

Oversight and Governance Chief Executive's Department Plymouth City Council Ballard House Plymouth PLI 3BJ T 01752 305155 www.plymouth.gov.uk/democracy Published 29/11/24

Delegated Decisions

Delegated Executive/Officer Decisions

Delegated Executive and Officer decisions are published and are available at the following link - <u>https://tinyurl.com/ms6umor</u>

Cabinet decisions subject to call-in are published at the following link -http://tinyurl.com/yddrqll6

Notice of call-in for non-urgent decisions must be given to the Democratic Support Team by 4.30 pm on 06 December 2024. Please note – urgent decisions and non-key Council Officer decisions cannot be called in. Copies of the decisions together with background reports are available for viewing as follows:

- on the Council's Intranet Site at https://modgov/mgDelegatedDecisions.aspx
- on the Council's website at https://tinyurl.com/jhnax4e

The decision detailed below may be implemented on 09 December 2024 if it is not called-in.

Delegated Decisions

I. Councillor Tudor Evans OBE, Leader of the Council:

I.a. L32 24/25 - Capital Programme Allocation: Development of (Pages I - 38) Children's Homes

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER

Executive Decision Reference Number – L32 24/25

Decision

I	Title of decision: Capital Programme Allocation: Development of Children's Homes
2	Decision maker: Councillor Tudor Evans OBE, Leader of the Council
3	Report author and contact details: Vivien Lines, <u>Vivien.lines@plymouth.gov.uk</u> T +441752308971
4	Decision to be taken:
	I. Approve the Business Case for the purchase of two houses to establish two children's homes in Plymouth;
	2. Allocate £2,000,000 for the project into the Capital Programme funded by service borrowing;
	3. Delegate approval to the Director of Children's Services in consultation with the Head of Land and Property to acquire the properties within the approved financial envelope.
5	Reasons for decision:
	I. Plymouth City Council becoming a provider of residential care for children is part of a programme of work responding to pressures securing sufficient value for money homes locally for children in care in line with need.
	2. Like many Local Authorities nationally, PCC has become reliant on the independent sector for a significant volume of fostering and residential provision for children in the care of the Local Authority. At the same time, the independent sector has demonstrated that it is not able to provide sufficient high-quality and value for money placements to meet the needs of our young people.
	3. Opening our own children's homes presents an opportunity to improve the cost and quality of care and outcomes for children in care who need residential placements.
	4. Added value of the local provision being developed includes:
	 Potential to prevent a child moving into an unregulated arrangement. Savings from social workers not having to visit children at a distance from Plymouth. Ability to support children with local health and education services. Greater potential to support children into foster care or home to their families.
6	Alternative options considered and rejected:
	I. Do nothing: Children will continue to live far away from Plymouth.
	It will remain challenging to bring children back to Plymouth and to support them to move into family placements once they are placed. It will continue to be challenging to find suitable family homes for children when they live far away. The private market unit costs will continue to rise. Quality assurance for private provision will remain outside of Plymouth's control.
	This option was discounted as there is an interest and political backing to develop this offer and

Plymouth currently have children in residential placements a long way from Plymouth. There is a need to be more ambitious for these children to ensure more positive futures than can be diverted out of long-term residential care and into family homes where possible.

2. Do minimum: Set up one children's home. Would lead to continued lack of local sufficiency for children in care and high price of care.

Not a broad enough offer to understand whether this approach could work in the future. Insufficient to make any impact on outcomes for children.

This was discounted because levels of current need indicate demand for more provision. There are some benefits anticipated from developing more than one provision including management support and staff development.

3. Work with local children's residential providers already operating in the city with a view to them expanding their provision for Plymouth's sole use.

No risk to purchasing of property. Shared risk for placements. No control over matching and placement longevity. Challenges over partnership working with foster carers and stepping down from residential care due to placement stability and objectives not always being well aligned.

This option does not fulfil the council objectives to own and run our own provision with an extended oversight for a child's journey through and most importantly, out of care.

4. Work with an existing local children's residential provider to develop a partnering approach. For example, Plymouth City Council purchase the property and the Independent Sector organisation employ the staff.

Reduced risk from employing staff (although dependent on a third party for this). Shared risk for placements. Potentially reduced cost.

Unlikely to be appetite from local providers who have access to capital should they wish to purchase additional properties and expand. However, this option has not been discounted and parallel discussions are taking place with local providers.

7 Financial implications and risks:

The revenue cost of the proposal is indicated as £1.6m annually.

Voids may occur due to single occupancy arising from difficulties matching children given the complex needs of the children living in the homes and potential delays in discharge. PCC has a block contract for children's homes places with an independent sector provider and achieved 78% occupancy for the first six months of 2024-25.

- Potential year Isavings if 75% occupancy = £326,490
- Potential year 1 savings if 60% occupancy achieved = £261,192
- Potential year 1 savings if 50% occupancy achieved = $\pounds 217,660$

This has the potential to increase if the approach prevents children from being placed in unregulated arrangements which can cost on average $\pounds 12,000 - \pounds 16,000$ a week ($\pounds 624,000 - \pounds 832,000$ p.a.). The current forecast spend for unregulated placements this year is $\pounds 5.420$ m.

Assuming the model reduces unregulated placements by one FYE;

- Potential year I savings if 75% occupancy = £542,160
- Potential year I savings if 60% occupancy achieved = £433,728
- Potential year Isavings if 50% occupancy achieved = £361,440

Capital costs;

Exact property purchase and refurbishment costs can only be confirmed when the properties are identified, It is anticipated that Capital requirements will be in the region of $\pounds 1.5m - \pounds 2m$ for the two homes.

There is the opportunity to apply for a Department for Education (DfE) capital allocation for 50% of the

funding should the proposal meet the DfE criteria. It is more likely that one home, for older young people with more complex needs and risk taking behaviour, will meet the DfE criteria. Indicative capital cost scenarios based on service borrowing £2,000,000 over 50 years: Full cost to PCC utilising service borrowing - £140,355.95 annual revenue requirement for service borrowing. DfE agree 50% capital allocation for full development - £70,177.98 annual revenue requirement for service borrowing. DfE agree 50% funding for one children's home - £105,266.96 annual review requirement for service borrowing. The key risk of not proceeding with this proposal is that the private market providers will continue to raise their unit costs and local authorities will find it increasingly difficult to identify suitable placements for children. Risks of proceeding arise from potential difficulties recruiting appropriate managers and the staff team locally and of finding a suitable property. In addition, there is a risk of a higher rate of voids than modelled due to the challenges of matching suitable children. Is the decision a Key Decision? No 8 Yes Per the Constitution, a key decision is one which: (please contact Democratic Support for further advice) in the case of **capital** projects and х contract awards, results in a new commitment to spend and/or save in excess of £3million in total in the case of **revenue** projects when х the decision involves entering into new commitments and/or making new savings in excess of **£1 million** annually is **significant** in terms of its effect on х communities living or working in an area comprising **two or more** wards in the area of the local authority. If yes, date of publication of the N/A notice in the Forward Plan of Key **Decisions** 9 Please specify how this decision is This would be a good capital investment because: linked to the Council's corporate I. It supports council objectives: plan/Plymouth Plan and/or the policy framework and/or the The Plymouth Plan 2014-2034 – 23/04/2024 revenue/capital budget: Policy HEA2 - Delivering the best outcomes for children, young people and families states: Ensuring that early intervention, help and prevention meets the needs of children, young people and their families who are 'vulnerable' to poor life outcomes and supports them to achieve their potential. Ensuring that integrated assessment and outcomebased care planning for children with special educational needs and disabilities and additional needs, including social, emotional, mental health and speech, language and communication problems, are built upon the voice of the child and family. The Corporate Plan states that Plymouth will take

					nsibility – because we care about the impact			
			childre	authorit commun services interven Service 0 0	decisions and actions" and as a local by we pledge to "keeping children, adults and nities safe" by "providing quality public ," "focusing on prevention and early ntion" and "spending money wisely." Planning Guidance 2024 – 2025; Key Outcome (KO) 11 - Improved Child and Family Level Outcomes: KO11f. Children and young people in the right accommodation in line with their needs. Priority 4 - The right homes for cared for children at the right time, which meets their needs and enable more children to live in family settings closer to Plymouth. lates to revenue spend on placements for which is currently a considerable pressure			
			homes	. Service l . This has	to release capital investment to purchase the borrowing will be funded from revenue s been discussed and supported by CPOG			
10	Please specify environmenta decision (carb	l implications of the	impact •	 It is anticipated that the homes will not have any climate impact because: The homes already exist The properties are domestic The occupancy and use remain similar 				
					work is needed beyond small internal and			
Urge	ent decisions							
11	implemented interests of th	n urgent and to be I immediately in the ne Council or the	Yes		(If yes, please contact Democratic Support (<u>democraticsupport@plymouth.gov.uk</u>) for advice)			
	public?		Νο	x	(If no, go to section 13a)			
l 2a	Reason for ur	gency:						
I 2b	Scrutiny Chair Signature:			Date				
	Scrutiny Committee name:							
	Print Name:							

13a		Yes	×				
	portfolios affected by the decision?		No		(If no go to sectio	n 14)	
I 3 b		ch other Cabinet member's folio is affected by the decision?	Cabine		mima Laing (Deputy Lea ber for Children's Socia ons)		
l3c	Date	e Cabinet member consulted	31/10/	2024			
14		any Cabinet member declared a lict of interest in relation to the	Yes		lf yes, please discuss Officer	with the Monitoring	
	decis		Νο	x			
15		ch Corporate Management	Name	e	David Haley		
	Tear	n member has been consulted?	Job ti	tle	Director of Children	n's Services	
			Date consu	lted	31/10/2024		
Sign	-off						
16	Sign off codes from the relevant departments consulted:		Democratic Support (mandatory)			JS75 24/25	
				ce (m	DJN.24.25.137		
				(man	datory)	LS/00001312/1/AC/2 7/11/24	
			Procurement (if applicable)			CS.24.25.027	
			involv	ving C	property (decisions puncil owned land or applicable)	NA	
			Human Resources (if applicable)			NA	
Арр	endic	es					
17	Ref.	Title of appendix					
	A Equalities Impact Assessment						
	В	Climate Impact Assessment					
Con	fident	ial/exempt information					
18a		ou need to include any idential/exempt information?	Yes	x	If yes, prepare a second briefing report and indi		

			Nopublication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)					ticking in the	
				Exe	mption	Paragra	ph Num	nber	
			I	2	3	4	5	6	7
I 8b	Confidenti title: Busine	al/exempt briefing report ess Case			x				
Back	ground Pap	bers							
19	Please list a	l unpublished, background paper	rs relevar	nt to the	decision	in the tab	le below	' .	
	Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.							e/all of	
	The of	background paper(s)		2	3	n Paragra	5	6	7
			-		3		5	0	
Cabi	not Mombo	v Signatura							
20	 Cabinet Member Signature I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached. 						o etween		
Signature		Tudal 25	Date of	f decisio		29 Noverr	1ber 2024	4	
Print	t Na me	Tudor Evans OBE							

The following relates to exempt or confidential matters (Para(s) 3 of Part 1, Schedule 12A of the Local Govt Act 1972). Any breach of confidentiality could prejudice the Council/person/body concerned & might amount to a breach of the councillors /employees codes of conduct.

Document is Restricted

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EQUALITY IMPACT ASSESSMENT – CHILDREN'S HOMES

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Victoria Whitman	Department and service:	Children's Services – Children, Young People and Families	Date of assessment:	14/11/24		
Lead Officer:	Temi Salimon	Signature:	David Haley, DCS	Approval	29/11/24		
Head of Service, Service Director, or Strategic Director.		(signed on behalf of Temi Salimon)	Daridfleby	date:			
Overview:		consideration of PCC becoming a ecuring sufficient value for money			programme of		
	secure attachments and to supp young person to make progress home. We are committed to pla family and friendship relationship	hat children and young people in care should grow up in a family home with foster carers so that they can experience ments and to support healthy development. Exceptionally, residential children's homes can be appropriate to enable a to make progress with their emotional and behavioural needs in order to achieve a planned move back into a family e committed to placing children in care in settings that are as close as possible to their home to enable them to maintain endship relationships (where positive), access their social worker and local health and therapeutic services and maintain placements to support good outcomes including a supported and local transition to independence.					
		are being experienced. A growth ments and additional learning nee					
	establish two children's homes in securing match funding from DfE	p to £2m capital through service borrowing to purchase two four bedroom homes with an annexe to nomes in Plymouth. There is the potential for the capital requirement to reduce if we are successful in om DfE from a current programme to support the development of residential care for children. Bids open confirmation in the Autumn budget) and decisions will be made by June.					
		nat these homes would be registered with Ofsted to collectively offer provision for up to 6 children at any one time who would directly employ the staff team required.					
	they would both have an annexe These homes would be in or clo	o four+ bedroom family homes would be purchased on the open market. The specification would be that that n annexe or alternative living space to be able to offer a diverse range of care to children with complex needs is in or close to the city and will be in neighbourhoods which can understand and accept the need for these would ideally have a garden area and some flexibility of space to allow children to have wrap around support					

	within the home where this is appropriate. The homes would seek to provide a family environment and a nurturing space, while also having an emphasis on safety and security to maintain children and young people's wellbeing while living in the home.
	The project promotes and enables significant local market development of provision for children with complex emotional and behavioural needs whilst increasing the council's assets. This works to disrupt the private market on a national level by increasing Plymouth's own local provision and it also will enhance partnership working with local providers who Plymouth currently purchase beds from. Increasing sufficiency in the local area will be beneficial to the council in terms of outcomes for children but also in terms of costly private placements. Many other local authorities around the Country are pursuing a similar approach at this time.
Decision required:	 Approves the Business Case for the purchase of two houses to establish two children's homes in Plymouth. Allocate £2,000,000 for the project into the Capital Programme funded by service borrowing. Delegate the approval to the Strategic Director of Children's Services for all purchases within the approved financial envelope.

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts:	Yes		No	х
Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?				
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	×
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes		No	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	The proposal aims to be inclusive of all children we meet the criteria for being in need of a placement children's home and this is not affected by any protected characteristics. The provision aims to be inclusive of all children in their diverse needs and presentations, however, I have detailed this further below.		lacement in a by any aims to be eeds and	

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Age	 Plymouth 16.4 per cent of people in Plymouth are children aged under 15. 65.1 per cent are adults aged 15 to 64. 18.5 percent are adults aged 65 and over. 2.4 percent of the resident population are 85 and over. South West 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. 22.3 per cent are aged 65 and over. England 17.4 per cent of people are aged 0 to 14. 64.2 per cent of people are aged 15 to 64. 18.4 per cent of people are aged 15 to 64. 18.4 per cent of people are aged 65 and over. 	No adverse impact	The proposal intentionally creates an offer that is flexible and allows children of all ages to access the homes that they need at the time that they need them. The offer enables children of all ages to have a fair and equal provision.	Transformation Team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.

Care experienced individuals (Note that as per the Independent Review of Children's Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).	It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation. The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group. In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).	No adverse impact	Children who are care experienced will have the same opportunity to have a space in the new provisions as all other children. They may even be more likely to secure a place if their current home is not in Plymouth.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.
	There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.			

Disability	 9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem. 12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census) 	No adverse impact	Homes will consider the needs of all children and aim to offer a service which is fully inclusive of their needs in line with the registration of the home.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.
Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans women (2021 Census).	No adverse impact	The homes will have a diverse workforce who are highly skilled and a therapeutic approach to care. All children will be considered in line with the registration of the home and an 'impact risk assessment' with regards to the cohort of children living there.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.

Marriage and civil partnership	 40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married. 0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census). 	No adverse impact	Homes will support all children, where applicable, into their transition to adulthood. They will be mindful and supportive to young peoples' personal choices and preferences.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impact	Homes will support all young people in their development and work with partners, agencies and other providers who specialise in parent and child care.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.

OFFICIAL

Race	 In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census) People with a mixed ethnic background comprised 1.8 per cent of the population. I per cent of the population use a different term to describe their ethnicity (2021 Census) 92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census). 	No adverse impact.	Homes will support children of all races and will aim to provide a workforce which reflects this diversity.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.
Religion or belief	 48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census). Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census). 	No adverse impact	Homes will support children in their personal choices and family preferences to engage in and practice their religious and cultural beliefs. Where applicable they will be supported to access religious communities or sites as a part of their care plan.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.

Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	No adverse impact	Homes will be registered for all children regardless of their sex.	Transformation team and CYPFS (Children, Young People and Families) are responsible department.
				Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.
Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).	No adverse impact	Homes will support children in their sexual development and provide a tolerant and inclusive environment in which they can grow and learn safely.	Transformation team and CYPFS (Children, Young People and Families) are responsible department. Timescale is within 18 months dependent on successful purchase of properties, development of properties to meet with Children's Homes Regulations 2015 and full Ofsted registration.

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
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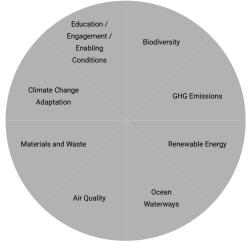
	1	

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to:			
 promote equality, diversity and inclusion 			
• facilitate community cohesion			
 support people with different backgrounds and lived experiences to get on well together 			
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.			
Build and develop a diverse workforce that represents the community and citizens it serves.			
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.			

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Residential Children's Homes DRAFT



Assessment ID: RES856

Assessment Author: Victoria Whitman

Project Summary:

The purchase and set up of two residential children's homes offering a total of six beds across both homes. The homes will care for children aged between 6 and 18 years of age who have a range of complex emotional and social behaviours and presentations. The homes will be fully registered with Ofsted.

Summary of Assessment:

It is anticipated that the project is minimally impactful given that there are little requirements for any renovation works and there are no changes to the residential use of the property.

Biodiversity Score: 3

Biodiversity Score Justification: There is no construction work involved and only existing property and land will be used. This is residential and therefore minimally impactful.

Biodiversity Score Mitigate: No

GHG Emissions Score: 3

GHG Emissions Score Justification: Properties already used as family homes will be used so there will be no change to this. There will be minimal work need to property and will not require large plant or machinery or changes to roads and traffic.

GHG Emissions Score Mitigate: No

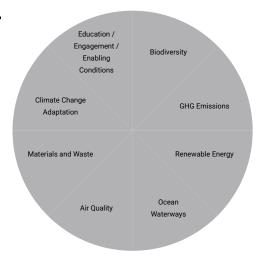
Renewable Energy Score: 3

Renewable Energy Score Justification: There is no change to use of buildings.

Renewable Energy Score Mitigate: No

Ocean and Waterways Score: 3

Residential Children's Homes DRAFT



Ocean and Waterways Score Justification: The family homes will still be occupied by similar residents so there should be no changes to sewage outputs or increase to pollutants.

Ocean and Waterways Score Mitigate: No

Air Quality Score: 3

Air Quality Score Justification: There will be no change of use to the residential properties that will have an impact.

Air Quality Score Mitigate: No

Materials and Waste Score: 3

Materials and Waste Score Justification: Minimal work to be done and little waste will be produced.

Materials and Waste Score Mitigate: No

Climate Change Adaptation Score: 3

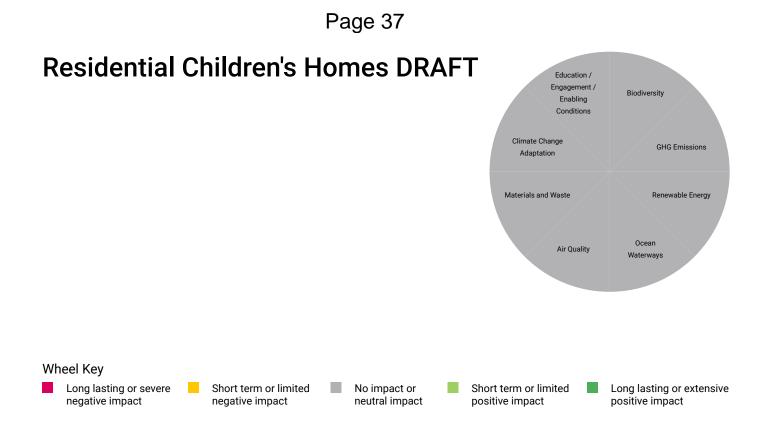
Climate Change Adaptation Score Justification: No environmental impact to this project.

Climate Change Adaptation Score Mitigate: No

Education / Engagement / Enabling Conditions Score: 3

Education / Engagement / Enabling Conditions Score Justification: There is no predicted change to the current status.

Education / Engagement / Enabling Conditions Score Mitigate: No



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