect community composition and increase vulnerability to invasive species (Natural England and RSPB, 2019).

7.6 Opportunities

- Enhancement of existing poor-quality grasslands within public open space, with biodiversity net gain providing a driver for better quality habitats on development sites and via off-site projects, in accordance with the emerging Local Access to Nature standard
- Enhancement of grasslands for nature on agricultural land, supported by agri-environment schemes
- Increasing the diversity of the extensive horse paddocks in the borough
- Public interest in wildflowers and pollinators has increased support for grassland restoration in recent years

7.7 Targets

15. Design and undertake regular surveys of key grassland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

16. Enhance, restore or create 15ha grassland habitats

Contributes to objective: **(C)**

(J)

17. Survey 5ha grassland to propose as Local Wildlife Sites

Contributes to objective: **(B) (D)**

18. Make management advice available to grassland landowners

Contributes to objective: **(C) (G)**

**19. Raise awareness of grassland biodiversity within annual events and articles
(see General Themes target 8)**

Contribute to objective: **(G)**

8 Woodland Habitat Action Plan

8.1 Bracknell Forest BAP Species for Woodland

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important woodland habitats in the borough.

Bullfinch (*Pyrrhula pyrrhula*)

Status: A UKBAP species, classified as Amber under the UK Birds of Conservation Concern. Numbers in the UK declined steeply in the 1970s. Although there has been an improvement more recently, the population is still about 40% lower than in the 1960s. Present in the borough in low numbers.

Habitat requirements: Feeds on buds and fruit in woodlands, hedgerows, parklands, gardens and orchards. Usually nests in shrubs, such as hawthorn and blackthorn.

Wild Service Tree (*Sorbus torminalis*)

Status: Widespread but not common in England. Generally confined to ancient woodlands and hedges, particularly on heavy clay soils.

Habitat requirements: Grows best in clay and lime-based soils. In Bracknell Forest this species appears to tolerate the neutral and clay soils in the north of the borough.

Noctule Bat (*Nyctalus noctula*)

Status: A UKBAP species and European protected species. Relatively widespread but has declined in Britain due to loss of feeding habitat and suitable trees for roosting. Found throughout the borough but roosts are rarely identified.

Habitat requirements: Noctules typically roost in holes in trees. They forage for insects in open areas, woodlands, wetlands and grasslands.

Stag beetle (*Lucanus cervus*)

Status: A UKBAP species which is declining across much of Europe. London and the Thames Valley area are a hotspot for stag beetles.

Habitat requirements: The natural habitat of stag beetles is woodland, but they also live in hedgerows, orchards, parks and gardens. The larvae rely on dead wood, particularly of oak trees and other broad-leaved species.

Woodland species info from: Stanbury and others (2021), BTO (no date, A), The Wildlife Trusts (no date, A & B), Woodland Trust (no date, A), Bat Conservation Trust (2010), Mammal Society (no date, B), Hendry (no date) and previous Bracknell Forest BAP.

8.2 UKBAP priority habitats

- Lowland beech and yew woodland
- Lowland mixed deciduous woodland
- Wet woodland
- Wood pasture and parkland
- Traditional orchards
- Hedgerows

Ancient woodland describes areas which have been woodland since 1600AD. These areas may now be one of the priority habitats above or may be another type of woodland habitat such as conifer plantation. Regardless of the current type of woodland cover, ancient woodlands are defined as irreplaceable habitats. They are given special protection in planning policies and Biodiversity Net Gain.

8.3 National status

Following declines in previous centuries, over the last 100 years the UK's woodland cover has more than doubled. Woodland today covers 13.2% of the UK's land, up from 12% in 1998. Half of this is native, the other half mainly non-native conifer plantation. Within this, ancient woodland covers 2.5% of the UK's land (Reid and others, 2021).

8.4 Woodland habitats in Bracknell Forest

Woodlands

Bracknell Forest has a tree canopy cover (woodland and other trees) of 35%. This is the second highest of the local authorities in England (Friends of the Earth, 2023). Some of the largest areas of woodland are Swinley Forest and Crowthorne Woods. These are owned by the Crown Estate and are predominantly conifer plantation. There are Local Wildlife Sites across the borough which support broadleaved woodland, often called 'copses', such as Long Copse and Tarman's Copse.

Traditional Orchards

Traditional orchards are a hotspot for biodiversity. They provide a mix of habitats such as fruit trees, grassland, hedges, scrub, deadwood and sometimes ponds. Since the 1950s, 90% of traditional orchards in England and Wales have been lost (PTES, no date). Natural England data maps 65 traditional orchards in Bracknell Forest, but only a small number of these have been verified on the ground. There are community orchards at Larks Hill, Lily Hill Park, Jealott's Hill and Buckler's Park.

Hedgerows

There are half a million miles of hedgerow in the UK. Hedges have declined in the last century, although the loss has slowed since the 1990s. Hedges provide a variety of wildlife with food, shelter and 'corridors' to move through the landscape (Woodland Trust, no date, B). There is currently not an estimate for the overall extent of hedgerows in Bracknell Forest, but the northern parishes where there is more agriculture hold the main resource.

Ancient & Veteran Trees

Old trees can develop features such as decay, fungus, deadwood, holes and cavities. This creates a complex habitat which can support many species. The UK is very important for ancient and veteran trees, and Windsor Forest is home to many of these trees. It is recognised as a Special Area of Conservation for its valuable beech and oak woodland habitat which supports rare species such as the violet click beetle. Veteran trees have been identified by the Crown Estate within Windsor Forest, and by a range of groups and volunteers across the borough.

8.5 Threats

Woodland habitats in the borough are threatened by:

- Isolation from other habitats
- Invasive non-native species, in particular Rhododendron and Laurel which create dense shade and prevent understory species and new young trees from growing
- Lack of management
- Degradation by human activities such as dumping, fires and recreational pressures
- Deer browsing and grey squirrel damage
- Inappropriate management e.g., hedge cutting
- Removal of deadwood
- Development, particularly for veteran trees and orchards
- Pollution

Impacts of climate change on priority habitats

Wet woodland is assessed as moderately sensitive to climate change, while deciduous woodland, wood pasture, orchards and hedgerows have a low sensitivity. Woodlands are likely to be most threatened by more frequent and severe droughts. Pests and diseases may be more frequent as stressed trees are more susceptible, and pest insects are likely to benefit from climate change. Grey squirrel and deer are also likely to benefit from climate change which may increase pressure and reduce natural regeneration. Wind-throw may be more common if the UK becomes more stormy (Natural England and RSPB, 2019).

8.6 Opportunities

The government has a target to increase tree cover (which includes woodlands and smaller areas of trees) in England from 14.5% in 2023 to 16.5% in 2050 (Natural England and Forestry Commission, 2023). There are existing grant schemes for woodland creation and tree planting, and new opportunities from Biodiversity Net Gain and carbon markets. Agri-environment schemes provide incentives to landowners for activities such as woodland creation, woodland and hedgerow management and improving tree health (Defra, 2023, A).

8.7 Targets

20. Design and undertake regular surveys of key woodland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

21. Enhance, restore or create 25ha woodland habitats, including ancient woodland sites where possible

Contributes to objective: (C) (I)

(J)

22. Enhance, restore or create 5km native hedgerow

Contributes to objective: (C) (E) (F) (I)

(J)

23. Survey 5ha woodland to propose as Local Wildlife Sites

Contributes to objective: (B) (D)

24. Consolidate veteran tree data, identify gaps and undertake targeted surveys to identify veteran trees

Contributes to objective: (B) (G)

25. Identify 50 trees with potential to become veterans and improve management

Contributes to objective: (C)

26. Plant trees in an open, parkland-style setting at 5 sites

Contributes to objective: (C) (I)

27. Install loggeries and bat roosting opportunities at 30 sites with limited deadwood

Contributes to target: (F)

28. Make management advice available to woodland and hedgerow landowners

Contributes to objective: (C) (G) (I)

(J)

29. Raise awareness of woodland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: (G)

30. Review Bracknell Forest Borough Tree Strategy

Contributes to objective: (H) (I)

(J)

9 Rivers and Wetlands Habitat Action Plan

9.1 Bracknell Forest BAP Species for Rivers and Wetlands

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important wetland habitats in the borough.

Great Crested Newt (*Triturus cristatus*)

Status: A UKBAP species and European Protected Species. Widespread in the UK but with a patchy distribution. Populations have disappeared from sites across Europe due to habitat loss. Found across Bracknell Forest where there are ponds.

Habitat requirements: Great crested newts breed in ponds in the spring, favouring large ponds with lots of weeds but no fish. The rest of the year they rely on woodland, hedgerow, marsh and tussocky grassland habitats for feeding and sheltering.

Brown Trout (*Salmo trutta*)

Status: A UKBAP species, threatened by overfishing, habitat loss and climate change (as it relies on cold water habitats). In Bracknell Forest, limited to the Wish Stream and possibly the River Blackwater.

Habitat requirements: Unpolluted, free-flowing rivers and streams with gravel beds for spawning and aquatic plants providing invertebrate prey.

Kingfisher (*Alcedo atthis*)

Status: In 2021, Kingfisher was moved from Amber to Green under the UK Birds of Conservation Concern. Listed on Schedule 1 of the Wildlife and Countryside Act 1981 which provides additional protections from disturbance.

Habitat requirements: Slow-moving water with low hanging branches or posts to use as hunting perches. Kingfishers tunnel into high sided riverbanks to make a chamber for their nests.

Rivers and wetlands species info from: Froglife (no date), The Wildlife Trusts (no date, C), Stanbury and others (2021), Woodland Trust (no date, C &D) and previous Bracknell Forest BAP.

9.2 UKBAP priority habitats

- Eutrophic standing waters
- Ponds
- Mesotrophic lakes
- Rivers
- Lowland fens
- Lowland raised bog
- Reedbeds

9.3 National status

Freshwater, wetlands and floodplains cover approximately 5% of the UK. The extent of these habitats increased by 25% between 1990 and 2019. Many former quarries have been converted to artificial lakes which provide new habitats (Office for National Statistics, 2022). However, only 14% of rivers and lakes are in good ecological health (achieving 'good ecological status' in 2019) (Environment Agency and Natural England, 2022).

9.4 Rivers and wetland habitats in Bracknell Forest

Many areas in the north of the borough were historically dug for clay to make bricks. This has left many ponds in Binfield, Warfield and Winkfield.

Two main rivers flow through Bracknell Forest. The Cut is a tributary of the River Thames, which flows through the northern parishes. It is partly fed by the Bullbrook stream. The River Blackwater flows along the southern boundary of Sandhurst, partly fed by the Wish Stream. It is a tributary of the River Loddon.

Along the River Blackwater, extensive gravel extraction has created large lakes. These have varying conditions for biodiversity. Wetland habitats are focused, although not limited to, around these areas.

9.5 Threats

The borough's rivers and lakes are mainly threatened by activities within their floodplains or catchments, whereas ponds and wetlands tend to be more affected by a lack of management. Key issues include:

- Nutrient enrichment and pollution – this often reaches the river at specific points, known as outfalls
- Inappropriate management of waterside vegetation
- Invasive non-native species
- Artificial structures or alterations
- Formalisation of natural waterbodies
- Effects on hydrology from surrounding land use

Impacts of climate change on priority habitats

Rivers, streams and open waters have a high sensitivity to climate change, and reedbeds a moderate level. In rivers and lakes, changes to temperature and hydrological regimes are predicted. Warmer water temperatures will affect species adapted to cold conditions, and droughts may reduce available habitat space and water quality. There may be an increase in problems associated with algal blooms in lakes. Heavy rainfall events may increase runoff. Invasive species may spread further or more quickly (Natural England and RSPB, 2019).

9.6 Opportunities

The role wetlands play in flood alleviation may provide opportunities for habitat creation and restoration, often known as 'nature-based solutions'. In recent years, there has been much greater public awareness of pressures on rivers such as pollution, which may provide drivers for protection and restoration. The Government's Environmental Improvement Plan (HM Government, 2023) includes a goal for clean and plentiful water, with associated targets and commitments such as reducing water use, restoring 75% of water bodies to good ecological status and reducing pollution from agriculture. Biodiversity net gain will provide a driver for better quality habitats on development sites and via off-site projects. There is a specific watercourse assessment module for developments affecting rivers and streams (Defra, 2023, B). Agri-environment schemes provide incentives to landowners to take action to improve water quality and biodiversity in watercourses, such as creating riparian buffers, and support wetland habitats, for example by creating and managing reedbeds (Defra, 2023, A).

9.7 Targets

31. Design and undertake regular surveys of key wetland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

32. Monitor outfalls at least every 4 years

Contributes to objective: **(B) (G) (H)**

33. Enhance, restore or create 20 ponds

Contributes to objective: (C) (F) (I)

(J)

34. Restore or enhance 2km of river or stream habitat

Contributes to objective: (C) (E) (F)

(J)

35. Tackle invasive Himalayan Balsam at 5 sites

Contributes to objective: (C)

(J)

36. Review access patterns at two river or wetland sites and adapt access management

Contributes to objective: (C) (G)

37. Make management advice available to riverside landowners

Contributes to objective: (C) (G)

38. Raise awareness of wetland biodiversity, including issues facing rivers and opportunities for communities to get involved, within annual events and articles (see General Themes target 8)

Contributes to objective: (G)

39. Engage with the Catchment Partnership and its strategic plans

Contributes to objective: (H)

10 Heathland Habitat Action Plan

10.1 Bracknell Forest BAP species for heathland

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important heathland habitats in the borough.

Dartford Warbler (*Sylvia undata*)

Woodlark (*Lullula arborea*)

Nightjar (*Caprimulgus europaeus*)

Status: The Thames Basin Heaths Special Protection area (SPA) was created to protect these three threatened heathland birds. Nightjars are a UKBAP priority species. Dartford Warblers and Woodlarks are listed on Schedule 1 of the Wildlife and Countryside Act 1981. These species are found in the south of the borough in heathland and young conifer plantations.

Habitat requirements: Dartford warblers prefer long heather and gorse bushes to forage and nest. Nightjars prefer more open heath and will nest and forage in early plantation.

Woodlarks need occasional trees for territorial song and display and nest in heath and early plantation. All three species nest on or very near the ground.

Brilliant Emerald Dragonfly (*Somatochlora metallica*)

Status: Nationally scarce species found in discrete areas of southeast England and Scotland.

Habitat requirements: Sheltered standing or slow-flowing waters, with some overhanging vegetation or trees.

Silver-studded Blue (*Plebejus argus*)

Status: A UKBAP species. It has a restricted distribution and has declined through most of its range, but can occur in large numbers in suitable sites.

Habitat requirements: Lowland heathland, with eggs often laid in short or sparse vegetation. They have a close relationship with ants and will only lay eggs where there are suitable ant populations.

Adder (*Vipera berus*)

Status: A UKBAP species, adder numbers are in decline and populations are becoming fragmented and isolated.

Habitat requirements: Associated with open habitats such as heathland, moorland and woodland edges. Adders hibernate in sheltered, dry places such as old rodent burrows or in fallen trees.

Heathland species info from: British Dragonfly Society (no date), Butterfly Conservation (no date), Woodland Trust (no date, E) and previous Bracknell Forest BAP.

10.2 UKBAP priority habitats

- Lowland heathland
- Lowland raised bog (covered in wetland section)

10.3 National status

In the lowlands, around 85% of heathland has been lost over the past 150 years. However, in more recent years, there has been conservation efforts to halt losses, restore and increase the area of heathland (The Wildlife Trusts, no date, D).

10.4 Heathland habitats in Bracknell Forest

The underlying geology in Crowthorne and Sandhurst provides the conditions for heathland. It forms a patchwork with large areas of forestry and development. Forestry can provide benefits for biodiversity through rotational management of land. This provides a range of habitat niches which support heathland habitats and species. Bogs are a specialised habitat within heathland areas. Waterlogging can form wet heathland, ponds and true bog areas.

10.5 Threats

The majority of heathland in the borough falls within Sites of Species Scientific Interest (SSSIs), though there are some patches outside of these designated sites. Threats or pressures on heathland, both within and outside of protected sites, can include:

- Lack of or inappropriate management
- Change in groundwater levels affecting bogs
- Nutrient enrichment e.g., dog fouling, air pollution, agricultural runoff
- Fires and dumping
- Disturbance of key species e.g., ground nesting birds

- Persecution e.g., snakes and other species can be subject to persecution due to culturally inherited fears

Impacts of climate change on priority habitats

Higher temperatures and more frequent droughts associated with climate change may affect the hydrological conditions within heathlands and the frequency of fires. This may change the balance of species. Warmer temperatures may also cause grass species to become more dominant. Some heathland species may benefit from warmer temperatures by expanding their range north. However, the fragmented nature of heathland means the habitat and its associated species may be vulnerable and struggle to adapt to climate change (Natural England and RSPB, 2019).

10.6 Opportunities

Heathland is a rare and valuable habitat and management and restoration is supported through agri-environment schemes. Biodiversity net gain is providing a driver for better quality habitats. While heathland is not typically directly affected by development, there may be opportunities to create and enhance heathland via off-site projects.

Suitable Alternative Natural Greenspaces are important in protecting the heathland habitats of the SPA. They provide opportunities for recreation away from the most important heathland sites which are sensitive to disturbance. New housing developments close to the SPA must contribute towards the enhancement of SANGs.

10.7 Targets

40. Design and undertake regular surveys of key heathland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

41. Enhance, restore or create 10ha of heathland

Contributes to objective: **(C) (I)**

(J)

42. Create 5 new bogs or ponds within heathland

Contributes to objective: **(C) (I)**

(J)

43. Promote SANGs to reduce pressure on SPA heathland

Contributes to objective: **(G) (H)**

44. Review access patterns at two heathland sites and adapt access management

Contributes to objective: **(C) (G)**

45. Run 20 educational sessions on heathland wildlife and conservation

Contributes to objective: **(G)**

46. Raise awareness of heathland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: **(G)**

11 Farmland Habitat Action Plan

11.1 Bracknell Forest BAP species for farmland

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important farmland habitats in the borough. However, species representing other habitats, found within farmland, will also be relevant.

Skylark (*Alauda arvensis*)

Status: A UKBAP species and red listed in the UK under the Birds of Conservation Concern 5 (2021). Skylark numbers have fallen dramatically in the UK since the 1970s, but latest population trends indicate a small upturn.

Habitat requirements: Found in open farmland, preferring larger arable and grassland fields. Skylarks nest on the ground in short grass or crops.

Barn Owl (*Tyto alba*)

Status: Barn owl numbers have suffered declines and the species is thought to have been negatively affected by pesticides such as DDT in the 1950s and '60s. However, they are green listed under the Birds of Conservation Concern 5 (2021). Listed on Schedule 1 of the Wildlife and Countryside Act 1981 which provides additional protections from disturbance.

Habitat requirements: Barn owls hunt over open grassland for small mammals. They nest in old barns and buildings and hollows of trees.

Farmland species info from: BTO (no date, B), Game and Wildlife Conservation Trust (no date), RSPB (no date, A), Woodland Trust (no date, F), Stanbury and others (2021) and previous Bracknell Forest BAP.

11.2 UKBAP priority habitats

Arable field margins are a UKBAP priority habitat, though they are typically not mapped in priority habitat maps and are not included in TVERC habitat coverage data.

All terrestrial habitats have the potential to be part of farmland and therefore there is a high level of overlap with the other habitat action plans.

11.3 Farmland habitats in Bracknell Forest

The majority of farmland is found in the north of the borough where soils are neutral and clay. The area of farmed land is falling in the borough. According to Defra's June surveys of agriculture and horticulture, in 2021, 1,335ha of land in Bracknell Forest was farmed. Of this, 886ha is grassland (Defra, 2023, C).

11.4 Threats

Farmland biodiversity generally relies on less intensively managed areas around the edges of fields or uncultivated areas of the farm. These areas can be vulnerable to:

- Intensification of crop production
- Market forces leading to changes in land use, such as development, urbanisation or neglect
- Intensification of grazing
- Use of pesticides and fertilisers

Impacts of climate change on priority habitats

Arable field margins managed for wildlife are the priority habitat most closely associated with farmland. These have been assessed as having a low sensitivity to climate change. Nonetheless, threats from climate change may include an increase in pests and diseases, and drier summers may cause changes in species composition and more bare ground (Natural England and RSPB, 2019).

11.5 Opportunities

Farmers are recognised as key stewards of our countryside, and many are keen to support wildlife provided it can be done whilst maintaining a livelihood. Agri-environment schemes provide financial incentives to improve biodiversity on farmland. Biodiversity net gain may provide farmers with a new source of income to manage uncultivated areas of habitat in their farm.

11.6 Targets

47. Monitor trends in farmland bird species and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

48. Monitor barn owl boxes

Contributes to objective: **(B) (F)**

49. Share information on new agri-environment schemes and monitor uptake

Contributes to objective: **(C) (G) (H) (I)**

(J)

50. Make management advice available to farmland landowners and horse owners

Contributes to objective: **(C) (G) (I)**

(J)

51. Raise awareness of farmland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: **(G)**

12 Urban Habitat Action Plan

12.1 Bracknell Forest BAP species for urban areas

These species have been chosen to represent and promote the habitat. They will be included in projects to protect and enhance important urban habitats in the borough. Species representing other habitats, found within urban areas, will also be relevant.

Swift (*Apus apus*)

Status: Added to the red list under the Birds of Conservation Concern 5 (2021). A factor in their decline is a loss of nesting sites as old buildings are renovated.

Habitat requirements: Swifts nest in roof cervices of buildings and forage for insects while on the wing (flying).

Hedgehog (*Erinaceus europaeus*)

Status: A UKBAP species suffering a long historic decline in numbers. The decline is thought to relate to loss of hedgerow and woodland habitat, use of pesticides, and the impact of urbanisation, including impermeable fencing and road casualties. In urban areas, numbers are thought to be stabilising and may be recovering.

Habitat requirements: Can live in a variety of habitats including woodland, farmland, parks and gardens. Eats mainly invertebrates and needs areas to shelter during winter hibernation and during the day in the summer.

Cowslip (*Primula veris*)

Status: After suffering declines due to agricultural intensification, it is now showing signs of recovery.

Habitat requirements: Can be found in open woods, meadows, pastures and roadsides.

Badgers

Badgers are not a BAP species due to their widespread populations across the UK. However, their numbers are declining in Bracknell Forest. The main threats are the high levels of human activity in woodlands, road accidents, and development in surrounding fields.

Badgers need a diverse range of habitats for foraging and wide corridors. Actions to protect this species will also benefit other urban wildlife and habitats, and so badgers are given special consideration in this section.

Urban species info from: RSPB (no date, B), Woodland Trust (no date, G), Plantlife (no date) and previous Bracknell Forest BAP.

12.2 UKBAP priority habitats

- Open mosaic habitat on previously developed land

All terrestrial habitats have the potential to be part of urban areas and therefore there is a high level of overlap with the other habitat action plans.

12.3 Urban habitats in Bracknell Forest

The largest urban area in the borough is Bracknell Town. Other urban and residential areas include the town of Sandhurst and villages of Crowthorne, Binfield, Warfield and Winkfield.

All of the other habitats in the BAP may be found within urban areas. In addition, the following are some of the places that can be valuable for biodiversity:

- Parks and open spaces
- Verges next to roads, railways, cycleways and footpaths
- Sports pitches and play areas
- Private gardens
- Golf courses
- Churchyards and cemeteries
- Buildings

Settlements areas can support rare and declining species both within semi-natural habitats and the built environment. For example, swifts rely on buildings to provide their nest sites.

Green infrastructure is the network of green spaces and features which provides many different benefits for people and wildlife. Green infrastructure is important in urban areas for many reasons, including allowing species to move and respond to climate change.

12.4 Threats

Urban biodiversity can be overlooked, and may be affected by the following factors:

- Changes in management regimes e.g., grass cutting
- Building maintenance and construction
- Development
- Invasive non-native species
- Isolation and fragmentation of habitats
- Persecution e.g., bats, snakes and stag beetles can be subject to persecution due to culturally inherited fears

Impacts of climate change on biodiversity in urban areas

As with rural areas, urban habitats may change in composition as the climate changes. Species may shift in range and distribution. There may be changes in interactions between different species and between species and natural events (such as earlier spring weather). As urban habitats can be small and fragmented, the ability of species to move and adapt may be restricted (Natural England and RSPB, 2019).

12.5 Opportunities

Engaging support for urban species can be very successful in showing the link between people and nature at home, at work and during leisure. As urban areas encompass many different people, this urban action plan has a greater emphasis on community involvement, such as with schools, religious groups and businesses.

Green infrastructure within urban areas can provide new habitats for wildlife, while also improving urban areas for people and helping us adapt to climate change (Natural England and RSPB, 2019).

12.6 Targets

- 52. Design and undertake regular surveys of key urban sites/species to understand trends and feed into annual report (see General Themes target 5)**

Contributes to objective: **(B)**

- 53. Identify, protect and increase the number of active swift nest sites**

Contributes to objective: **(B) (F)**

- 54. Plant or replace 50 large native urban trees**

Contributes to objective: **(C) (I)**

(J)

- 55. Enhance 10 community spaces for wildlife**

Contributes to objective: **(C) (F) (G)**

(J)

- 56. At least 10 private landowners to have enhanced their grounds for wildlife**

Contributes to objective: (C) (F) (G)

57. Secure wildlife enhancement features, including nest boxes, hibernation features and gaps for movement, within new and existing urban spaces

Contributes to objective: (F)

58. Planning permissions in areas with badger setts to ensure measures for badger protection

Contributes to objective: (F) (H)

59. All public greenspace management plans to include biodiversity actions

Contributes to objective: (C) (F) (H)

60. Make management advice available to urban landowners, such as businesses

Contributes to objective: (C) (G)

61. Raise awareness of urban and garden biodiversity, and opportunities for communities to get involved, within annual events and articles (see General Themes target 8)

Contributes to objective: (G)

62. Promote Local Access to Nature to residents

Contributes to objective: (G)

Appendix 1: Bracknell Forest Borough Information

Area

10,943 hectares or 42 square miles.

Location

Bracknell Forest lies 40km west of London, within the county of Berkshire. Bracknell Forest is one of 6 unitary authorities in Berkshire. It borders two of these: Wokingham and Royal Borough of Windsor and Maidenhead. The south of the borough also borders Hampshire and Surrey.

Towns and Parishes

There are two towns: Bracknell and Sandhurst, and four parishes: Binfield, Crowthorne, Warfield and Winkfield. Each of these has a corresponding town or parish council.

Geology and soils

Towards the south of the borough, the sandy Barton Beds, Bracklesham Beds and Bagshot Beds create acidic soils mixed with gravels. These support a landscape of heathland and conifer plantations. Towards the north, London Clay soils support a traditional lowland agricultural landscape of woodland, open fields and hedgerows. This meets in the centre of the borough where Bracknell town holds a mixture of soil types. This may include imported soil of chalk origin indicated by some of the plants found there.

Hydrology

Two main rivers run through Bracknell Forest. The River Blackwater forms the borough's southern boundary, and The Cut meanders through the northern parishes. These receive water from small streams, namely the Bull Brook feeds water into The Cut and the Wish Stream flows into the River Blackwater.

Land cover

Land use statistics for 2022 (Department for Levelling Up, Housing and Communities, 2022) indicate that 18% of Bracknell Forest is developed, including uses such as housing, offices, retail and roads (this figure excludes residential gardens). Agricultural land uses cover 26% and woodland and forestry 27%.

Appendix 2: Glossary

Agri-environment schemes: Schemes that pay farmers and other land managers to manage their land in an environmentally friendly way (Natural England, 2009).

Ancient woodland: Areas that have been woodland continuously for at least the past 400 years.

Biodiversity: The variety of all life on Earth.

Biodiversity Action Plan (BAP): Biodiversity Action Plans were first developed following the 1992 United Nations 'Earth Summit'. Biodiversity Action Plans provide plans for the conservation of nature. Bracknell Forest Council launched the first BAP for the borough in 1997.

Biodiversity Net Gain (BNG): Approach to development that requires habitats for wildlife to be left in a measurably better state than before development.

Biodiversity Opportunity Areas (BOAs): BOAs identify areas with the greatest potential for habitat creation and restoration. This helps focus resources to where they will have the greatest nature conservation impact (Berkshire LNP, no date).

Climate change adaptation: Adjusting and adapting to cope with the impacts of a changing climate.

Climate change mitigation: Lowering emissions and/or increasing storage of greenhouse gases, which cause climate change.

Designated sites: In the context of the BAP, these are sites identified and protected for their nature conservation value. See Appendix 3.

Environmental Land Management Schemes (ELMS): New agricultural policy being brought in since the UK left the EU. See National Strategies under Appendix 5.

Green infrastructure: The network of green spaces and features which provide benefits for people and wildlife.

Invasive non-native species (INNS): Species which have been introduced to a new area by people, and go on to spread and cause harm to wildlife, the environment, human health and/or the economy.

Joint Climate Action Board: A board of key stakeholders in Bracknell Forest working to coordinate and track action towards net zero.

Local Access to Nature: The standard in the emerging Bracknell Forest Local Plan for green infrastructure features including biodiversity, habitat and passive open space of public value within 250 metres (5 minutes walk) of every home.

Local Nature Recovery Strategy: County-scale strategies with mapped priorities and actions to recover nature.

Local Plan: Local Plans set out planning policies and proposals for a local area.

Local Wildlife Site (LWS): Sites of value for nature conservation at a county level. See Appendix 3.

Net-zero greenhouse gas emissions: A target to not add to the overall greenhouse gases in the atmosphere, by reducing emissions and increasing how much is absorbed and stored.

Passive Open Space of Value (OSPV): OSPV is land on which play, open space and recreational facilities are located. Passive OSPV comprises woodland, green corridors, SANG, nature areas, picnic areas and amenity open space.

Site of Special Scientific Interest (SSSI): Sites designated nationally as wildlife habitats. See Appendix 3.

Suitable Alternative Natural Greenspace (SANG): Open spaces which are improved for recreation. The aim is to help reduce the number of visitors to Special Protection Areas (SPAs) and reduce recreational pressure on these important habitats.

UKBAP Species and Habitats: Habitats and species first identified in the UKBAP to direct action for nature recovery. The government has a legal duty to publish the list under Section 41 of the NERC Act. Also known as priority species and habitats, Habitats and Species of Principle Importance, or Section 41 species and habitats.

Veteran trees: Trees with decay features which provide value for wildlife and heritage. Very old veteran trees are called ancient trees.

Appendix 3: Designated sites

Designated or protected sites are identified for their nature conservation value (see map below). A summary is given in Section 4.6.

Local Wildlife Sites (LWS)

Local Wildlife Sites are non-statutory sites of significant value for the conservation of wildlife at a county level. They are protected from harmful development through the planning system. LWS may support species and habitats of national significance or may be of more local importance. They are designated if they meet certain selection criteria, developed by local environmental records centres in line with guidance from Defra. Site may be selected for supporting species or habitats which are rare or special within the county. There are also criteria relating to diversity, connectivity, cultural significance and value for public engagement with nature.

Survey work is carried out by TVERC staff and experienced volunteers, with the aim of surveying sites every 10 years. This information is used to decide if a site should remain as an LWS. TVERC also reports annually to local authorities in Berkshire and Defra on how well LWS are being managed (TVERC, no date).

Local Nature Reserve (LNR)

Local Nature Reserves are a statutory designation. Local authorities can designate a site as a Local Nature Reserve if it is important for wildlife, geology, education and enjoyment (Natural England and Defra, 2023).

Sites of Special Scientific Interest (SSSI)

This is the primary designation relating to wildlife habitats in England and Wales. SSSI are

areas of special interest for their flora, fauna, geological or physiological features. They are selected and monitored by Natural England.

SSSIs are given special protection from development and landowners must manage land within a SSSI appropriately to conserve its special features.

Special Protection Area (SPA)

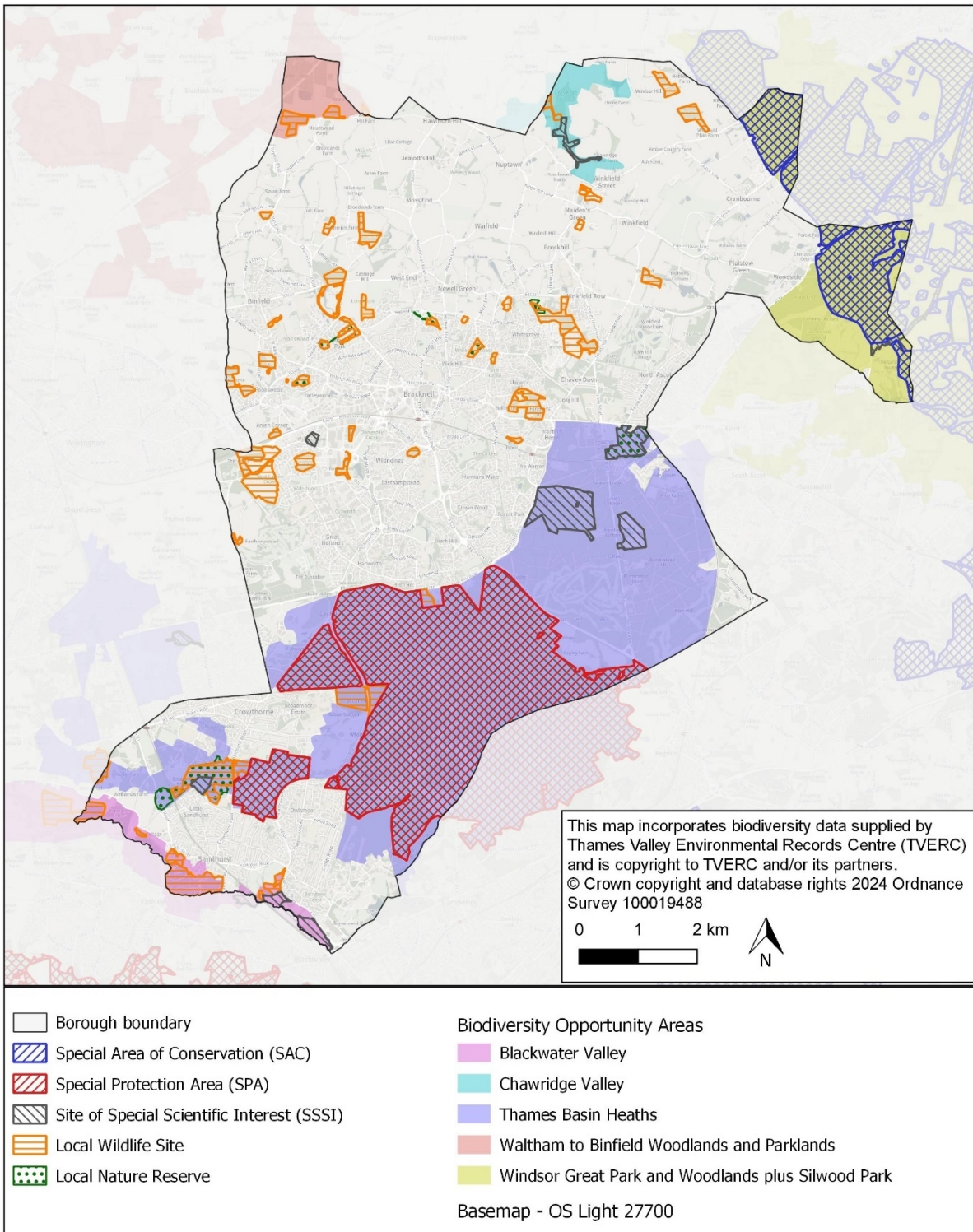
The origin of Special Protection Areas is the EC directive 79/409 (amended in 2009 to Directive 2009/147), known as the 'Birds Directive'. This required the government to designate the most suitable areas of habitat for rare and migratory birds listed in Annex I of the directive. The Thames Basin Heath Special Protection Area is partly within Bracknell Forest. It supports nationally important populations of Dartford Warbler, Nightjar and Woodlark.

Special Area of Conservation (SAC)

The origin of Special Areas of Conservation is the EC Directive 92/43, known as the 'Habitats Directive'. This required the government to identify SACs to protect the habitats of the species listed in Annex II of the Directive. Part of the Windsor Forest and Great Park Special Area of Conservation lies within Bracknell Forest. The site supports the Violet Click Beetle, an extremely rare species throughout its European range. The area is one of only four locations in the UK containing dry oak dominated woodland on acid sandy soils, which are of high value for saproxylic invertebrates and lichens.

Other sites

Biodiversity Opportunity Areas - BOAs identify key areas to focus nature conservation efforts at a landscape scale.



Appendix 4: Bracknell Forest BAP Species Selection Process

The Bracknell Forest BAP species were reviewed ahead of the 2012-2018 BAP, when the plan became more habitat focused. The species have remained consistent since then, with the addition of 2 for this current BAP (2024-2029). This section describes the species selection process.

Three criteria for habitats and species were taken from the Guidance for Local Biodiversity Action Plans Guidance Note 4 published by the UK Local Issues Advisory Group in 1996, as follows:

- UKBAP species
- Significance of local resource in UK context
- Distinctiveness

The species were also rated based on how well they can represent their habitat and be indicators of good habitat quality. However, there was also a need to select species that are distinctive and widespread to achieve benefits for the wider habitat.

Stage 1

UKBAP/NERC species list was reviewed and any species with no records in the borough were removed. This left 243 species.

Stage 2

Any other existing Bracknell Forest BAP species were added. These species were included as they had a good record base and conservation interest established in previous plans.

Each species was scored for the proportion of national resource found within the borough. This used a relative scale of 1-5 (a lower score for more common species). They were also scored for distinctiveness, scoring more highly species which are easy to identify and will be engaging to local people. This left 96 species.

Stage 3

Each species was assigned a main habitat.

Stage 4

An overall assessment was made of the remaining species grouped by habitat. The lists were considered in order of score, considering the existing BAP species and factors such as representing different aspects of the broad habitats.

2024 addition

Two additional species have been added based on consultation with key stakeholders. These are harvest mouse and adder. These are both UKBAP species which are distinctive and charismatic. They therefore fit the original selection criteria.

Appendix 5: Relevant Legislation, Policies and Plans

Legislation

Conservation of Habitats and Species Regulations 2017 (as amended)

Link: <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

These regulations are one of the pieces of domestic law that transposed the EEC Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC). The regulations provide protection for European Protected Species (listed in Schedule 2). These include bats and great crested newts. It is illegal to disturb injure or kill individuals or to disturb or destroy the resting place or breeding site of such a species.

Countryside and Rights of Way Act 2000

Link: <https://www.legislation.gov.uk/ukpga/2000/37/contents>

Provides for public access on foot to certain types of land, amends the law relating to public rights of way, increases measures for the management and protection of Sites of Special Scientific Interest and strengthens wildlife enforcement legislation, and provides for better management of Areas of Outstanding Natural Beauty (now known as National Landscapes).

Environment Act 2021

Link: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

Legislation to improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment. The legislation brings in long term targets, Environmental Improvement Plans and establishes an Office for Environmental Protection to uphold environmental law. Parts most relevant for nature conservation include:

- Strengthened biodiversity duty
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network
- Conservation Covenants
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature

Natural Environment and Rural Communities Act 2006

Link: <https://www.legislation.gov.uk/ukpga/2006/16/contents>

Section 40 of the NERC 2006 Act has been updated by the Environment Act 2021 to bring in an 'enhanced biodiversity duty'. Section 40A brings in associated reporting for public authorities. An extract of Section 40 is:

"40 Duty to conserve and enhance biodiversity

(A1) For the purposes of this section "the general biodiversity objective" is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England.

(1) A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

(1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)—

(a) determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and

(b) take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.

..."

Section 41 requires the Secretary of State to publish a list of Habitats and Species of Principle Importance for the purpose of conserving or enhancing biodiversity. In this plan these are referred to as UKBAP species and habitats.

Wildlife & Countryside Act 1981

Link: <https://www.legislation.gov.uk/ukpga/1981/69/contents>

Part 1 protects by law all wild birds, their nests and eggs. It is an offence, with certain exceptions, to:

- kill, injure or take any wild bird;
- take, damage or destroy the nest of a wild bird included in Schedule ZA1
- take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- take or destroy an egg of any wild bird

Birds listed in Schedule 1 (which includes Bracknell Forest BAP species kingfisher, barn owl, Dartford warbler and woodlark) have additional protection against disturbance. They are protected from disturbance while building a nest or while in, on or near a nest containing eggs or young.

Wild animals in schedule 5 are protected against killing and injury. These include the four species of reptile found in Bracknell Forest (adders, common lizards, grass snakes and slow worms).

Schedule 8 plants are protected. Part II of Schedule 9 lists plants which are non-native invasive, which by law must not be planted or caused to grow in the wild.

Planning Policy

National Planning Policy Framework (NPPF)

Link: <https://www.gov.uk/guidance/national-planning-policy-framework>

The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It was first published in 2012 and has been updated several times, most recently (at the time of writing) in December 2023. Of particular relevance are:

2. Achieving sustainable development

Paragraph 8 (c): an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

11. Making effective use of land

Paragraph 24: Planning policies and decisions should:

(a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside

(b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;

12. Achieving well-designed and beautiful places

Paragraph 136: Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted

trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

13. Protecting Green Belt land

Paragraph 142: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

15. Conserving and enhancing the natural environment

Paragraph 180: Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

Paragraph 186: When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

Link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf

This document covers a wide range of biodiversity issues including protected sites and protected species. Of particular relevance is:

The potential effects of a development, on habitats or species listed as priorities in the UK Biodiversity Action Plan (BAP), and by Local Biodiversity Partnerships, together with policies in the England Biodiversity Strategy, are capable of being a material consideration in the preparation of regional spatial strategies and local development documents and the making of planning decisions.

Emerging Bracknell Forest Local Plan (Bracknell Forest Council)

The emerging Bracknell Forest Local Plan (BFLP) is the principal planning policy document for the Borough and will guide development in the Borough up to 2037. At the time of writing the BAP, the Local Plan is at examination stage and it is anticipated to be adopted in 2024. Once adopted it will replace many of the saved policies in the Bracknell Forest Local Plan (2002) and the Core Strategy (2008).

Green infrastructure

The borough's green infrastructure will be protected and enhanced...

Thames Basin Heaths Special Protection Area

New development which, either alone or in combination with other plans or projects, is likely to have a significant adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA) (as identified on the Policies Map) without appropriate avoidance and mitigation measures will be refused...

Biodiversity

1. Development in the Borough will be expected to achieve a minimum 10% net gain for biodiversity.
2. Development proposals will be expected to:
 - i. provide suitable ecological survey information and assessment to establish biodiversity net gains and the extent of any potential impact on ecological features. These may include ancient woodland, veteran trees, waterbodies, wildlife corridors (including river corridors), protected species, priority species or priority habitat that may be affected during and after development. This information shall be provided prior to the determination of an application;
 - ii. retain, protect, enhance and buffer ecological features and provide for their appropriate management;

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- iii. where possible, create new ecological features and incorporate provisions to maximise opportunities for biodiversity; and
 - iv. avoid fragmentation of habitats and create coherent ecological networks within the borough such as improvements to Biodiversity Opportunity Areas and Nature Recovery Networks.
3. Where the adverse impacts of development on biodiversity are identified, they must be proportionately addressed in accordance with the mitigation hierarchy of:
- i. avoidance;
 - ii. mitigation; and,
 - iii. compensation.
4. Where the requirements of this hierarchy cannot be met, development will be refused.
5. Where biodiversity has been removed or degraded (including through neglect), the Council will take the pre-development biodiversity value as what it is likely to have been had the removal or degradation not occurred.
6. The Council will secure effective avoidance, mitigation, monitoring and compensation measures which will be maintained for at least 30 years after the development has been completed through the imposition of planning conditions, conservation covenants or planning obligations as appropriate, including monitoring of the effectiveness of these measures.

Binfield Neighbourhood Plan 2015-2026 (Binfield Parish Council)

Link: <https://binfieldparishcouncil.gov.uk/binfield-parish-council-neighbourhood-plan/>

Objectives – Environment

6. To protect and enhance wildlife corridors in order to improve biodiversity
7. Ensure that air pollution does not reach unacceptable levels
8. Protect and enhance local green areas and their biodiversity value to ensure local people continue to have access to nature
9. Ensure that development sustains or enhances the historic rural quality of the Parish's landscape and makes areas of rural character and historic parkland accessible to residents for their health and enjoyment as a result of development.

Bracknell Town Neighbourhood Plan 2016-2036 (Bracknell Town Council)

Link: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/neighbourhood-planning/bracknell-town-neighbourhood-area>

Policy EV 4 Protection of Trees

Development proposals will be expected to retain all trees in good condition and which possess amenity value, especially ancient trees, which, either individually or collectively, contribute to the sylvan character of the immediate area and the town in general.

Policy EV 5 New Tree Planting

Wherever possible and where appropriate, all new development, particularly at gateway locations, will be expected to incorporate tree planting within their landscaping proposals, including trees of an appropriate size and species of suitable longevity, that can make a significant contribution to enhancing the sylvan character of the town, as well as add to the visual amenity of the immediate area

Policy EV 8 Watercourses and River Corridors

Development proposals that provide improved public access to watercourses and river corridors will be supported where they maintain and enhance the quality of the environment.

Policy HO 5 Private Gardens: Green infrastructure and biodiversity networks

On all future residential development, including any infill development, the configuration of private gardens and their means of enclosure should provide a degree of connectivity to enable wildlife such as hedgehogs to travel between gardens and onto any adjacent areas of green space.

Crowthorne Neighbourhood Plan 2018-2036 (Crowthorne Parish Council)

Link: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/neighbourhood-planning/crowthorne-neighbourhood-plan>

Policy CR12

Biodiversity Development proposals should take account of the protected and other notable biodiversity species in the neighbourhood area as set out in Appendix D of the Plan. Development proposals which would affect any of the natural assets as identified in Appendix D will be determined on the basis of the principles in paragraph 175 of the NPPF (2019). Wherever practicable, proposals should contribute to, increase and enhance the natural environment by providing additional habitat resources for wildlife and green spaces for the community.

Note: Appendix D refers to an appendix of the Crowthorne Local Plan which provides a summary of legally protected and notable species in Crowthorne Parish. It is not appended to this BAP report. All the documents can be downloaded from the link above.

Warfield Neighbourhood Plan 2013-2037 (Warfield Parish Council)

Link: <https://www.warfieldparishcouncil.gov.uk/the-council/information/neighbourhood-plan/>

Policy WNP8: Enhancing Green Infrastructure

The Parish's green and blue infrastructure will be protected and enhanced. The Warfield Green Infrastructure Network will be established and will include, but is not limited to, the features shown on the Green Infrastructure Policies Map.

Development proposals on land that adjoins the network should enhance its visual character and biodiversity and contribute to the maintenance and improvement of the network, including the ecological value of The Cut and Bull Brook. Opportunity to create a new Bridleway Circuit, as shown on the Policies Map, will be supported.

Proposals that lead to the loss of land or features that form part of the network, that reduce its environmental quality or will prejudice the completion of the comprehensive network will not be supported.

Policy WNP11: Protecting and Enhancing Heritage and Biodiversity

B. Developments should provide net gains for biodiversity. Where effects are unavoidable then the proposals must show how these effects will be mitigated. Development proposals should contribute to and enhance the natural environment by ensuring the protection of local assets such as mature trees, hedgerows, woodland, the network of Local Nature Reserves in the south of the Parish and the provision of additional habitat for wildlife and green spaces for the community.

Winkfield Parish Neighbourhood Plan 2022-2037 (Winkfield Parish Council)

Link: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/neighbourhood-planning/winkfield-neighbourhood-plan>

Policy W8: Biodiversity and Wildlife Corridors

A. As appropriate to their scale, nature and location development proposals are expected to deliver at least a 10% biodiversity net gain in addition to protecting existing habitats and species. Development proposals on or adjacent to the wildlife corridors identified in Figure 11.1 and on the Policy Map must demonstrate a layout and design which ensures that wildlife is not impeded in its movement along the corridor. Proposals to enhance the wildlife corridors or create new corridors are strongly encouraged.

B. The incorporation of design features into development proposals that encourage and promote local wildlife will be particularly supported.

C. As part of its requirements to demonstrate biodiversity net gain, development should be designed to retain trees, shrubs and hedgerows of arboricultural, habitat and amenity value on-site and to conserve and enhance connectivity to the wider green and blue infrastructure networks. New planting should consist of native species of trees, shrubs and grasses acting and designed to provide accessibility for wildlife.

D. Where practicable development proposals should incorporate sustainable urban drainage and natural flood management techniques.

National Strategies

Environmental Improvement Plan

Link: <https://www.gov.uk/government/publications/environmental-improvement-plan/environmental-improvement-plan-2023-executive-summary>

In 2018, the 25 Year Environment Plan set out the government's plans to improve the environment within a generation. In 2023 the government undertook the first 5-yearly review and published the Environmental Improvement Plan 2023. The apex goal is to halt the decline in biodiversity and achieve thriving plants and wildlife. This is one of 10 goals, with other goals including clean air, clean and plentiful water and mitigating and adapting to climate change.

Environmental Land Management

Link: <https://www.gov.uk/government/publications/environmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services/environmental-land-management-elm-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services>

The government is undertaking a significant reform of agricultural policy and spending in England. Environmental Land Management (ELM) schemes will pay farmers to provide environmental goods and services alongside food production. There will be three schemes:

- Sustainable Farming Incentive (SFI) will pay farmers for sustainable farming practices that can protect and enhance the natural environment alongside food production, and also support farm productivity
- Countryside Stewardship (CS) will pay for more targeted actions relating to specific locations, features and habitats

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- Landscape Recovery will pay for bespoke, longer-term, larger scale projects to enhance the natural environment

Natural England – Vision, Mission and Priorities

Link: <https://www.gov.uk/government/organisations/natural-england/about>

Natural England's vision is 'Thriving Nature for people and planet'.

They aim to achieve this through their mission 'Building partnerships for Nature's recovery'.

Natural England's priorities for 2020 to 2025 support their mission and the ambitions of the government's 25 Year Environment Plan. They aim for:

- a well-managed Nature Recovery Network across land, water and sea, which creates and protects resilient ecosystems rich in wildlife and natural beauty, enjoyed by people and widely benefiting society
- people connected to the natural environment for their own and society's wellbeing, enjoyment and prosperity
- Nature-based solutions contributing fully to tackling the climate change challenge and wider environmental hazards and threats
- improvements in the natural capital that drives sustainable economic growth, healthy food systems and prospering communities
- evidence and expertise being used by a broad range of partnerships, organisations and communities to achieve Nature recovery and enable effective regulation and accreditation
- being a values-led organisation that delivers excellent service standards to all partners, organisations and communities engaged in achieving Nature's recovery

Environment Agency – Priorities

Link: <https://www.gov.uk/government/organisations/environment-agency/about>

The Environment Agency's priorities are to:

- work with businesses and other organisations to manage the use of resources
- increase the resilience of people, property and businesses to the risks of flooding and coastal erosion
- protect and improving water, land and biodiversity
- improve the way we work as a regulator to protect people and the environment and support sustainable growth

Ministry of Defence/ Defence Infrastructure Organisation

Link: <https://www.gov.uk/guidance/defence-infrastructure-organisation-estate-and-sustainable-development>

MOD biodiversity targets are:

- to be an exemplar in the management of designated sites where compatible with military requirements
- to ensure natural environment requirements and best practice are fully integrated into the estate management

- to contribute, as appropriate, to the UK Biodiversity Action Plan (and Country Biodiversity Strategies)

The Crown Estate

Link: <https://www.thecrownestate.co.uk/about-us>

The Crown Estate's strategy focuses on:

- Net zero and energy security - Being a leader in supporting the UK towards a net zero carbon and energy-secure future
- Inclusive communities and economic growth - Helping create inclusive communities and support economic growth and productivity
- Nature and biodiversity - Taking a leading role in stewarding the UK's natural environment and biodiversity

Bracknell Forest Council Plans and Strategies

Council Plan 2023-2027

Link: <https://www.bracknell-forest.gov.uk/council-and-democracy/strategies-plans-and-policies/council-plan-2023-2027>

Our vision for the borough is where we put residents first, working together to grow sustainable, resilient, and inclusive communities.

The Council Plan for 2023 to 2027 will focus on 3 borough priorities to achieve this ambition:

- Engaged and healthy communities
- Thriving and connected economy
- Green and sustainable environment

Within the green and sustainable environment priority, our ambitions for the borough are:

- There is collective action to address and adapt to the climate and biodiversity emergency
- Our green spaces and parks foster sustainability, biodiversity, and wellbeing
- Local transport networks provide choice in travel

Parks and Open Spaces Strategy

Link: <https://www.bracknell-forest.gov.uk/sites/default/files/2021-11/parks-and-open-spaces-strategy.pdf>

Priorities

3. Encourage the provision of new parks and open spaces to support achievement of sustainable development. Create links between existing parks and open spaces to extend green infrastructure networks.
4. Implement planned improvement works to sites designated as Suitable Alternative Natural Greenspaces (SANGs) to encourage residents to visit recreational areas outside of the Thames Basin Heaths Special Protection Area. Identify opportunities to extend the provision of SANGs.
6. Enhance the natural qualities of parks and open spaces. Protect and enhance biodiversity. Positively manage trees and woodlands, to include new planting to provide for future generations.

7. Identify opportunities to increase the positive role that parks and open spaces can contribute to climate change mitigation (e.g. tree planting as part of carbon sequestration). Implement appropriate measures in support of climate change adaptation (e.g. ponds and scrapes).

Climate Change

Link: <https://www.bracknell-forest.gov.uk/council-and-democracy/strategies-plans-and-policies/climate-change>

Motion of 13 September 2023

This council declares a climate and biodiversity emergency.

To that end, this council invites the Executive to:

1. Resolve to review, broaden and accelerate its Climate Change Strategy. To commit to achieve net-zero CO2 emissions as close to 2030 as possible.
2. Co-produce with the community a Community Climate Emergency Strategy. The aim will be to make the wider Bracknell Forest area net-zero as close to 2030 as possible.
3. Both strategies should be produced in a financially transparent way. They will demonstrate accountability, affordability and economic benefits with clear interim, smart targets.
4. Explore the feasibility of raising a Bracknell Forest Local Climate Bond. This will be to support decarbonisation projects throughout the borough.
5. Revise the Biodiversity Action Plan to include audits of the state of nature in the borough and to highlight local biodiversity threats due to climate change. Reports of these will be presented annually. Any expected ecological impacts will also be added to Executive and council reports.

Climate Change Strategy 2020-2024

The council's climate change strategy gives a strategic framework for tackling climate change in Bracknell Forest and is underpinned by a rolling action plan. This will be replaced by an updated strategy for 2024-2028.

Our objective will be to achieve this through 4 strategic principles:

- Working with partners
- Preserving the climate beneficial elements of the COVID-19 pandemic
- Working with schools and young people
- Preserving the natural environment sustainably in line with the Bracknell Forest plans

Our strategy has 2 main strands:

- Reduce carbon emissions that are under the council's control
- Influence and lead community action against climate change

Tree Strategy

Link: <https://www.bracknell-forest.gov.uk/council-and-democracy/strategies-plans-and-policies/parks-and-countryside-strategies-and-policies>

This strategy describes how the council will approach the management of trees, hedgerows, orchards and woodland in Bracknell Forest on public and private land. The adoption of this strategy provides a coordinated approach to the management of Council owned and private trees, while maintaining their individual character.

Rights of Way Improvement Plan (RoWIP2) 2017-2027

Link: <https://www.bracknell-forest.gov.uk/council-and-democracy/strategies-plans-and-policies/parks-and-countryside-strategies-and-policies>

Policy RoWIP 7: Sustainable Development

Manage a countryside and access network that delivers benefits to health and well-being, economy and biodiversity...

7.2 Protect and enhance environment and biodiversity on PRow network...

Local Strategies

Berkshire Amphibian & Reptile Group

The aim of BRAG is to try to help prevent the continuing decline of amphibians and reptiles in Berkshire in a number of ways including:

- Providing information and advice about reptiles and amphibians to the public, planners and developers.
- Recording, mapping and monitoring amphibian and reptile populations across the county.
- Providing training for volunteers in reptile and amphibian survey methods.
- Helping safeguard important sites

BRAG is a member of the ARG-UK network.

Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) Strategic Plan 2021-2026

Link: https://issuu.com/bbowt/docs/bbowt_wilder_vision_2021-26_jul_2021?fr=sMDA2ZTQyNDc3Njc

BBOWT's mission is to bring about nature's recovery through local action – in partnership with people from all sectors of society, working with councils, MP's landowners, farmers and people from across local communities.

To achieve this mission, BBOWT has the following goals:

1. Put nature into recovery
Encouraging nature's recovery through joining up bigger, wilder, connected landscapes where nature can thrive
2. Empower people to act for nature
Support and enable local communities to reconnect with and restore nature in their own neighbourhoods and beyond
3. Secure our future
Making BBOWT secure and sustainable

Berkshire Local Nature Partnership

Link: <https://www.berkshirelnp.org/>

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The Berkshire Local Nature Partnership (BLNP) works together to create a sustainable, healthy and vibrant Berkshire by promoting the conservation and enhancement of nature and the benefits we receive from a healthy environment. The BLNP do this by:

- Creating a strategic vision for the natural environment in Berkshire
- Offering a single, unified voice for the natural environment in decision-making
- Improving awareness of the challenges and opportunities facing nature
- Providing a network of advice and expertise relating to the environment

Berkshire and South Bucks Bat Group

Link: <http://berksbats.org.uk/>

The group's main aims are:

- To promote and further the conservation of bats and their habitats.
- To raise awareness of bats and their conservation status.

Binfield Environment Group

Link: <https://binfieldeg.wixsite.com/binfieldeg/get-involved>

Binfield Environment Group (BEG) is a voluntary organisation, formed in 2017 by residents who care about the local environment and want to help improve it.

Blackwater Valley Countryside Trust

Link: <https://www.bvct.org.uk/about-us/>

The Blackwater Valley Countryside Trust was founded in 2006 by enthusiasts who are passionate about the people and wildlife of the Blackwater Valley.

BVCT's aims are to enhance the environment for both people and wildlife by:

1. Promoting public access to the countryside by means of a programme of events, including walks and talks
2. Involving people in their valley and the wildlife on their doorstep
3. Identifying improvement ideas, creating projects and raising funds to progress them
4. Encouraging a sense of belonging in the Blackwater Valley

Bracknell Conservation Volunteers

Link: <http://www.bracknellcv.org.uk/index.html>

Bracknell Conservation Volunteers are a friendly and informal group of local adults who carry out conservation work and practical tasks to promote wildlife and enhance the local environment.

Bracknell Forest Natural History Society

Link: <http://www.bfnathistsoc.org.uk/index.html>

The Society is for everyone interested in nature and its conservation. The Society aims are to present and share information about the Natural World, to increase awareness about its importance and to work to increase the biodiversity of local wildlife habitats.

Crowthorne Village Action Group

Link: <https://www.cvag.org.uk/>

CVAG is a non-political residents association, seeking to balance the pressures for additional homes with conserving those features which make Crowthorne such a lovely place to live.

Forestry England Thames Basin Heaths Forest Plan

Link: <https://www.forestryengland.uk/forest-planning/thames-basin-heaths-forest-plan>

The objectives of the management plan include:

- Contribute to stopping the long-term decline in the number of woodland birds by 2020.
- Maintain SPA bird populations (nightjar, woodlark and Dartford warbler).

Hedge and Woodland Conservationists

Link: <https://bracknellforestgetinvolved.org.uk/listing/hawcs/>

HAWCs aims to...

- Keep the ancient crafts of hedgelaying and coppicing alive
- Conserve and maintain hedgerows, woodlands, and rights of way for the benefit of the public and the wildlife which depends on them
- Educate the public in the principles and practice of nature conservation

Loddon Catchment Partnership – Catchment Priorities

Link:

<https://storymaps.arcgis.com/collections/4328b25bc06947889a21710cbefcca4e?item=5>

Protecting and enhancing our landscapes

- Identifying habitat improvements - taking a strategic approach to deliver habitat enhancements across the catchment;
- Implementing habitat enhancements - delivering habitat enhancements in priority areas across the catchment;
- Improving fish passage - identifying and tackling barriers to fish;
- Keeping rivers cool - using tree shade to keep small rivers cool in the face of a changing climate;
- Tackling invasive non-native species - taking a catchment-based approach to the management of INNS.

Loddon Fisheries and Conservation Consultative

Link: <https://lfcc.org.uk/about-us>

The three main objectives of the LFCC are:

- 1) Represent fisheries, angling and conservation interests.
- 2) Work with others to protect and improve for future generations stillwaters, rivers and canals in the Loddon catchment.
- 3) Increase awareness of fisheries, angling and conservation through collection and sharing of best practice information.

Maidenhead to Teddington Catchment Partnership

Link: <https://www.thames21.org.uk/catchment-partnerships/maidenhead-to-teddington/>

The Maidenhead to Teddington catchment partnership meets regularly to discuss the sustainable management of land and water in the Lower Thames catchment and to balance the environmental, economic and social demands. The partnership works together to:

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- Engage local communities in understanding, valuing, caring for, and enjoying their river catchment
- Enhance, improve and protect the water environment by collaboratively delivering river and valley improvement projects
- Share information, skills and bring people together working catchment-wide with multiple organisations.

Moor Green Lakes Group

Link: <https://www.mglg.org.uk/>

The Moor Green Lakes Group (MGLG) was established in 1993 as an organisation to help manage the Moor Green Lakes Nature Reserve in Berkshire, England. The group's aims are:

- To improve the Reserve for wildlife
- Record and monitor that wildlife
- Enhance the facilities of the Reserve for members of the Moor Green Lakes Group and other visitors

Warfield Environment Group

Link: <https://warfieldenvgroup.wordpress.com/committee/>

The aim of the group is to encourage the community of Warfield to take pride in their environment by involving groups, individuals and businesses in a variety of projects to enhance habitats for wildlife and to encourage conservation, recycling and the clearing of litter.

Wildlife in Ascot

Link: <https://www.wildlifeinascot.org/about-us>

Mission: Taking responsibility for protecting and encouraging wildlife in and around Ascot

Goals:

- We want to create good habitats and still have beautiful gardens.
- We want to have fun, get to know our neighbours and learn about the world on our doorstep.
- We want to manage the "Green corridors" in our area which we have succeeded in getting recognised in our neighbourhood plan.
- We want to improve the eco-system of our area by highlighting opportunities and raising concerns as necessary to try to ensure that future development does not have a negative impact on the environment and enhances habitats where possible.

References

A link is included directly under each section of Appendix 5: Relevant Legislation, Policies and Plans. The following references are relevant for the rest of the document:

Bat Conservation Trust (2010). Noctule bat.

https://cdn.bats.org.uk/uploads/pdf/About%20Bats/noctule_11.02.13.pdf?v=1541085182&gl=1*a2rihm*_ga*MTI5NTE4NDA1Mi4xNjU5MTA3MzM3*_ga_G28378TB9V*MTcwMzI0NTAxNy4xNy4xLjE3MDMyNDUwOTIuMC4wLjA (accessed 01/02/2024).

DRAFT

Berkshire Local Nature Partnership (no date). Biodiversity Opportunity Areas. <https://www.berkshirelnp.org/what-we-do/strategy/biodiversity-opportunity-areas> (accessed 23/02/2024).

British Dragonfly Society (no date). Where to See Brilliant Emerald. <https://british-dragonflies.org.uk/species-map/brilliant-emerald/> (accessed 05/02/2024).

BTO (no date, A). Bird Facts: Bullfinch. <https://www.bto.org/understanding-birds/birdfacts/bullfinch> (accessed 01/02/2024).

BTO (no date, B). Bird Facts: Skylark. <https://www.bto.org/understanding-birds/birdfacts/skylark> (accessed 05/02/2024).

Bumblebee Conservation Trust (2021). Why bumblebees need our help. <https://www.bumblebeeconservation.org/why-bees-need-our-help/> (accessed 01/02/2024).

Butterfly Conservation (no date). Silver-studded Blue. https://butterfly-conservation.org/sites/default/files/silver-studded_blue-psf.pdf (accessed 05/02/2024).

Defra (2023, A). Environmental Land Management (ELM) update: how government will pay for land-based environment and climate goods and services. <https://www.gov.uk/government/publications/environmental-land-management-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services/environmental-land-management-elm-update-how-government-will-pay-for-land-based-environment-and-climate-goods-and-services> (accessed 01/02/2024).

Defra (2023, B). Calculate biodiversity value using the biodiversity metric. <https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development> (accessed 08/02/2024).

Defra (2023, C). Structure of the agricultural industry in England and the UK at June (Local Authority Breakdown). <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june> (accessed 05/02/2024).

Department for Levelling Up, Housing and Communities (2022). Land use in England, 2022. <https://www.gov.uk/government/statistics/land-use-in-england-2022> (accessed 15/02/2024).

Environment Agency and Natural England (2022). State of the water environment indicator B3: supporting evidence. <https://www.gov.uk/government/publications/state-of-the-water-environment-indicator-b3-supporting-evidence/state-of-the-water-environment-indicator-b3-supporting-evidence> (accessed 05/02/2024).

Freshwater Habitat Trust (no date). Species: Ragged-robin. <https://freshwaterhabitats.org.uk/species/ragged-robin-silene-flos-cuculi/> (accessed 01/02/2024).

Friends of the Earth (2023). Mapping English tree cover: results, ranking and methodology. <https://policy.friendsoftheearth.uk/insight/mapping-english-tree-cover-results-ranking-and-methodology> (accessed 26/02/2024).

Froglife (no date). Great Crested Newt. <https://www.froglife.org/info-advice/amphibians-and-reptiles/great-crested-newt/> (accessed 05/02/2024).

Game and Wildlife Conservation Trust (no date). Skylark. <https://www.gwct.org.uk/farming/big-farmland-bird-count/farmland-birds-to-count/skylark> (accessed 05/02/2024)

Hendry, L. (no date). Stag beetles: facts about the UK's largest beetle and where to see it. <https://www.nhm.ac.uk/discover/stag-beetles.html> (accessed 01/02/2024).

HM Government (2023). Environmental Improvement Plan. <https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64ffa/environmental-improvement-plan-2023.pdf> (accessed 06/02/2024).

Magnificent Meadows (no date). Devil's-bit scabious. http://www.magnificentmeadows.org.uk/assets/pdfs/Devils-bit_scabious.pdf (accessed 01/02/2024).

Mammal Society (no date, A). Species – Harvest Mouse. <https://www.mammal.org.uk/species-hub/full-species-hub/discover-mammals/species-harvest-mouse/> (accessed 01/02/2024).

Mammal Society (no date, B). Species – Noctule Bat. <https://www.mammal.org.uk/species-noctule-bat/> (accessed 01/02/2024).

Natural England (2009). Farming with nature: Agri-environment schemes in action. Natural England, York, UK.

Natural England (2021). The Environment Act 2021 – a turning point for Nature. <https://naturalengland.blog.gov.uk/2021/11/23/the-environment-act-2021-a-turning-point-for-nature/> (accessed 01/02/2024).

Natural England and Defra (2023). Local nature reserves: setting up and management. <https://www.gov.uk/guidance/create-and-manage-local-nature-reserves> (accessed 14/02/2024).

Natural England and Forestry Commission (2023). Natural England and Forestry Commission: Our position on woodland creation. <https://www.gov.uk/government/publications/our-position-on-woodland-creation-in-england/natural-england-and-forestry-commission-our-position-on-woodland-creation> (accessed 05/02/2024).

Natural England and RSPB (2019). Climate Change Adaptation Manual - Evidence to support nature conservation in a changing climate, 2nd Edition. Natural England, York, UK.

Office for National Statistics (2022). Habitat extent and condition, natural capital, UK: 2022. <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/habitatextentandconditionnaturalcapitaluk/2022> (accessed 05/02/2024).

Plantlife (no date). Cowslip. <https://www.plantlife.org.uk/plants-and-fungi/cowslip/> (accessed 15/02/2024).

Plantlife International (2023). Review of trends in grasslands across the UK. <https://www.plantlife.org.uk/wp-content/uploads/2023/07/Plantlife-report-1-Status-Trends-and-Definitions-of-UK-Grasslands.pdf> (accessed 06/02/2024).

PTES (no date). Traditional Orchards. <https://ptes.org/campaigns/traditional-orchard-project/> (accessed 01/02/2024).

DRAFT

Reid, C., Hornigold, K., McHenry, E., Nichols, C., Townsend, M., Lewthwaite, K., Elliot, M., Pullinger, R., Hotchkiss, A., Gilmartin, E., White, I., Chesshire, H., Whittle, L., Garforth, J., Gosling, R., Reed, T. and Hugi, M. (2021). State of the UK's Woods and Trees 2021, Woodland Trust.

RSPB (no date, A). Barn Owl. <https://www.rspb.org.uk/birds-and-wildlife/barn-owl> (accessed 05/02/2024).

RSPB (no date, B) Swift. <https://www.rspb.org.uk/birds-and-wildlife/swift> (accessed 05/02/2024).

Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. *British Birds* 114: 723-747. Available online at <https://britishbirds.co.uk/content/status-our-bird-populations> (accessed 05/02/2024).

The Wildlife Trusts (no date, A). Bullfinch. <https://www.wildlifetrusts.org/wildlife-explorer/birds/finches-and-buntings/bullfinch> (accessed 01/02/2024).

The Wildlife Trusts (no date, B). Wild Service Tree. <https://www.wildlifetrusts.org/wildlife-explorer/trees-and-shrubs/wild-service-tree> (accessed 01/02/2024).

The Wildlife Trusts (no date, C). Great crested newt. <https://www.wildlifetrusts.org/wildlife-explorer/amphibians/great-crested-newt> (accessed 05/02/2024).

The Wildlife Trusts (no date, D). Heathland and Moorland. <https://www.wildlifetrusts.org/habitats/heathland-and-moorland> (accessed 05/02/2024).

TVERC (2023). Habitat and Land Use data. Biodiversity data supplied by Thames Valley Environmental Records Centre (TVERC) is copyright to TVERC and/or its partners.

TVERC (no date). Local Wildlife Sites. <https://www.tverc.org/cms/content/local-wildlife-sites> (accessed 14/02/2024).

Woodland Trust (no date, A). Wild Service Tree. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/a-z-of-british-trees/wild-service-tree/> (accessed 01/02/2024).

Woodland Trust (no date, B). Hedgerows. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/hedgerows/> (accessed 01/02/2024).

Woodland Trust (no date, C). Brown Trout. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/animals/fish/brown-trout/> (accessed 05/02/2024).

Woodland Trust (no date, D). Kingfisher. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/animals/birds/kingfisher/> (accessed 05/02/2024).

Woodland Trust (no date, E). Adder. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/animals/reptiles-and-amphibians/adder/> (accessed 05/02/2024).

Woodland Trust (no date, F) Barn Owl. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/animals/birds/barn-owl/> (accessed 05/02/2024).

DRAFT

Woodland Trust (no date, G) Hedgehog. <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/animals/mammals/hedgehog/> (accessed 05/02/2024).

Bracknell Forest Council

Biodiversity Action Plan 2024-2029

Aims, objectives and targets

This document includes the aims, objectives and targets of the draft Biodiversity Action Plan (BAP) 2024-2029, without the supporting information. The section numbering matches the full plan.

2.1 Aim

The aim of the BAP is to conserve and enhance biodiversity within Bracknell Forest Borough.

This will be achieved through:

- Targeted monitoring
- Positive management
- Effective communication
- Proactive policies

2.2 Objectives

The BAP has the following objectives:

(A) Track the condition of designated sites

(B) Monitor key sites, features and indicator species to understand trends and inform management

(C) Enhance, restore or create high quality habitats, through Biodiversity Net Gain (BNG) and Passive Open Space of Value (OSPV) projects and other project routes

(D) Designate the best sites for nature

(E) Improve habitat connectivity

(F) Enhance sites for wildlife by providing opportunities for nesting, foraging, hibernation and movement

(G) Build awareness and engage communities

(H) Contribute to related strategic plans and activities within Bracknell Forest and across administrative boundaries

(I) Contribute to climate change mitigation (lowering emissions and/or carbon storage)

(J) Contribute to climate change adaptation (improving the resilience of habitats, species and people to a changing climate)

The objectives link through to each of the targets in the plan. This is shown under each target.

6.1 General Themes Targets

1. Track condition of Sites of Special Scientific Interest (SSSIs)

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Contributes to objective: (A)

2. Survey each Local Wildlife Site every 10 years

Contributes to objective: (A) (B)

3. 75% Local Wildlife Sites in positive management

Contributes to objective: (A) (B)

4. Review the network of Local Nature Reserves and designate appropriate sites

Contributes to objective: (A) (D)

5. Produce an annual report on the state of nature in Bracknell Forest

Contributes to objective: (B) (H)

6. Promote wildlife recording including submitting records to TVERC

Contributes to objective: (B) (G)

7. Involve educational institutions in monitoring and management of biodiversity

Contributes to objective: (B) (G)

8. Hold or publish at least 30 events and articles each year promoting the importance of biodiversity within the borough (see also individual habitat plans), including links to climate change where possible

Contributes to objective: (G) (H) (I)

(J)

9. Host at least 8000 hours of volunteering for nature each year

Contributes to objective: (C) (F) (G)

(J)

10. Bring together, review and enhance the plans and strategies for green infrastructure in Bracknell Forest

Contributes to objective: (H) (I)

(J)

11. Secure and monitor at least 10% biodiversity net gain on relevant developments

Contributes to objective: (C) (H)

(J)

12. Engage with the development of the Berkshire Local Nature Recovery Strategy (LNRS)

Contributes to objective: (H)

13. Support the delivery of the Berkshire Local Nature Recovery Strategy (LNRS)

Contributes to objective: (H)

14. Support and work with the Joint Climate Action Board, including the biodiversity working group

Contributes to objective: (G) (H) (I)

(J)

7.7 Grassland Targets

15. Design and undertake regular surveys of key grassland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: (B)

16. Enhance, restore or create 15ha grassland habitats

Contributes to objective: (C)

(J)

17. Survey 5ha grassland to propose as Local Wildlife Sites

Contributes to objective: (B) (D)

18. Make management advice available to grassland landowners

Contributes to objective: (C) (G)

19. Raise awareness of grassland biodiversity within annual events and articles (see General Themes target 8)

Contribute to objective: (G)

8.7 Woodland Targets

20. Design and undertake regular surveys of key woodland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: (B)

21. Enhance, restore or create 25ha woodland habitats, including ancient woodland sites where possible

Contributes to objective: (C) (I)

(J)

22. Enhance, restore or create 5km native hedgerow

Contributes to objective: (C) (E) (F) (I)

(J)

23. Survey 5ha woodland to propose as Local Wildlife Sites

Contributes to objective: (B) (D)

24. Consolidate veteran tree data, identify gaps and undertake targeted surveys to identify veteran trees

Contributes to objective: (B) (G)

25. Identify 50 trees with potential to become veterans and improve management

Contributes to objective: (C)

26. Plant trees in an open, parkland-style setting at 5 sites

Contributes to objective: (C) (I)

27. Install loggeries and bat roosting opportunities at 30 sites with limited deadwood

Contributes to target: **(F)**

28. Make management advice available to woodland and hedgerow landowners

Contributes to objective: **(C) (G) (I)**

(J)

29. Raise awareness of woodland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: **(G)**

30. Review Bracknell Forest Borough Tree Strategy

Contributes to objective: **(H) (I)**

(J)

9.7 Rivers and Wetlands Targets

31. Design and undertake regular surveys of key wetland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: **(B)**

32. Monitor outfalls at least every 4 years

Contributes to objective: **(B) (G) (H)**

33. Enhance, restore or create 20 ponds

Contributes to objective: **(C) (F) (I)**

(J)

34. Restore or enhance 2km of river or stream habitat

Contributes to objective: **(C) (E) (F)**

(J)

35. Tackle invasive Himalayan Balsam at 5 sites

Contributes to objective: **(C)**

(J)

36. Review access patterns at two river or wetland sites and adapt access management

Contributes to objective: **(C) (G)**

37. Make management advice available to riverside landowners

Contributes to objective: **(C) (G)**

38. Raise awareness of wetland biodiversity, including issues facing rivers and opportunities for communities to get involved, within annual events and articles (see General Themes target 8)

Contributes to objective: **(G)**

39. Engage with the Catchment Partnership and its strategic plans

Contributes to objective: (H)

10.7 Heathland Targets

40. Design and undertake regular surveys of key heathland sites/species to understand trends and feed into annual report (see General Themes target 5)

Contributes to objective: (B)

41. Enhance, restore or create 10ha of heathland

Contributes to objective: (C) (I)

(J)

42. Create 5 new bogs or ponds within heathland

Contributes to objective: (C) (I)

(J)

43. Promote SANGs to reduce pressure on SPA heathland

Contributes to objective: (G) (H)

44. Review access patterns at two heathland sites and adapt access management

Contributes to objective: (C) (G)

45. Run 20 educational sessions on heathland wildlife and conservation

Contributes to objective: (G)

46. Raise awareness of heathland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: (G)

11.6 Farmland Targets

47. Monitor trends in farmland bird species and feed into annual report (see General Themes target 5)

Contributes to objective: (B)

48. Monitor barn owl boxes

Contributes to objective: (B) (F)

49. Share information on new agri-environment schemes and monitor uptake

Contributes to objective: (C) (G) (H) (I)

(J)

50. Make management advice available to farmland landowners and horse owners

Contributes to objective: (C) (G) (I)

(J)

51. Raise awareness of farmland biodiversity within annual events and articles (see General Themes target 8)

Contributes to objective: (G)

12.6 Urban Targets

- 52. Design and undertake regular surveys of key urban sites/species to understand trends and feed into annual report (see General Themes target 5)**
Contributes to objective: **(B)**
- 53. Identify, protect and increase the number of active swift nest sites**
Contributes to objective: **(B) (F)**
- 54. Plant or replace 50 large native urban trees**
Contributes to objective: **(C) (I)**
(J)
- 55. Enhance 10 community spaces for wildlife**
Contributes to objective: **(C) (F) (G)**
(J)
- 56. At least 10 private landowners to have enhanced their grounds for wildlife**
Contributes to objective: **(C) (F) (G)**
- 57. Secure wildlife enhancement features, including nest boxes, hibernation features and gaps for movement, within new and existing urban spaces**
Contributes to objective: **(F)**
- 58. Planning permissions in areas with badger setts to ensure measures for badger protection**
Contributes to objective: **(F) (H)**
- 59. All public greenspace management plans to include biodiversity actions**
Contributes to objective: **(C) (F) (H)**
- 60. Make management advice available to urban landowners, such as businesses**
Contributes to objective: **(C) (G)**
- 61. Raise awareness of urban and garden biodiversity, and opportunities for communities to get involved, within annual events and articles (see General Themes target 8)**
Contributes to objective: **(G)**
- 62. Promote Local Access to Nature to residents**
Contributes to objective: **(G)**

To: **Executive**

Adoption of a Social Value Policy Executive Director: Resources

1 Purpose of Report

- 1.1 The Council has an obligation under the Public Services (Social Value) Act 2012 to apply social value to all appropriate and relevant contracts. The Act places specific duties on the Council that we are required to evidence. Social value can also be incredibly beneficial to local communities and support structures outside of those directly commissioned by local authorities, but generally it is not well understood by either suppliers or officers, meaning this potential benefit is often missed.
- 1.2 A new Social Value Policy is intended to provide guidance and direction to officers in the commissioning and procurement of contracts so this benefit can be realised for the residents of Bracknell Forest, whilst also demonstrating how the Council will be fulfilling its duties under the Act.

2 Recommendation

That the Executive:

- 2.1 Approves the adoption of the new Social Value Policy (attachment 1) under the Local Target methodology.
- 2.2 Approves the adoption of the Bracknell Forest Council Social Value Matrix (attachment 2), developed by the Bracknell Forest community, to operate as the Council's current Local Targets under the Policy. The Matrix is not fixed and the specific targets will be reviewed annually and adjusted to reflect the changing needs of the community.

3 Reasons for Recommendation

- 3.1 The Local Target methodology sets a broad range of targets that are reflective of the needs and goals of the local community. It should be noted that as per the Act, the community should be the primary driver behind these targets so they may not be reflective of the Council Plan or other officer or Member objectives.
- 3.2 These targets can be adjusted, so will remain reflective of the local community whilst it changes, but individual community consultation for every relevant contract will not be required.
- 3.3 Officers are not required to apply every target in the Matrix to every contract. Instead they select the 5 or 6 they believe are most relevant and appropriate to the contract they are commissioning and the market they are approaching. This balances flexibility to match the wide variety of contracts the Council commissions, and the need to give both officers and bidders some structure, process and guidance to deliver a complex requirement
- 3.4 The Local Target methodology will also give a framework to support the evaluation, monitoring and management of incredibly diverse social value offers – an area the Council has historically needed to improve.

4 Alternative Options Considered

- 4.1 Two other methodologies for assessing social value outcomes were considered;
- The national Themes, Outcomes & Measures (TOMs)
 - Commissioner Created
- 4.2 The TOMs were created by a private company, the Social Value Group, but have been adopted by the Local Government Association as national best practise. However;
- As they are national they lack a lot of local nuance. Many Local Authorities using them find they get social value offers that don't reflect their local community, e.g. veteran employment in areas with a low veteran population.
 - They are inflexible, so it's possible to 'run out' of a social value TOM because your Local Authority has delivered on it, but it remains as a target and you continue to receive bids against it
 - They are very complex for both officers and bidders – there are 198 TOMs.
 - As they are based upon money they can lead to problematic bidder behaviours, e.g. offering payment in place of a social value commitment.
- 4.3 Commissioner Created was designed by Milton Keynes City Council. It gives a requirement that social value be included, but leaves the 'how' entirely within the hands of each commissioning officer. It can lead to incredibly creative and successful social value offers. However;
- The lack of guidance and support often leaves both officers and bidders at a loss as to how to proceed.
 - Whilst it can support very innovative and creative offers, the majority will be basic and low impact, i.e. plant a small number of trees, employ 1 apprentice etc. These low level offers are also repeated again and again by the same bidders across multiple contracts
- 4.4 Neither the TOMs nor Commissioner Created models were selected due to the issues identified with each above.

5 Supporting Information

Social Value Obligations

- 5.1 The Public Services (Social Value) Act 2012 came into force in January 2013. The Act introduced an obligation on public authorities to have regard to economic, social and environmental well-being in connection with public services contracts (i.e. contracts for services above the procurement threshold limits). To discharge this duty, the authority must consider:
- a) how what is proposed to be procured might improve the economic, social and environmental well-being of the relevant area; and
 - b) how, in conducting the process of procurement, it might act with a view to securing that improvement.
- 5.2 The Council must consider under subsection (b), above, only matters that are relevant to what is proposed to be procured and, in doing so, must consider the extent to which it is proportionate in all the circumstances.
- 5.3 Whilst there is not an obligation for public authorities to consider social value in other procurements, such as capital works, there is equally no prohibition, provided the

process used to procure is fair, equitable and transparent and the principle of proportionality and relevance is applied. In fact, one objective of the Public Contract Regulations (2015) is to enable procurement to be used more strategically, offering new opportunities for social value to be considered throughout the procurement process.

- 5.4. The new Procurement Act 2023, which will come into force in October 2024, goes further than this, making social value a specific objective that should be achieved through procurement.

Social Value Policy

- 5.5 One of the ways that the Council can evidence that it is delivering its social value obligations is by adopting a social value policy governing how it will include social value in relevant contracts. This also has the benefit of supporting officers in obtaining improved outcomes for the wider Bracknell Forest community in what can be an area lacking in clear goals.
- 5.6 There are currently 3 ways to assess social value nationally, as set out in alternative options above. The Head of Corporate Procurement has consulted with Members and the wider community, and the Local Target method has been selected.
- 5.7 Through this consultation, the Social Value Policy (Appendix 1) and the Bracknell Forest Social Value Matrix (Appendix 2) have been drafted.
- 5.8 The Matrix is not intended to be a static document, and will be reviewed annually to ensure that the targets within it are reflective of the Bracknell Forest community. It should be noted that social value, and therefore the targets within the Matrix, is not driven by Council or Member goals or directives, but instead should reflect the desires of the local community as a whole. This does mean that social value targets may not relate to the Council Plan or other Council objectives.
- 5.9 Whilst the Matrix is substantive, containing 80 individual targets, it is not intended that officers must apply all 80 to a contract they are procuring. They will instead select the 5 or 6 targets they consider most relevant to their contract, most likely to receive a response from that particular market and which are going to deliver the greatest benefit to the community.
- 5.10 Likewise, bidders will not be required to respond to every social value target in a contract they are bidding for. They will be free to structure their response based upon their own capability and business, responding to all, some, or none of the targets listed for the contract – though of course smaller social value offers will give them a lower score and therefore they will be less likely to win the contract.
- 5.11 The Matrix also defines how social value offers should be scored during bidding and assessed during contract management – this will support officers in procuring and managing contracts, support the reporting of achieved social value outcomes and

support bidders in preparing their offer. Accompanying training and guidance is being prepared for both officers and bidders.

- 5.12 The Policy will be matched to the Thresholds under the Contract Standing Orders. Social Value must be included for all contracts where a Procurement Plan is required, and must be considered (meaning the commissioning officer must justify why if it is not included) for all contracts requiring Executive Director approval. Where Social Value is included it must form 5% of the total score as a minimum.

6 Consultation and Other Considerations

Legal Advice

- 6.1 The Public Service (Social Value) Act 2012 requires local authorities to ‘consider’ social value when commissioning services currently subject to the Public Contracts Regulations (PCR) 2015 (above prescribed value thresholds). The Act explicitly requires commissioners to consider:
- How the services they are going to buy might improve the social, economic or environmental well-being of the area;
 - How they might secure this improvement; and
 - Whether they should consult on these issues.

The consideration and application of social value is required to be relevant to the subject matter of the contract and proportionate without any unequal treatment of bidders, and this is reflected in the report.

Financial Advice

- 6.2 There are no direct financial implications in the report. The policy sets out the methodology by which the Council maximises social value whilst delivering services, which will have social, economic, environmental and financial benefits.

Other Consultation Responses

- 6.3 Members were extensively consulted in the creation of the Policy and Matrix via the Social Value Consultation Group, with representatives from all parties.
- 6.4 The local community took part in a detailed consultation on the Matrix via both the Community Cohesion and Engagement Partnership and the Bracknell Forest Climate Change Summit, and led on what targets should be included and the relative importance of each within the Matrix.

Equalities Impact Assessment

- 6.5 A summary EIA accompanies this report.

Strategic Risk Management Issues

- 6.6 Without a social value policy the Council is in breach of the Public Services (Social Value) Act 2012.

Climate Change Implications

- 6.7 Climate change goals have been a primary concern of the community, and a number of climate change objectives have been integrated as targets into the Matrix. This will also support the monitoring and reporting of the Council's climate change objectives. It should be noted though that the community a number of the Council's more ambitious objectives for inclusion in the Matrix, therefore it does not directly replicate the Council Plan in this regard. The Social Value Matrix should be considered supplemental for reporting against these objectives rather than acting as a substitute.

Background Papers

- Bracknell Forest Council Social Value Policy
- Bracknell Forest Council Social Value Matrix
- Summary EIA

Contact for further information

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Bracknell Forest Council

Social value policy and procedure



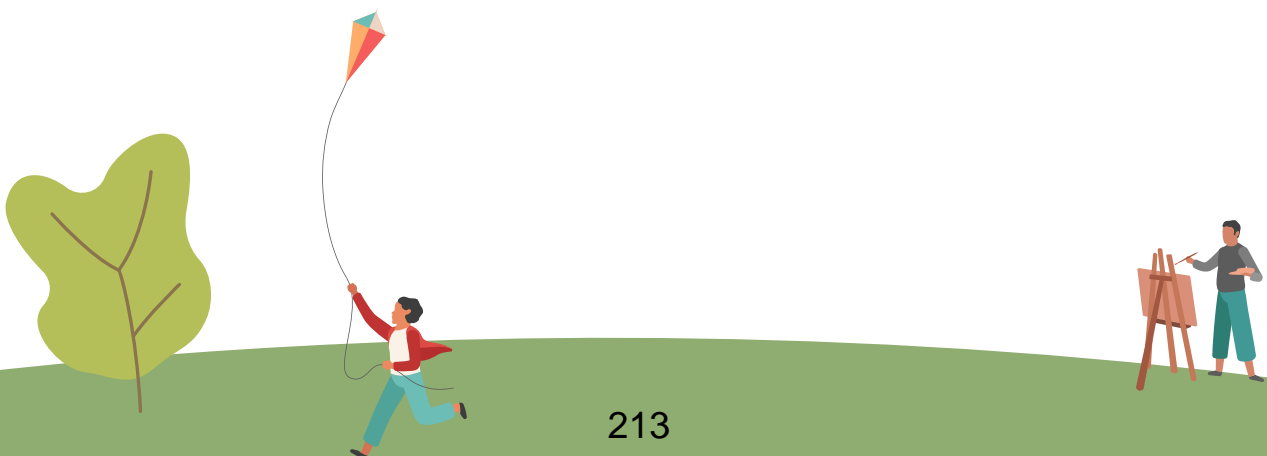
1. Introduction

- 1.1. The Public Services (Social Value) Act 2012 came into force in January 2013. The Act states that public authorities must consider how public contracts (contracts above procurement threshold limits) may have an economic, social or environmental wellbeing impact. To fulfil its duty, the council must consider:
 - a) how the procurement proposal might improve the economic, social and environmental wellbeing of the relevant area; and
 - b) how, in conducting the procurement process, it might act to secure that improvement.
- 1.2. The council must consider under subsection (b), above, only matters that are relevant to what is proposed to be procured. In doing so, it must consider what is proportionate within the circumstances.
- 1.3. While there is no obligation for public authorities to consider social value in other procurements, such as capital works, there is equally no prohibition. However, the procurement process must be fair, equitable and transparent and the principle of proportionality and relevance must be applied.
- 1.4. One objective of the Public Contract Regulations (2015) is to enable procurement to be used more strategically, offering new opportunities for social value to be considered throughout the procurement process. The new Procurement Act 2023, which will come into force in October 2024, goes further than this, making social value a specific objective that should be achieved through procurement.



2. Aims and scope of this policy

- 2.1. Bracknell Forest Council's aim in adopting this policy is to go beyond the Act requirements and seek to drive social value in all aspects of its procurement and contracting activity where it is practical and proportionate to do so, to support a more inclusive local economy and help address the climate emergency.
- 2.2. Due to the wide range of services provided by the council there is no 'one size fits all' model that can be used to calculate or recommend any social value sought through Council activity, for example x apprentices for y contract spend/ size of activity. This is especially the case for procurement and contracts where, as outlined above, any social value sought and obtained should be relevant and proportionate to the contract being tendered.
- 2.3. To inform social value commitments sought through procurements and provide a consistent reporting standard for measuring social value delivered, the council is proposing to adopt a local target social value framework. For both officers commissioning contracts and organisations seeking to submit bids, it provides a clear indication of what social value measures are of most important to the Bracknell Forest community. [link]
- 2.4. The Bracknell Forest Council local target Matrix contains all social value priorities that have been identified for delivery. A weighted 'BFC SV Score' is assigned to each priority. This is not intended to be a fixed position. It will be updated annually to reflect changes to the Bracknell Forest community and its priorities.
- 2.5. It should be noted that no contract is expected to deliver all local targets. Officers commissioning contracts will select several from the matrix, which are most relevant and proportionate to what they are commissioning. Organisations submitting bids then prepare the social value offer they wish to make against the listed local targets.
- 2.6. All contracts greater than £100,000 must contain social value local targets as part of their evaluation criteria. All contracts greater than £50,000 must consider the inclusion of social value local targets as part of their evaluation criteria. Where social value is included, it must constitute at least 5 per cent of the overall evaluation criteria.



3. Application

- 3.1. Guidance has been provided regarding the application of the matrix, which officers should refer to when preparing their procurement documents.
- 3.2. Officers should identify their approach to social value when seeking approval to procure – further detail is provided within the guidance.
- 3.3. Once awarded, social value local targets become part of the contract’s performance regime, like any other key performance indicator (KPI). Officers may be required to report on the delivery of social value local targets in the contracts they are responsible for – further detail is provided within the guidance.

4. Roles and responsibilities

- 4.1. The responsibilities for securing and ensuring delivery of social value align with the council’s overall model for procurement and contracts.
- 4.2. The council’s corporate procurement team will provide strategic guidance and support on seeking social value through procurements (including the review and update of the council’s contract procedure rules to refer to the policy, as appropriate).
- 4.3. Commissioners and contract managers across the council will ensure that suppliers are made aware of social value requirements within contracts. They will track delivery against the social value commitments through regular performance reporting with suppliers, once the contract has been awarded.
- 4.4. Commissioners and contract managers will also be responsible for updating the corporate contract register and any other reporting tools regarding social value outcomes.



Bracknell Forest Council Social Value Matrix

Reference Number	Description of Social Value Measure	Units	Social Value Points	How to Score
Theme:	More local people in meaningful employment			
BFC1	No. of full time equivalent direct local employees (FTE) hired or retained for the duration of the contract.	No. of employees	5 points	No. of employees hired on contract / FTE or partial time / duration of contract / total financial or cumulative value of contract each employee = 5 points
BFC2	No. of full time equivalent local employees (FTE) hired or retained directly (or through the supply chain) for the duration of the contract, who are resident in targeted areas	No. of employees	5 points	each employee = 5 points
BFC3	No. of full time equivalent local employees (FTE) hired or retained for the duration of the contract who are employed in your supply chain.	No. of employees	5 points	each employee = 5 points
Theme:	Fair work opportunities			
BFC4	Union recognition agreements (or equivalent worker representation) and collective bargaining are present or encouraged.	Yes or No	25 points	
BFC5	Good and fair work charters and related employment practices are implemented and facilitated on contract.	Yes or No	25 points	
Theme:	More opportunities for disadvantaged people and minority groups			
BFC6	Percentage of leadership positions (manager or above) on the contract filled by women.	% of employees in leadership positions	100 points	1% = 1 point
BFC7	Percentage of leadership positions (manager or above) on the contract held by people from Ethnic Minority Groups.	% of employees in leadership positions	200 points	1% = 2 points
BFC8	No. of full time equivalent employees (FTE) hired on the contract who are long term unemployed (unemployed for a year or longer).	No. of employees	125 points	each employee = 125 points
BFC9	No. of full time equivalent mothers returning to work (FTE) hired on the contract who are long-term unemployed (unemployed for a year or longer) - when the mother is the primary carer.	No. of employees	125 points	each employee = 125 points
BFC10	No. of full time equivalent employees (FTE) hired on the contract who are Not in Employment, Education, or Training (NEETs).	No. of employees	80 points	each employee = 80 points
BFC11	No. of full time equivalent 16-25 year old care leavers (FTE) hired on the contract.	No. of employees	80 points	each employee = 80 points
BFC12	No. of full time equivalent disabled employees (FTE) hired on the contract.	No. of employees	80 points	each employee = 80 points
BFC13	No. of full time equivalent employees (FTE) hired on the contract who are registered as unemployed.	No. of employees	45 points	each employee = 45 points
BFC14	No. of full time equivalent employees (FTE) hired on the contract who are rehabilitating or ex-offenders.	No. of employees	110 points	each employee = 110 points
BFC15	No. of weeks of training opportunities or apprenticeships (BTEC, City & Guilds, NVQ, HNC - Level 2,3, or 4+) on the contract that have either been completed during the year, or will be supported by the organisation until completion in the following years. (Delivered for specified disadvantaged groups, e.g. NEETs, under-represented gender and ethnic groups, disabled, homeless, rehabilitating young offenders).	No. of weeks	50 points	each week = 50 points
BFC16	No. of hours of 'support into work' assistance provided to unemployed people in targeted areas through career mentoring, including mock interviews, work experience, CV advice, and careers guidance.	No. of hours of sessions x No. of attendees	5 points per staff hour	each person hour with employees = 5 points
Theme:	Improved skills, qualifications, employability and development opportunities			
BFC17	No. of staff hours spent on local school and college visits supporting pupils e.g. delivering career talks, curriculum support, literacy support, health and safety talks (includes research and preparation time).	No. of staff hours	8 points per staff hour	each person hour with employees = 8 points
BFC18	No. of weeks of training opportunities or apprenticeships (BTEC, City & Guilds, NVQ, HNC - Level 2,3, or 4+) on the contract that have either been completed during the year, or that will be supported by the organisation until completion in the following years.	No. of weeks	30 points	each week = 30 points
BFC19	No. of weeks of apprenticeships or T-Levels (Level 2,3, or 4) provided on the contract (completed or supported by the organisation).	No. of weeks	15 points	each week = 15 points
BFC20	No. of weeks of employee (FTE) upskilling, further development and training programmes specifically delivered on the contract. Must have either been completed during the year, or will be supported by the organisation until completion in the following years.	No. of weeks	30 points	each week = 30 points
BFC21	Meaningful work placements that pay Minimum or National Living wage according to eligibility - 6 weeks or more (internships) for people from targeted areas or disadvantaged backgrounds.	No. of placements x No. of weeks	25 points per placement week	each week of each placement = 25 points
BFC22	Meaningful work placements that pay Real Living wage according to eligibility - 6 weeks or more (internships).	No. of placements x No. of weeks	20 points per placement week	each week of each placement = 20 points
Theme:	Business continuity, retaining jobs, skills and employment opportunities for employees after Covid-19			
BFC23	Percentage of invoices on the contract paid to micro / small businesses and voluntary / community enterprises within 30 days.	% of invoices	2 points per %	1% = 2 points
BFC24	No. people hired who had previously lost their job or had been unable to find work due to Covid-19.	No. of employees	40 points	each employee = 40 points
BFC25	Safeguarding jobs on contract - Percentage of directly employed staff on contract retained with pre Covid-19 level pay and hours.	% own staff on contract retained	2 points per %	1% = 2 points
Theme:	More opportunities for local small and medium businesses, social enterprises and voluntary organisations			
BFC26	Total amount (£) spent in local supply chain through the contract.	£ spent	1 point per £2000 spent	Local considered to be your suppliers based within the geographical area of Berkshire every £2000 = 1 point
BFC27	Total amount (£) spent with voluntary organisations / social enterprises within your supply chain.	£ spent	1 point per £1000 spent	every £1000 = 1 point
BFC28	Number of voluntary hours donated to support voluntary organisations / social enterprises. (Does not include expert business advice).	No. of staff volunteering hours	3 points per staff hour	each person hour of volunteering = 3 points Commissioner to define specifically targeted areas and list them here
BFC29	Total amount (£) spent through the contract in targeted areas (areas specifically targeted for support under the scheme e.g. high deprivation areas).	£ spent	1 point per £1000 spent	every £1000 = 1 point
BFC30	Total amount (£) spent through contract with local micro, small and medium enterprises / businesses (MSMEs)	£ spent	1 point per £1000 spent	every £1000 = 1 point
BFC31	Total amount (£) spent through contract with local micro, small and medium enterprises within your supply chain.	£ spent	1 point per £1000 spent	every £1000 = 1 point
Theme:	Improving providers' staff wellbeing, employee benefits and mental health support			
BFC32	Do you have a policy or a strategy to provide support around mental health and wellbeing to staff working remotely?	Yes or No	50 points	
BFC33	Safeguarding jobs on contract - Percentage of directly employed staff on contract retained with pre-crisis level pay and hours.	% own staff on contract retained	5 points per %	1% = 5 points
BFC34	Do you have a policy document or strategy to provide and manage safe virtual spaces to staff, including guidance around cyber security and around remote and virtual working best practice.	Yes or No	35 points	
BFC35	Initiatives to provide and manage safe virtual spaces to staff, including guidance around cyber security and around remote and virtual working best practice.	£ invested / no. of staff hours	25 points	every person hour = 25 points
BFC36	Mental health campaigns for staff on the contract to create community of acceptance and remove stigma around mental health.	£ invested / no. of staff hours	2 points per staff hour or per £500 invested	either: every person hour = 2 points or: every £500 = 2 points
BFC37	Equality, diversity and inclusion (EDI) training provided both for internal staff and supply chain staff.	No. of hours of sessions x No. of attendees	10 points per hour	every person hour = 10 points
BFC38	No. of employees on the contract that have been provided access for at least 12 months to comprehensive and multidimensional wellbeing programmes.	No. of employees provided access	30 points	each employee = 30 points
BFC39	No. of employees provided with professional support for anxiety and depression (at least six sessions of Cognitive Behavioural Therapy (CBT) or equivalent) following a workplace screening or occupational health referral.	No. of employees provided access	50 points	each employee = 50 points
Theme:	Reducing employment inequalities			
BFC40	Prime contractor's median gender salary pay gap for staff.	% median gender pay gap	100 points	inverse % = points, e.g. 0% = 100 points, 1% = 99 points etc
BFC41	No. and type of initiatives to be put in place to reduce the gender pay gap for staff employed in relation to the contract - (describe and document initiatives)	£ invested / no. of staff hours	2 points	total £ invested / total staff hours x 2 points = point total
BFC42	Percentage of staff on contract that are paid at least the relevant Real Living Wage as specified by Living Wage foundation.	% of staff	6 points per %	1% = 6 points
BFC43	Percentage of contractors in the supply chain required (or supported if they are micro or small business) to pay at least Real Living Wage.	% of contractors	7 points per %	1% = 7 points
Theme:	Promoting ethical procurement and supply chain management			
BFC44	Percentage of invoices on the contract paid within 30 days	% of invoices	2 points per %	1% = 2 points
BFC45	Percentage of contracts with the supply chain on which Social Value commitments, measurement and monitoring are required.	% of contracts	1 point per %	1% = 1 point
BFC46	Percentage of your procurement contracts that include commitments to ethical employment practices in the local and global supply chain. (Relating to zero tolerance and elimination of modern slavery, child labour, forced labour and as elimination of false self-employment, unfair zero hours contracts and blacklists).	% of procurement	10 points per %	1% = 10 points
BFC47	Initiatives taken throughout the local and global supply chain to strengthen the identification, monitoring and reduction of risks of modern slavery and unethical work practices occurring in relation to the contract (e.g. supply chain investigating, ethics principles, staff training, contract management).	£ invested / no. of staff hours	12 points per initiative	total £ invested / total staff hours x 12 points = point total
BFC48	Percentage of procurement contracts that include sustainable procurement commitments and certifications (e.g. to use local produce, reduce food waste, reduce total plastic and single use materials, keep resources in circulation longer).	% of contracts	10 points per %	1% = 10 points
BFC49	Requirements for suppliers to demonstrate climate change knowledge and carbon reduction training for all staff. (e.g. Sustainable Development Goals Academy courses, Carbon Literacy, Supply Chain Sustainability School bronze or higher or equivalent).	No. of hours of sessions x No. of attendees	35 points	every person hour = 35 points
BFC50	Percentage of contracts with the supply chain requiring contractors to operate low or zero emission vehicles.	% of contracts	75 points	% x 75 points = point total
BFC51	Supply Chain Carbon Certification (e.g. Carbon Trust Standard for Supply Chain) - achieved or to achieve for current year.	Yes or No	50 points	e.g. 60% = 45 points
Theme:	Developing healthier, safer and more inclusive, resilient communities			
BFC52	Donations and/or in-kind contributions to specific local community projects (£ cost or materials donated).	£ value	1 point per £500 contributed	every £500 = 1 point
BFC53	Initiatives aimed at reducing crime (e.g. support for local youth groups, lighting for public spaces, etc).	£ invested / no. of staff hours	15 points per initiative	total £ invested / total staff hours x 15 points = point total
BFC54	Initiatives to be taken to tackle homelessness (supporting temporary housing schemes etc).	£ invested / no. of staff hours	10 points per initiative	total £ invested / total staff hours x 10 points = point total
BFC55	Initiatives to support rough sleepers - including training for security and night staff, opening up facilities spaces (e.g. showers or additional beds when temperature drops) after hours.	£ invested / no. of staff hours	15 points per initiative	total £ invested / total staff hours x 15 points = point total
BFC56	Initiatives taken or supported to engage people in health interventions (e.g. stop smoking, obesity, alcoholism, drugs) or wellbeing initiatives in the community, including physical activities for adults and children.	£ invested / no. of staff hours	15 points per initiative	total £ invested / total staff hours x 15 points = point total
BFC57	Initiatives to be taken to support senior and disabled people to build stronger community networks (e.g. befriending schemes, digital inclusion clubs).	£ invested / no. of staff hours	15 points per initiative	total £ invested / total staff hours x 15 points = point total
BFC58	No. of hours volunteering time provided to support local community, volunteering and/or social enterprise projects.	No. of staff volunteering hours	3 points per hour	every person hour = 3 points
BFC59	No. of hours volunteering time provided to support healthcare and public health awareness related charity and community projects.	No. of staff volunteering hours	3 points per hour	every person hour = 3 points
Theme:	Reducing or mitigating carbon emissions			
BFC60	Savings in CO2e emissions on contract achieved through de-carbonisation (i.e. a reduction of the carbon intensity of processes and operations, specify how these are to be achieved) against a specific benchmark.	Kilograms of CO2 emissions	175 points	every kg reduction = 175 points
BFC61	Carbon emission reductions through reduced energy use and energy efficiency measures - on site.	Kilograms of CO2 emissions	150 points	every kg reduction = 150 points
BFC62	Commitment to carbon emissions savings to achieve net zero carbon before 2030.	Yes or No	250 points	
BFC63	Commitment to measure and disclose Scope 1, 2 and 3 carbon emissions.	Yes or No	100 points	
BFC64	Savings in Scope 3 CO2e emissions on contract achieved through de-carbonisation (i.e. a reduction of the carbon intensity of processes and operations, specify how these are to be achieved) against a specific benchmark.	Kilograms of CO2 emissions	50 points	every kg reduction = 50 points
Theme:	Reducing air pollution			
BFC65	Corporate travel schemes available to employees on the contract. (For example, subsidised public transport, subsidised cycling schemes and storage, sustainable corporate transport such as electric bus from public station to corporate facilities).	Yes or No	100 points	

BFC66	Car miles saved on the project as a result of a green transport programme or equivalent (e.g. cycle to work programmes, public transport or car pooling programmes).	No. of miles saved	2 points per 1 car mile saved.	every car mile reduced or saved = 2 points
BFC67	Freight miles saved as a result of a sustainable or more efficient logistics plan (e.g. reduced trips to site).	No. of miles saved	2 points per 1 car mile saved.	every car mile reduced or saved = 2 points
BFC68	Percentage of fleet or construction vehicles on the contract that is at Least Euro 6 or LEV.	% of vehicles	3 points per %	1% = 3 points
BFC69	Fleet emissions monitoring programme on the contract, including data collection (miles, type of vehicle, engine type, emission standard).	Yes or No	50 points	
Theme:	Safeguarding the natural environment, supporting biodiversity and sustainable management of green spaces			
BFC70	Donations or investments towards initiatives aimed at environmental and biodiversity conservations, and sustainable management projects for both marine and terrestrial ecosystems.	£ spent	10 points per £1000 spent 50 points per £1000 invested	every £1000 = 10 points
BFC71	Resources (on the contract) dedicated to creating green spaces, improving biodiversity or helping ecosystems.	£ invested	15 points per %	every £1000 = 50 points
BFC72	Plastic recycling rate on the contract. To increase plastic recycling rate and reduce microplastics use.	% plastic recycling rate	4 points per £500 spent	1% = 15 points
BFC73	Donations or investments towards expert designed sustainable reforestation or afforestation initiatives.	£ spent	3 points per staff hour	every £500 = 4 points
BFC74	Volunteering time for environmental conservation and sustainable ecosystem management initiatives.	No. of staff volunteering hours	3 points per staff hour	every person hour = 3 points
BFC75	Total volume of reduced plastics against a relevant benchmark.	kg of plastic reduced	8 points per kg of plastic reduced	every Kg reduction = 8 points
Theme:	Supporting solutions for resource efficiency and circular economy			
BFC76	Single-use plastic packaging eliminated through reusable packaging solutions or schemes (e.g. Loop or equivalent) on the contract.	kg of single use plastic	12 points per kg of plastic saved 1 point per £1000 invested	every Kg reduction = 12 points
BFC77	£ Value of service provided by financial agreements and partnerships that implement circular economy and resource efficiency solutions.	£ value	200 points	every £1000 = 1 point
BFC78	Hard to recycle waste diverted from landfill or incineration through specific recycling partnerships (e.g. Terracycle or equivalent).	tonnes of waste	125 points	every tonne = 200 points
BFC79	Reduce volume of waste through reusing and recycling of products and materials. Reduce volume of waste going to landfill.	tonnes of waste	125 points	every tonne = 125 points
BFC80	Proposing a business case / developing sustainable marketing strategies / proposing new leadership strategies for circular economy and resource efficiency solutions (for organisations of any size).	No. of expert staff hours	25 points	every person hour = 25 points

Initial Equalities Screening Record Form

Date of Screening:	Directorate: Resources	Section: Corporate Procurement	
1. Activity to be assessed	Adoption of a Social Value Policy to support delivery of social value objectives through commissioned contracts		
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change		
3. Is it a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing		
4. Officer responsible for the screening	Alistair Little		
5. Who are the members of the screening team?	Alistair Little		
6. What is the purpose of the activity?	The Policy is intended to fulfil the Council's duties under the Public Services (Social Value) Act 2012 and deliver additional economic, environmental and social benefits to the Bracknell Forest community.		
7. Who is the activity designed to benefit/target?	The entire Bracknell Forest community, however due to the nature of the specific social value targets, a variety of individuals under a broad range of protected characteristics are most likely to benefit, particularly but not limited to; <ul style="list-style-type: none"> BAME Parents recently returning to work from maternity / paternity leave Disabled persons Homeless persons 		
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.	N		
9. Racial equality	N		

10. Gender equality		N	
11. Sexual orientation equality		N	
12. Gender re-assignment		N	
13. Age equality		N	
14. Religion and belief equality		N	
15. Pregnancy and maternity equality		N	
16. Marriage and civil partnership equality		N	
17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.	Please explain		
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	Please explain		
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	Please explain		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?		N	Please explain for each equality group

21. What further information or data is required to better understand the impact? Where and how can that information be obtained?			
22. On the basis of sections 7 – 17 above is a full impact assessment required?		N	Please explain your decision. If you are not proceeding to a full equality impact assessment make sure you have the evidence to justify this decision should you be challenged. If you are proceeding to a full equality impact assessment, please contact Samantha.wood@bracknell-forest.gov.uk or Harjit.Hunjan@bracknell-forest.gov.uk
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria
24. Which service, business or work plan will these actions be included in?			
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	Please list		
26. Assistant Director/Director signature.	Signature: <i>A. Little</i> <div style="text-align: right;">Date: 26/02/2024</div>		

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