

Notice of Meeting and Agenda Communities and Housing Policy Board

Date	Time	Venue
Tuesday, 12 March 2024	13:00	Council Chambers (Renfrewshire), Council Headquarters, Renfrewshire House, Cotton Street, Paisley, PA1 1AN

MARK CONAGHAN
Head of Corporate Governance

Membership

Councillor Marie McGurk (Convener): Councillor Robert Innes (Vice Convener):

Councillor Jacqueline Cameron: Councillor Carolann Davidson: Councillor Gillian Graham: Councillor John Hood: Councillor Lisa-Marie Hughes: Councillor Alec Leishman: Councillor Kenny MacLaren: Councillor Mags MacLaren: Councillor Colin McCulloch: Councillor Janis McDonald: Councillor Cathy McEwan: Councillor Jamie McGuire: Councillor Iain McMillan: Councillor John McNaughtan: Councillor Emma Rodden:

Further Information

This is a meeting which is open to members of the public.

A copy of the agenda and reports for this meeting will be available for inspection prior to the meeting at the Customer Service Centre, Renfrewshire House, Cotton Street, Paisley and online

at <http://renfrewshire.cmis.uk.com/renfrewshire/CouncilandBoards.aspx>

For further information, please email
democratic-services@renfrewshire.gov.uk

Members of the Press and Public

Members of the press and public wishing to attend the meeting should report to the customer service centre where they will be met and directed to the meeting.

Hybrid Meeting

Please note that this meeting is scheduled to be held in the Council Chambers. However, it is a hybrid meeting and arrangements have been made for members to join the meeting remotely should they wish.

Webcasting of Meeting

This meeting will be filmed for live or subsequent broadcast via the Council's internet site – at the start of the meeting the Convener will confirm if all or part of the meeting is being filmed. To find the webcast please navigate to

<https://renfrewshire.public-i.tv/core/portal/home>

Apologies

Apologies from members.

Declarations of Interest and Transparency Statements

Members are asked to declare an interest or make a transparency statement in any item(s) on the agenda and to provide a brief explanation of the nature of the interest or the transparency statement.

Community Safety and Public Protection

- | | | |
|----------|---|----------------|
| 1 | Police and Fire & Rescue Services Scrutiny Sub-committee | 5 - 8 |
| | Minute of meeting of the Police and Fire & Rescue Services Scrutiny Sub-committee held on 16 January 2024. | |
| 2 | Consultation on Martyn's Law - Terrorism (Protection of Premises) Bill - Standard Tier Government consultation | 9 - 34 |
| | Report by Director of Environment, Housing & Infrastructure. | |
| 3 | Consultation on Amendments to the Environmental Authorisations (Scotland) Regulations 2018 and Proposed Regulation by SEPA | 35 - 74 |
| | Report by Director of Environment, Housing & Infrastructure. | |

Finance

- | | | |
|----------|--|----------------|
| 4 | General Services Revenue, Housing Revenue Account and Capital Budget Monitoring | 75 - 84 |
| | Report by Director of Finance & Resources. | |

Performance

- | | | |
|----------|------------------------------|-----------------|
| 5 | Service Update Report | 85 - 102 |
|----------|------------------------------|-----------------|

Report by Director of Environment, Housing & Infrastructure.

Housing

- | | | |
|----------|--|------------------|
| 6 | Renfrewshire Council Tenant Participation Strategy - Update | 103 - 118 |
|----------|--|------------------|

Report by Director of Environment, Housing & Infrastructure.

- | | | |
|----------|--|------------------|
| 7 | Update on Paisley West End Regeneration and addresses for Compulsory Purchase Order | 119 - 124 |
|----------|--|------------------|

Report by Director of Environment, Housing & Infrastructure.

- | | | |
|----------|---|------------------|
| 8 | Renfrewshire Common Housing Allocation Policy – Council Allocation Targets for 2024/25 | 125 - 130 |
|----------|---|------------------|

Report by Director of Environment, Infrastructure & Housing,

- | | | |
|----------|---|------------------|
| 9 | Allocation of property to staff, elected member or committee members: Housing Rule 2.5 | 131 - 132 |
|----------|---|------------------|

Report by Director of Environment, Housing & Infrastructure.

Community Empowerment

- | | | |
|-----------|---------------------------------------|------------------|
| 10 | Community Funding applications | 133 - 146 |
|-----------|---------------------------------------|------------------|

Report by Chief Executive.

Minute of Meeting

Police and Fire and Rescue Scrutiny Sub-Committee

Date	Time	Venue
Tuesday, 16 January 2024	15:00	Council Chambers (Renfrewshire), Council Headquarters, Renfrewshire House, Cotton Street, Paisley, PA1 1AN

Present: Councillor Robert Innes, Councillor Alec Leishman, Councillor Mags MacLaren, Councillor Marie McGurk, Councillor Iain McMillan

Chair

Councillor McGurk, Convener, presided.

In Attendance

G Heaney, Climate and Public Protection Manager and M Hendry, Resilience and Deployment Manager (both Environment, Housing and Infrastructure); and C MacDonald, Senior Committee Services Officer and D Cunningham, Committee Services and Licensing Officer (both Finance & Resources).

Also in Attendance

Chief Superintendent G McCreadie, Superintendent R Banks, Chief Inspector W Graham and Sergeant M Logan, (all Police Scotland); and D McCarrey, Area Commander and P Storrie, Group Manager (both Scottish Fire and Rescue Service).

Webcasting of Meeting

Prior to the commencement of the meeting the Convener intimated that this meeting of the Sub-committee would be filmed for live or subsequent broadcast on the Council's internet site.

Declarations of Interest and Transparency Statements

There were no declarations of interest or transparency statements intimated prior to the commencement of the meeting.

Additional Item

In terms of Standing Order 14b, the Convener indicated that there was an additional item in relation to Local Issues which had not been included in the notice calling the meeting. The Convener, being of the opinion that the item, which is dealt with at item 4 of this Minute, was urgent, authorised its consideration.

1 Police Scotland - Quarterly Performance Report

There was submitted a report by the Chief Superintendent, Police Scotland, relative to service performance and activities in the Renfrewshire area for the reporting period 1 April to 31 October 2023. The report summarised the key performance indicators and provided statistics on the key objectives detailed in the Renfrewshire Policing Priorities 2023/26 and the Police Scotland's Policing Priorities 2023/24.

The report provided updates in relation to the Renfrewshire Policing Priorities 2023/26 of violence, disorder and anti-social behaviour; protecting vulnerable people; acquisitive and cyber/digital crime; serious and organised crime; road safety and road crime.

The report also provided updates to the Police Scotland's Policing Priorities 2023/24 of protecting vulnerable people; working with communities; tackling crime in the digital age; support for operational policing; public confidence and user satisfaction; and forthcoming initiatives.

The Chief Superintendent advised that the report required to be amended to indicate that the serious violence figure had decreased by 9.8 percent rather than the increase of almost one percent as stated.

The Chief Superintendent provided an update in relation to a request from Councillor Hughes at the last meeting of the Sub Committee held on 31 October 2023 for more information relating to an incident which took place in Renfrew on 30 October 2023.

DECIDED: That the contents of the report and verbal update be noted.

2 Spotlight – Police Scotland Estate within Renfrewshire

The Chief Superintendent, Police Scotland, provided a verbal update relative to the Police Scotland Estate within Renfrewshire.

It was noted that a public consultation was available on the Scottish Police Authority website which would end on 31 March 2024 after which responses would be collated/analysed and decisions formed. It was anticipated that the outcome from the consultation/engagement exercise would be realised approximately 24 months from now. The Convener asked Members to encourage their constituents to respond to the Consultation.

The Chief Superintendent provided assurances that there would be no reduction in response officers, CID or support staff.

DECIDED: That the verbal update be noted.

3 **Scottish Fire and Rescue Service - Quarterly Performance Report**

There was submitted a report by the Group Manager, Scottish Fire and Rescue Service (SFRS) relative to SFRS performance and local fire and rescue service plan priorities in the Renfrewshire area during period 1 October to 31 December 2023.

The report provided updates in relation to Renfrewshire activity, accidental dwelling fires and casualties, unintentional injury and harm, deliberate fire setting, non-domestic fire safety and unwanted fire alarm signals.

DECIDED: That the contents of the report be noted.

4 **Local Issues**

In response to a query raised by Councillor Iain McMillan in respect of the role of the Police in illegal evictions, the Chief Inspector intimated that Police Scotland would attend to maintain order and advise tenants of their rights.

Councillor Iain McMillan requested an update on the situation at the Erskine Muthu Hotel. The Chief Superintendent advised that a decision had been taken to redeploy Police resources elsewhere and at this time, no further issues had been reported, however, the situation would be closely monitored.

Concern was expressed by Councillor Iain McMillan that the number of Community Police Officers in Johnstone was being reduced. The Chief Inspector advised that this was not the case and that although an officer was retiring, additional officers were being introduced with effect from 26 February 2024.

Police Scotland expressed thanks to PC Dick on his retirement having served 29.5 years as an Officer in Johnstone.

DECIDED: That the information provided be noted.



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing & Infrastructure

Heading: Consultation on Martyn's Law - Terrorism (Protection of Premises) Bill - Standard Tier Government consultation

1. Summary

- 1.1 Martyn's Law is a proposed piece of legislation aimed at enhancing security measures at public venues and spaces in the United Kingdom. The law is named after Martyn Hett, one of the victims of the Manchester Arena bombing in May 2017. Martyn's Law campaign was spearheaded by Martyn's mother, Figen Murray, who has been advocating for improved security standards at public venues to prevent similar tragedies.
 - 1.2 A consultation on the proposed legislation was carried out in 2021 and significant feedback was received on the application of the proposals in relation to standard tier premises, which are premises with capacity of 100 - 799 individuals. In response to this feedback the Government has reviewed the approach to the Standard Tier, proposing changes to the requirements to ensure that they are proportionate and clear.
 - 1.3 In February 2024, the UK Government launched a consultation to ensure the public can share their views on these proposals for the Standard Tier, which will support policy decisions prior to the legislation's introduction to Parliament.
 - 1.4 This consultation is solely focussed on the requirements proposed in relation to standard tier premises. This consultation began on 5 February 2024 and will end on 18 March 2024. The link to the UK Government consultation document is - [https://assets.publishing.service.gov.uk/media/65c0dcd3c4319100141a456e/05.02.24_Martyn s Law Standard Tier Consultation .pdf](https://assets.publishing.service.gov.uk/media/65c0dcd3c4319100141a456e/05.02.24_Martyn_s_Law_Standard_Tier_Consultation_.pdf) and the proposed response to the consultation from Renfrewshire Council is attached as appendix 1 to this report.
 - 1.5 The Council are responding to this consultation as an organisation who have venues which fall within the highlighted category.
-

2. Recommendations

It is recommended that the Board:

- 2.1 Approves the proposed consultation response from Renfrewshire Council as detailed within Appendix 1, and
 - 2.2 Notes that any further progress with the legislation and associated implementation will be reported through the Service Update reports to the Board.
-

3. Background

- 3.1 The core principle of Martyn's Law is to make it mandatory for public venues and spaces to assess and improve their security measures to mitigate the risk of terrorist attacks. This includes implementing measures such as bag checks, metal detectors, CCTV cameras, staff training in emergency response procedures, and collaboration with law enforcement agencies.
- 3.2 The proposed Terrorism (Protection of Premises) Bill aims to ensure that venues and spaces across the UK have appropriate security measures in place, thereby enhancing public safety and resilience against potential threats. While specific details of the legislation are still being developed, the overarching goal remains to prevent future terrorist attacks and protect the public in crowded spaces.
- 3.3 The proposals set out different requirements for i) Standard Tier premises, which would have a capacity of 100-799 individuals, and ii) Enhanced Tier premises and qualifying public events, both of which have a capacity of 800 individuals or more.
- 3.4 To ensure this legislation can meaningfully enhance public safety whilst remaining proportionate, the UK Government requested the Home Affairs Select Committee (HASC) conduct pre-legislative scrutiny of the published draft Bill. Evidence sessions were completed in June 2023 and a report was produced by HASC on 27 July 2023 scrutinising the proposed measures. Throughout the scrutiny period, and over the summer, the UK Government have continued to engage directly with stakeholders across a variety of sectors, presenting an overview of the proposed legislation, supporting understanding, and seeking feedback on proposals.
- 3.5 The UK Government has considered feedback provided as part of HASC's pre legislative scrutiny process, as well as engagement from across the sectors within scope of the proposed Bill. Significant feedback was received on the Terrorism (Protection of Premises) Bill - Standard Tier Consultation 3 application of the proposals in relation to smaller premises (with capacity of 100 to 799 individuals).
- 3.6 It is now proposed that Standard Tier premises must:
 - Notify the regulator that they are, or have become, responsible for premises within the scope of the Bill (and so subject to the relevant requirements),

- Have in place procedural measures that could be expected to reduce, so far as reasonably practicable the risk of physical harm to individuals at the premises in the event of an attack.
- Ensure employees will be sufficiently instructed or trained to carry out associated procedures efficiently.

3.7 Officers have completed a draft response to the current consultation which is attached at appendix 1 for the Board's consideration.

Implications of the Report

1. **Financial** – None
2. **HR & Organisational Development** – None.
3. **Community/Council Planning** – None
4. **Legal** – None.
5. **Property/Assets** – None.
6. **Information Technology** – None.
7. **Equality & Human Rights** –
 - (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – None.
9. **Procurement** – None.
10. **Risk** – None.
11. **Privacy Impact** – None.
12. **COSLA Policy Position** – N/A.
13. **Climate Risk** – N/A.

List of Background Papers

- (a) None
-

Author: Gwyneth Heaney, Climate and Public Protection Manager
Email: Gwyneth.heaney@renfrewshire.gov.uk

Renfrewshire Council response to the Martyn's Law - Terrorism (Protection of Premises) Bill -Standard Tier Government consultation

Full consultation can be viewed at:

https://assets.publishing.service.gov.uk/media/65c0dcd3c4319100141a456e/05.02.24_Martyn_s_Law_Standard_Tier_Consultation_.pdf

Renfrewshire Council Consultation response

Section 1: Information about you and your organisation

QA. Which of the following best describes you or your organisation?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☒ I own or operate premises **7** Go to QB
- 2 ☐ I own or operate an event **7** Go to QB
- 3 ☐ I am responsible for security at premises or events **7** Go to QB
- 4 ☐ I work at a premises or event in scope, but do not own or operate it **7** Go to QE
- 5 ☐ I am a security consultant **7** Go to QB
- 6 ☐ I am an interested member of the public **7** Go to QG
- 98 ☐ Other **7** Go to QG
- 99 ☐ Don't know **7** Go to QG
- 97 ☐ I prefer not to say **7** Go to QG

QB. Do you own and/or operate any premises that would fall within the Standard Tier?



To be in scope for Standard Tier:

- Premises and events must be accessible to the public.
- Premises must be used for a purpose listed in the Bill (e.g. entertainment and leisure, retail, food and drink).
- Have a capacity of 100-799 individuals.

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☒ Yes 7 Read the following information box and then go to QC
- 2 ☐ No 7 Read the following information box and then go to QC
- 99 ☐ Don't know 7 Read the information box below and then go to QC
- 3 ☐ I don't own or operate any premises 7 Read the following information box and then go to QE



- If you own or operate multiple premises, please answer the questions in the rest of this survey by reference to one particular Standard Tier site.

QC. IF YOU ANSWERED 'YES' AT QB: What is the estimated capacity of your Standard Tier premises based on capacity calculations you already have in place?

IF YOU ANSWERED 'NO' OR 'DON'T KNOW' AT QB: What is the estimated capacity of your premises based on capacity calculations you already have in place? If you own or operate multiple premises, please provide an answer based on your typical capacity size.

Please cross or highlight one box only ☒ and then go to QD.

- 1 ☐ Less than 100
- 2 ☐ 100-199
- 3 ☐ 200-299
- 4 ☐ 300-399
- 5 ☐ 400-499
- 6 ☐ 500-599
- 7 ☐ 600-699
- 8 ☐ 700-799
- 9 ☒ 800 or more (i.e. Enhanced Tier premises)
- 99 ☐ Don't know
- 11 ☐ Not calculated presently
- 12 ☐ I don't own or operate any premises

QD. IF YOU ANSWERED 'YES' AT QB: How many people work for you or your organisation (whether paid or not) at your chosen Standard Tier site (in relation to which you are answering this survey)?


IF YOU ANSWERED 'NO' OR 'DON'T KNOW' AT QB: How many people work for you or your organisation (whether paid or not)? If you own or operate multiple premises, please provide an answer based on your typical capacity size.

Please cross or highlight one box only ☒ and then go to QE.

- 1 ☐ Zero
- 2 ☐ 1-4
- 3 ☐ 5-9
- 4 ☐ 10-24
- 5 ☐ 25-49
- 6 ☐ 50-99
- 7 ☐ 100-199
- 8 ☐ 200-399
- 9 ☐ 400-499
- 10 ☒ 500 or more
- 11 ☐ I don't own or operate any premises
- 99 ☐ Don't know

QE. Which of the following best describes the nature of your organisation?

Please cross or highlight one box only ☒ and then go to QF.

- 1 ☐ Company
- 2 ☐ Sole trader
- 3 ☐ Partnership
- 4 ☐ Not for profit
- 5 ☒ Local government
- 6 ☐ Unincorporated association
- 98 ☐ Other **7** Please specify in the box below 
- 99 ☐ Don't know
- 97 ☐ Prefer not to say

QF. In which of the following sectors do you or your organisation primarily operate?

Please cross or highlight one box only ☒ and then go to QG.

- 1 ☐ Retail, e.g. stores or shopping centres
- 2 ☐ Hospitality and nightlife, e.g. bars, pubs, restaurants, cafés, nightclubs and other public clubs
- 3 ☐ Entertainment, e.g. theatres, cinemas, and concert halls and arenas
- 4 ☐ Sports grounds
- 5 ☐ Recreation and leisure, e.g. public sports/leisure centres, ice rinks and gyms
- 6 ☐ Public libraries, museums and galleries
- 7 ☐ Public conference centres, exhibition halls and other venues for hire
- 8 ☐ Visitor attractions
- 9 ☐ Hotels, holiday parks and similar holiday accommodation
- 10 ☐ Places of worship
- 11 ☐ Healthcare
- 12 ☐ Education and childcare
- 13 ☐ Public transport, including trains stations, ports and airports
- 14 ☒ Public services and facilities
- 15 ☐ Village hall/community centre
- 98 ☐ Other sector
- 99 ☐ Don't know
- 97 ☐ Not applicable

QG. In which part of the UK are you based?

Please cross or highlight one box only ☒ and then go to Section 2.

- 1 ☐ North East
- 2 ☐ North West
- 3 ☐ Yorkshire and the Humber
- 4 ☐ East Midlands
- 5 ☐ West Midlands
- 6 ☐ East of England
- 7 ☐ South East exc. London
- 8 ☐ London
- 9 ☐ South West
- 10 ☒ Scotland
- 11 ☐ Wales
- 12 ☐ Northern Ireland
- 13 ☐ I'm not based in the UK

Section 2: Your views on the proposed Standard Tier



- Thank you for your responses so far. The next section of this survey is about the proposed Standard Tier
- The current threat picture is complex, evolving, and enduring, with terrorists choosing to attack a broad range of locations. Martyn's Law will ensure premises in the UK are better prepared for and protected from terrorist attacks, therefore reducing their impact.
- The UK Government's view is that the Standard Tier will drive good preparedness outcomes.

Q1. To what extent do you agree or disagree that those responsible for premises within the Standard Tier should have a legal obligation to be prepared for a terrorist attack?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☒ Strongly agree [Go to the information above Q2](#)
- 2 ☐ Agree [Go to the information above Q2](#)
- 3 ☐ Neither agree nor disagree [Go to the information above Q2](#)
- 4 ☐ Disagree [Go to Q1a](#)
- 5 ☐ Strongly disagree [Go to Q1a](#)
- 99 ☐ Don't know [Go to the information above Q2](#)

Q1a. Which of the following best describes why you disagree that those responsible for premises within the Standard Tier should have a legal obligation to be prepared for a terrorist attack?

Please cross or highlight one box only ☒ and then go to the information above Q2.

- 1 ☐ I believe it is only for the Government to be prepared to reduce the impact of terrorism
- 2 ☐ I don't believe the obligation should be legal
- 3 ☐ I believe only larger premises should have a legal obligation
- 4 ☐ I don't believe that premises of any size should have a legal obligation
- 5 ☐ I don't believe that there should be any responsibility for premises to be prepared for a terrorist attack
- 98 ☐ Other **7** Please specify in the box below ✍
- 99 ☐ Don't know



- As outlined in paragraph 18, we (the UK Home Office) have revised the requirements in the Standard Tier. Those responsible for Standard Tier premises will be required to have in place reasonably practicable procedures to follow in the event of an attack. We have also removed the requirement for specific terrorism protection training. Instead, training or instruction will be what is sufficient and appropriate to ensure procedures are effectively in place in light of their circumstances and that staff are aware of the actions to take and protocols to follow in the event of an attack. Guidance will assist those responsible for standard duty premises.

Q2. To what extent do you agree or disagree that ‘the revised requirements for the Standard Tier are more appropriate for the broad spectrum of premises in scope, as outlined at paragraph 18 (e.g. village halls to a 799-seater theatre), than the previous requirements outlined in the Draft May 2023 Bill’ (key changes outlined at paragraphs 40 and 41)?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☒ Strongly agree 7 Go to Q2a
- 2 ☐ Agree 7 Go to Q2a
- 3 ☐ Neither agree nor disagree 7 Go to Q3
- 4 ☐ Disagree 7 Go to Q2b
- 5 ☐ Strongly disagree 7 Go to Q2b
- 99 ☐ Don't know 7 Go to Q3

Q2a. Why do you agree that the revised requirements are more appropriate than the previous requirements?

Please cross or highlight all boxes that apply ☒ and then go to Q3.

- 1 ☐ I think the proposed changes make the Standard Tier clearer
- 2 ☒ I think the proposed changes remove unnecessary administrative burden for small premises
- 3 ☒ I think the proposed changes are more appropriate for the broad spectrum of organisations in scope
- 4 ☒ I think the proposed changes will be more proportionate for businesses
- 98 ☐ Other **7** Please specify in the box below ✍
- 99 ☐ Don't know

Q2b. Why do you disagree that the revised requirements are more appropriate than the previous requirements?

Please cross or highlight all boxes that apply ☒ and then go to Q3.

- 1 ☐ I don't think the proposed changes make the Standard Tier clearer
- 2 ☐ I don't think the proposed changes go far enough to remove unnecessary burdens for small premises
- 3 ☐ I don't think the proposed changes are more appropriate for the broad spectrum of organisations in scope
- 4 ☐ I don't think the proposed changes will be more proportionate for businesses
- 98 ☐ Other **7** Please specify in the box below ✍
- 99 ☐ Don't know

Q3. How successful, if at all, do you think the revised Standard Tier requirements will be at improving feelings of safety for staff and visitors at premises within the Standard Tier?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☐ Very successful **7** Go to Q4
- 2 ☒ Moderately successful **7** Goto Q4
- 3 ☐ Slightly successful **7** Go to Q3a
- 4 ☐ Not at all successful **7** Go to Q3a
- 99 ☐ Don't know **7** Go to Q4

Q3a. Why do you think the Standard Tier requirements will not be or will only be slightly successful at improving feelings of safety for staff and visitors at premises within the Standard Tier?

Please cross or highlight one box only ☒ and then go to Q4.

- 1 ☐ Premises already do the things that the Standard Tier would now require
- 2 ☐ I don't think the revised requirements will have any positive impact
- 3 ☐ I think other things are required to improve feelings of safety for staff and visitors
- 98 ☐ Other 7 Please specify in the box below ✍
- 99 ☐ Don't know

Q4. How easy or difficult do you think it will be for those responsible for Standard Tier premises to take forward the revised requirements (outlined in paragraph 18)?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☐ Very easy 7 Go to Q5
- 2 ☐ Easy 7 Go to Q5
- 3 ☒ Neither difficult noreasy 7 Go to Q5
- 4 ☐ Difficult 7 Go to Q4a
- 5 ☐ Very difficult 7 Go to Q4a
- 99 ☐ Don't know 7 Go to Q5

Q4a. Why do you think the revised requirements will be difficult for those responsible for Standard Tier premises to take forward?

Please cross or highlight all boxes that apply ☒ and then go to Q5.

- 1 ☐ The requirements are too complicated to implement
- 2 ☐ The requirements are too burdensome (in terms of time/effort) to implement
- 3 ☐ The requirements are too costly to implement
- 98 ☐ Other 7 Please specify in the box below ✍
- 99 ☐ Don't know

Q5. What unintended consequences, if any, do you think could result from taking forward the revised Standard Tier requirements?

Please write your answer below ✍ OR cross or highlight one box only ☒ and go to the next information box.

- 1 ☒ I don't think there will be any unintended consequences
- 99 ☐ Don't know



- Information in this box relates to Q6, Q6a and Q7.
- Q6 should only be answered by Standard Tier premises operators/owners excluding consultants – this applies if you answered with option 1, 2 or 3 at QA and option 1 at QB. Please read the following information and then answer Q6.
- All others should read the information in this box and then go to Q7.
- Following on from Impact Assessment detail in paragraphs 42-45, below is a summary of the costs of the Standard Tier of Martyn's Law:
- The Standard Tier has an estimated total cost of between £387 million and £1.63 billion with a central estimate of £860 million (PV/Present Value) over the full appraisal period of 10 years. This is an economic cost from working hours being taken up to complete counter-terrorism planning and training, with no financial burden on sites. For an individual site, it is estimated to cost between £160 and £525 per year, with a central estimate of £310 per year. This is likely an upper estimate, with the addition of a reasonably practicable test meaning that some sites will face reduced costs. For more information, you can read Annex A.

Q6. How concerned, if at all, are you that the cost of meeting the Standard Tier requirements will affect your organisation's financial ability to continue operating?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☒ Not at all concerned **➤ Go to Q7**
- 2 ☐ Slightly concerned **➤ Go to Q7**
- 3 ☐ Somewhat concerned **➤ Goto6a**
- 4 ☐ Very concerned **➤ Go to Q6a**
- 5 ☐ Extremely concerned **➤ GotoQ6a**
- 99 ☐ Don't know **➤ Go to Q7**

Q6a. You indicated that you're concerned about your organisation's ability to meet the cost of Standard Tier requirements. Please help us understand your concerns by providing detail below.

Please write your answer below ✍ and then go to Q7.

99 <input type="checkbox"/> Don't know

Q7. Given this cost assessment, how would you think any costs of the Standard Tier should be met?

Please cross or highlight one box only ☒ and then go to the information above Q8.

- 1 ☐ **All** the cost should be met by the **customers** of the premises where possible
- 2 ☐ **Most** of the cost should be met by **customers** of the premises
- 3 ☐ The costs should be **shared** equally by the premises owner/operator and the customers of the premises
- 4 ☒ **Most** of the cost should be **absorbed** by the premises owner/operator and only a minimum passed on to the customers
- 5 ☐ **All** of the cost should be **absorbed** by the premises owner/operator and none should be met by the customers of the premises
- 99 ☐ Don't know



- As outlined in paragraphs 29-32, the training expected as a result of the proposals is now limited to that which forms part of ensuring that there are effective procedural measures to reduce the risk of harm in the event of a terrorist attack. Workers must have sufficient awareness of what they need to do in the event of an attack, i.e. the procedure to be followed, for such measures to be in place. Organisations should ensure training is right for their specific needs and relevant to the roles of specific staff.

Q8. Do you think the new approach to training places more or less burden on Standard Tier organisations compared to the previous approach (as outlined in paragraphs 40 and 41)? By “burden”, we mean any burden including financial, time, effort or other.

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☐ Much more burden with the new approach ➊ Go to Q8a
- 2 ☐ More ➋ Go to Q8a
- 3 ☐ About the same ➌ Go to the information above Q9
- 4 ☐ Less ➍ Go to the information above Q9
- 5 ☒ Much less burden with the new approach ➎ Go to the information above Q9
- 99 ☐ Don't know ➏ Go to the information above Q9

Q8a. Why do you think there is more burden on Standard Tier organisations with the new approach compared to the previous approach? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only ☒ and then go to the information above Q9.

99 <input type="checkbox"/> Don't know



- Q9 should only be answered by Standard Tier premises operators/owners or those who are security consultants or are responsible for security at premises or events – this applies if you answered with option 3 or 5 at QA or option 1 at QB. Please read the following information box and then answer Q9.
- All others should go to Q10.



- Standard Tier requirements will focus on procedures to be enacted in the event of an attack as set out at paragraph 22. These surround evacuation, invacuation, securing the premises and communicating with individuals on the premises. Security partners advise that consideration of these activities, in the event of an attack, will lead to the most relevant and effective actions to save lives. These procedures focus on activities that will help to keep people away from danger.

Q9. We'd like to hear about any other procedures that could be utilised in Standard Tier premises were a terrorist attack to occur further to the above (i.e. other than evacuation, invacuation, lockdown and communications procedures). Please type them in the space below.

Please write your answer below  and then go to Q10.

As part of our existing business continuity plans Renfrewshire Council have in place "Council Security Threats Guidance". As part of this there are existing arrangements in place to identify threats, as well as evacuation, invacuation and lockdown procedures



Q10. Do you think the Standard Tier procedures in Martyn's Law place more or less burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? By "burden", we mean any burden including financial, time, effort or other.

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☐ Much more burden in Martyn's Law than for Health & Safety and Fire Safety 7
Go to Q10a
- 2 ☐ More 7 Go to Q10a
- 3 ☒ About the same 7 Go to Q10b
- 4 ☐ Less 7 Go to Q10c
- 5 ☐ Much less burden in Martyn's Law than for Health & Safety and Fire Safety 7
Go to Q10c
- 99 ☐ Don't know 7 Go to the information above Q11

Q10a. Why do you say that the Standard Tier procedures in Martyn's Law will place more burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only ☒ and then go to the information above Q11.

99 <input type="checkbox"/> Don't know

Q10b. Why do you say that the Standard Tier procedures in Martyn's Law will place about the same burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below  and then go to the information above Q11.

Through business continuity plans, local authorities already consider many of the elements covered within the standard tier procedures including identifying threats, invacuation,evacuation and lockdown procedures.

Q10c. Why do you say that the Standard Tier procedures in Martyn's Law will place less burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below  and then go to the information above Q11.



- Q11 and Q12 should only be answered by Standard Tier premises operators/owners – this applies if you answered with option 1 at QB and any of options 2-8 at QC.
- All others should go to the information box after Q12a.

Q11. If volunteers work at your premises, who is responsible for planning Health & Safety and Fire Safety policies and procedures?

Please cross or highlight one box only ☒ and then go to Q12.

- 1 ☒ Only paid employees are responsible
- 2 ☐ Volunteers are responsible in the same way as paid employees
- 3 ☐ Volunteers are responsible but not in the same way as paid employees
- 97 ☐ Not applicable – there are no volunteers working at my premises
- 99 ☐ Don't know

Q12. If volunteers work at your premises, what arrangements do you make for training on Health & Safety and Fire Safety?

Please cross or highlight one box only ☒ and then go to the specified question.

- 1 ☐ Only paid employees complete mandatory training ➤ Go to the information box after Q12a
- 2 ☐ Volunteers are trained in the same manner as paid employees ➤ Go to the information box after Q12a
- 3 ☐ Volunteers undertake different training from paid employees ➤ Go to Q12a
- 97 ☒ Not applicable – there are no volunteers working at my premises ➤ Go to the information box after Q12a
- 99 ☐ Don't know ➤ Go to the information box after Q12a

Q12a. How does training on Health & Safety and Fire Safety for volunteers differ, if at all, from that for paid employees? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only ☒ and then go to the information box below.

--





To: Communities and Housing Policy Board

On: 20 March 2024

Report by: Director of Environment, Housing & Infrastructure

Heading: Consultation on Amendments to the Environmental Authorisations (Scotland) Regulations 2018 and Proposed Regulation by SEPA

1. Summary

- 1.1 The Scottish Government and SEPA, as part of their Better Regulation Programme are consulting on proposed amendments to the Environmental Authorisations (Scotland) Regulations 2018 (the 2018 Regulations) and how SEPA intend to authorise the activities which will be brought under the proposed Integrated Authorisation Framework.
- 1.2 Currently only radioactive substances are regulated under the 2018 Regulations and it is being proposed that Waste Management, Water and Industrial Activities which are regulated under a number of pieces of legislation will all be brought under the new framework, with the level of authorisation required for each type of activity being directly proportionate to the environmental risk which they pose.
- 1.3 In terms of the waste management sector, it is recognised these activities are subject to a complex regulatory regime for both SEPA and operators within the sector and is found to be often over-regulating low risk activities and under-regulating higher risk activities. It is further recognised that the currently regulatory regime has not kept pace with the new waste and resource economy, as well as not being adequately equipped to prevent the increasingly evident infiltration of serious and organised crime into the waste industry.
- 1.4 Regulation of water and industrial activities whilst being brought under the Integrated Authorisation Framework, will have only minor changes to their controls however, there are four new areas of activity which are intended to be also brought under the framework: the application of sewage sludge to land; carbon capture activity (not including the already regulated carbon capture for the purposes of geological storage); non-waste anaerobic digestion of biomass and combustion plants which generate electricity and aggregate to one Mega Watt Thermal input (MWth) or more at the one site.

- 1.5 The Scottish Government consultation document is available to view at <https://consult.gov.scot/environment-forestry/easr-2018-proposed-amendments/> and the closing date for responses is 31 March 2024.

The SEPA consultation document is available to view at <https://consultation.sepa.org.uk/regulatory-services/better-regulation-consultation-types-of-authorisation/> and the closing date for responses is 12 April 2024.

The draft regulations can also be viewed at <https://www.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2023/12/environmental-authorisations-scotland-regulations-2018-proposed-amendments-consultation-draft-regulations/documents/environmental-authorisations-scotland-amendment-regulations-2024-consultation-draft/environmental-authorisations-scotland-amendment-regulations-2024-consultation-draft/govscot%3Adocument/environmental-authorisations-scotland-amendment-regulations-2024-consultation-draft.pdf>

- 1.6 The draft consultation responses are detailed within Appendices 1 and 2 to this report. Members will note that the draft responses are in agreement with the new Regulations and how SEPA intend authorising the various activities which come into scope by virtue of the Integrated Authorisation Framework.

2. Recommendations

It is recommended that the Board:

- 2.1 notes the consultation proposals and authorises the Director of Environment, Housing and Infrastructure to submit the draft response to both consultations, as detailed within Appendices 1 and 2.

3. Background

- 3.1 The Scottish Government and SEPA, as part of their Better Environmental Regulation Programme are consulting on amendments to the Environmental Authorisations (Scotland) Regulations 2018 and on how SEPA intend regulating relevant activities under the Regulations.
- 3.2 Currently the Environmental Authorisations (Scotland) Regulations 2018 provide a regulatory framework for radioactive substances, however in recognition of the often complex landscape for regulating water, waste and industrial emissions, both the Scottish Government and SEPA intend to improve the regulatory framework for these areas by bringing them under one set of Regulations, with varying levels of authorisation which better reflect the risks posed by the activities allowing resources to be focussed on activities deemed to be higher risk. The 2018 Regulations will become the framework for environmental regulation in Scotland.

3.3 In addition to this, the consultation also seeks views on the regulation of new activities: a change in relation to the regulation of sewage sludge activities once they are in the 2018 Regulations, and the extension of environmental regulation to the activities of carbon capture, non-waste anaerobic digestion and certain generators by bringing them within the scope of the 2018 Regulations.

3.4 Regulation of New Activities

3.4.1 The application of sewage sludge to land has proved controversial with Renfrewshire having direct, first-hand experience of this a number of years ago and in light of significant numbers of complaints received by Scottish ministers, a review of legislation and guidance was undertaken in 2015, resulting in a number of recommendations being made. The proposed amendment of the 2018 Regulations will incorporate a number of new technical requirements, including:

- incorporating requirements of the Safe Sludge Matrix into law;
- an operator's permit including a 'Fit and Proper Person' test should be introduced for all operators who are involved in the handling, storage, transportation and spreading of sewage sludge;
- establishing one regulatory system for organic waste to land, including the agricultural and non-agricultural application of sludge; and
- tighter regulatory powers for SEPA, by having it as the lead agency with a single point of contact for incidents and complaints relating specifically to sewage sludge, subject to cost recovery via charging.

3.4.2 It is recognised that the role of carbon capture is evolving, and several types of carbon capture are emerging. Current regulation captures only one specific activity and proposals for new plants are already coming forward which would not be captured under the current Pollution Prevention and Control Regulatory regime. Environmental regulations need to support the deployment of carbon capture technology in-line with the national 2045 net-zero greenhouse gas emissions reduction target, as well as protect the environment and human health. Carbon capture technologies give rise to potential significant impacts on air and water quality, and from noise. It is therefore proposed that any carbon capture activity (not including the already regulated carbon capture for the purposes of geological storage) will require an authorisation from SEPA under the 2018 Regulations.

3.4.3 Non-waste anaerobic digestion processes of biomass (plant and animal material) into methane or biogas for heat and power. This is an important activity to the circular economy and net-zero, however such plant could be a significant source of pollution to air and water (gaseous release and liquid effluent) and the requirement for these activities to be authorised will ensure appropriate management of the environmental risks posed from non-waste anaerobic digestion.

- 3.4.4 Combustion plants which generate electricity and aggregate to one Mega Watt Thermal input (MWth) or more, at the same location will also be brought into the new framework. Individual plant exceeding the 1MWth threshold already require an environmental authorisation and sites with smaller plant which aggregate to 1MWth have an equivalent environmental impact and including these sites under the 2018 Regulations will ensure environmental risks are appropriately managed and is in line with Scottish Government commitments to improving air quality as well as net zero and decarbonisation goals.
- 3.4.5 The consultation also discusses potential future regulation which will control the emissions of ammonia from livestock farms, an area of activity which has only seen marginal improvements in emissions over a 30 year period.
- 3.4.6 Members will note that the draft Officer response to the Scottish Government consultation on including the above activities into the 2018 Regulations are generally supported, given the wider environmental benefits of doing so. This will bring consistency of regulation for these. A copy of the consultation document and draft response to this is included within Appendix A.

3.5 Common Framework- Proposed Amendments

- 3.5.1 Bringing all four environmental regulatory regimes together in the common framework provided by the 2018 Regulations will ensure a consistent approach to environment regulation. The common framework has been in place since 2018 and through its application to radioactive substances, the current amendment proposals has provided an opportunity to allow for improvements to the 2018 Regulations. Further proposals include amending the call-in procedure as well as enhancing the opportunities for public participation under the 2018 Regulations. The consultation recognises that from experience under other regulatory regimes that the earliest stages of a permit application (or application for variation of a permit) are the best time for meaningful engagement to explore local environmental knowledge and resolve issues in relation to a proposed development. Proposed changes to the public consultation provisions in the 2018 Regulations will incorporate, where appropriate, early public engagement in the authorisation process by means of pre-application public consultation and community engagement. This will ensure that communities are properly informed and engaged in decision making where they may be directly impacted by regulated activities, with the intention this will be easier for communities to have their say.
- 3.5.2 There are a number of minor changes for radioactive substances regulation being proposed, with the main changes relating to alignment with the EU Bais Safety Standards Directive and the disposal of smoke detectors. With regard to the latter, current disposal routes are not clear, with different requirements for various parts of smoke detectors. It is proposed that the 2018 Regulations will align with the Waste Electrical and Electronic Equipment Regulations 2013, requiring smoke detectors to be broken down to remove the sealed radioactive source from plastics only by persons authorised to do so. Smoke detectors can also be disposed of via waste management companies that are legally entitled to manage them.

3.6 Water Technical Provisions

3.6.1 The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) currently provide the principal regulatory framework for protecting the water environment in Scotland. These will be revoked when the 2018 Regulations take effect. Transitioning authorisations for water activities into the 2018 Regulations will have benefits for persons involved in such activity, including:

- authorising radioactive substances, waste, water, and industrial activities under a single framework;
- more flexible permitting approaches, such as entire site permits and corporate permits to suit the needs of operators;
- the ability to use standard conditions in permits and registrations to improve regulatory consistency;
- the availability of notification as a new tier of authorisation, to give more flexibility for the authorisation tiers in future;
- a 'Fit and Proper Person' test, better able to uphold high standards in the industry;
- more effective enforcement tools to better deal with non-compliant sites and protect the water environment.

3.6.2 A new General Binding Rule is proposed to control the discharge of hot tub effluent, from a premises with only one hot tub, to groundwater. chemicals, usually chlorine and bromine, can be harmful to aquatic life. By establishing this GBR the discharge to groundwater from a single hot tub (e.g. from a domestic house) would be allowed, whilst discharges to groundwater from more than one hot tub would require a registration.

3.6.3 A second, new General Binding Rule will replace a number of authorisations for activities that may require temporary works around a watercourse, such as temporary crossings, bridges, or other temporary structures associated with other activity in watercourses (which will already require an authorisation). The new General Binding Rule would simplify this activity, creating the same level of authorisation for the same level of environmental activity.

Industrial Activities Technical Provisions

3.6.4 It is considered that the Pollution Prevention and Control (PPC) regime is procedurally and technically complex and provides limited flexibility to allow regulation to reflect the risk of a specific activity. The draft Regulations and the associated SEPA guidance on the type of authorisation needed, aim to create a framework which will:

- maintain a high level of environmental protection and alignment with the technical standards at EU level
- provide simplified and responsive regulation that is proportionate to risk
- reduce administrative burdens and increase regulatory clarity.

- 3.6.5 The draft 2018 Regulations include currently regulated activities, such as those covered by the EU Industrial Emissions Directive; large combustion plant, waste incineration plant and co-incineration plant; solvent emissions activities; district heating and cooling networks (as described within the EU Energy Efficiency Directive); crude oil handling and storage; medium combustion plant (1-50MWth) and petrol vapour recovery activities.
- 3.6.6 Transitioning PPC permitting into the 2018 Regulations will have benefits for the industry. These include:
- authorising radioactive substances, waste, water, and industrial activities under a single framework
 - more flexible permitting approaches, such as entire site permits and corporate permits to suit the needs of operators
 - a broader 'Fit and Proper Person' test, better able to uphold high standards in the industry
 - more effective enforcement tools to better deal with non-compliance, failing sites and illegal deposits of waste
 - a more flexible approach to suspension and revocation of authorisations giving SEPA more effective powers to intervene where necessary.
- 3.6.7 All existing PPC activities will require a relevant level of authorisation under the 2018 Regulations and any existing operational permits will automatically become authorisations under the Regulations without a need for any re-application. There will be some existing activities which may not be able to comply with relevant standard conditions for their sector and they may be required to make an application for an authorisation at the time the new 2018 Regulations are being implemented.
- 3.6.8 The intention is to create a new General Binding Rule for crushing and screening equipment as such activities are considered low risk and the employment of methods to prevent pollution are standard across the industry.

3.7 Waste Technical Provisions

- 3.7.1 Waste management activities are subject to a complex regulatory regime for both SEPA and operators, often over-regulating low risk activities and under-regulating higher risk activities. The current waste regulatory regime has not kept pace with the new waste and resource economy where value recovery is a priority, as well as not being adequately equipped to prevent the infiltration of serious and organised crime into the waste industry.
- 3.7.2 There are at least eight statutory instruments (and associated amendments) all of which will be transposed into the authorisation regime under the 2018 Regulations. The draft regulations and the proposed types of authorisations required for waste activities, set out in SEPA's consultation, aim to create "an authorisation regime which protects the environment and communities, prevents waste crime and supports the move to a zero-waste society and a circular economy."

3.7.3 It is intended that the waste permitting framework, through the 2018 Regulations, will:

- maintain a high level of environmental protection and alignment with the technical standards at EU level
- provide simplified and responsive regulation that is proportionate to risk
- reduce administrative burdens and increase regulatory clarity
- favour the practical application of the waste hierarchy
- prevent waste crime

3.7.4 The new regime will introduce a Fit and Proper test for relevant levels of authorisation, better able to uphold high standards in the industry and to tackle threats from criminal activity; more effective enforcement tools to better deal with non-compliance, failing sites and illegal deposits of waste and a simplified and strengthened approach to waste carriers.

3.7.5 Waste activities requiring an authorisation under the draft Regulations are:

- the storage, treatment (including sorting), recovery and disposal of waste,
- including the supervision of such operations and the aftercare of disposal sites
- the collection and transport of waste on a professional basis
- acting as a dealer or broker

where this is undertaken in or on land, or in the vicinity of land when connected with a waste management activity taking place on any land.

3.7.6 The management of waste carried on in connection with a person's private dwelling or a place where the person is resident is excluded under the proposed amendment to the 2018 Regulations. This ensures that, for example, carrying household waste to a Household Waste Recycling site, burning leaves, or burying a dead pet in a garden will not fall within the scope of the 2018 regulations.

3.7.7 It should be noted that Regulation 7 of the 2018 Regulations provides a general prohibition such that a "person must not carry on a regulated activity except in so far as it is authorised and carried on in accordance with, and to the extent authorised by, that authorisation". This is equivalent, in relation to waste, to section 33(1)(a) of the Environmental Protection Act 1990 which makes it an offence to "deposit or treat, keep or dispose of waste in or on land" without waste management licence being in place.

3.7.8 The definitions of 'controlled waste' within Section 75 of the Environmental Protection Act 1990 and the Controlled Waste Regulations are not proposed to be repealed as they will remain relevant to waste collection functions undertaken by local authorities.

3.7.9 Where these activities already need a waste management licence under the Environmental Protection Act 1990 the existing licence will automatically become an authorisation under the draft Regulations without the need for licence holders to reapply. People currently operating under exemptions from the requirement to hold a waste management licence under the WML regulations will need to apply for a new authorisation (at registration or permit level) unless a General Binding Rule covers their activity, the person in control of the activity will need to apply for a new authorisation before their current exemption expires. It is expected this transition will start in 2025 and anticipate simple exemptions will end in 2026.

3.7.10 Waste carriers and brokers registrations will be deemed to be Registrations under the draft Regulations and will keep their existing expiry date. The registered carrier or broker will need to apply for a new authorisation under the draft Regulations before the expiry date, as is the case under the current process, but will be subject to the 'Fit and Proper Person' test in the 2018 Regulations.

3.7.11 It is proposed that the 2018 Regulations will include four new General Binding Rules specific to waste management, which will replace a number of existing registrable exemptions under existing waste management licensing requirements. These new General Binding Rules include:

- temporary storage of waste at the place of production
- temporary storage of waste at a place controlled by the producer
- temporary storage and treatment of waste at a collection point
- the deposit of non-hazardous dredging sludges or sediment on or alongside the bank or towpath of inland waters from which they have been dredged.

These rules have a number of exemptions which may apply under certain circumstances eg community collection points or bring banks at churches, schools, car parks and supermarkets or a builder/landscaper/tradesperson who generates waste in the course of trade or business and return it to a storage yard to place in designated skips.

3.7.12 Provisions relied upon by local authorities and regulators other than SEPA will remain in place to ensure continuity of enforcement. This includes Section 33 of the Environmental Protection Act 1990 to tackle fly-tipping by local authorities and accordingly, all such provisions are to be retained. The Duty of Care obligations (section 34 of the Environmental Protection Act 1990) and the consignment note procedures in the Special Waste Regulations 1996 are not included in these amendments as they do not relate directly to the granting of authorisations.

3.7.13 Members will note that the draft Officer response to the Scottish Government consultation on including all of the above activities into the 2018 Regulations are generally supported, given the wider environmental benefits of doing so. This will bring consistency of regulation for these. A copy of the consultation document and draft response to this is included within Appendix A.

3.8 SEPA Consultation on Regulation of Regimes under the 2018 Regulations

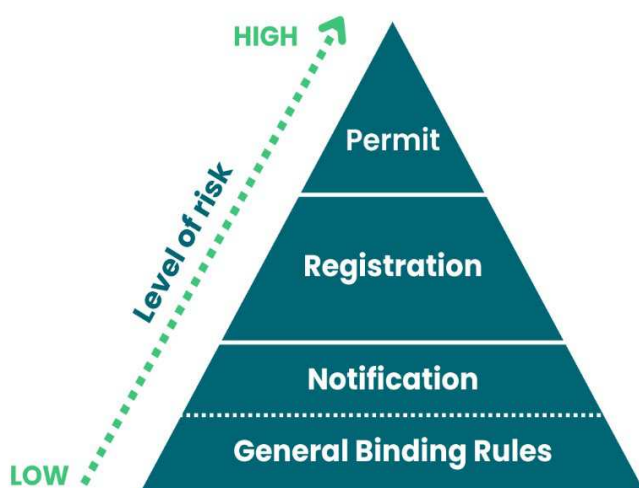
3.8.1 SEPA, in their consultation document, have set out its proposed approach to regulation and the integrated authorisation framework underpins its work to:

- control pollution
- help Scotland to tackle the climate and nature loss crises
- support environmentally safe and successful organisations and activities
- tackle environmental crime, protecting Scotland's environment and communities
- support sectors who want to use innovation to go further and to do more than required by environmental regulations

3.8.2 The integrated authorisation framework seeks to simplify how relevant activities are subject to regulation. SEPAs current regulation of sites can be listed as:

- Waste- 1140 sites are licensed with 32,390 sites subject to one of three levels of exemption
- Water- 10,200 licences, 91,000 registrations
- Industrial activities- 470 Part A Permits and 1570 Part B Permits
- Radioactive substances- 665 authorisations and registrations

These will all be transitioned into an integrated framework which will be simpler and focusses resources on sites presenting the greatest risk of emissions (or harm) to the environment. The four levels of authorisation are summarised in the graphic below:



3.8.3 When proposing the type of authorisation required for each activity, SEPA have considered:

- risk to the environment and human health
- legislative requirements

- fairness to the operator
- public and third-party interests

- 3.8.4 At the lowest end of the scale, General Binding Rules are mandatory rules which apply to relevant activities which are not considered to pose significant risk and providing the activity is carried out in accordance with these rules, SEPA would, in most cases, not require any contact from the operators and the activity would be considered as authorised.
- 3.8.5 Notifications are for low-risk activities where SEPA does not need to decide whether to grant or refuse an authorisation, but they must be notified the activity is being carried out and by who. Activities in this category will be authorised as soon as SEPA have received notification. In most cases, an activity that requires a Notification to SEPA, will also have to follow a General Binding Rule. Unless specifically stated, Notifications do not expire. The authorisation is granted until it is surrendered by the authorised person.
- 3.8.6 Registrations are intended for lower risk activities that require a simple assessment prior to SEPA deciding whether to grant or refuse the authorisation. SEPA will have 28 days to determine an application. If authorised, the Registration will be issued to the authorised person with Standard Conditions. Standard Conditions are a set of rules that apply to a particular activity and must be consulted upon before they are used. Once they have been published, they cannot be appealed. SEPA intend consulting on proposed Standard Conditions for Registration activities prior to the 2018 Regulations coming into effect. If the person wishing to undertake a registration activity cannot comply with the associated Standard Conditions, they will be required to apply for a permit instead. Unless specifically stated, Registrations do not expire. The authorisation exists until it is surrendered by the authorised person or revoked by SEPA.
- 3.8.7 Permits are for higher risk or non-standard activities. Permit applications are likely to require a rigorous assessment before SEPA decides whether to grant or refuse the authorisation. If any activity requires a detailed Fit and Proper Person assessment, or involves a public consultation process, it will need a Permit authorisation. A Permit may include Standard Conditions, and any other conditions that SEPA believe are required to mitigate the risk of environmental harm from the activity (bespoke conditions). Unless specifically stated, Permits do not expire. The authorisation exists until it is surrendered by the authorised person or revoked by SEPA.
- 3.8.8 Many operations will have more than one regulated activity involved in the process. SEPA may choose to issue one authorisation for all the activities involved. The type of authorisation will be dependent on the activities and will default to the highest level of authorisation required.

3.9 Waste Management Activities

3.9.1 Waste management obligations are relevant to every business in Scotland and not only those involved in the waste sector. The case for change recognises that what is being proposed will be significant to operators but are considered essential to deliver a proportionate, risk-based approach to environmental regulation. The current system is ill equipped to prevent the infiltration of serious and organised crime into the industry and when proposing the type of authorisation required for each waste management activity, SEPA have given careful consideration of each area's vulnerability to waste crime. SEPA have applied the same review process when considering currently exempted waste management activities and then determining which level of authorisation is appropriate.

3.9.2 SEPA have separated waste activities into the categories below and are consulting on whether the authorisation they have decided for each activity is appropriate:

- low-risk waste activities
- storage as part of collection
- transporting waste
- acting as a broker or dealer of waste
- storage and treatment of waste
- composting
- anaerobic digestion
- recovery of waste by application to land for the purpose of soil improvement
- recovery of waste for construction, restoration, reclamation, or improvement of land
- incineration and co-incineration
- landfill
- other activities

Activities considered low risk will not require advance notification to SEPA however should any activity cause, or become likely to cause, environmental harm, they may take enforcement action. This could include requiring the person carrying out the activity to take additional precautions, or stop entirely, in addition to undertaking remedial works to repair any harm already caused. There are twenty eight categories of low risk activity- a few examples of these are listed below:

- removal of bitumen asphalt road surfacing, followed by crushing and screening by a cold milling machine. Excludes coal tar;
- cut, chip and shred plant matter, as use the mulch at the same site;
- treatment and disposal of Japanese knotweed and soils contaminated with this, carried out in accordance with best practice;

- separate gully wastes into solid and liquid in the collection vehicle and discharge liquids back into the gully;
- compost organic green waste or manure in open systems eg at farms, liveries, schools parks, golf courses and nature reserves
- temporary storage of waste following a community clear up

3.9.3 Transporting waste, including transporting your own waste or transporting waste produced by another person- The 2018 Independent Review into Serious and Organised Crime in the Waste Sector² highlighted “the extent to which waste is handled by an increasing number of, often opaque, intermediaries”. This Review recommended that “Registration and duty of care requirements for carriers, brokers and dealers should be reformed”. Although the report focused on England and Wales, these findings are also relevant to Scotland. Scottish Government’s Litter and Fly-tipping Strategy³ also commits to reform, so carriers linked to fly-tipping can be more easily removed from the register.

3.9.4 Under the current waste carriers system there are approximately 10,000 waste carriers, brokers and dealers registered with SEPA and there is a requirement SEPA register these with limited ability to refuse or revoke these. Refusal or revocation can only occur when either the applicant or other relevant person has been convicted of an environmental criminal offence or if, in SEPA’s opinion, it is undesirable for the applicant or registered person to continue to be authorised as a carrier, broker or dealer, in controlled waste. This means it isn’t possible to refuse or revoke a registration based on poor compliance history, civil offences (such as local authority fly-tipping fixed penalties, or evidenced links to wider non-environmental criminality).

3.9.5 Benefits of the proposed new system whereby this will be simplified and strengthened by bringing this into the 2018 Regulations and will have the benefit of:

- The Regulations allow SEPA to apply the right level of proportionate scrutiny to applications, and ongoing regulation to the transport of waste.
- The Regulations provide for a wider range of regulatory tools including the Fit and Proper Person test and more options for enforcement when required. We will use these levers to raise standards and build greater confidence in the system, while reducing opportunities for waste criminals.
- SEPA will be able to make more efficient and risk-based decisions. Lower risk applications could be automated, freeing up staff time to scrutinise applications that warrant further assessment.
- Registration type authorisations allow for refusal and revocation in cases where a person, whether transporting their own waste or other people’s waste, is linked to fly-tipping, illegal waste sites or other activity which would suggest they are not Fit and Proper. It also allows the introduction of Standard Conditions and, in time, a level of technical competence assessment. SEPA intend that authorisations will be time limited for a period of five years at the end of which, operators will need to apply to extend their authorisation.

3.9.6 SEPA further intend introducing Standard Conditions for waste carriers which must be met at all times and intend consulting on these, separately later in 2024. However key elements of these are likely to include:

- requirement to keep relevant records
- compliance with the waste hierarchy
- transporting waste in a way which does not endanger human health or harm the environment
- compliance with any relevant technical competence requirements
- requirement to tell SEPA if certain details change (trading names, insolvency etc.)
- requirement to notify SEPA in event of incident/accident that may result in environmental harm

3.9.7 Transporting waste produced by other persons will include any activity where someone offers waste management services to other, including local authority commercial refuse collection; skip uplifts; waste soil haulage; collecting waste tyres or oils and household clearances. SEPA are proposing authorisations of this type are time-limited for a period of three years. SEPA intend introducing a charge for this activity and in time, introduce a level of technical competence assessment.

3.9.8 Persons acting as a waste broker or dealer will be authorised by Registration. It is a distinct activity separate from Registrations to transport waste described above. Anyone who arranges the recovery or disposal of another persons' waste, is currently required to register with SEPA as a waste broker or dealer. This is regardless of whether they handle the waste themselves. SEPA propose to maintain the current time-limited authorisation period of three years for this Registration and expect to introduce an appropriate charge and in time, introduce a level of technical competence assessment.

3.9.9 SEPA intends the storage and treatment of waste will encourage legitimate, small-scale operators into the sector and help to achieve Scotland's ambitious recycling targets. Applicants will have to demonstrate they are a Fit and Proper Person, provide a site boundary plan and confirmation of land ownership (or consent of the landowner). This is a significant shift for those who previously operated under exemption and will provide SEPA with the means of preventing rogue operators from gaining authorisations for smaller-scale waste facilities. SEPA consider waste types with a high pollution, nuisance potential, or low value waste streams (e.g., tyres and residual municipal waste), should be managed through permitted sites. These waste operators would be subject to more detailed and robust scrutiny, proportionate to the activity, including a requirement to demonstrate appropriate financial provision.

3.9.10 Other forms of the storage and treatment of waste will require a Permit with applications of this type requiring a Fit and Proper person assessment, along with being subject to application and subsistence charges. It should be noted that this will apply to Household Waste Recycling Centres.

3.9.11 The recovery of waste for construction, restoration, reclamation or improvement of land is an area of waste activity subject to infiltration by serious and organised criminals. There are a significant number of legitimate exemptions across Scotland for this activity however, they can be an attractive option for illegal disposal, rather than the intended purpose of recovery. A SEPA review of data relating to these exemptions suggest n to a quarter of these applications for exemption were at risk of waste crime. Despite this, under current systems SEPA are unable to refuse these types of exemptions, when applied for. SEPA consider these activities would be better regulated by replacing the current system of exemptions with a range of proportionate and targeted authorisations. We propose to authorise these activities with Notifications, Registrations, or Permits, dependant on the level of risk associated with the activity.

3.9.12 There are a number of additional waste activities discussed in terms of the level of authorisation proposed, including composting, anaerobic digestion of waste and the storage and spreading of sewage sludge on land, and Members will note the proposed response to the consultation is supportive of SEPA's position.

3.10 Water Activities

3.10.1 Water activities are currently regulated under the Controlled Activities (Scotland) Regulations with water activities authorised by three different types of authorisation: Licence, Registration or General Binding Rules. The proposal is to bring water activities under the new Regulations and the (single) Integrated Framework. SEPA are not proposing significant changes to the type of authorisation required for water related activities but the consultation is seeking views on the type of authorisation proposed for each activity under the new framework.

Water activities have been categorised, for the purpose of the consultation into categories:

- Pollution Control, including sewage discharges; hot tub and swimming pool discharges; water run-off from surface drainage and discharge of other effluents.
- Abstractions, including from the water environment; boreholes and wells; and dewatering of excavations.
- Impoundments which relate to construction or alteration of dams, weirs, or other works by which water may be impounded.
- Engineering works such as bank works, channel modifications, crossings, sediment management and other specified engineering activities.
- Other water activities which may have a significant adverse impact on the water environment.

3.10.11 Authorisation level for the types of water activity which require to be regulated are based on risk to the water environment but are aimed to simplify the regulatory process overall. Many of these authorisations will be subject to application and subsistence charges.

3.11 Industrial Activities

3.11.1 Industrial activities currently regulated by SEPA under Pollution Prevention and Control legislation will be included within the 2018 Regulations and SPEA do not intend proposing any significant changes to the type of authorisation which will be required- most current activities require a Permit at this time and will remain the position under the new Integrated Framework (although there are a small number of activities which, in recognition of their lower risk, will move to a lesser level of regulation e.g. crushing and screening activities). In addition, three new activities are proposed to be included within the 2018 Regulations: anaerobic digestion (non-waste); carbon capture and storage (non-geological); and generators of electricity aggregating to 1 megawatt thermal (MWth). The SEPA consultation states what type of authorisation each of these activities would require. The draft response, in most cases does not propose any comments in respect of the Industrial Activities but the benefits of bringing all of these into the Integrated Framework is supported.

3.11.2 The new activities being brought into the 2018 Regulations have been detailed within Section 3.4 of this report.

4. Consultation Responses

4.1 Board members will note that the draft responses to both consultations are generally supportive of the proposals to bring the various activities within the Integrated Authorisation Framework, providing clearer and more effective regulation across these sectors.

Implications of the Report

1. **Financial-** There may be some additional financial considerations for the Council to comply with some of the requirements which will be imposed through the implementation of this Integrated Authorisation Framework where a need for any authorisation is required. The financial impact is currently not known as the charging scheme for applications and subsistence is still to be set by SEPA.
2. **HR & Organisational Development- None**
3. **Community/Council Planning –**
 - *Our Renfrewshire is thriving* – the Better Regulation Programme and Integrated Authorisation framework will benefit communities through a simplified regulatory framework which aims to tackle criminal activity within waste management activities, allowing legitimate business to flourish whilst allowing SEPA to deal with persons operating outwith the framework
4. **Legal-** This is significantly amended legislation which the Council, in a number of areas, will require to comply with.

5. **Property/Assets-** None
6. **Information Technology-** None
7. **Equality & Human Rights**
 - (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety-** None.
9. **Procurement -** None
10. **Risk -** None
11. **Privacy Impact-** None
12. **COSLA Policy Position** N/A
13. **Climate Risk-** The Integrated Authorisation Framework seeks to limit the release of chemicals to the air, water and land. This aims to contribute to the circular economy and improve air quality.

List of Background Papers

- (a) Background Papers- None
-

Author: Colin Hunter, Environmental Health Public Health Manager
Email: colin.hunter@renfrewshire.gov.uk

**Renfrewshire Council Response to the Scottish Government Consultation
on the Environmental Authorisations (Scotland) 2018 Regulations:
Proposed Amendments.**

Question 1

Are there any other regulatory measures relating to the spreading of sewage sludge to land that you feel should be considered for inclusion in the Regulations?

When sludge is being applied to land, considerations to odour impacts should also be required to avoid odour nuisance arising. Renfrewshire Council has experience from a number of years ago when sewage sludge was being stored and then spread on farmland with a significant number of complaints arising as a result of offensive odours being evident across a wide area. Sewage sludge treatment to land should be required to be undertaken in such manner which avoids odour nuisance.

Question 2

Do you agree that this carbon capture activity should be an environmental activity in the Regulations?

Yes, it would appear appropriate for carbon capture activities to be considered as an environmental activity within the regulations given their potential impact to air and water quality from nitrogen oxide, amine and sulphur dioxide emissions, and associated plant noise.

Question 3

Do you agree non-waste anaerobic digestion should be an environmental activity in the Regulations?

Yes, as this activity gives rise to potential emissions similar to waste anaerobic digestion (which is currently within the Regulations) then non-waste anaerobic digestion should be subject to the same environmental controls which are protective of water and air quality.

Question 4

Do you agree any combustion plant on the same site that generate electricity and aggregate to 1 MWth or more should be an environmental activity in the Regulations?

Yes, this should be considered as an environmental activity in the Regulations to ensure consistency in approach as individual plant producing 1MWth or greater is already subject to environmental control, protective of air quality.

Question 5

Should the scope be expanded to all combustion plants on the same site that aggregate to 1 MWth or more including those that generate heat (e.g. boilers)?

Yes, including all combustion plants on the same site aggregating to 1MWth or more, including those generating heat should also be subject to environmental regulation which will be applied through the 2018 Regulations.

Question 6

For combustion plant (or plants) on the same site that generate electricity and aggregate to 1 MWth or more, located in the highlands or on the islands are there plans in place to upgrade the plant or to replace it with renewable / low carbon technology / carbon capture usage and storage?

Renfrewshire Council has no comment to make in respect of this question.

Question 7

How should ammonia emissions from intensive livestock farms be controlled in future? This could include, a regulatory basis, the provision of advice, or information and examples of good practice or other means.

As part of a regulatory model, the provision of advice, guidance and examples of good practice should support the industry toward achieving beneficial improvements in ammonia emissions to air.

Question 8

What considerations should be taken into account when considering future control or management of ammonia emissions from intensive livestock farms? Such considerations may include specific issues relating to farm type, size or other matters related to management of emissions such as costs.

Detailed cost, benefit, analysis frameworks should be developed to ensure that there is minimal/acceptable detriment to the industry whilst reducing emissions of ammonia to air.

The use of best available techniques not entailing excessive costs, or a similar model should be utilised to ensure the application of technical measures to mitigate emissions are not at unreasonable cost to the operator of intensive livestock farms.

Question 9

Do you have any comments on the proposal to amend the existing public consultation requirements in the 2018 Regulations so that SEPA may require pre-application public consultation in relation to permit applications or applications for variations to permits in certain circumstances?

Renfrewshire Council supports the proposals to provide that SEPA can, if deemed necessary, require pre-application public consultation for permit or variation applications. This will afford third parties the opportunity at an early stage in any application process to air concerns and for the applicant (and Regulator) to resolve/allay these appropriately.

To support this, there should be a neighbour notification process which will provide third parties advance notice of an application/variation and avoid them being unaware of any application/variation for a permit.

Question 10

Do you have any comments on the proposal to simplify the call-in procedure provisions in the 2018 Regulations so as to remove the requirement that SEPA directly notify those who have made third-party representations of a proposed determination of a permit application or variation and the associated timing provisions which prevent SEPA from finally determining the application or variation until the elapse of the statutory time periods?

It is noted that 3.2.3 states that the call-in procedures currently in place under CAR has generally demonstrated that the procedure results in delays, rarely results in a change of outcome, and is of limited utility to the process of determining applications and variations under CAR. The proposal appears to be a focus on more and earlier public engagement in the permitting process is considered to be of much greater impact.

Renfrewshire Council would in general be supportive of this position provided there is no detriment to the engagement process for relevant third-parties to ensure there is a transparent and robust procedure in place which provides sufficient time for third parties to make representation/objections at permit determination stages.

Question 11

Do you have any comments on the proposed amendment to provide for a procedure for issuing revocation notices where an authorised person has died or no longer exists?

No comments.

Question 12

Do you have any comments on proposed amendment to the provisions in respect of the public register required to be maintained by SEPA?

No. Renfrewshire Council supports the proposed amendment in respect of the public register.

Question 13

Do you have any comments on the minor amendments as set out in Annex D for the common framework: minor changes relevant to all activities?

No comments.

Question 14

Do you have any comments on the minor amendments as set out in Annex D for the minor changes relevant to radioactive substances activities?

No comments.

Question 15

Do you agree with or have comments on the proposed changes to Schedules 8 and 9 for radioactive substances activities?

No comments.

Question 16

Do you have any comments on the new General Binding Rules (nos. 7 and 35) for water activities in Schedule 9 and the water activities in Schedule 10 in the draft Regulations?

Renfrewshire Council welcomes the introduction of the new General Binding Rules as detailed.

There is the potential for many of the stated activities to be undertaken by owners/operators of relevant activities without them having knowledge of these specific and new requirements which it is expected they should be adhering to and a public communications strategy is recommended to ensure this is understood as widely as possible.

This will be particularly relevant with the popularity of hot tubs in rural environments where waste water arising from these may be discharged, via surface discharge, into the groundwater.

This will also apply to persons who operate private sewage activities (septic tanks) as they may be unaware of the proposals being introduced.

Question 17

Do you have any comments on the minor amendments relevant to water activities as set out in Annex D?

Renfrewshire Council supports the minor amendments relative to water activities, as set out within Annex D, providing clarity and differentiation between different types of hazardous substances within the proposed integrated regime.

Question 18

Do you have any comments on the activity “industrial emissions activities” or on the technical requirements in Schedules 19 to 24 in the draft Regulations?

No comments.

Question 19

Do you have any comments on the additional technical requirements in Schedule 25 in the draft Regulations?

No comments.

Question 20

Do you have any comments on the industrial activity carrying out “other emissions activities” Schedule 26 in the draft Regulations?

No comments.

Question 20

Do you have any comments on the activity “operating a medium combustion plant” in Schedule 27 in the draft Regulations?

Renfrewshire Council supports the move to an integrated regulatory model which will take into permit SEPA to set conditions for such activities relating to impacts arising from emissions other than emissions to air.

Simplifying the process for operators should prove advantageous to their compliance with the regulations.

Question 21

Do you have any comments on the activity “operating a petrol vapour recovery activity” in Schedule 28 in the draft Regulations?

Renfrewshire Council supports the removal of the 20MWth threshold which will significantly simplify the regulatory arrangements for combustion plant and provide clearer alignment with EU standards.

Question 23

Do you have any comments on this general binding rule 1, from Schedule 9, Chapter 4, Low Emission Activities in the draft Regulations?

No comment.

Question 24

Do you have any comments on the minor amendments relating to PPC activities as set out in Annex D?

No comments.s

Question 25?

Do you agree that the regulations adequately capture waste activities?

Yes, Renfrewshire Council agrees that the proposed regulations adequately capture relevant waste activities. The proposed amendments to the regulation of waste management is welcomed as it is recognised the complexities of the current system along with some areas which are higher risk and exposed to criminal exploitation of the system requires to be simplified and at the same time made significantly more robust to tackle waste crime

Question 26

Do you have any comments on the geographical extent in the draft Regulations?

No comments.

Question 27

Do you have any comments on the requirements applying all waste management activities (Schedule 11) in the draft Regulations?

Renfrewshire Council agrees with the inclusion of all waste management activities detailed within Schedule 11, into the draft regulations.

Question 28

Do you have any comments on the requirements applying to landfill activities (Schedule 13) in the draft Regulations?

No comments

Question 29

Do you have any comments on the requirements applying to hazardous waste mixing and treatment of waste oil (Schedule 12) in the draft Regulations?

Renfrewshire Council welcomes the proposed application of single standards for waste oil, rather than the current position where different regulations apply different technical standards.

Question 30

Do you have any comments on the requirements for management of separately collected recyclable waste and for operating a materials facility (Schedule 14) in the draft Regulations?

Renfrewshire Council welcomes proposals in this regard which aims to further Scotland's ambitions for a circular economy and a zero-waste society by supporting recycling chains and improving the quality of dry recyclable wastes made available for reprocessing.

Question 31

Do you have any comments on the requirements for the management of end-of-life vehicles (Schedule 15) in the draft Regulations?

No comments.

Question 32

Do you have any comments on the requirements applying to the management of WEEE (Schedule 16) in the draft Regulations?

No comments.

Question 33

Do you have any comments on the requirements applying to the management of waste batteries (Schedule 17) in the draft Regulations?

No comments.

Question 34

Do you have any comments on draft GBRs 1 to 4?

Renfrewshire Council welcomes the introduction of the General Binding Rules 1-4 which provides for the temporary storage of waste under specific circumstances, as detailed at points 7.3.22 to 7.3.28.

Question 35

Do you have any comments on the minor amendments relating to waste activities as set out in

Renfrewshire Council welcomes the minor amendments within Annex D which aims to bring radioactive substances, water, waste and industrial emission activities into a single regulatory regime.

This will aggregate a number of areas of regulation which can be challenging to navigate and will bring about clarity for both operators and regulators.

Annex D?

Renfrewshire Council Response to the Scottish Environment Protection Agency Consultation on the Environmental Authorisations (Scotland) 2018 Regulations: Proposed Types of authorisation for Waste management; Water and Industrial Activities

The questions below have been extracted from the full document for reasons of brevity. This can however be viewed at the link detailed within 1.5 of the main report.

Questions: Low-Risk Waste Activities; Storage As Part Of Collection And Transporting Waste

(a) Do you agree these activities should be authorised by Registration?

Yes, Renfrewshire Council supports the intention that these activities are authorised by Registration. This reflects the higher risk level posed by operators of such businesses, particularly within the private sector where there are currently opportunities for persons involved in criminal activity to exploit the current regime, ranging from the ‘man with a van’ operations through to organised crime gangs who are increasingly becoming involved in waste crime.

(b) Do you agree with the proposed names of these new authorisations (i.e., transporting your own waste, and transporting waste produced by another person)?

Yes, Renfrewshire Council agrees that the proposed names for such authorisations are appropriate and brings clarity to the type of operation being conducted.

(c) Do you agree with an authorisation period of five years when registering to transport your own waste?

Yes, Renfrewshire Council agrees with this timescale as being appropriate for such authorisations.

(d) Do you agree with an authorisation period of three years when registering to transport waste produced by another person?

Yes, Renfrewshire Council agrees with this timescale as being appropriate for such authorisations however, with regard to waste collection authorities (local authorities) this may be more burdensome and consideration to a specific authorisation for local authorities would be welcomed with longer timescales attached to these.

- (e) Do you agree that SEPA should apply a level of technical competence assessment to anyone seeking authorisation to transport waste produced by another person?

Yes, Renfrewshire Council supports the application of a technical competence assessment to persons/organisations seeking authorisation to transport waste produced by other persons. This will strengthen the regulation of such activity and ensure that all authorised operators have demonstrated this competency as part of the application process, giving confidence in their ability to comply with the regulatory requirements prior to obtaining the authorisation.

- (f) Do you have views on possible Standard Conditions?

Renfrewshire Council, whilst not offering suggested standard conditions would recommend these are sufficiently robust to avoid potential opportunities for persons to take advantage of any situation to avoid regulatory controls being applied. To avoid the potential for waste operators to collect and store significant amounts of waste and then cease operating without having legitimately disposed of the waste, consideration should be given to the requirement for a bond/insurance to be provided which would assist with disposal costs in the event that such circumstances arise.

- (g) Do you have views on whether charities and voluntary organisations should be liable to pay the appropriate charges when registering to transport waste produced by another person?

Charities/voluntary organisations should be required to pay appropriate charges, however these could be set at a reduced rate from the full charges to support the organisation.

- (h) Do you think anyone operating waste collection services should be required to display their registration authorisation number on any advert for waste services, whether in print or online, including social media?

Yes, Renfrewshire Council would support the requirement for operators to display their authorisation number within any advert, including social media. This would allow persons to check the authorisation in advance of engaging operators for waste services, providing greater confidence in the industry. The absence of an authorisation number would allow SEPA to target resources to these operators, seeking compliance.

Questions on Acting as a Broker or Dealer of Waste

- (a) Do you agree these activities should be authorised by Registration?

Yes, Renfrewshire Council supports these activities being subject to authorisation at Registration level.

- (b) Do you agree with an authorisation period of three years when registering as a broker or dealer of waste?

Yes, Renfrewshire Council supports this timeframe

- (c) Do you agree that SEPA should apply a level of technical competence assessment to anyone seeking authorisation as a broker or dealer of waste?

Yes, Renfrewshire Council supports the proposal to introduce a level of technical competence assessment for persons seeking such authorisation. This will strengthen the regulation of such activity and ensure that all authorised operators have demonstrated this competency as part of the application process, giving confidence in their ability to comply with the regulatory requirements prior to obtaining the authorisation.

Questions on Storage and Treatment of Waste

- (a) Is Table 2: Type of authorisation for the storage and treatment of waste, clear and understandable?

Yes, Table 2 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes Renfrewshire Council considers the proposed type of authorisation for each category of activity to be appropriate.

- (c) What maximum size of container do you consider appropriate for the storage of asbestos at Registration level?

Renfrewshire Council considers that a 14 yard closed and lockable container would be an appropriate size for the storage of asbestos.

Questions on Composting of Waste

- (a) Is Table 3: Type of authorisation for composting, clear and understandable?

Yes, Table 3 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

Questions on Anaerobic Digestion

- (a) Is Table 4: Type of authorisation for anaerobic digestion, clear and understandable?

Yes, Table 3 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

Questions Recovery Of Waste By Application To Land For The Purpose Of Soil Improvement

- (a) Is Table 5: Type of authorisation for recovery of waste by application to land for the purpose of soil improvement, clear and understandable?

Yes, Table 5 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

Questions Recovery Of Waste For Construction, Restoration, Reclamation, Or Improvement Of Land

- (a) Is Table 6: Type of authorisation for recovery of waste for construction, restoration, reclamation, or improvement of land clear and understandable?

Yes table 6 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

- (c) Do you agree with the 100,000 tonnes threshold separating Registrations from Permits?

Yes, Renfrewshire Council supports the threshold between sites requiring Registrations and Permits. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

- (d) Waste types will be restricted to those suitable for these types of activities at Registration level. What types of waste do you consider appropriate for use?

Renfrewshire Council considers that whilst there may be no specific 'type' of waste considered suitable for these activities at Registration level, materials should require to be both physically and chemically suitable for such use at any site and prior to being so used, acceptance criteria for any site should be determined. Thereafter any materials being brought to site should have appropriate test certification which confirms their suitability for use.

Questions Incineration And Co-Incineration Of Waste

- (a) Is Table 7: Type of authorisation for incineration and co-incineration clear and understandable?

Yes Table 7 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity. This will allow SEPA to focus resources on the higher risk activities where large volumes of waste are being treated.

Questions Landfill Of Waste

- (a) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the maintenance of Permit authorisations for all landfilling of waste.

Questions on Emerging Waste Management Activities

- (a) Do you carry out, or are you aware of, any new or emerging waste management activities that SEPA should take into consideration under the new framework?

No comments

- (b) Do you carry out, or are you aware of, any other activity that may be appropriately authorised at Notification or Registration level, which would require a Permit under current proposals?

No comments

Questions On Authorisation For Pollution Control, Sewage Discharges

- (a) Is Table 8: Type of authorisation for pollution control, sewage discharges, clear and understandable?

Yes, Table 8 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity.

Questions on Finfish Farm And Hatchery Discharges

- (a) Do you agree with the type of authorisation proposed for this activity?

Renfrewshire Council recognises that many of these activities will require bespoke conditions and therefore agrees that the authorisation for these should be at the Permit level.

Questions On Discharges From Hot Tubs And Swimming Pools

- (a) Is Table 9: Type of authorisation for discharges from hot tubs and swimming pools, clear and understandable?

Yes, Table 9 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the proposed level of authorisation for each activity, recognising the risk to the water environment posed by such discharges.

Questions on Discharges of water run-off from surface water drainage systems

- (a) Is Table 10: Type of authorisation for discharges of water run-off from surface water drainage systems, clear and understandable?

Yes, Table 10 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council agrees with the type of authorisation proposed for each activity

Questions on Discharges of water run-off from construction sites, borrow pits, quarries, and waterbound roads and tracks

- (a) Is Table 11: Type of authorisation for discharges of water run-off from construction sites, borrow pits, quarries, and waterbound roads and tracks, clear and understandable?

Yes table 11 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity, these being commensurate with the risk posed.

Questions on Authorisation For The Cultivation Of Land And Pesticide Storage And Application

- (a) Is Table 13: Type of authorisation for the cultivation of land and pesticide storage and application, clear and understandable?

Yes, table 13 is clear and readily understandable.

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for each activity, these being commensurate with the risk posed.

Questions- Sheep Dipping and Keeping of Livestock

- (a) Is Table 14: Type of authorisation for sheep dipping and the keeping of livestock, clear and understandable?

Yes, table 14 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Renfrewshire Council has no comments to make on this proposal

Questions Authorisation For Disposal Of Disinfectants And Detergents During The Outbreak Of A Notifiable Disease

- (a) Is Table 15: Type of authorisation for disposal of disinfectants and detergents during the outbreak of a notifiable disease, clear and understandable?

Yes table 15 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for this activity?

Renfrewshire Council supports the type of authorisation proposed for this activity which, it is assumed meets technical guidance for the disposal detergents and washings used in this activity.

Questions Oil Storage

- (a) Is Table 16: Type of authorisation for oil storage, clear and understandable?

Yes, table 16 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each of these activities?

No comments

Questions For Discharge Of Other Effluents

- (a) Is Table 17: Type of authorisation for discharge of other effluents, clear and understandable?

Yes, table 17 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each of these activities?

No comments

Questions- Water Abstraction

- (a) Is Table 18: Type of authorisation for water abstraction, clear and understandable?

Yes Table 18 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions Construction, Extension And/Or Operation Of A Borehole Or Well

- (a) Is Table 19: Type of authorisation for construction, extension and/or operation of a borehole or well, clear and understandable?

Yes, table 19 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council agrees with the type of authorisation proposed for each activity

Questions- Impoundment Activities

- (a) Is Table 18: Type of authorisation for impoundment activities, clear and understandable?

Yes, table 18 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council agrees with the type of authorisation proposed for each activity

Questions- Bank Works

- (a) Is Table 21: Type of authorisation for bank works, clear and understandable?

Yes, table 21 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council agrees with the type of authorisation proposed for each activity

Questions- Channel Modification

- (a) Is Table 22: Type of authorisation for channel modification, clear and understandable?

Yes, table 22 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

Yes, Renfrewshire Council agrees with the type of authorisation proposed for each activity

Questions- Crossings

- (a) Is Table 23: Type of authorisation for crossings, clear and understandable?

Yes.

- (b) Do you agree with the type of authorisation proposed for each activity?

No Comments

Questions- In-Loch Structures Or The Placement Of Boulders

- (a) Is Table 24: Type of authorisation for in-loch structures or the placement of boulders, clear and understandable?

Yes table 24 is clear and readily understandable

- (b) Do you agree with the type of authorisation proposed for each activity?

No Comments

Questions- sediment management

- (a) Is Table 25: Type of authorisation for sediment management, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Other Engineering Activities

- (a) Is Table 26: Type of authorisation for other engineering activities, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Other Engineering Activities In Wetlands

- (a) Is Table 27: Type of authorisation for other engineering activities in wetlands, clear and understandable?

Yes.

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Engineering Activities In The Vicinity Of Inland Surface Waters Or Wetlands

- (a) Is Table 28: Type of authorisation for engineering activities in the vicinity of inland surface waters or wetlands, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No Comments

Questions- engineering activities beyond the vicinity of any inland surface waters or wetlands

- (a) Is Table 29: Type of authorisation for engineering activities beyond the vicinity of any inland surface waters or wetlands, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Maintenance, Replacement, Or Removal, Of An Existing Engineered Structure

- (a) Is Table 30: Type of authorisation for maintenance, replacement, or removal, of an existing engineered structure, clear and understandable?

Yes.

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- other Water Activities

- (a) Do you agree that activities not otherwise specified or covered by another authorisation, that have, or are likely to have, a significant impact on the water environment, require a Permit authorisation?

No comments

Questions- Petrol Vapour Recovery

- (a) Is Table 32: Type of authorisation for petrol vapour recovery, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for these activities?

No Comments

Questions- Production Of Cement, Lime, And Magnesium Oxide

- (a) Is Table 33: Type of authorisation for production of cement, lime, and magnesium oxide, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for these activities?

No comments

Questions- Other Mineral Activities

- (a) Is Table 34: Type of authorisation for other mineral activities, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for these activities?

No comments

12.5.1 Questions- Coating Activities

- (a) Is Table 35: Type of authorisation for coating activities, printing, and textile treatments, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for this activity?

No comments

Questions- Timber Activities

- (a) Is Table 36: Type of authorisation for timber activities, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for this activity?

No comments

Questions- Treatment Of Animal And Vegetable Matter And Food Industries

- (a) Is Table 37: Type of authorisation for treatment of animal and vegetable matter and food industries, clear and understandable?

Yes- although a definition of what ensiling is would be helpful in understanding this.

- (b) Do you agree with the type of authorisation proposed for this activity?

No comments

Questions- Solvents Installations

- (a) Is Table 38: Type of authorisation for operating a solvents installation, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for this activity?

Yes, Renfrewshire Council supports the type of authorisation for this activity.

Questions- Anaerobic Digestion (Non-Waste)

- (a) Is Table 39: Type of authorisation for anaerobic digestion (AD) (non-waste), clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Carbon Capture

- (a) Is Table 40: Type of authorisation for carbon capture, clear and understandable?

Yes

- (b) Do you agree with the type of authorisation proposed for each activity?

No comments

Questions- Generators Of Electricity Aggregating To 1 Megawatt Thermal (MWth) Or More

- (a) Is Table 41: Type of authorisation for generators of electricity aggregating to 1 megawatt thermal (MWth) or more, clear and understandable?

Yes

(b) Do you agree with the type of authorisation proposed for this activity?

Yes, Renfrewshire Council supports the type of authorisation proposed for this activity



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Finance and Resources

Heading: General Services Revenue, Housing Revenue Account (HRA) and Capital Budget Monitoring as at 5 January 2024

1. Summary of Financial Position

- 1.1. The projected outturn at 31 March 2024 for all services reporting to the Communities and Housing Policy Board, including the Housing Revenue Account, is an overspend of £0.021m against the revised budget for the year in General Services and a break-even position in the HRA.
- 1.2. The projected capital outturn at 31 March 2024 for projects reported to the Communities and Housing Policy Board is a break-even position against the revised budget of £21.451m for the year.
- 1.3. This is summarised over the relevant services in the table below and further analysis is provided in the appendices.

Table 1: Revenue				
Division / Department	Revised Annual Budget £000	Projected Outturn £000	Budget Variance £000	Budget Variance %
Housing Revenue Account (HRA)	0	0	0	0%
Housing – General Services (Non-HRA)	4,667	4,688	(21)	(0.4%)
Communities and Public Protection	5,927	5,927	0	0%
Criminal Justice	3,843	3,843	0	0%
Board Total – Revenue	14,437	14,458	(21)	(0.1%)

Table 2: Capital				
Division / Department	Revised Annual Budget £000	Projected Outturn £000	Budget Variance £000	Budget Variance %
Housing Revenue Account (HRA)	20,378	20,378	0	0%
Other Housing PSHG	1,073	1,073	0	0%
Board Total – Capital	21,451	21,451	0	0%

2. Recommendations

Members are requested to:

- 2.1. Note the projected Revenue outturn position detailed in Table 1 above
- 2.2. Note the projected Capital outturn position detailed in Table 2 above; and
- 2.3. Approve the budget adjustments detailed at section 4.

3. Revenue

- 3.1. The Revenue Budget Monitoring Statement at Appendix 1 identifies a projected overspend of £0.021m for all services reporting to this Policy Board. Detailed division service reports can also be found here, along with an explanation of each significant projected variance.
- 3.2. The projected outturn is based on information currently available, and assumptions made by service budget holders. Projections are subject to continuous review, and any changes will be detailed in future reports to the Board.
- 3.3. The projected outturn for Homelessness within Housing – General Services Non-HRA, continues to be a risk over the remainder of the financial year, with increasing demand on services being managed within existing resources at present, including some additional staffing being supported through migration and asylum funding streams allocated to the Council by the UK and Scottish Government.
- 3.4. The significant potential increase in homeless presentations linked to asylum population in Renfrewshire and more widely across the West of Scotland, is anticipated to create additional long-term financial pressures for Council services. Projections of these pressures will continue to be reviewed and reported to future Communities and Housing Policy Boards as required.
- 3.5. The main reasons for the projected outturn positions are indicated below the Appendix tables, showing both the subjective analysis (what the budget is spent on) and the objective analysis (which division is spending the budget).

4. Revenue Budget Adjustments

- 4.1. Members are requested to note, from Appendix 1, a budget adjustment totalling (£0.016m) relating to Non-Domestic Rates.

5. Communities and Housing Services Capital

- 5.1. The Capital Investment Programme 2023/24 to 2027/28 was approved by the Council on 2 March 2023. For Communities and Housing Services the approved capital spend for 2023/24 was £30.795m.
- 5.2. The Capital Monitoring report at Appendix 2 indicates a revised budget in 2023/24 for Communities and Housing Services of £21.451m.

6. Capital Budget Adjustments

- 6.1. Since the last report, budget changes totalling £0.044m have arisen which reflect the following PSHG capital projects:
- Budget carried forward from 2023/24 into 2024/25 of (£0.044m)
 - Owners In Council House Schemes – (£0.040m)
 - Fees/Consultancy/Title Clearance – (£0.004m)
-

Implications of this report

1. **Financial** – The projected budget outturn position for Communities and Housing Services Revenue budget is projected overspend of £0.021m. Income and expenditure in all services within the department will continue to be monitored closely for the rest of the financial year and, where necessary, steps will be taken to mitigate any significant overspend.

The projected outturn position for Communities and Housing Services' Capital budget is break-even. The Capital programme will continue to be monitored closely for the rest of the financial year and, where necessary, steps will be taken to mitigate any significant overspend.

Any changes to current projections in either Revenue or Capital budgets will be reported to the Board as early as possible, along with an explanation for the movement.

2. **HR and Organisational Development**

None directly arising from this report.

3. **Community/Council Planning**

None directly arising from this report.

4. **Legal**

None directly arising from this report.

5. **Property/Assets**

The Capital Plan Investment programme includes Capital projects that will result in new build Council housing stock and improvements to existing stock.

6. **Information Technology**

None directly arising from this report.

7. **Equality and Human Rights**

None directly arising from this report.

8. **Health and Safety**

The Capital Plan Investment programme includes investment in Council assets and facilities to ensure they remain safe and accessible in line with statutory obligations.

9. Procurement

None directly arising from this report.

10. Risk

The potential risk that the Council will overspend its approved budget for the year will be managed at a Council-wide level by the Chief Executive and Directors.

11. Privacy Impact

None directly arising from this report.

12. Cosla Policy Position

N/a.

13. Climate Risk

Investment in Council assets improves energy efficiency, reducing the Council's carbon footprint and helping it achieve its Net Zero by 2030 target.

List of Background Papers

Housing Revenue Account Budget & Rent Levels 2023/24 and Housing Capital Investment Plan 2023/24 to 2027/28, Council, 2 March 2023;

Non-housing Capital Investment Programme, Prudential Framework and Treasury Management Strategy, and Capital Strategy 2023/24 – 2027/28, Council, 2 March 2023.

Authors: John Kilpatrick, Finance Business Partner
Linsey McGregor, Capital Accountant

RENFREWSHIRE COUNCIL
REVENUE BUDGET MONITORING STATEMENT 2023/24
1 April 2023 to 5 January 2024

POLICY BOARD : COMMUNITIES AND HOUSING - All SERVICES

Objective Summary	Annual Budget at Period 8	Budget Adjustments	Revised Annual Budget at Period 10	Projected Outturn	Budget Variance (Adverse) or Favourable		Previous Projected Outturn Variance	Movement
	£000	£000	£000	£000	£000	%		£000
Housing Revenue Account (HRA)	0	0	0	0	0	0.0%	0	0
Housing - General Services (Not HRA)	4,682	(15)	4,667	4,688	(21)	(0.4%)	0	(21)
Communities and Public Protection (including Regulatory Services)	5,926	1	5,927	5,927	0	0.0%	0	0
Criminal Justice	3,845	(2)	3,843	3,843	0	0.0%	0	0
NET EXPENDITURE	14,453	(16)	14,437	14,458	(21)	(0.1%)	0	(21)

Objective Heading	Key Reasons for Projected Variance
Housing Revenue Account (HRA)	A projected underspend in employee costs is due to the timing of recruitment of vacancies within the service. Property costs are projected to significantly overspend, reflecting ongoing demands for repair and maintenance provision, particularly in void properties. Transfer payments continue to forecast an overspend, owing to the impact of repairs pressures on void rent loss, as well as additional Council Tax costs for these properties. These overspends are expected to be offset by reduced loan charges and additional interest received on balances. Overall, the HRA is therefore still projected to break even at year-end.
Housing - General Services (Non-HRA)	There is a continuing increased demand for homelessness accommodation, impacting on rental costs, Council Tax and furniture for temporary accommodation units. The forecasted overspends are expected to be partially offset by additional rental income received in relation to these units. As previously reported, there are increasing pressures in relation to migration and asylum provision, particularly related to UK Home Office decisions being streamlined to tackle the volume of asylum seekers nationally. The significant potential increase in homeless presentations linked to the asylum population in Renfrewshire and more widely across the West of Scotland, is anticipated to create additional financial pressures for Council services. This increasing demand on services is being managed within existing resources at present, including some additional staffing being supported through migration and asylum funding streams allocated to the Council by the UK and Scottish Government. Projections will be monitored and revised as the situation continues to develop.
Communities and Public Protection	Employee costs are projected to underspend which is due to vacancies within the service, part of this underspend has been allocated against spend across other budget lines and overall, the service is projected to break-even at year end.
Criminal Justice	No significant projected year end variances to report.

RENFREWSHIRE COUNCIL
REVENUE BUDGET MONITORING STATEMENT 2023/24
1 April 2023 to 5 January 2024

POLICY BOARD : COMMUNITIES AND HOUSING - GENERAL SERVICES (excluding HRA)

Subjective Summary	Annual Budget at Period 8	Budget Adjustments	Revised Annual Budget at Period 10	Projected Outturn	Budget Variance (Adverse) or Favourable		Previous Projected Outturn Variance	Movement
	£000	£000	£000	£000	£000	%	£000	£000
Employees	12,324	(1)	12,323	12,153	170	1.4%	198	(28)
Premises Related	1,945	(16)	1,930	2,388	(458)	(23.7%)	(236)	(222)
Transport Related	171	0	171	314	(143)	(83.6%)	(530)	387
Supplies and Services	3,354	0	3,354	3,861	(507)	(15.1%)	143	(650)
Third Party Payments	87	0	87	88	(1)	(1.1%)	(20)	19
Transfer Payments	2,382	(1)	2,381	2,879	(498)	(20.9%)	(284)	(214)
Support Services	54	0	54	20	34	63.0%	26	8
Depreciation and Impairment Losses	(23)	0	(23)	(18)	(5)	(21.7%)	(5)	0
GROSS EXPENDITURE	20,294	(18)	20,276	21,684	(1,408)	(6.9%)	(708)	(700)
Income	(5,841)	2	(5,839)	(7,226)	1,387	23.8%	708	679
NET EXPENDITURE	14,453	(16)	14,437	14,458	(21)	(0.1%)	0	(21)

RENFREWSHIRE COUNCIL
REVENUE BUDGET MONITORING STATEMENT 2023/24
1 April 2023 to 5 January 2024

POLICY BOARD : COMMUNITIES, HOUSING AND PLANNING SERVICES - Housing Revenue Account (HRA) Only

Subjective Summary	Annual Budget at Period 8	Budget Adjustments	Revised Annual Budget at Period 10	Projected Outturn	Budget Variance (Adverse) or Favourable		Previous Projected Outturn Variance	Movement
	£000	£000	£000	£000	£000	%	£000	£000
Employees	11,098	0	11,098	10,709	389	3.5%	226	163
Premises Related	20,288	0	20,288	23,057	(2,769)	(13.6%)	(2,579)	(190)
Transport Related	103	0	103	52	51	49.5%	52	(1)
Supplies and Services	733	0	733	684	49	6.7%	(10)	59
Third Party Payments	49	0	49	49	0	0.0%	0	0
Transfer Payments	4,399	0	4,399	5,044	(645)	(14.7%)	(793)	148
Support Services	2,492	0	2,492	2,455	37	1.5%	37	0
Depreciation and Impairment Losses	19,089	0	19,089	18,711	378	2.0%	0	378
GROSS EXPENDITURE	58,251	0	58,251	60,761	(2,510)	(4.3%)	(3,067)	557
Income	(58,251)	0	(58,251)	(60,761)	2,510	4.3%	3,067	(557)
NET EXPENDITURE	0	0	0	0	0	0.0%	0	0

RENFREWSHIRE COUNCIL
CAPITAL INVESTMENT STRATEGY
1st April to 5th January 2023
POLICY BOARD: COMMUNITIES & HOUSING

Project Title	Prior Years Expenditure to 31/03/2023 £000	Current Year 2023-24						Full Programme - All years			
		Annual Budget at P8 2023-24 £000	Budget Adjustments £000	Revised Budget 2023-24 £000	Projected Outturn 2023-24 £000	Budget Variance (Adverse) or Favourable		Total Approved Budget to 31-Mar-27 £000	Projected Outturn to 31-Mar-27 £000	Budget Variance (Adverse) or Favourable	
HOUSING(HRA)											
Improvements To Existing Properties	0	10,250	0	10,250	10,250	0	0%	113,885	113,885	0	0%
Regeneration	5,414	4,768	0	4,768	4,768	0	0%	106,953	106,953	0	0%
Other Assets	0	1,815	0	1,815	1,815	0	0%	12,500	12,500	0	0%
Non Property Expenditure	0	550	0	550	550	0	0%	1,550	1,550	0	0%
Council House New Build	41,237	1,330	0	1,330	1,330	0	0%	74,478	74,478	0	0%
Professional Fees	0	1,665	0	1,665	1,665	0	0%	9,415	9,415	0	0%
Total Housing(HRA) Programme	46,651	20,378	0	20,378	20,378	0	0%	318,781	318,781	0	0%
HOUSING(PSHG)											
Private Sector Housing Grant Programme	0	1,117	(44)	1,073	1,073	0	0%	1,117	1,117	0	0%
Total Housing(PSHG) Programme	0	1,117	(44)	1,073	1,073	0	0%	1,117	1,117	0	0%
TOTAL COMMUNITIES, HOUSING & PLANNING BOARD	46,651	21,495	(44)	21,451	21,451	0	0%	319,898	319,898	0	0%

*Rolling programmes have a prior year year expenditure of £0 as the expenditure is not directly linked from one year to the next as a singular project.



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing and Infrastructure

Heading: Service Update Report

1. Summary

- 1.1 This report provides an overview of key service activities, an operational performance update since the last Policy Board meeting on the services and key projects and updates on any other relevant changes to service areas covered within the remit of this Board.
-

2. Recommendations

It is recommended that the Communities and Housing Policy Board

- 2.1 Note the contents of this report.
- 2.2 Note the progress of the Orchard Street tenement rehabilitation project and the signing of a Minute of Agreement between the Council and Paisley Housing Association Ltd as set out in paragraph 3.1.14 of this report.
-

Updates for Communities and Housing Policy Board

3. Housing Services

3.1 Housing-Led Regeneration and Development

Regeneration

- 3.1.1 As reported to the Board at its meeting of 16 January 2024, good progress continues to be made on the rehousing of Council tenants and the acquisition of privately-owned homes in order to progress demolition in regeneration areas. To date 44 of 89 properties have been acquired. Table 1 below illustrates the situation as of 31 January 2024.

Table 1

Regeneration & Renewal Area	Council Demo Props	Props to be acquired	Props acquired to Date	Total for demo	Demo void end Jan 24	%age void
Auchentorlie	17	1	0	18	17	94%
Ferguslie/Broomlands	64	16	6	80	30	38%
Howard Street Area	55	11	7	66	41	62%
Howwood Road Area	163	15	9	178	38	21%
Springbank/Mossvale	118	36	17	154	71	46%
Thrushcraigs	90	6	2	96	37	38%
Waverley Road Area	68	4	3	72	62	86%
	575	89	44	664	296	44%

More Homes Service

- 3.1.2 The More Homes Service offered by the Regeneration and Development Team is actively promoted on the Council website, on social media channels and with local estate and letting agents. The service includes offering advice and assistance to owners of private properties that have been vacant for over 6 months and are classed as long-term empty throughout Renfrewshire.
- 3.1.3 Bringing private properties back into productive use helps to increase the supply of homes to meet housing needs and assists in improving local amenity. Scottish Government housing statistics show that up to December 2023, there were 796 private properties within Renfrewshire classed as long-term empty (for a period of 6 months or more) that were not classed as a second home. The More Homes service has assisted in bringing 22 long-term empty properties back into use this financial year, with advice and assistance ranging from information on discounts, the matchmaker service, selling/letting advice and looking at the possibility of the Council purchasing properties that meet its acquisition criteria.
- 3.1.4 The Regeneration and Development team manage the Council's property acquisition scheme, approved by the Communities, Housing and Planning Policy Board in 2019. The buy-back scheme has been designed to prioritise former Council owned properties, within areas where we have existing Council-owned lettable stock and where purchasing another property would increase the majority or give the Council full ownership. Properties have been acquired with vacant possession to allow works to be carried out to bring the properties to the Council's letting standards before being offered to applicants from the Council's housing waiting list.
- 3.1.5 From a property acquisition perspective, 37 offers to purchase have been made this financial year as part of the acquisition scheme. Twelve of these have resulted in the successful acquisition by the Council and a further eight are in progress. Since the introduction of the scheme in 2019, a total of 28 properties have been acquired this way (this figure does not include any properties acquired to enable demolition within Regeneration areas).

- 3.1.6 One recent example of where the two roles combine is where a property that had been privately owned and empty for over ten years was recently acquired by the Council. This positive outcome has led the team to focus in on other potential long term empty properties that may be of interest to the Council to meet specific needs or are in areas where we have higher demand and lower stock levels.
- 3.1.7 The continued work of the More Homes Service is invaluable to the work we are carrying out in reducing the number of empty homes across Renfrewshire and increasing the Council's lettable stock to tackle increasing demand from the housing waiting list.

Paisley West End

- 3.1.8 There has been positive progress made to date by the Council's delivery partner Sanctuary Scotland Housing Association Ltd in acquiring private properties in the Paisley West End Masterplan Area on a voluntary basis and works are now on site for the construction of the first phase of newbuild housing. Sanctuary have been working with architects Anderson Bell + Christie to refresh the masterplan for the regeneration of the area and held public consultation events to showcase these plans on 8 and 9 August and 26 October 2023. Sanctuary's application for Planning Permission in Principle for a further proposed residential development was registered on 20 February 2024.
- 3.1.9 As previously reported to the Policy Board, a Compulsory Purchase Order was successfully promoted for the dangerous building at 22 Well Street/1 Underwood Lane, Paisley. Following a competitive tender exercise George Beattie and Sons Ltd was appointed to carry out the demolition of the dangerous building and work started on 29 January 2024. On 1 March 2024 the contractor was able to re-open the junction between Underwood Lane and Well Street.
- 3.1.10 An update on Compulsory Purchase Orders in relation to Paisley West End is the subject of a separate report to the Policy Board.

Johnstone Castle Regeneration Area

- 3.1.11 On 22 August 2023, the Communities and Housing Policy Board authorised the issue of a Demolition Order and the demolition of the blocks in respect of the properties at 24A – 24F and 26A – 26F Cedar Avenue, Johnstone and the promotion of a Compulsory Purchase Order to acquire the property at 26E Cedar Avenue, Johnstone.
- 3.1.12 A Demolition Order in respect of the full blocks at 24 and 26 Cedar Avenue, Johnstone has been served and arrangements are now being made to demolish these blocks. A Compulsory Purchase Order will now be promoted to acquire the remaining private interest in the block.

Orchard Street

- 3.1.13 As approved at the 14 March 2017 meeting of the Housing and Community Safety Policy Board, the Council is supporting Paisley Housing Association Ltd to carry out a comprehensive tenement rehabilitation project at 33 Causeyside Street and 3–9 Orchard Street, Paisley. To date the Association has acquired all of the residential properties in the five closes except for three flats in 9 Orchard Street, where negotiations continue for the voluntary acquisition of these properties. There are also two commercial owners remaining within these addresses, those of a public house and a shop.
- 3.1.14 Significant progress has been made towards the delivery of this project, with the Association appointing a contractor and works anticipated to commence on site in Spring. The cost of delivering this project will be met by the Association, supported with grant funding from the Scottish Government and by Private Sector Housing Grant from the Council. To ensure that the project can progress and as agreed by the Housing and Community Safety Policy Board the Council will underwrite the costs of essential common repairs due from the private owners if they do not pay and the Council will then seek to recover those costs. The Council and Paisley Housing Association signed A Minute of Agreement to that effect on 13 February 2024.

Newbuild projects

- 3.1.15 The Scottish Government has completed its review of the Council's applications for above-benchmark grant finance for Howwood Road Area Phase 1 (the former Cochrane Castle Primary School site) and Gallowhill and has confirmed the level of Affordable Housing Grant that will be provided for both projects. Officers are satisfied that the grant funding levels are suitable and following receipt of the formal offer of grant from Scottish Government, arrangements will be made to award contracts as authorised by the Finance, Resources and Customer Services Policy Board at its meeting on 23 November 2023.

Service Improvement

- 3.1.16 Renfrewshire Council has a statutory duty to consult tenants before increasing rents. To help inform the decision on rents for 2024/25, consultation was undertaken in December 2023 and January 2024 involving discussion with tenant representatives at the annual Council Wide Forum and via online and telephone surveys of Council tenants. All tenants were advised of the surveys by a letter which included information on service priorities and around 5,000 tenants also received this information by email where contact information had been provided.
- 3.1.17 1,449 tenants took part in the consultation. 609 tenants were asked their views by a telephone survey, with a further 840 participating online. The results of the consultations were broadly similar regardless of the method of consultation. The outcome of the consultation exercise was reported to Council.

3.2 Housing Management

Income Advice

- 3.2.1 Information from income advice interviews at the end January confirms that over 2,200 income advice cases involved households from Council Tenancies this financial year.
- 3.2.2 During these interviews staff assess any entitlements to assistance that are due and support people to access entitlement alongside giving advice on all money matters and budgeting. There are several sources of additional assistance accessed which can include universal credit / housing benefit, attendance and disability allowances, financial insecurity funds, food vouchers and many more.
- 3.2.3 Since commencement of the Tenant's Support Fund in October to the end of January, there have been 222 Tenants referred for Tenant Support Fund assessments, which will have the added value of full income assessment and advice provision. Of the referrals 107 have engaged with Specialist Income Advisors and 93 qualify for assistance from the fund. Officers continue to engage with tenants to maximise access to any underlying entitlement to benefits and funds available.

Housing Advice

- 3.2.4 There has been continued take-up of the option to apply to join the Council's housing waiting list since the introduction of the online system in November 2023. The online housing application is available alongside existing ways to apply, such as telephone, video conferencing (Near Me), email and in person as requested.
- 3.2.5 Housing staff are still available to assist in completing on-line forms and all applicants still have the opportunity for housing options advice, to assist those making a housing enquiry to gain a realistic understanding of the choices available to suit their circumstances. At the end of January 2024, 140 applications had been received online.

Estate Management

- 3.2.6 Joint work with colleagues in Digital Services continues to progress with the aim of piloting the use of an online Anti-social behaviour (ASB) reporting system – the 'ASB App'. Existing alongside the other reporting methods, telephone, email, in writing and in person, the App will extend the ways tenants impacted by ASB can make reports and log incidents. If following the necessary system checks, the 'App' can be integrated to the Council's system and devices, it will be piloted in one of the housing neighbourhood teams prior to evaluation and roll-out.

3.3 Homelessness and Housing Support

- 3.3.1 As is the case across most of Scotland just now, there continues to be increased demand for assistance from our Homeless and Housing Support Services.

- 3.3.2 A detailed report to the Policy Board in January 2024 on the scale of these homeless pressures identified a number of measures which continue to be implemented in order to ensure those who require somewhere to stay are provided with temporary accommodation and the support they need. These measures include an increase in the stock of temporary accommodation, meeting the target for lets to those who are homeless by the Council, recruitment of additional frontline staff on a temporary basis, and RSL partners increasing their targets for lets to those who are homeless.
- 3.3.3 The number of those being supported via Housing First at any one time now exceeds 70, and the MyLA project (My Life Ahead) has received additional funding from the Alcohol & Drug Programme Board to allow the initiative to support those with alcohol / drug issues and who are at risk of losing their settled home.
- 3.3.4 A further full report on the homelessness and housing support pressures in Renfrewshire will be presented to the Policy Board in May 2024.

Sheltered Housing

- 3.3.5 Our sheltered housing service continues to promote independent living and seeks to address our tenants individual support needs, by encouraging them to remain active and live well.
- 3.3.6 The strong focus on tackling the threat of loneliness continues across the 10 sheltered complexes and a range of meaningful activities, parties and trips to theatre were organised throughout the winter months as well as themed Burns Night and Valentine's Day activities, and local community initiatives with Get Creative arranged at the Tannahill Centre.
- 3.3.7 Our in-house Befriending Service continues to support 9 tenants who do not have family or friends who are able to visit via 1-2-1 support in their own homes and taking trips into the community.
- 3.3.8 Our 'Fit and Fed' sessions in partnership with St Mirren Football Club have been well received, and each Monday, St Mirren open their doors to create a warm space where there is always an activity for tenants to take part in or watch, followed by dinner. We now have 40 tenants who currently attend on a fortnightly basis and St Mirren have secured funding to continue this worthwhile activity for the foreseeable future.
- 3.3.9 The AGM of 'Forever Young', the sheltered housing constituted tenants' group recently took place with 14 members attending to discuss their plans for the year ahead, and our Quality Circle 'inspections' have now fully re-started following the recovery from COVID, with tenants involved in inspection and improvement discussions at every complex.
- 3.3.10 Digital support continues to be provided to assist tenants to access services, media and activities online, and funding is being sought for digital notice boards to be placed in each complex to update tenants live with information, support and advice.

Refugee Resettlement

- 3.3.11 The number of Ukrainian Displaced Persons being supported at our Welcome Hub at hotels near Glasgow Airport continues to reduce.
- 3.3.12 There are now 44 individuals staying in the hotels from a high of over 400 in Autumn / Winter 2022.
- 3.3.13 The number of Ukrainian households who have been supported to resettle in social rented tenancies in Renfrewshire has now reached 158, and a range of integration events are now regularly taking place, as well as activities with partners such as Impact Arts.
- 3.3.14 The Refugee Resettlement team continues to also support those Syrian and Afghan families who have resettled in Renfrewshire.

3.4 Housing Asset and Investment

Housing Investment Programme External Works

- 3.4.1 The Housing investment Team is currently on-site at several locations, improving the external fabric and reducing residents' fuel costs by installing various energy saving measures including external wall insulation/cavity wall insulation, roughcasting, roof replacement, triple glazed windows, loft insulation & solar PV. The programme for 2024/25 will include approximately 700 homes in the following areas: Johnstone, Elderslie, Renfrew, Villages, Paisley & Linwood.
- 3.4.2 In addition to this, the Housing Investment team are currently re-visiting circa 480 properties throughout Renfrewshire, which have already had some external works to further enhance their energy efficiency through the installation of additional measures solar PV, triple glazed windows & loft insulation. This is to further improve the energy efficiency of these dwellings, reduce carbon and more importantly, reduce fuel costs for our tenants. We anticipate completion by the end of the calendar year.

EICR Compliance Update

- 3.4.3 Following changes made by the Scottish Government, a programme to carry out EICR's (Electrical Installation Condition Reports) every five years was implemented to ensure Renfrewshire Council achieves SHQS compliance for electrical safety. All tenants have received 3 letters inviting them to make an appointment and those that did not respond had a 4th letter issued with a pre-arranged appointment date. Despite these efforts, at the end of December 2023 there were circa 1000 properties still outstanding due to access not being granted.
- 3.4.4 To ensure compliance with this element of SHQS, a 'forced access' programme commenced in February 2024 which will run for approximately 7 months. All tenants will have a final (5th) letter hand delivered 7 days before their pre-arranged appointment date and time and advised access will be

gained by our Building Services team if no one is at home to allow this important safety check to be carried out.

- 3.4.5 A further circa 1,500 properties have EICRs due to expire in 2024. To ensure SHQS compliance for these properties, three external contractors have been appointed to carry out EICRs over a five month period starting late February. Any properties where the EICR remains outstanding after three letters have been issued will be added to our forced access programme.
- 3.4.6 Successful completion of these programmes will ensure full compliance with regards to EICRs by the end of the calendar year. Thereafter the intention is for all EICRs to be undertaken by Building Services. There are circa 600 properties due to expire in 2025 and the programme for these will commence from mid-2024.

Dampness and Mould Update

- 3.4.7 The volume of requests for inspections in relation to dampness and mould increased during the Winter months. The initial inspection is usually carried out by our repairs and maintenance officer who will arrange any follow up repairs required. Cases that are more complex including severe cases of mould, which require specialist treatment are handed over to our rotworks contractor as noted in Table 1 below.

Table 1: Dampness and Mould inspections April – Dec 2023.

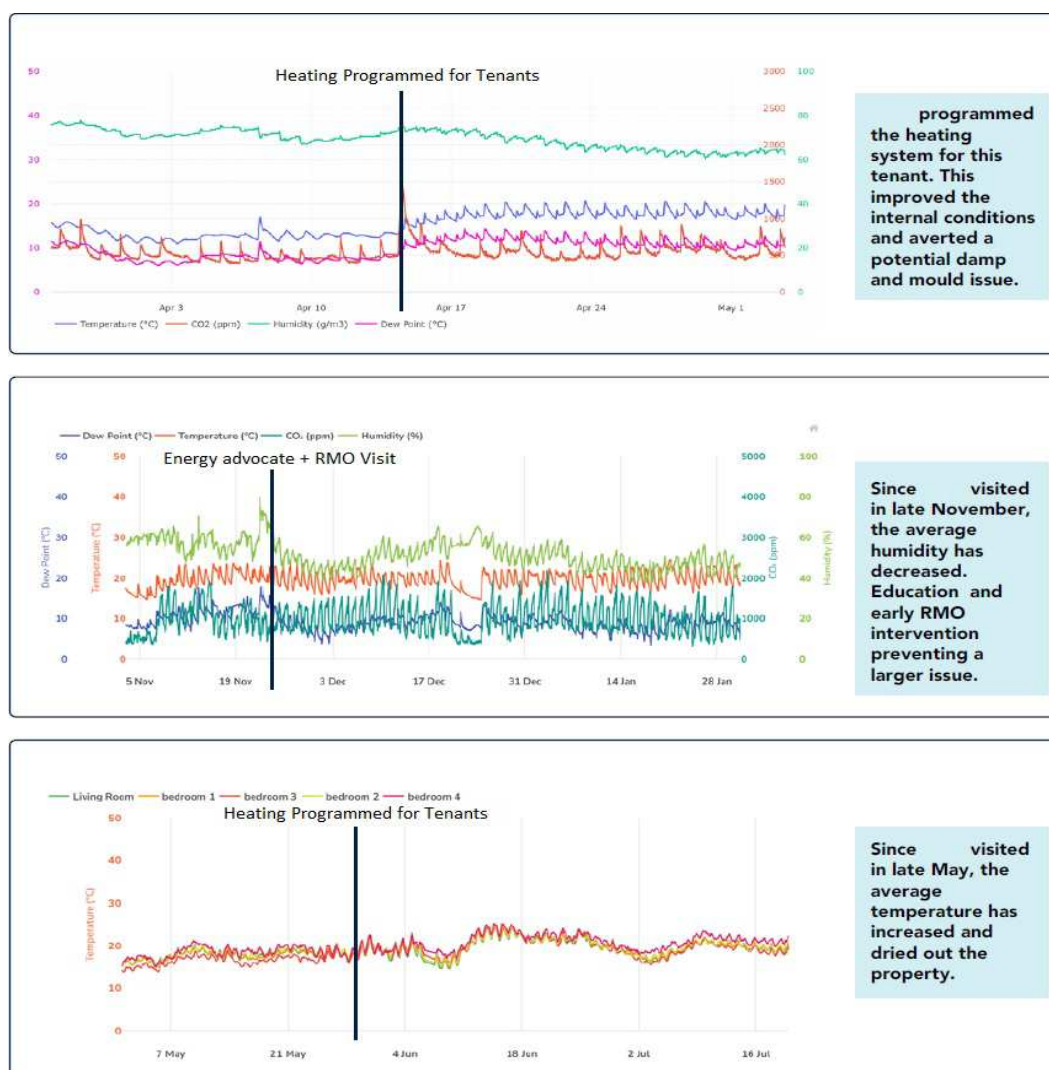
2023/2024	Inspections completed	Passed to rotworks contractor
Quarter 1	44	8
Quarter 2	52	8
Quarter 3	93	33

- 3.4.8 As advised in the report to Policy Board in August 2023, consultation was underway with a specialist decontamination and disinfecting company which was followed up with a pilot case. To date the specialised 'misting' treatment has been utilised in 24 cases. Feedback from tenants who have had this undertaken has been positive.
- 3.4.9 This 'misting' process is carried out in conjunction with other measures to minimise the possibility of the mould returning which may include improving ventilation, providing advice on heating and referring tenants for energy advice. In some cases environmental sensors are installed to allow ongoing monitoring of humidity and temperatures within the home.

Sensor Installation Update

- 3.4.10 The Housing Investment team have contracted IOPT, who are specialists in remote property monitoring, to monitor the conditions within properties by supplying environmental sensors, operating a radio network to extract the data, and reporting where data suggests the conditions create a potential for damp mould and condensation to occur in the future.

- 3.4.11 Environmental sensors are currently being installed in every void property prior to being relet, and in selected properties to monitor the impact of energy efficiency measures which are being installed, or occasionally on request from the repair and maintenance team to help understand and resolve specific issues.
- 3.4.12 At the end of January, sensors have been installed in circa 600 properties, with the temperature, humidity and air quality being monitored in the living room and all bedrooms.
- 3.4.13 IOPT continually monitor conditions through their online platform, and on a monthly basis highlight any properties which show concern and require intervention. The highlighted properties are passed to our housing energy advocate, who over the last 12 months has accessed 114 properties to engage with tenants in properties which are showing concern, to gain further information and offer advice and support on how to heat and ventilate their home to reduce the risk moving forwards. As part of these interventions, advice on how to make best use of heating and ventilation, signposting to any debt and funding support, help to switch tariffs and help to report any repairs is offered.
- 3.4.14 Three Case Examples are noted below:



Private Landlord Forum Event

- 3.4.15 Housing Services, in conjunction with Licensing, organised a private landlord forum event in Paisley on 15 February. Renfrewshire Landlord Forum saw over 65 landlords and agents attend the event in the Town Hall.
- 3.4.16 Topics covered at the event included an update from the Council on investment plans and programmes including the regeneration areas as well as providing information to attendees on Council energy efficiency targets and the need to work with over 5200 landlords and private owners who will be involved in Council capital programmes over the coming years.
- 3.4.17 Partner organisations Landlord Accreditation Scotland and Under One Roof also updated landlords on major legislative changes to the Repairing Standard affecting the private rented sector and discussed issues around organising common repairs in flatted property.

This event was oversubscribed, and the Council is now looking to arrange a further online event to update landlords who were unable to secure a place on the day.

Repairs & Maintenance Team Resources

- 3.4.18 The repairs and maintenance team have been working under challenging circumstances due to staff shortages. The normal staffing complement within the reactive repairs team is 8 officers and currently, due to a combination of vacancies and unplanned illness absences, there are 3.5 FTE officers. This is having an impact on the timescale for inspections and the timescales for responding to complaints and enquiries. Recruitment has taken place and 2 permanent officers are due to start at the end of March, with further temporary posts advertised for recruitment.
- 3.4.19 To address the current demand on the service, a number of management actions have been put in place. A wider pool of staff is assisting and there have been ongoing reviews of future inspections resulting in some works being passed directly for repair works without pre-inspection. The process for arranging follow on works has also been streamlined in conjunction with Building Services, reducing the demands on officers' time. We are focussed on maintaining the delivery of the inspection service for our customers and are doing everything we can to ensure that waiting times are reduced and the most urgent cases, such as dampness and mould, are prioritised.

3.5 Review of Void Property Management

- 3.5.1 The Single Voids Manager continues to develop and implement the action plan for improvement in conjunction with colleagues from all teams involved in the void process.

- 3.5.2 A new temporary structure for the Single Voids Team has been designed bringing together key personnel from Housing Services and Building Services. The team will be co-located at Underwood Road, working closely together to identify areas for improved efficiency across the void process and the Policy Board will continue to receive updates on progress in this key area for improvement.

4. Public Protection

4.1 Community Safety

CONTEST & Serious Organised Crime

CONTEST

- 4.1.1 Following its revision by the Scottish Government Strategic Board it has been agreed that there will be a three-year Local CONTEST Delivery Strategy for each local authority.
- 4.1.2 Work is now ongoing with stakeholders within Renfrewshire Community Protection Prevent Steering Group to consider the Terms of Reference including a list of all partners, both statutory and non-statutory who form part of the membership. The group will commence by reviewing the key objectives and performance indicators used to measure success in the delivery of the 4 P's, Prevent, Pursue, Protect and Prepare.
- 4.1.3 Whilst the document strategy covers a three-year period, a return to the Contest Secretariat from each Local Authority will be submitted at the end of each year. This will also inform the Annual Assurance Statement in relation to Prevent delivery.

Serious Organised Crime

Cannabis Edibles

- 4.1.4 The National Serious Organised Crime interventions unit has presented the current picture on cannabis edibles that contain cannabis oils which holds high amounts of "THC" – the psychoactive component of cannabis which is currently on the streets in forms of sweets, cakes, chocolate, biscuits etc which are appealing to young people. Environmental Health Officers, Trading standards and the Community Development team are working closely together around awareness raising of these and what packaging to look out for to try and mitigate harm to young people.

Prevent

Prevent Training

- 4.1.5 Prevent training continues to be rolled out to frontline services. Within the recent Annual Assurance Statement, it was identified the need for Counter Terrorism Awareness including Prevent Awareness to our colleagues within OneRen and Renfrewshire's Janitorial colleagues. This has now been completed.
- 4.1.6 Training for Mental Health Services and Adult Social Workers will be carried out during the remainder of 2024.

4.2 Trading Standards

Tobacco and Nicotine Vapour Products

- 4.2.1 Work around Tobacco and Nicotine Vapour Products (NVPs or Vapes) continues to be of a high priority for the Team.
- 4.2.2 There are around 290 premises registered for the sale/supply of Tobacco and/or Nicotine Vapour Products in Renfrewshire. Compliance activity is being out on a rolling 3-year programme utilising the "4 Es" model to engage with traders, explain the requirements, encourage compliance then enforce only when necessary.
- 4.2.3 Nicotine Vapour Products account for a significant portion of this activity, with Officers recovering non-compliant products on the majority of visits. Non-compliant for these purposes includes mis-labelled, unsafe or counterfeit products. Visits have been targeted around Secondary Schools, as young persons are known to be an increasing user group of these products. In around 50% of cases, the trader is aware that the products are non-compliant. Businesses are given enhanced advice and guidance on compliance, as well as information around underage sales. The non-compliant products are signed over to the service for destruction, in order that they can be removed from the supply chain. This is likely to be a growth area in terms of demand, with the recent [Four Nations Consultation outcome](#) recommending enhanced controls on NVPs
- 4.2.4 The Team receive intelligence through a number of sources around the alleged sale and supply of illicit tobacco products. Operation CECE is a UK-wide partnership initiative between HMRC and Trading Standards services, to remove illicit tobacco products from the marketplace. A number of premises have been subject to repeat visits from the Team, and consideration is now being given to how to best progress enforcement action against those not brought into compliance.

4.3 Environmental Health

Short Term let Application Consultations

- 4.3.1 Short term lettings are now required to be subject to a licensing process following the introduction of legislation by the Scottish Government, with the intention that this will ensure properties are safe for paying guests but also affords neighbours and other interested parties the opportunity to object to premises being used for short-term letting purposes. The Environmental Health team are amongst a number of consultees and to date have been consulted on 119 short term let applications. Inspections having been undertaken of 68 of these (predominantly secondary lettings). There are a small number of properties which have still to be inspected at this time with arrangements being made to progress these.
- 4.3.2 There have been 26 consultations for home sharing/home letting properties and whilst these are not routinely subject to inspection, Officers are reviewing these applications and where concerns arise, are requesting various pieces of evidence to ensure the property is fit for purpose and safe for guests.

Slush Ice Drinks

- 4.3.3 The Environmental Health Business Regulation Team carried out a recent intervention to business businesses selling “slush” ice drinks. This is due to reports of children becoming ill following consumption of these products.
- 4.3.4 Glycerol is a permitted additive in food products and has the E number (E422). It is widely used in the food industry as a sweetener, thickening agent and preservative. It is a key ingredient in the production of slush ice drinks due to it serving the function of maintaining the “slush” properties prevent the liquid freezing solid.
- 4.3.5 Although glycerol is generally of low toxicity, there are concerns about the effect on young children when large quantities are consumed over a short period of time.
- 4.3.6 As body weight is a factor in the adverse effects of glycerol on the body, Food Standards (Scotland) have issued guidance that, slush ice drinks should not be sold to children under 4 years old and free refills should not be offered to under 10's. Those above the age of four are considered unlikely to suffer ill effects from drinking one slush drink.
- 4.3.7 Given that these products are widespread throughout Renfrewshire, officers have Initially visited businesses identified as likely to be serving higher numbers of children within the target age. These included indoor soft play, cinemas and those premises located near to schools and nurseries. This will be followed up with further visits to other businesses.

Meat and meat products

- 4.3.8 Following intelligence and a product recall from Food Standards Scotland (Food Crime Unit), the Environmental Health Business Regulation Team carried out visits to a number of food businesses in Paisley. The recall related to imported animal by products including beef masks, cow feet and turkey wings originating from a Company based in London.
- 4.3.9 During visits to premises, including an unregistered food business, a total of 724.69 Kg of meat, fish and animal by products from 3 premises, were removed and destroyed. Enforcement Action has been taken where necessary and follow up visits carried out to each business and advice given in relation to food provenance, labelling, packing, etc.

5. Community Development

5.1 Team Up to clean Up

- 5.1.1 Team Up to Clean Up partners SEPA, Zero Waste Scotland and Keep Scotland Beautiful are delivering 5 events across Scotland to gather the views of communities in accordance with the new Scottish Litter & Flytipping Strategy. Renfrewshire House hosted the Renfrewshire Community Litter Workshop on 21 February. The 25 places offered were acquired after the event was advertised on the Team Up platform. Attendees had an opportunity to share ideas, learn about behaviours and attitudes and what they can do to help.
- 5.1.2 Zero Waste Scotland has partnered with UCL Centre for Behaviour Change to investigate the complex causes of littering and flytipping behaviours. Renfrewshire responded to the survey issued which aims to generate a new approach to preventing items becoming litter/flytipping and tackle behaviours through effective intervention.
- 5.1.3 The Big Spring Clean was launched on 1 March and will run across March and April. Schools are registering their ongoing interest in delivering local litter picks and/or receiving a school presentation. The Team is further working with local retail parks to encourage take up there, presenting a more attractive area for customers. So far Linwood fast Food retailers have agreed to join the event.
- 5.1.4 Three further Wildflower Workshops will be delivered over the course of the Big Spring Clean, one in Elderslie, hosted by Evergreen Elderslie, one in Paisley at the West End Growing Ground Association (WEGGA) Sanctuary Gardens, and the final workshop in Renfrew at Broadloan, hosted by Renfrew Association of Growing Grounds (RAGG). Groups and individuals will be treated to a workshop then attend an onsite area for a demonstration.

5.2 Environmental Taskforce

- 5.2.1 The Environmental Taskforce continues to deliver intervention to reduce instances of flytipping. Key statistics for the most recent period are:

Action	2023 total	1 Jan – 29 Feb
Proactive visits to identified hotspot areas	2,258	506
Number of reports investigated	1,321	378
Tonnes of flytipping removed	436	48
Number of sites secured to prevent further flytipping	11	1
Letters to private landowners re flytipping	85	7
Visits to businesses to ensure Waste Disposal Arrangements in place	126	17
Fixed Penalty Notices Issued	93	11

- 5.2.2 Using captured footage, the first £500 Fixed Penalty Notice was issued in January to a company who flytipped in Paisley however is based out with the authority.

Duke of Edinburgh Programme

- 5.3 On 21 February, an event was held in Paisley Town Hall to celebrate the success of the young people of Renfrewshire engaged in the Duke of Edinburgh's Award programme. As part of the celebration it was recognised that by taking part in the Duke of Edinburgh's Award, young people have contributed over 4,000 hours of volunteering in their local communities.
- 5.4 The Duke of Edinburgh's Award is an internationally recognised personal development programme, open to any young person from aged 14 to 25. Renfrewshire is very much to the fore in supporting DofE with a record breaking 450 young people starting their DofE journey this year so far, whilst across Scotland there are 21,000 who have newly engaged with DofE.
- 5.5 Youth Services, Renfrewshire Council's youth work team, co-ordinates and drives the development of the Duke of Edinburgh's Award programme on behalf of the local authority, working in partnership with schools and a wide variety of community -based open groups, supporting young people so they can benefit from taking part.
- 5.6 The celebration event is the first time Renfrewshire has held such a big awards ceremony, with over five hundred guests attending that included young people, their family and friends, DofE Leaders, Head Teachers and wider Renfrewshire supporters. All gathered to see and hear participants talk about their experiences and receive their Bronze, Silver and Gold certificates and badges recognising their achievement.

Recognition awards were also provided to staff members that have been so committed to making the programme a success in Renfrewshire.

- 5.7 The whole evening was presented young people themselves and it was really motivational to hear just how much DofE has meant to them and how they have developed through their personal experiences in taking part.

6. Justice Social Work

- 6.1.1 Staff have been recruited within the fieldwork service, the women's justice service and Whole Systems, to ensure that these services can be developed. All will be in post by February 2024. Extended diversions and Structured Deferred Sentences are now being undertaken by those staff with a plan for them to undertake voluntary throughcare and commence Bail Supervision in February 2024. This is in line with East Renfrewshire Council, so that similar services are available to the court for all areas covered. (Paisley Sheriff Court is the court that covers East Renfrewshire).
- 6.1.2 Good progress has been made to re-establish Renfrewshire's Community Justice Partnership. The partnership is responsible for coordinating local improvement activity in pursuit of national justice improvement outcomes. Recent efforts have focused on strengthening relationships between stakeholders and promoting the partnership's alignment with other strategic priorities.
- 6.1.3 Employability provision for people with convictions has been an early focus, progressed through Renfrewshire's Local Employability Partnership. Work is ongoing to gather insight into the breadth, depth, and quality of support on offer to Renfrewshire's justice experienced population, with a particular focus on statutory and voluntary throughcare for people leaving custody and reintegrating back into the community.

Implications of the Report

1. **Financial** – Any financial elements referenced in this report will be progressed through the Council's financial & budget planning process.
2. **HR & Organisational Development** – None
3. **Community/Council Planning** – The report details a range of activities which reflect local community and council planning themes.
4. **Legal** – The Minute of Agreement between the Council and Paisley Housing Association Ltd referred to at 3.1.14 was prepared by the Council's legal team and the Association's solicitors.
5. **Property/Assets** – None

6. **Information Technology** –None
7. **Equality & Human Rights** - The recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – None
9. **Procurement** – None
10. **Risk** – None
11. **Privacy Impact** – None
12. **COSLA Policy Position** – None
13. **Climate Change** – there are a range of actions and activities throughout the Service Update Report which support the Council's Plan for Net Zero,

List of Background Papers: None

Author Gordon McNeil, Director of Environment, Housing & Infrastructure
Email: gordon.mcneil@renfrewshire.gov.uk



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing and infrastructure

Heading: Renfrewshire Council Tenant Participation Strategy – Update

1. Summary

- 1.1 This report provides the Policy Board with an update on the Council's Tenant Participation Strategy Action Plan, which was approved by the Board on 25 October 2022.
-

2. Recommendations

It is recommended that the Communities and Housing Policy Board:

- 2.1 Note the progress made with regard to the Tenant Participation Strategy Action Plan as set out in Appendix 1.
-

3. Background

- 3.1 The Tenant Participation Strategy 2022 – 2027 which was approved by the Policy Board at its meeting of 25 October 2022 sets out the range of opportunities available to tenants and residents to get involved and to influence decisions about the housing services we deliver. The strategy includes an Action Plan which sets out a range of priorities agreed for the period October 2022 – March 2024.
- 3.2 Tenant representatives worked closely with council officers to develop the strategy and continue to work with officers to monitor the progress of the Action Plan on a quarterly basis. Progress to date on the key priorities contained within the Action Plan is attached at Appendix 1 and section 4 of this report highlights some of the actions undertaken.

4. Tenant Participation Strategy Progress

- 4.1 The Strategy covers a five-year period and attached at Appendix 1 is the Scorecard for the Action Plan highlighting what has been achieved since October 2022. The Scorecard was presented to the Tenant Scrutiny Panel for their comments as part of their role in monitoring the Strategy. The Panel provided positive feedback, notably on The People's News, the number of responses received to digital consultation methods, the Council Wide Forum, and they are pleased to see the Quality Circles starting in person again and noted that involvement in regeneration areas may attract wider interest in other general housing matters.

The Strategy will continue to be monitored and developed in consultation with our tenant representatives with an annual update provided to the Policy Board for noting. The following are some key highlights since its inception:

4.2 Consultative Forums

Tenant Scrutiny Panel

- The Tenant Scrutiny Panel consists of volunteer council tenants who meet throughout the year to assess and influence the performance, service delivery, plans and activities of Renfrewshire Council's Housing Service. The Panel also act as a sounding board on how the Service has performed against the Scottish Social Housing Charter and were involved in the design and content of the Tenants Report for the Charter. Influential in developing the Tenant Participation Strategy, they provided a positive assessment on progress of the Strategy so far. The Panel are currently working on a scrutiny exercise examining Tenant and Resident Association (TARA) funding and will report their findings and recommendations in due course.

Tenant Quality Circles

- Tenant Quality Circles are a small groups of volunteer council tenants who carry out inspections of Renfrewshire Council's multi-storey blocks, sheltered housing complexes and council housing estates to ensure a quality standard is being achieved and maintained in every multi-story block, sheltered complex and housing estate. The volunteers help to identify any matters that could be changed, repaired, or upgraded to improve the quality of the buildings and their surrounding areas.
- The volunteers carry out 4 inspections per year, with each inspection usually taking a couple of hours, followed by a meeting after the inspections to discuss the outcome of any issues raised. Volunteers commit as much or as little time as they can and play a vital role in ensuring tenants' feedback is at the heart of shaping services.
- The High Rise and Sheltered Quality Circles have recommenced in-person inspections of multi-storey blocks and sheltered accommodation. Their inspections are followed up with a short report to officers for action.

- A new Estate Management Quality Circle has been developed with representatives from different areas of Renfrewshire. Inspections started in February in the Thornbrae area, and a programme of inspections across different areas of Renfrewshire will be developed. The inspections will cover matters including cleanliness and tidiness of common areas, vandalism and any visible outstanding repairs. As with the other Quality Circles, the inspections will be followed up with a report to for officers to action.
- To help in relaunching the Quality Circles following their activities being restricted during the pandemic period, new logos for each group are being developed to provide the groups with a fresh look.

4.3 Digital Participation

The strategy was developed so that tenants and the Service could make best use of digital resources to maximise participation. Throughout the year the Tenants' Scrutiny Panel has continued to meet online using the Microsoft TEAMS platform and the Panel has recently started hybrid meetings.

The 2024/25 Rent Consultation process was conducted using a mix of online and telephone surveys and in total over 1,400 tenants participated in this survey which is more than twice as many as participated in previous consultations.

This was the first time the Service has made use of an online consultation method to this extent. Participation in the online survey was promoted by letter and using targeted e mails from the Corporate Communications Team. In addition to the response on the proposed increases, the service received valuable feedback on service quality and standards from those tenants who participated. The mixed approach has proved to be very successful and will be replicated in other future surveys to maximise participation.

4.4 Communication

We have worked closely with colleagues in our corporate Communications team to improve the ways we communicate with tenants. We will continue to collaborate with our Communications team throughout the lifetime of the strategy to develop improved channels of communication. During the year we informed tenants of service updates and our regulatory requirements, using:

- *The People's News*, which provided service updates and our performance on the Scottish Social Housing Charter
- Council website to advise of our performance on the Scottish Social Housing Charter and the Scottish Housing Regulator's Engagement Plan

- As noted in section 4.3 above, this year's rent consultation process was extensive, with 12% of tenants participating. All tenants were advised of the telephone and online surveys by letter, which was accompanied with background information setting out service priorities. Targeted e-mails advised over 5,000 tenants of the online survey which again was accompanied with service priorities and background information. In addition to tenant consultation, the Council Wide Forum received a presentation on Service priorities and the background to the rent increase proposals.

4.5 TARA Activity, Training and Events

Re-registration for Tenant and Resident Associations was resumed last year, and six TARAs applied for and were accepted for re-registration. As well as this the TARAs undertook a 'health check' with the Tenant Participation Development Officer who discussed their requirements for the forthcoming year, by way of support and training needs. Tenant and Resident Association members attended the Tenants' Information Service Annual Conference this year.

4.6 Tenant Surveys

During the past year we have changed the way we gather data from our housing repairs satisfaction survey, moving from telephone surveys to electronic surveys which are sent via text message. By making use of text messaging, we can get responses from tenants more quickly and reach a larger audience to increase participation - since April 2023 2,100 tenants have used the text messaging service for repairs satisfaction, the results of which will be reported as part of this year's ARC return. We also surveyed tenants in our new build properties, through a combination of face to face and online surveys. The feedback from all surveys helps inform our services and highlights areas where improvements can be made.

4.7 Consultation with Tenants and Residents in Regeneration Areas

Officers continue to consult with tenants and residents in each of the Housing-Led Regeneration and Renewal areas, adapting to the needs of each community as required and in line with the timeline of the delivery of investment within each area.

- In the Howwood Road area, we have an active Facebook page to ensure active two way communication and we are also investigating opportunities locally for a suitable location for a drop in surgery as matters within that area progress.
- In Springbank, officers are available within the Beechwood Community Centre on a weekly basis, every Wednesday afternoon to allow tenants and residents to pop in and discuss matters relating to their individual circumstances.

- We have a regular on site presence in each of the areas and issue newsletter updates to provide updates on progress across the programme.
- Neighbourhood Renewal Groups have commenced in 2 of the 8 areas and other groups are being established across the others to capture views on key issues affecting residents and what action can be taken to tackle them.

5. Tenant Participation Priorities for 2024/2025

- 5.1 For the forthcoming year the priorities, in addition to day-to-day tenant participation, will see further developments in expanding the ways in which tenants are involved in shaping housing services:

5.2 Tenant Scrutiny Panel and Quality Circles

During the forthcoming year the Tenant Scrutiny Panel will carry out an exercise looking at TARA funding and the registration process and will present their findings to the Service's Senior Management Team on completion. Officers will support the Panel to expand their membership over the course of this year and a programme of topics for the Panel to work on will be developed.

Now that the Quality Circles are meeting again in person, it is expected that there will be an increase in the number of inspections in the multi storey and sheltered housing blocks. The new Estate Management Quality Circle will aim to carry out inspections in at least two of the Council's neighbourhoods this year.

5.3 Digital Participation and reaching out to other groups

Officers are working with colleagues in the council's Digital Participation team to investigate and accelerate new ways of consulting with and involving tenants using digital methods. This will include an increased use of online surveys and looking at alternative online platforms to assist in decision making.

Taking cognisance that many of our tenants use digital platforms as their main source of information, we will work with partner organisations to look at ways to consult with a wider base of tenants, particularly those who do not currently engage with us, such as young people, to maximise their involvement.

Similarly, we will look to work with other partners and community groups to engage with other tenants who may not usually be involved, such as disabled groups or tenants from ethnic communities.

5.4 Communication

With the assistance of colleagues in Corporate Communications we will make use of the GovDelivery channel to communicate with tenants on a subject-by-subject basis. This channel enables us to contact 4,100 tenants by e mail.

We do recognise that tenants may not be interested in being involved with all aspects of the housing service, so it is proposed to make use of GovDelivery to enable tenants to select areas that interest them for their views.

We will continue to publish The People's News newsletter and our Annual Report to tenants on the Scottish Social Housing Charter. We will improve our consultation process on the style and content by asking tenants targeted questions on what they would like to see reported and how it is reported.

5.5 Council Wide Forum and Neighbourhood Forums

We will hold another Council Wide Forum in the forthcoming year, which will provide tenants with service information and consult them on service priorities. We will look at how the Neighbourhood Forums could link in with the Council Wide Forum to enable more tenants to have a say in Participatory Budgeting

Implications of the Report

1. **Financial** - none arising directly from this report.
2. **HR & Organisational Development** - none
3. **Community/Council Planning** -
 - **Our Renfrewshire is thriving** – effective tenant participation gives tenants the opportunity to influence decisions about housing services and gives the Council stronger links with local communities.
4. **Legal** - none
5. **Property/Assets** - none
6. **Information Technology** - to support tenants the new strategy will be aligned to the Council's Digital Strategy.
7. **Equality & Human Rights** - the Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** - none
9. **Procurement** – Where external consultants may be required to support tenant participation activities, these will be commissioned in line with the Council's requirements on the procurement of services.

- 10. **Risk** - none
 - 11. **Privacy Impact** - none
 - 12. **COSLA Policy Position** - N/A
 - 13. **Climate Risk** - N/A
-

List of Background Papers

- (a) Report to the Communities and Housing Policy Board, 25 October 2022, Renfrewshire Council Tenant Participation Strategy'
 - (b) Report to the Communities and Housing Policy Board, 17 January 2023, 'Housing Customer Engagement Annual Report 2021/22'
-

Author: Ray Walkinshaw, Housing Regeneration and Development Manager

Email: ray.walkinshaw@renfrewshire.gov.uk



Tenant Participation Strategy Action Plan

Scorecard for 2023/24

www.renfrewshire.gov.uk



<p>Priority</p> <p>To ensure tenants and residents are well informed</p>
<p>What have we achieved</p> <p>In consultation with tenants and service managers, we issued a copy of The People’s News in October 2023, with a further copy scheduled for Spring 2024. Copies of The People’s News are available in different formats on request.</p> <p>In consultation with tenants, we published Renfrewshire Council’s Tenants’ Report on the Charter.</p> <p>We reported the outcome of our Rent Consultation with tenants to the Council at its meeting on 29 February 2024. This year we received over 1,400 responses to our rent consultation.</p>
<p>Priority</p> <p>We will develop our digital participation opportunities and embed digital engagement across Renfrewshire</p>
<p>What have we achieved</p> <p>We have met the Tenants Scrutiny Panel and continue to meet with tenants’ groups online using the MS Teams platform.</p> <p>With the support of the Digital Participation Officer tenants and residents have received equipment to work with the service online.</p> <p>New members of the Tenants’ Scrutiny Panel received training and resources to participate online.</p> <p>Our rent consultation for 2024/2025 was carried out using a telephone survey and an online survey to reach a wider audience. We received over 1,400 responses to the survey which included valuable service feedback as well as views on the proposed rent increases.</p>

Priority

To listen to tenants and consider their views before decisions are reached and promote real opportunities to participate and influence housing services.

What have we achieved

To maximise participation, the Rent Consultation Survey for 2024/25 was conducted both by telephone and online. All tenants were advised by letter of the online survey and the telephone survey. The online survey had 840 responses, and 609 tenants were consulted by telephone.

The Service continues to carry out tenant satisfaction surveys for key services areas and undertake service improvements where identified from feedback, for example:

- Standard of temporary accommodation, this survey is carried out at point of service by our Homeless Services team and our return for this survey is consistently over 90% satisfaction.
- Repairs satisfaction, our method of collection for this survey has changed to text surveys to ensure an immediate response and maximum participation. Since September 2023 2,100 tenants have taken part in this survey, the results of which will be reported in this year's ARC return.
- Quality of home satisfaction. This survey is carried out at point of service by housing staff when a tenant moves into a new home.
- Owners' survey, this survey is carried out by post each year to gauge satisfaction with the service provided by Owners Services.
- Our most recent survey for tenants in New Build properties was carried out online. The survey has been publicised in *The People's News*.

<p>Priority</p> <p>Increasing Tenant Participation Opportunities</p>
<p>What have we achieved</p> <p>The most recent edition of The People’s News promoted the benefits of tenant participation which attracted interest from tenants who not been involved before. A number of these tenants attended the Council Wide Forum in December and have noted their interested in joining the Estate Management Quality Circle and the Tenant Scrutiny Panel. These new members will help refresh these groups and support existing members in developing the role of the Quality Circles and Tenant Scrutiny Panel.</p>
<p>Priority</p> <p>Local Tenants and Residents Associations (TARAs)</p>
<p>What have we achieved</p> <p>As part of our support to TARAs each association was offered a ‘health check’ as part of the TARA registration process. This check identified areas where each association required additional support and training requirements.</p> <p>The Tenants’ Scrutiny Panel have started a scrutiny exercise looking at the Registration Scheme for Tenants’ and Residents’ Associations and how TARAs are supported.</p>

<p>Priority</p> <p>Council wide Tenants' Forum and the role of the local Neighbourhood Forums</p>
<p>What have we achieved</p> <p>We held the first 'in person' Council Wide Forum for three years in December 2023 which was well attended. At the Forum, participants were consulted on the proposed rent increase with additional information on service priorities and investment. In addition, a presentation on fire safety and other home safety measures was provided which was well received by attendees. Feedback from the Tenant Scrutiny Panel on the Forum was that it was a very positive and informative meeting.</p>
<p>Priority</p> <p>Tenant Scrutiny Panel</p>
<p>What have we achieved</p> <p>New members were recruited to join the Tenants' Scrutiny Panel. The Panel has resumed working on a hybrid basis and has started a scrutiny exercise looking at the Registration Scheme for Tenants' and Residents' Associations and how TARAs are supported.</p> <p>During the past year the Panel has been involved in the design and content of the Tenants Report on the Scottish Social Housing Charter.</p>

<p>Priority</p> <p>Expand the Quality Circles</p>
<p>What have we achieved</p> <p>A new Estate Management Quality Circle was established in January 2024. Inspections started in February in the Thornbrae area of Johnstone. It will meet monthly with local housing staff looking at estate management issues in agreed neighbourhoods.</p> <p>To provide a fresh start for the High Rise and Sheltered Quality Circles will be part of a rebranding exercise.</p> <p>The High rise and Sheltered Quality Circles have both recommenced in person inspections. These had been previously put on hold during the pandemic. Initial feedback from tenants involved was that they were pleased to be back working on these projects.</p>
<p>Priority</p> <p>Participation in regeneration areas</p>
<p>What have we achieved</p> <p>We have used a range of consultation methods in each of the Housing-Led Regeneration and Renewal areas, adapting to the needs and requirements of each community as required and in line with the timeline of the delivery of investment within each area, including:</p> <ul style="list-style-type: none"> o Groups using social media to promote activity and to keep involved. o Regular community drop-ins where staff can provide information to residents. o Newsletters, and o Neighbourhood Renewal groups have started in 2 areas to capture the views of local people affected by the proposals.

<p>Priority</p> <p>To provide resources and support to empower tenants and residents to influence decisions about housing services</p>
<p>What have we achieved</p> <p>We continue to fund tenant participation activities through an identified budget for tenant participation which facilitates:</p> <ul style="list-style-type: none"> o Support for TARAs through the provision of grant funding. o Support for tenant participation activity, with Housing staff regularly attending TARA meetings to provide advice and support. o Training and development for tenants' groups, tenant representatives have attended external tenant participation events that provide opportunities to exchange good practice and network with other tenants. o Membership to independent organisations such as The Tenant Participation Advisory Service and the Tenants' Information Service. <p>We continued to support existing Tenant & Resident Associations and assist in establishing new TARAs.</p>



Environment, Housing & Infrastructure
Renfrewshire Council
Renfrewshire House
Cotton Street
Paisley
PA1 1BR

www.renfrewshire.gov.uk





To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing and Infrastructure

Heading: Update on Paisley West End Regeneration and addresses for Compulsory Purchase Order

1. Summary

- 1.1 The purpose of this report is to provide an update on the delivery of the Paisley West End Area Masterplan and obtain Policy Board approval for the Director of Environment, Housing and Infrastructure to proceed to submit a Compulsory Purchase Order in relation to the remaining privately-owned residential and commercial properties and land within the Paisley West End Masterplan Area detailed in the table at paragraph 4.2 below to the Scottish Ministers for confirmation.
 - 1.2 The properties subject to the proposed Compulsory Purchase Order have been revised since the previous report to the Communities and Housing Policy Board on 16 May 2023 due to voluntarily acquisitions that have taken place by Sanctuary Scotland HA since the previous report and includes additional privately owned properties identified during the course of technical checks in anticipation of a submission to the Scottish Ministers.
-

2. Recommendations

It is recommended that the Communities and Housing Policy Board:

- 2.1 Note the progress made by the Council's delivery partner Sanctuary Scotland HA in acquiring private properties in the Paisley West End Masterplan Area on a voluntary basis;
- 2.2 Note the progress made in relation to the demolition of the dangerous building at 22 Well Street, Paisley and 1 Underwood Lane, Paisley; and

- 2.3 Agree that a Compulsory Purchase Order will now be submitted by the Director of Environment, Housing and Infrastructure to the Scottish Ministers for confirmation to acquire the revised list of remaining privately-owned residential and commercial properties and land within the Paisley West End Masterplan Area, as detailed at paragraph 4.2 of this report.

3. Background

- 3.1 After confirmation of The Renfrewshire Council (Paisley West End Number 1) Compulsory Purchase Order 2021 in January 2023 by the Scottish Ministers the remaining six privately owned properties at 1 Underwood Lane, Paisley and at 22 Well Street, Paisley were acquired by the Council by general vesting declaration in June 2023. Following transfer of ownership to the Council, an appointment was made to George Beattie and Sons Limited, following a competitive tender exercise, for the demolition of the dangerous building and work is now ongoing for the transfer of the cleared site to Sanctuary Scotland HA following the demolition and site clearance. On 1 March 2024 the contractor was able to re-open the junction between Underwood Lane and Well Street.
- 3.2 On 16 May 2023, the Communities and Housing Policy Board in accordance with the previous decisions taken at the meeting of the Leadership Board held on 12 December 2017 and the meeting of this Policy Board held on 25th October 2022 a further Compulsory Purchase Order (or, at most, two such Orders) would be promoted with a view to acquiring the remaining privately owned residential and commercial properties and land within the Paisley West End Masterplan Area.

4. Compulsory Purchase Order

- 4.1 Having taken account of the additional acquisitions by Sanctuary Scotland HA and carrying out final technical checks, authorisation is now sought for the submission by the Director of Environment, Housing and Infrastructure to the Scottish Ministers for confirmation of a further Compulsory Purchase Order to acquire the remaining privately-owned residential and commercial properties and land within the Paisley West End Masterplan Area as detailed in paragraph 4.2 to allow the next phase of the masterplan to be delivered.
- 4.2 A Compulsory Purchase Order will be submitted to the Scottish Ministers for confirmation to acquire the following properties:

Address		Type of property
6 Well Street	Ground floor shop premises (or 6A)	Commercial
8 Well Street	Northmost Shop	Commercial
	Middle Shop	Commercial
	Southmost Shop	Commercial
10 Well Street	Lefthand Shop	Commercial
	Righthand or south-eastmost Shop	Commercial
12 Well Street	Right hand Shop	Commercial

14 Well Street	Northmost shop on ground floor	Commercial
	Right hand or northmost house on second floor above ground*	Residential
	Middle house on top floor*	Residential
16 Well Street	Southmost and middle ground floor shops	Commercial
	Northmost shop	Commercial
18 Well Street	Middle shop	Commercial
26 Well Street	Northmost shop	Commercial
	Southmost shop and centre shop	Commercial
30 Well Street	Middle shop	Commercial
32 Well Street	former southmost shop (now 32A or Flat 0/2)	Residential
13 Well Street (also known as subjects at the rear of 34-36 Wellmeadow Street, Paisley)		Commercial
3 Clavering Street East	Eastmost ground floor flat Flat 0/2 (or Ground/2)	Residential
	Westmost flat on first floor Flat 1/1	Residential
	Area of ground	Residential
Land behind 2–20 Well Street		Brownfield site

*The two residential properties at 14 Well Street, Paisley are believed to have formed part of a previous Compulsory Purchase Order by the Council's predecessor, title investigations are ongoing and these properties will be removed from the order if the title position can be resolved.

An additional commercial property, the northmost shop on the ground floor at 14 Well Street, Paisley and additional area of ground at 3 Clavering Street East, Paisley have been included that were not included in the original report in May 2023.

- 4.3 The Compulsory Purchase Order process will run in parallel with Sanctuary Scotland HA's continued efforts to acquire the properties on a voluntary basis. During this time, if an acquisition were successful, the property would be removed from the list of those subject to the Compulsory Purchase Order.

Implications of the Report

1. **Financial** – Sanctuary Scotland HA will continue to acquire where voluntary agreement is reached. Costs associated with the acquisition of properties accrued as part of a successful CPO action will be paid by the Council and recharged to Sanctuary as part of the overall agreement approved for the regeneration masterplan for Paisley's West End.
2. **HR & Organisational Development** – none.

3. **Community/Council Planning –**

- *Reshaping our place, our economy and our future* – improving neighbourhoods and introducing new social rent opportunities to current and future residents.
- *Building strong, safe and resilient communities* – increasing resident satisfaction with neighbourhoods and communities.

4. **Legal** – conveyancing and legal advice associated with the CPO for Paisley West End and transfer of Council owned properties and land within the masterplan boundary to Sanctuary Scotland in line with the overall agreement approved for the Paisley West End Regeneration Masterplan.

5. **Property/Assets** – removal of void properties from Council stock.

6. **Information Technology** – none.

7. **Equality & Human Rights** –

- (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

8. **Health & Safety** – the dangerous building at 22 Well Street and 1 Underwood Lane, Paisley has now been demolished. Further demolition in the neighbouring blocks is planned by Sanctuary Scotland HA however these blocks are not subject to any statutory notices.

9. **Procurement** – none.

10. **Risk** – failure to obtain a Compulsory Purchase Order for the addresses in Paisley West End will prevent full delivery of the Paisley West End Regeneration Masterplan and be damaging reputationally.

11. **Privacy Impact** – none.

12. **COSLA Policy Position** – none.

13. **Climate Risk** – none.

List of Background Papers

Report to Leadership Board on 12 December 2017: Paisley West End Regeneration

Report to Communities and Housing Policy Board on 25 October 2022: Paisley West End – Regeneration Update

Report to Communities and Housing Policy Board on 16 May 2023: Compulsory Purchase Orders

The foregoing background papers will be retained within Communities and Housing Services for inspection by the public for the prescribed period of four years from the date of the meeting. The contact officer within the service is Jennifer Murdoch, Housing Regeneration Manager, Jennifer.murdoch@renfrewshire.gov.uk



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing and Infrastructure

Heading: Renfrewshire Common Housing Allocation Policy – Council Allocation Targets for 2024/25

1. Summary

- 1.1 Following approval by the Communities, Housing and Planning Policy Board in January 2019, the Renfrewshire Common Housing Allocation Policy was implemented by the Council on 1 May 2019.
 - 1.2 Applicants are placed in one of five groups according to their circumstances and targets are set for the proportion of lets to each of the groups. These targets are set and reviewed annually by the Council. This report contains the targets proposed for 2024/25.
 - 1.3 To assist in setting the allocation targets, analysis of the homelessness trends and profile of the Council's waiting list was carried out. A summary of which has been provided within this report.
-

2. Recommendations

It is recommended that the Communities and Housing Policy Board:

- 2.1 Approves the Council's allocation targets for 2024/25 as set out in section 4 of this report; and
 - 2.2 Notes that the target for lets to the Statutory Homeless Group will be reviewed in September 2024 and that if any change to targets is proposed, authorisation will be sought from the Policy Board at its meeting of 29 October 2024.
-

3. Background

- 3.1 Housing applicants are placed into one of the following five groups based on their circumstances. Depending on the group applicants are placed in, a level of priority ('A' to 'D') may also be awarded. Targets are set for the proportion of lets to each group and as properties become available for let applicants are selected from the five groups according to the agreed targets.

Statutory Homeless Group	Mobility Group (general and transfer applicants)	General Applicants Group (not landlord's own tenants)	Transfer Applicants Group - with housing need	Transfer Applicants Group - no housing need
Statutory homeless	A critical need B urgent need C moderate need D no need	A critical need B urgent need C moderate need D no need	A critical need B urgent need C moderate need D no need	Based on date of application

- 3.2 The Council and its four local housing association partners within the Common Housing Allocation Policy (Bridgewater, Linstone, Paisley and Williamsburgh) use the same groups but each landlord sets its own targets, taking account of the profile of its own Housing List and stock profile.

4. Council Allocations Targets for 2024/25

- 4.1 The Council and other social landlords have a statutory duty to give reasonable preference to people in housing need (people who are statutorily homeless, living in unsatisfactory housing conditions and tenants of social landlords who are under occupying their current home). The targets set for each of the groups must take account of this duty.
- 4.2 The proposed targets for 2024/25 have been informed by analysis of the demand from those who are statutorily homeless, the Council's housing list and lettings over the last few years. The current allocation policy has been in place since May 2019 and as such some of the reportable information, including trend analysis comparisons, is somewhat limited due to a significant proportion of this period being when various Covid-19 restrictions were in place.

The key points to note from this analysis are:

- There were 4,951 applicants on the Council's housing list at the end of the financial year 2022/23. The six monthly figure for 2023/24 for applicants on the housing list was 4,678.
- The Council let 945 properties in 2022/23. The 6 monthly figure for 2023/24 was 512.

- Most lets are made through the Group system (81% in 2022/23). The 6 monthly figure for 2023/24 was 72.5%. The remaining 19% (181 lets) made out with the group system are: special lets, sheltered housing lets and lets associated with the approved housing regeneration programme.
- Within the Group system, 41% of lets went to statutory homeless applicants in 2022/23. The number of homeless applicants at year end 2022/23 was 245. Just over 57% of group lets went to statutory homeless applicants in the first 6 months of 2023/24. This has helped to contain the snapshot number of homeless applicants at the end of the first six months of 2023/24 at 231, however, the total number of homeless applicants across 2023/24 is expected to be in excess of 1,000. The total number in 2022/23 was 935.
- Like all local authorities across Scotland, Renfrewshire is experiencing significant pressures in meeting demand for social housing. As reported to the Policy Board in January, whilst Renfrewshire is experiencing increasing homelessness and local housing pressures, it is not currently at risk of 'systemic failure' as some other local authorities are. However, if homeless presentations continue to rise in the coming months, there is little resilience left across the system and it is anticipated Renfrewshire may struggle to continue to provide both temporary and settled accommodation in line with our statutory duty. It is anticipated that local social rented housing pressures will continue to build here in Renfrewshire, with it being likely that there may be a significant increase in the number of homeless applications in the current and next financial year.
- Lets to Mobility applicants remain the same, at 13% of lets by the Council over the last three years. This figure is constrained by the suitability of available stock and a property-led approach is used to maximise opportunities to let suitable properties to applicants with mobility needs. Year-end figure for 2022/23 was 13% against a 10% target. The six-monthly figure for 2023/24 is 12.7%.
- Existing Council tenants are placed in one of two groups – Transfer Applicants with housing need who made up 12.3% of the applicants on the housing list at the six-month point and Transfer Applicants with no housing need who made up just over 22% of all applicants on the Council's list at the six month point.
- Applicants who are not currently Council tenants and are not homeless or have mobility needs, are placed within the General Applicants group. This is the largest group of applicants, currently representing around two-thirds of all applicants on the housing list. This group includes both people with housing need and with no housing need. The applicants with a housing need held in this group represent around 60% of all applicants on the housing list.

- Renfrewshire Council and the national and local RSLs operating in Renfrewshire provided 62 social rented lets during 2022/23 as part of the national Homes for Ukraine response. Since the resettlement programme started there have been a total of 158 social rented lets to displaced persons from Ukraine with 111 lets from Council stock. Moving forward, the General Applicants Group will also include Ukrainian Displaced Persons who are awaiting settled accommodation in Renfrewshire. This will help ensure that Renfrewshire continues to play its part in meeting the needs of those arriving in Scotland from Ukraine.

4.3 Taking account of the above information, and the duty to give reasonable preference to housing need, targets proposed for 2024/25 are set out in the table below:

Lets Through Group System	2022/23		2023/24 (6 months)		2024/25
Group	2021/22 Target	Actual Lets %	Current Target	Actual Lets %	Proposed Target
Statutory Homeless	49%	41%	49%	57.1%	55%
Mobility	10%	13%	10%	12.7%	10%
General Applicants (not landlord's own tenants)	23%	35%	26%	23.4%	24%
Transfer Applicants (with housing need)	15%	9%	12%	6.5%	10%
Transfer Applicants (with no housing need)	3%	2%	3%	0.3%	1%

4.4 Summary of proposed targets:

- To ensure the Council continue to meet their statutory obligations to homeless people and to reduce time spent in temporary accommodation, particularly B&B, it is proposed that we allocate 55% of available properties to the Statutory Homeless Group. This target will be reviewed in September 2024 taking account of local and national pressures on the system. If, as a result of the review, any change to targets is proposed, authorisation will be sought from the Policy Board at its meeting of 29 October 2024.
- Properties that meet mobility requirements are let on a property led approach and it is proposed that we continue to keep a target of 10% of available lets to the Mobility Group where properties meet mobility needs.

- It is proposed that the target for the General Applicants groups is decreased from 26% to 24%. Applicants with an assessed housing need in this group make up just over 30% of all waiting list applicants and it will now include Ukrainian Displaced Persons.
- It is proposed that the Transfer Applicants with housing need allocations is set at 10% to ensure we continue to meet the needs of our existing tenants.
- 1% of allocations for the Transfer applicants with no identified housing need is proposed to allow the continuation of rehousing opportunities for existing Council tenants who have an aspirational desire to move to an alternative property type or area. This small allocation of housing will continue to free up the tenants existing home to fulfil other demand from the Councils housing waiting list.

Implications of the Report

1. **Financial** – None
2. **HR & Organisational Development** – None
3. **Community/Council Planning:**
 - **Our Renfrewshire is thriving** – Meeting the needs of housing applicants
 - **Building strong, safe and resilient communities** – Creating strong communities in our approach to allocating homes
4. **Legal** – None
5. **Property/Assets** – None
6. **Information Technology** – None
7. **Equality & Human Rights** – Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – None
9. **Procurement** – None
10. **Risk** – None

- 11. **Privacy Impact** – None
 - 12. **COSLA Policy Position** – None
 - 13. **Climate Change** – None
-

List of Background Papers

- (a) Background Papers - None
-

Author: Ray Walkinshaw, Housing Regeneration and Development Manager
Email: ray.walkinshaw@renfrewshire.gov.uk



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing and Infrastructure

Heading: Allocation of property to staff, elected member or committee members: Housing Rule 2.5

1. Summary

- 1.1 The purpose of this report is to notify the Communities and Housing Policy Board of housing allocations which involve Council members or their immediate families or members of staff of the Housing Service and their immediate families.
-

2. Recommendations

It is recommended that the Communities and Housing Policy Board:

- 2.1 Note the contents of this report for information.
-

3. Background

- 3.1 In terms of the Renfrewshire Common Housing Allocation Policy Rule 2.5, the Director of Environment, Housing and Infrastructure is required to notify the relevant Policy Board of all housing allocations which involve either Council members or their immediate families or members of staff of the Housing Service or their immediate families.
- 3.2 The following two allocations have been made during the period August 2023 to December 2023.

Address	1/2, 6D Mitchell Avenue Moorpark, Renfrew
Size	3 bedroom
Allocated to	Employee within Housing Services
Date Let	21 August 2023

Address	1/2, 3 Teviot Avenue, Foxbar, Paisley
Size	1 bedroom
Allocated to	Daughter of employee within Housing Services
Date Let	18 December 2023

Address	1/1, 36 Sycamore Avenue Johnstone Castle
Size	1 bedroom
Allocated to	Son of an Elected Member
Date Let	15 January 2024

Implications of the Report

1. **Financial - none**
2. **HR & Organisational Development – none**
3. **Community/Council Planning – none**
4. **Legal - none**
5. **Property/Assets - none**
6. **Information Technology - none**
7. **Equality & Human Rights**
 - (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because it is for noting only.
8. **Health & Safety – none**
9. **Procurement – none**
10. **Risk – none**
11. **Privacy Impact – n/a**
12. **COSLA Policy Position – n/a**
13. **Climate Risk – n/a**

List of Background Papers - None

Author: Lyndsey Green, Senior Allocation Officer
E Mail: lyndsey.green@renfrewshire.gov.uk



To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Chief Executive

Heading: Community Funding Update

1. Summary

- 1.1 As agreed previously by the board, the Policy and Partnerships service now prepares and submits a paper for consideration each cycle in relation to Council led community funding available for allocation through the Greenspaces, Villages Investment and Sustainable Communities Fund(s). This paper represents the most recent update for members in relation to these funds.
- 1.2 Whilst the Greenspaces and Villages Investment Fund are well established, elected members will be aware that the Sustainable Communities Fund was launched in early October 2023. The initial response to the fund continues to be very positive with a strong pipeline of applications under development.
- 1.3 An officer panel has been established to review applications for the Sustainable Communities Fund and to make recommendations on funding awards to members of the Communities and Housing Board. The panel met in February 2024 to consider applications received through the second funding round which closed on 31st January 2024.
- 1.4 Section 4 of the report provides an overview of the Sustainable Communities Fund and sets out recommendations for consideration by the board in relation to the second funding round. 5 applications are recommended for approval, 10 new applications are recommended to be deferred at this time to allow for further information gathering and engagement on applications with the community organisations concerned. 4 applications are not recommended for funding, as these were not assessed as meeting the funding criteria by the officer panel.
- 1.5 Members are asked to note that where projects are not recommended for award, this does not reflect the quality and value of these projects and associated organisations

at a local level, and officers will work with wider partners to signpost to other appropriate funding mechanisms.

- 1.6 The Sustainable Communities Fund has been very popular since its launch and has attracted a significant number of initial formal applications and more informal contacts and expressions of potential interest. Applicants are strongly advised to engage with co-ordinating officers as early as possible in the application development process. In the first two rounds there have been a number of applications where further information is required to fully assess an application, which has led to a number of applications being recommended to be deferred at this time, in order to give applicants the best possible chance of success as part of the assessment process.
- 1.7 Following learning from the first round of the Sustainable Communities Fund, several areas have been identified where Fund guidance can be clarified and strengthened to improve the application process for both applicants and officers. Officers will work to reflect learning both in the formal guidance in due course, as well as the advice given to applicants and information available through the Council website.
- 1.8 Full detail on all applications and related recommendations relating to the Sustainable Communities Fund is provided in Appendix 1 of this report. Elected members are asked to note that the next funding round ends on 31st March 2024.
- 1.9 Sections 5 and 6 of this report sets out recommendations in relation to the allocation of Greenspaces and Villages Investment funding.

2. Recommendations

- 2.1 It is recommended that members of the Board:
 - Approve the funding recommendations detailed in Section 4 and Appendix 1 of this report in relation to the proposed allocation of the Sustainable Communities Fund
 - Approve the funding recommendations outlined in Section 6 in relation to the proposed allocation of funding from the Villages Investment Fund

3. Background

- 3.1 To strengthen monitoring and oversight of funding recommendations made in relation to a number of specific Council funding streams, the Policy and Partnerships service now submits a community funding paper to each cycle of the Communities and Housing Board. This includes recommendations from officers in relation to funding awards through the Greenspaces Fund, Villages Investment Fund and the recently launched Sustainable Communities Fund.

4. Sustainable Communities Fund

- 4.1 In March 2023, Council agreed to combine the remaining monies from the Community Empowerment Fund and Climate Change Action Fund to create a single Sustainable Communities Fund. This was further boosted by £650,000 from the UK Shared Prosperity Fund, Communities and Place for the support and improvement of

community assets and infrastructure. £1.5m is available as funding to support projects and organisations through this Fund.

- 4.2 On 20th September 2023, Leadership Board approved the key objectives and criteria of the fund and agreed that applications to the Sustainable Communities Fund be submitted to the Communities and Housing Board for final approval with a key focus on community infrastructure, place and climate.
- 4.3 The Sustainable Communities Fund utilises a tiered funding model to reflect different-sized community projects as well as the varying levels of support required at different stages of development. A tiered approach helps to ensure ease of access to a proportionate application process to enable a range of initiatives that align with community empowerment:
- **Small - awards up to £10K:** capital and revenue funding to develop local projects and initiatives which are targeted at enabling community participation and promoting community collaboration and which build resilience within our communities. This level would be targeted at groups where a small amount of money can make a significant difference to enabling community participation.
 - **Intermediate – awards of £10K to £25K:** capital and revenue funding to develop projects or organisations with a focus on improving community infrastructure and/or community wellbeing and which have the potential to be replicated in other areas; and
 - **large – awards up to £100K:** larger capital grants with the aim of supporting communities that aspire to take ownership or develop land or buildings in local communities.
- 4.4 The UK Shared Prosperity Fund (UKSPF), which makes up part of the Sustainable Communities Fund, comprises a clear split between capital and revenue funding with set amounts allocated over financial years 2023-24 and 2024-25. UKSPF will be allocated to approved projects which meet the criteria and to maximise drawdown within each financial year.
- 4.5 The Fund officially opened to applications on 10 October 2023, and the second funding round closed on 31st January 2024.
- 4.6 All applications were assessed in February 2024 by the cross service panel of officers which has been established to review and assess the applications against the agreed objectives and criteria outlined within the funding guidance. This included follow up discussions on applications which were deferred through previous funding rounds. In summary the panel has recommended that:
- 5 applications be recommended for funding awards with total funding to be allocated of £163,383
 - 10 applications be deferred to gather further information and to allow for further engagement to be undertaken
 - 4 applications are not recommended for funding awards as these were assessed as not meeting the criteria of this particular funding stream.

- 3 applications remain deferred and under development from previous rounds.
- 4.7 The five applications recommended for approval through the Sustainable Communities fund in this founding round are:
- 7th Paisley & District J.N.I Scout Group (£10,000)
 - Brick Lane Music Academy (£20,000)
 - Lochwinnoch Community Development Trust (£100,000)
 - Sculpture House Collective CIC (Dye Garden) (£8,383)
 - Renfrewshire Community Transport (£25,000)
- 4.8 Ten applications were submitted where further information requires to be gathered and evaluated before officers are able to make recommendations on these applications to the Board. To allow for further work to be carried out with groups relating to their proposals, it is recommended that applications are deferred as follows:
- Finding Your Feet
 - Bishopton Rugby Club
 - I was Gonnae
 - Sculpture House Collective CIC (Architectural Feasibility)
 - Local Energy Action Plan (LEAP) (Thrive Together and Zero Emission Shared Transport)
 - Ralston Primary Out of School care
 - Renfrew Town Sea Scouts
 - St Mirren FC Charitable Foundation
 - Linwood Community Gardens Ltd
- 4.9 As mentioned in Section 1 of this report applicants are strongly advised to engage with co-ordinating officers as early as possible in the application development process. In the first two rounds there have been a number of applications where further information is required to fully assess an application, which has led to a number of applications being recommended to be deferred at this time, in order to give applicants the best possible chance of success
- 4.10 The 3 applications which remain deferred from previous funding rounds are in relation to:
- Bishopton Tennis Club
 - Caledonia Bowling Club
 - Kirklandneuk Growers Group
- 4.11 Elected members are asked to note that applications previously submitted by Outspoken Arts and Renfrewshire Association of Growers have now been withdrawn.
- 4.12 Finally, following assessment by the officer panel, the following applications are not recommended for a funding award, as they do not meet the criteria of the fund:
- Sewing2gether All Nations
 - Ralston Community Council
 - The Tannahill Centre

- **Our Place Our Families Renfrew**

- 4.13 Members are asked to note that where projects are not recommended for award, this does not reflect the quality and value of these projects and associated organisations at a local level, and officers will work with wider partners to signpost to other appropriate funding mechanisms.
- 4.14 Detailed information in relation to each application is provided in Appendix 1. Elected members will note that for some projects this will require the development of partnership agreements to be progressed with relevant community organisations should funding recommendations be agreed by the Board.
- 4.15 Subject to the approval of recommendations as set out in Appendix 1, £163,383 would be allocated to successful projects through Round 2 of the fund (£135,383 Capital and £28,000 Revenue). Of the total £163,383, £108,383 will be funded through the UK Shared Prosperity Fund (£105,383 Capital and £3,000 Revenue).
- 4.16 The next funding round will close on 31st March 2024, and officers will continue to work with all new applicants and deferred applicants to progress information and proposals proactively over the coming months.
- 4.17 As highlighted in Section 1, following learning from the first round of the Sustainable Communities Fund, several areas have been identified where Fund guidance can be clarified and strengthened to improve the application process for both applicants and officers. Officers will work to reflect learning both in the formal guidance in due course, as well as the advice given to applicants, and applicants are strongly encouraged to discuss their application with officers in advance.

5. Green Spaces, Parks and Play Areas Fund

- 5.1 The Green Spaces, Parks and Play Areas Fund has supported 58 community projects since October 2018. As previously agreed by members of the board, remaining Greenspaces funding has been divided into three streams:
 - General funding available to fund greenspace, parks and play areas improvements.
 - Funding to support school-based developments.
 - Funding to support Team Up to Clean Up developments.
- 5.2 The Fund currently has approximately £13,000 available to support community projects, a further £20,000 is available for school projects meeting the fund criteria, and £13,000 for Team Up to Clean Up volunteers and projects.

Team Up to Clean Up Fund – “Trash for Cash”

- 5.3 Trash for Cash is the proposed brand for the initial Lotto Litter proposal that was previously agreed by the Board and is expected to launch on 15 April as pupils return to school after their Easter holiday. The Scheme will reward pupils for binning their litter where they upload a photograph of this evidence. Each school month until the end of the year, 2 participating pupils from each secondary school will receive a

voucher as a reward. It is hoped the scheme will encourage pupils to form good habits.

6. Villages Investment Fund

- 6.1 The Villages Investment Fund continues to support the villages in delivering innovative projects for local people. £242,000 remains available for village community groups to access through this funding stream.
- 6.2 Since the last update to board in January 2024, one Village Investment Fund application has been formally considered by officers, and also highlighted at the recent officer grant panel.

Howwood Community Council – Village Structural Improvements (£10,000)

- 6.3 Howwood Community Council have worked alongside the Green Spaces and Villages Investment Fund Team in the past to deliver upgrades to their local park, install a community shelter, and deliver other smaller projects creating a sense of pride within their village.
- 6.4 The Chair of the Community Council has evidence of local appetite for a handrail to be installed which will aid visitors to the public park in walking on the steep path at the entrance/exit point of the park. Further to this, the group have requested replacement fencing to replace a damaged section at the space cared for by volunteers, Rhombus Garden, and finally a replacement community notice board at the villages Triangle.

Implications of the Report

- 1. **Financial** – This paper recommends the allocation of £163,383 of funding from the Sustainable Communities Fund (£135,383 Capital and £28,000 Revenue). Section 6 also sets out recommendations to approve one application for £10,000 from the Villages Investment Fund.
- 2. **HR & Organisational Development** – none.
- 3. **Community/Council Planning** – the Fund set out in the paper supports engagement and collaboration with local communities on a range of activities which align with the new Council Plan 2022-2027; Our Renfrewshire Community Plan and/or Renfrewshire's Plan for Net Zero.
- 4. **Legal** - none.
- 5. **Property/Assets** – none.
- 6. **Information Technology** – none.
- 7. **Equality and Human Rights** - the Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
- 8. **Health and Safety** – none.

9. **Procurement** – none.
 10. **Risk** – none.
 11. **Privacy Impact** – none.
 12. **COSLA Policy Position** – none.
 13. **Climate Risk** – the Sustainable Communities Fund aligns with the themes within Renfrewshire's Plan for Net Zero and the delivery of relevant projects will assist the local response to the climate emergency.
-

Appendix 1: Summary of applications with Panel recommendations

List of Background Papers:

Sustainable Communities Fund Guidance

Author: Laura McIntyre, Head of Policy and Partnerships

Appendix 1 – Sustainable Communities Fund Applications Round 2

TABLE A - RECOMMENDATION TO APPROVE					
Name of organisation	Project description	Tier	Grant Application Amount	Funding Award Recommended	Comments
7th Paisley & District J.N.I. Scout Group	To provide modern, clean toilet facilities for activity centre users which are currently inadequate	Small	£10,000	Approve	Previously deferred by the Panel for further engagement with group on the extent to which the wider community could benefit. Group have provided details of extensive range of community groups that use facilities and would benefit from accessible facilities.
Brick Lane Music Academy	To improve the space at the back of Brick Lane Studios by creating a community sensory studio and gardens for families.	Intermediate	£20,000	Approve	Previously deferred by the Panel for further engagement with group on the extent to which the wider community could benefit. The group have provided details of access arrangements as well as further information on planning and consents required.
Lochwinnoch Community Development Trust	Creation of an inclusive garden space where all villagers can meet and socialise. Improvement of local facilities and services, helping the community to become more self-reliant.	Large	£100,000	Approve	Previously deferred by the Panel for further engagement with the group to understand costs and level of work required as part of funding application. Additional information provided and confirmation received that the organisation have secured funding from the National Lottery Community Led Fund of £115k to cover revenue

					and overhead costs for 3 years as well as contribution toward capital costs.
Sculpture House Collective CIC	To expand the growing capacity of the site at the front of the building used for growing dye plants and flowers.	Small	£8,383	Approve	N/a
Renfrewshire Community Transport	To develop a sustainable business case for the establishment of a Community Transport offer in Renfrewshire	Intermediate	£25,000	Approve	n/a

TABLE B - RECOMMENDATION TO DEFER

Name of organisation	Project description	Tier	Grant Application Amount	Funding Award Recommended	Comments
Finding Your Feet (FYF)	To enhance the garden space at the rear of the Finding Your Feet Hub, St James House Paisley. Activities and workshops would be run from the space for service users across 11 tenant organisations within the building.	Large	£92,245	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to gather further information on project sustainable, partner contributions and land use. around the sustainability of some of the revenue and staffing costs associated with the proposal, the role and contributions of partners and to clarify queries relating to land use.

Bishopton Rugby Club	To purchase grounds maintenance equipment to improve usability and access to both pitches and off pitch areas.	Intermediate	£20,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to clarify information in relation to land ownership and potential for wider external funding.
I was Gonnae	To contribute to costs of music experience programmes for various groups including adult learners, young adults with learning difficulties, adult drop-in centres, judicial groups, carers, visually impaired, veterans, and youth groups.	Intermediate	£19,100	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to better understand the relationship between this and other similar funding awards, and to seek clarification on the sustainability of the project.
Sculpture House Collective CIC	To instruct an Architectural Feasibility Study to explore how the fabric can be upgraded to reduce environmental impact, improve access and expand offer.	Small	£9,948	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to obtain further project information.
Local Energy Action Plan (LEAP)	To develop the Community Larder provision	Intermediate	£24,900	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to seek clarity on sustainability of the project.
Local Energy Action Plan (LEAP)	The project will increase users and usage of Zero-Emission cars and E-Bikes in Linwood and Lochwinnoch.	Intermediate	£25,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to obtain further information on project.

Ralston Primary Out of School care	To identify if the building of a purpose build family centre is needed and possible in the area between Ralston Primary School and the Ralston Community sports football pitches	Intermediate	£25,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to understand the strategic and place-based context for this project and to discuss this more widely with Council services.
Renfrew Town Sea Scouts	To renovate the hall used by the Sea Scouts to bring it up to standard and increase capacity	Intermediate	£25,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to explore this proposal in further detail. Further information is also required on the wider community benefit of the proposal.
St Mirren FC Charitable Foundation	To provide a health and wellbeing hub in Ferguslie Park as well as a standalone base for charity staff.	Large	£100,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to gain further information on how the project fits with wider strategic plans due to the scale of the funding requested.
Linwood Community Gardens Ltd	To redevelop the gardens and bring them back to a workable condition for the local community.	Intermediate	£25,000	n/a – Deferred application	Officer panel recommend that further engagement is undertaken with the group to obtain further information on planned expenditure.

TABLE C – DEFERRED APPLICATIONS FROM PREVIOUS ROUNDS					
Name of organisation	Project description	Tier	Grant Application Amount	Funding Award Recommended	Comments
Bishopton Tennis Club	To invest in floodlight provision to extend playing period and encourage	Intermediate	£24,000	n/a –Deferred application	Further information and engagement with the group is required to support assessment process.

	activity across senior age groups				
Caledonia Bowling Club	The purpose of the project is to improve the Club's internal and external facilities to make these safer and more inclusive, including ramps and handrails, toilet facilities.	Small	£10,000	n/a – Deferred application	Further information and engagement with the group is required to support assessment process.
Kirklandneuk Growers Group	To establish plots for local tenants to grow plants, fruit and veg, whilst enhancing the area, provide relief and recovery towards mental health, and educating children on growing foods.	Large	£100,000	n/a – Deferred application	Further information and engagement with the group is required to support assessment process.

TABLE D – APPLICATIONS NOT RECOMMENDED FOR AWARD

Name of organisation	Project description	Tier	Grant Application Amount	Funding Award Recommended	Comments
Sewing2gether All Nations	To provide upcycling workshops	Intermediate	£25,000	Not recommended for award	The application did not meet the core funding criteria in relation to project sustainability, and involved ongoing recurring revenue costs. Given the potential of this project, officers will continue to work with the organisation to identify alternative sources of funding to support this.

Ralston Community Council	To improve local environment by installing large planters in prominent locations within the Ralston area	Small	£8,500	Not recommended for award	The application did not meet the core funding criteria in relation to project sustainability, and involved ongoing recurring revenue costs. Given the potential of this project, officers will continue to work with the organisation to identify alternative sources of funding to support this.
The Tannahill Centre	To build capacity of local volunteers and groups by employing a development worker	Intermediate	£25,000	Not recommended for award	The application did not meet the core funding criteria in relation to project sustainability, and involved ongoing recurring revenue costs. Given the potential of this project, officers will continue to work with the organisation to identify alternative sources of funding to support this.
Our Place Our Families Renfrew	To support clients in the community that are needing extra financial help due to the cost of living with vouchers for winter boots and coats, heaters and energy vouchers	Small	£9,000	Not recommended for award	The application did not meet the core funding criteria, in relation to sustainability, place-based projects or climate. Given the potential of this project, officers will continue to work with the organisation to identify alternative sources of funding to support this.

TABLE E – WITHDRAWN

Name of organisation	Project description	Tier	Grant Application Amount
Outspoken Arts Scotland Limited	The purpose of the project is to redevelop the former Allders department store to secure it for permanent use as a town centre art gallery and mixed arts, retail use. It requires major modifications and repairs to make it fully accessible. The funds requested are to develop a feasibility study to bring the asset into ownership of the charity to secure it permanently for the town.	Intermediate	£15,000

Renfrew Association of Growers and Gardeners	Broadloan Community Gardens is a community-led project that aims to create a green and inclusive space that is accessible to everyone, regardless of their age, abilities, or background. Funding requested to cover salary of full-time community gardener for one year	Large	£30,200
---	--	-------	---------